Strategic goods control

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The Strategic Goods (Control) Act

The control of military and dual-use goods is older than the measures against Russia. The Strategic Goods (Control) Act came into force on 1 January 2003 and regulates the export, transhipment, transit, brokering and intangible transfer of strategic goods and technology. Its stated purpose is to prevent the movement through Singapore of items that could contribute to the proliferation of weapons of mass destruction. The list of controlled goods is set out in a Strategic Goods (Control) Order, which is updated regularly to follow the international export control regimes. The latest version, the Strategic Goods (Control) Order 2026, takes effect on 1 December 2026. A separate order of 2019 lists the goods and technologies whose brokering requires registration.[1]

The Act combines a list-based system with a catch-all clause. Goods and technology that appear on the list require a permit for export, transhipment or transit. Goods that do not appear on the list are also controlled when they are intended, or even likely, to be used for activities relating to weapons of mass destruction.[2] The catch-all clause shifts part of the burden to the trader. A company that has reason to suspect a weapons-related end use must apply for a permit even for an unlisted item, which makes knowledge of the customer as important as classification of the goods.

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Permits, brokering and intangible transfers

The administrative system is designed for a port with very large volumes. Traders may apply for individual permits or, for high-volume and time-sensitive transactions, for bulk permits, and the Strategic Trade Scheme simplifies compliance for companies with established internal programmes. Brokers must register or obtain a brokering permit. The transfer of controlled technology by intangible means, for example by email or download, requires a separate permit. Customs offers preliminary advice on whether an item is controlled, which usually takes about seven working days.[3]

Customs also publishes red flags. They include customers whose addresses resemble those of listed entities, reluctance to declare the end use, goods that exceed the technical capability of the destination and unusual shipping routes. Customs asks businesses to know who the customer is, what the goods are for, where they are going and why they are needed.[4] These questions apply equally to the Russian measures, which use the categories of the Strategic Goods (Control) Order to define the prohibited goods.

Penalties and enforcement

The penalties are substantial and are calculated by reference to the value of the goods. Transferring strategic goods without a permit is punishable on first conviction with a fine of up to S$100,000 or three times the value of the goods, whichever is greater, imprisonment of up to two years or both. A second or subsequent conviction for brokering without registration carries a fine of up to S$200,000 or four times the value of the goods, imprisonment of up to three years or both. Breach of the conditions of a permit is punishable with a fine of up to S$50,000, imprisonment of up to twelve months or both.[5]

The cases that Customs publishes show the range of the Act. A freight forwarder that exported controlled military electronic connectors as ordinary connectors was prosecuted and fined. A company that arranged the removal of expired ammunition from one foreign country to another without registering as a broker paid a

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composition sum. Two individuals were sentenced to nine and eighteen months' imprisonment for brokering arms to Syria. A Singaporean man who attempted to buy arms and ammunition for a foreign terrorist organisation was convicted in the United States and sentenced to 57 months' imprisonment.[6] Chapter H.V examines the cooperation between Singapore and foreign prosecutors that such cases require.

Semiconductors and the contest between the great powers

Strategic goods control has acquired a new dimension with the American restrictions on advanced semiconductors and on the equipment used to make them. Singapore is a significant producer of semiconductors and a regional distribution centre for their makers, so it has become a focus of American concern about the diversion of chips to China. In February 2025 Singapore charged three men with fraud in connection with the supply of servers that might have contained advanced American chips, after false representations about their end users had allegedly been made to the suppliers.[7] The charges were brought under the general law of fraud, because Singapore does not enforce the American export rules as such. The case nonetheless showed that the authorities will act when false declarations are used to move controlled technology through Singapore.

The tension is structural. Singapore wishes to remain a trusted node in the supply chains of both the United States and China. Its law protects that position by enforcing United Nations measures and its own controls without adopting the unilateral controls of either power. The American controls follow the goods wherever they go. A Singapore distributor that re-exports American chips to a prohibited Chinese buyer may break no Singapore law, yet it can still be placed on the Entity List and cut off from its suppliers. Chapter K.V examines this dilemma in the wider context of geopolitics.

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Notes

1. Singapore Customs, “Strategic Goods Control Overview”, customs.gov.sg (accessed November 2026): “Singapore has updated its list of strategic goods and strategic goods technology in the Strategic Goods (Control) Order 2026, effective from 1 December 2026”; the Strategic Goods (Control) (Brokering) Order 2019 lists items requiring brokering registration; Singapore Customs, “Strategic Goods Control Overview”, customs.gov.sg (accessed November 2026): Singapore implemented the Strategic Goods (Control) Act on 1 January 2003; the Act regulates the export, transhipment, transit, intangible transfer of technology and brokering of strategic goods; Singapore “shares the concern of the global community on the proliferation of weapons of mass destruction”. ↩

2. Singapore Customs, “Strategic Goods Control Overview”, customs.gov.sg (accessed November 2026): the SGCA includes a catch-all provision under which goods or technology “intended, or even likely, to be used for WMD activities” are subject to control even if not listed. ↩

3. Singapore Customs, “Permit and Registration Requirements” and “Strategic Goods Control”, customs.gov.sg (accessed November 2026): permits or registrations for export, transhipment, transit and brokering; individual and bulk permits, the latter for “high-volume or time-sensitive strategic goods transactions”; ITT permits for intangible transfers; the Strategic Trade Scheme; preliminary advice that “will take about seven working days”. ↩

4. Singapore Customs, “Sanctioned Lists and Red Flags”, customs.gov.sg (accessed November 2026): red flags include addresses similar to entities on UNSC lists, reluctance to declare end use, goods exceeding the destination’s technical capability and abnormal shipping routes; KYC checks covering who the customer is, what the goods are for, where they are going and why they are needed. ↩

5. Singapore Customs, “Strategic Goods Control Overview”, customs.gov.sg (accessed November 2026), penalty table: transfer without a valid permit (s.

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5), first conviction, fine up to S$100,000 or three times the value of the goods, or imprisonment up to 2 years, or both; brokering without registration (s. 6(1)), second or subsequent conviction, fine up to S$200,000 or four times the value, or imprisonment up to 3 years, or both; breach of permit or registration conditions (s. 9), fine up to S$50,000, or imprisonment up to 12 months, or both. ↩

6. Singapore Customs, "Strategic Goods Control Overview", customs.gov.sg (accessed November 2026), enforcement case highlights: freight forwarder fined under s. 5(1)(a) SGCA for exporting military electronic connectors falsely declared as ordinary connectors; company paid a composition sum under s. 6(1)(a) for unregistered brokering of ammunition removal; "two individuals were sentenced to 9 and 18 months' imprisonment respectively for brokering arms to Syria"; a Singaporean man convicted in the United States and sentenced to 57 months. ↩

7. Charges brought on 27 February 2025 against three men (two Singaporeans and a Chinese national) for fraud in connection with server transactions, reported by CNA and *The Straits Times*; the ministerial statements that followed confirmed that Singapore would act on the misrepresentation of end users. ↩

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