



Export Control in English

A language training course book for both self-study and trainer led courses

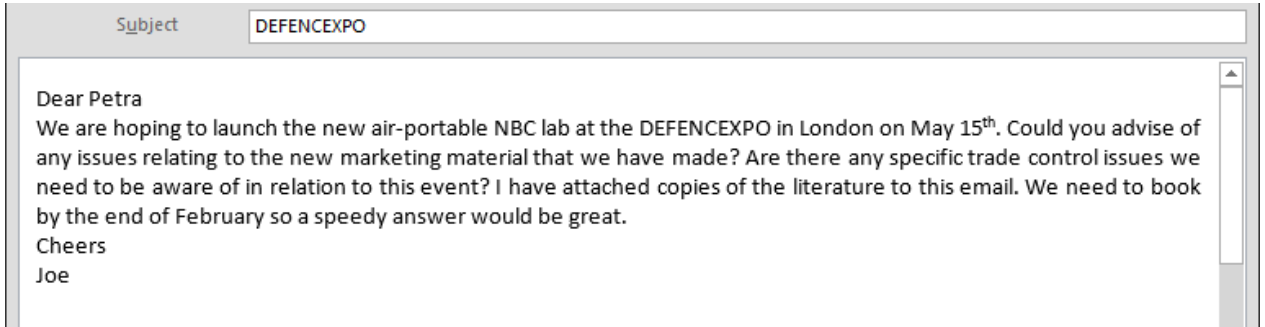
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7. Trade Fairs

Attending a Trade Event

The following email has been received from the Marketing department.



Think & Discuss: What are some export control issues that occur when attending a trade fair or expo. Make a note of your ideas below.

Examine the Kahn Chemical company marketing materials on the following page and identify and take note of any areas of concern.

KAHN CHEMICAL AND LABORATORY SUPPLIES LIMITED

COMPLETE LABORATORY SOLUTIONS FOR ALL YOUR APPLICATIONS

KCLS produces a range of complete systems as well as a large number of components under licence. We offer a full service, from manufacture and installation to servicing and will promptly send our service teams to your locations worldwide.

NUCLEAR, BIOLOGICAL AND CHEMICAL ANALYSIS LABORATORY SOLUTIONS – IN ONE PORTABLE LAB.

Our fully portable NBC lab builds and expands on our extensive experience in developing robust, modular containment systems for all types of harmful agents.



Fully equipped and fully self-contained, the lab is an invaluable tool for any government enforcement agency or military that must have the capability to rapidly detect, identify and quantify NBC hazards in remote or field operating locations.

With a standard 40 foot cargo container footprint, the lab can be shipped via road, rail or air and is also able to be air dropped!

GAS DELIVERY SYSTEMS

We have decades of experience in manufacturing chambers and vessels for a range of applications.



From gas delivery and containment systems for the US Department of Corrections to tailor made chambers for thin film deposition, our experience lets you get the job done right, dead on time!

Manufactured using only the highest quality stainless steel, and all joints robotically welded and then X-rayed, you can have peace of mind in the integrity of your process.

Kahn Chemical and Laboratory Supplies Limited was founded in 1975 to provide a full range of laboratory equipment and chemicals to the civilian, military and police sectors.

Initially comprising a small manufacturing facility in Cologne, Germany, Kahn Chemical Corporation now has three factories and offices in Baltimore, Brasilia and Singapore.

References:

-TOTAL Petroleum

-Saudi Aramco

-BAA

-United Nations

-LA Department of Corrections

Read the following guidelines from the organisers of the DEFENCEXPO event.

Compliance Regulations – DEFENCEXPO.

CLEARVIEW Exhibitions in conjunction with a range of different Government departments has developed the following regulations for companies wishing to exhibit at the DEFENCEXPO trade event.

1. It is forbidden to conduct any activity in relation to facilitating the sale, transfer or supply of Category A goods without a trade control licence from the relevant Government department.
2. Controlled activities include “marketing and promotion”.
3. All company personnel or contractors need to be accredited. This is the responsibility of the exhibitors.

NB; Category A goods include:

Security and Para Military Equipment.

Equipment for use in the Death Penalty.

Cluster Munitions.

Components for all of the above.

Technical Services in relation to all of the above.

Can you identify any areas of concern in Kahn’s marketing material having read the compliance regulations for DEFENCEXPO?

7.1 Now answer the following True / False questions.

1. Clearview Exhibitions alone produced a set of criteria for those companies wishing to exhibit at DEFENCEXPO. True / False
2. While you are not allowed to make a sale of Category A goods at the trade event without a licence, you may discuss the terms of the sale. True / False
3. Advertising the supply of category A goods is forbidden. True / False
4. Both employees and also external staff who may be working at the stand must be approved and authorized to work there. True / False
5. If you wish to promote your service facilities for Para Military Equipment, you will need a licence from the British government. True / False

Getting organised

You want to check about the licences needed to display the fully portable NBC lab at the DEFENCEXPO in London. You are going to call the organisers to ask for information . Make a list of topics / themes you may want to find out more information about.

