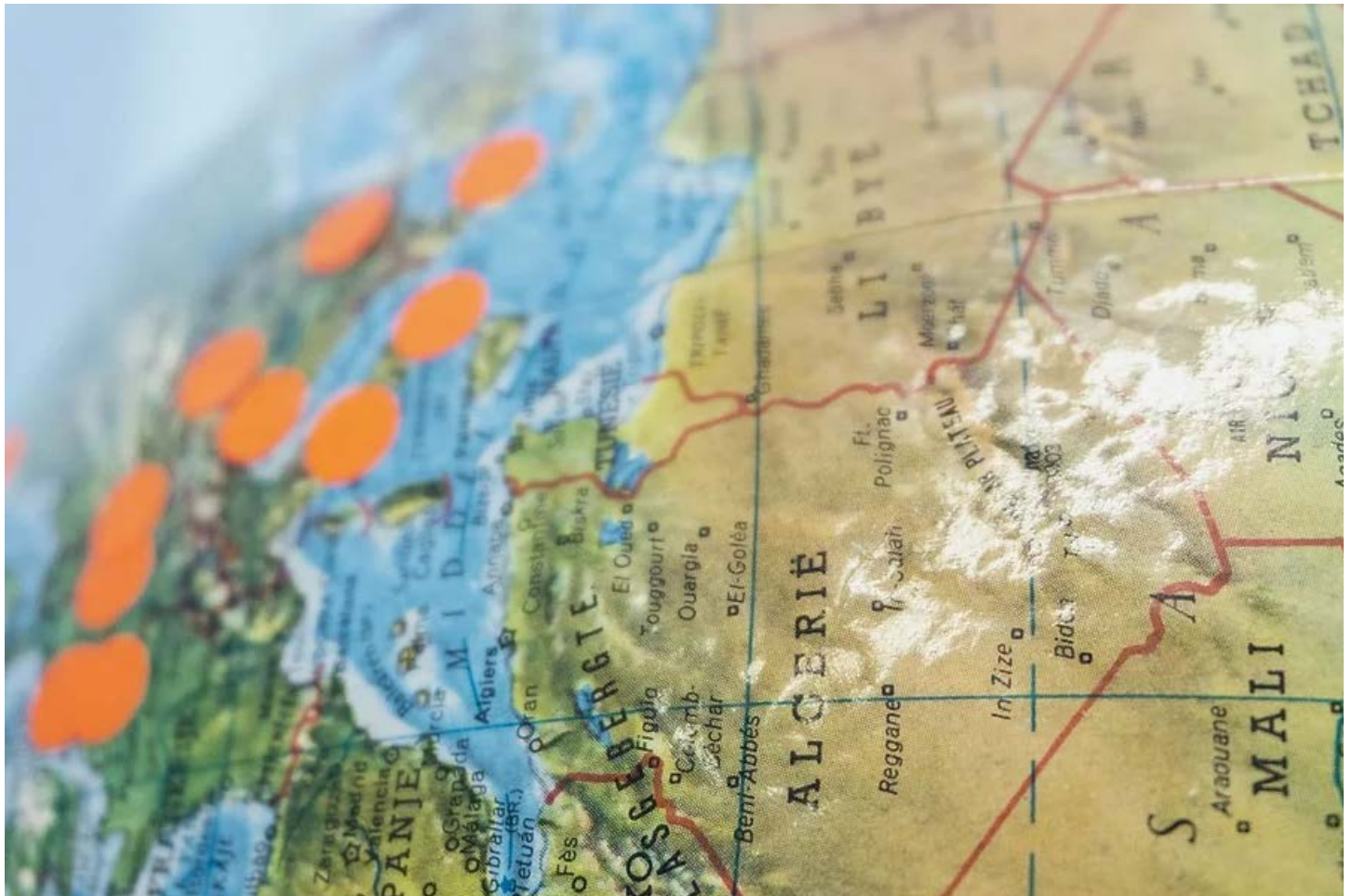




US Sanctions on Cambodia

Impact for the sale of military and dual-use items



On 8 December, the US Department of Commerce announced new restrictions to address human rights abuses and corruption by Cambodian government actors, including the military, as well as the growing influence of the People's Republic of China's military in Cambodia.

The new restrictions include end-use and end-user restrictions, on exports and reexports to Cambodia, and in-country transfers within Cambodia, of sensitive items subject to the Export Administration Regulations (EAR). Concurrently, the Department of State imposed a U.S. arms embargo on Cambodia. Together, these actions will restrict access to dual-use items, as well as certain less-sensitive military items and defense articles and defense services to the Cambodian military, military-intelligence services, and related entities and individuals.

The US Bureau of Industry and Security (BIS) added Cambodia to Country Group D:5 (U.S. Arms Embargoed countries). BIS also imposed a more restrictive review policy for license applications containing items controlled for national security, regardless of the end-user. It further renders end-

users in Cambodia ineligible for, or subject to further restriction with regard to, use of certain license exceptions for exports, reexports, and in-country transfers.

Applications to export or reexport of items to Cambodia for both sets of end-users or end-uses (military and military-intelligence) will be reviewed under a presumption of denial.

Source: [US Department of Commerce \(8 Dec 2021\)](#).