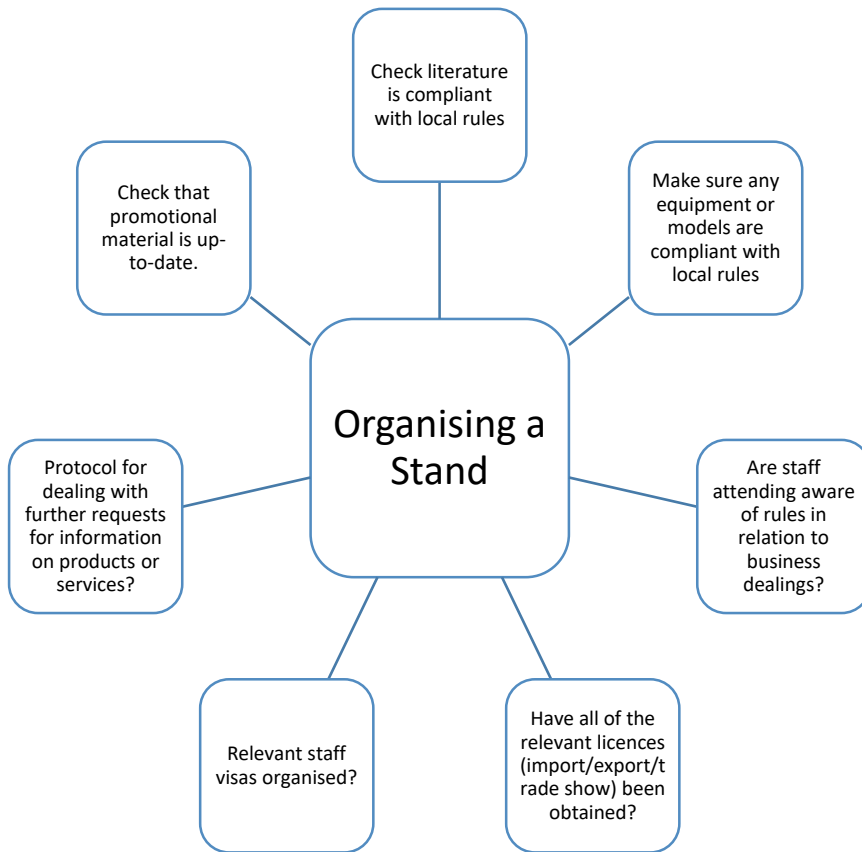
Export Control & Trade Fairs - Special Considerations

Italy: Licence for Pre Contract Negotiations. In Italy, Law 185, Article 9 (1) (1990) states that any company who wishes to import or export military equipment is required to apply for authorization to conduct contract negotiations for the deal in question. This provision has a number of exceptions for example, it does not apply to military equipment destined for use in trade events or for demonstrations. (Article 9 (5.5))

http://www.governo.it/Presidenza/UCPMA/normativa/Legge_185_90.pdf)

Uk: Export, Demonstrate or Promote classified material. In the UK if exporters wish to undertake any trade related activities, such as selling, promoting or demonstrating classified goods (including information) a specific form must be obtained from the Ministry of Defence, known as an F680 form, companies are also required to comply with any additional licensing requirements.

Examine the mind-map below – did you include the points listed in it in the previous task?



Create a list of Do's and Don'ts regarding export control for staff who may work on a stand for your own company; what regulations etc do they need to be made aware of?

When things go wrong.

You receive a phone call, listen and take notes.

- Who is calling?
- What is the problem?
- What is the result?

You receive a second phone call, listen and take notes;

- Who is calling
- What is the problem
- Should you receive a call from the media what should you say?

You receive a third phone call, listen and take notes;

- Who is calling?
- What organization are they calling from?
- What information do they want?
- What is your response?

Read and discuss the newspaper article below. What do you think the company's reaction should be?

Death on Display!

German company ejected for promoting death penalty products at UK trade event.



A Germany based company, Khan Chemical Corporation was found to have been promoting banned equipment at the biannual DEFENCEEXPO trade event held in London. The company promotional literature from the event, which the “Daily News” has obtained a copy of, contains an image of an execution chamber (see above), along-side the caption,

“From gas delivery and containment systems for the US Department of Corrections to tailor made chambers for thin film deposition, our experience lets you get the job done right, dead on time!”

The shows organisers, Clearview Trade Events, said that as soon as the literature had been discovered the stand of Khan Chemical Corporation had been shut down and the company representatives removed from the event. Defending the pre-show compliance checks undertaken by Clearview a company media spokesman said that,

“Clearview has in place a robust compliance procedure that covers pre show screening and checks during the show. As soon as we were notified of the possible breach of our exhibitor regulations we immediately investigated and the offending company’s stand was shutdown. We have also referred the case to HMRC. Clearview takes extremely seriously its responsibilities in ensuring that no prohibited equipment is on display at any events run by our company, and, where breaches may occasionally occur, we will act swiftly to ensure that those responsible are removed from the event and the relevant authorities are informed.”

This is not the first time that banned equipment has been displayed at a Clearview event. Two companies were ejected from the previous DEFENCEEXPO trade event for breaching the shows compliance guidelines.

The Daily News contacted Khan Chemical Corporation for comment however no one was available. A representative from HMRC said that because the investigation was on-going they could not comment on whether Khan Chemical Corporation would face prosecution for breaches of UK export control regulations. Civil society organisations repeated their calls for Clearview to lose their licence to hold the event given the... “inability of Clearview to adequately conduct pre-show compliance checks and the repeated breaches of UK trade control regulations at Clearview events. “ (STOPDEFENCEEXPO Campaign)

Prepare for a meeting

Khan Chemical Corporation Meeting

You have been called to a board level meeting to discuss the DEFENCEEXPO trade event.

Formulate an action plan to present to the board to ensure that this does not happen again. The action plan can be in the form of a revised compliance procedure, listing the steps that will be taken prior to any publicity material being sent out by the company or any trade fairs attended.

Activity: Re read the DEFENCEEXPO Compliance Regulations. Study the images of equipment below. Which equipment if any would be classed as category A goods as per the Regulations.



Activity: Search the internet and find the regulations required by a defence related trade event in two different countries.

Are there any references to trade controls? Compare and examine for similarities and differences between the two events regulations.

Acknowledgements

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Chapter Seven

Gas Chamber

Shelka04

Technician

US Defense Imagery