



Open Source and The Importance of Sharing Refusals

Session III: Effective Practices in the Licensing
Process: Lessons on Implementation

February 25-26, 2014

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Challenges - Globalisation

- Just in time - Less barrier
- Less staff for more duties (more with less)
- 3% EX-5%IM control
- Cost of intercepting
- Opportunity for criminal networks – more flexible than government
- The right information at the right place at the right time





Slovenian export control system

- Different ministries are responsible for „strategic goods“ (MoD- military, MoE- DU, MFA- sanctions)
- The Intraministerial Committee for support - issues preliminary decisions
- Membership of committees depending on the area - MoD, MoE, MI, MFA, NSA, CA, CARŠ, POL, IS
- CARŠ recives (have access) all licences, denials (national and international) and “catch all” and „soft“ info
- Network of knowledge, information and expertise





Use of open source and denial in various stages of control

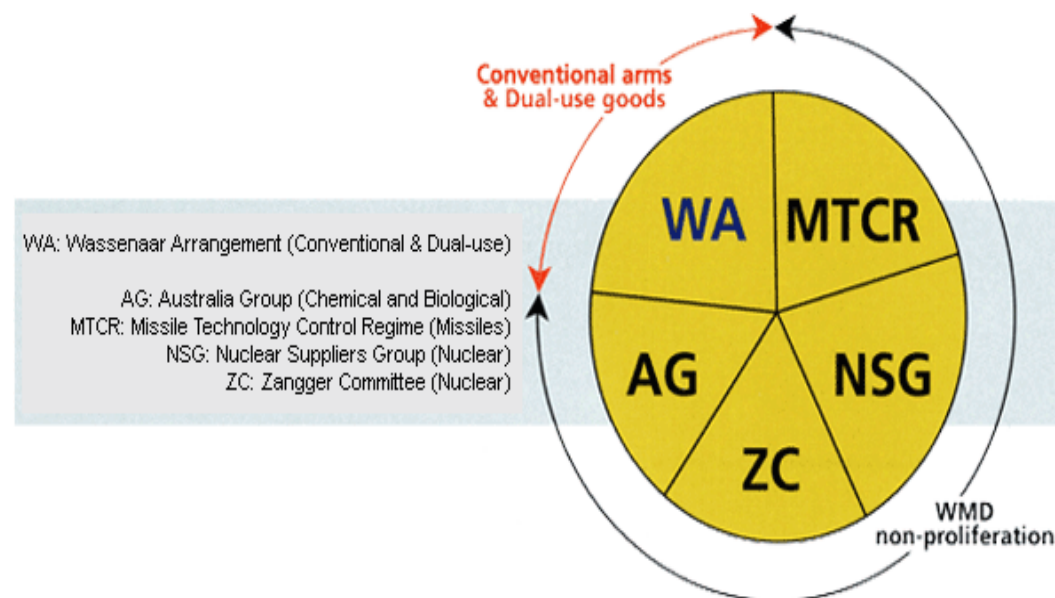
- Evaluating an application for a permit
 - end user, end-use, broker, item – technical specifications, country
- Enforcement
 - Developing risk profiles for better control on border
 - Faster and easier implementation of customs control (company profile, technical specifications, routes ect)
 - Inspection or investigation companies, which recived denial (intetion)
 - Risk assessment
 - Modus operandi
 - Rurrent proliferation issues





Denials

- National denials
- International denials – different systems (WA, AG, NSG, MTCR)
- EU – one systems for all - direct access
- Often do not contain all the informations (exporter, tariff number)
- Not in time





Open source informations

- Official export related web sites (eg WA, MTRC , AG, NSG, OPCW, IAEA, OPBW, HCOC, UNSCR, exportcontrol.org)
- Web sites for listed entities (eg.EU, US, JP, UK, UNSCR)
- Trade, Market and Company Information (eg UN statistical office, D&B, Local chambers of commerce, Industrial and trading companies, Google Finance, awards)
- General online databases
- Online translation (eg. google translate)





Use of the open source information in practice

- Customs Officer supplied the information which has been detected in a foreign newspaper
- We checked the information
- We made an analysis of shipments of Slovenian companies, which were forwarded to this company
- Then we analyzed all exports of individual companies in terms of DU
 - the declarations and an overview of the technical specifications
- Creating Risk profile
- Put company in annual plan for inspection

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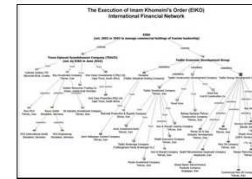
Details Published on Tuesday, 04 June 2013 19:26

WASHINGTON (Reuters): A global network of private companies were blacklisted by the United States on Tuesday for providing revenue to the Iranian government's leadership and helping it evade the pinch from international sanctions on Tehran's nuclear program, the US Treasury Department said.

The move targets 37 companies spread across the world, from Iran to Croatia, Germany and South Africa, and is the fourth action the United States has taken in the past week to sanction Iran's government and industries over its atomic program.

The sanctions prohibit US citizens and companies from dealing with the firms. Any foreign financial institutions dealing with them risk getting cut off from the US financial system.

The Treasury Department said the companies are governed by the Execution of Imam Khomeini's Order or



mercaturo veterinarima

POSLOVI S IRANOM

Tvrtka iz Slavovskog Broda na američkoj crnoj listi

Kako je navedeno na web-stranicama ministarstva, riječ je o tvrtki Cylinder sistem. Riječ je o tvrtki koja je pravi silaznik bivše tvrtke DO Bešavne tocke d. d. a proubla je na domaćem i svjetskom tržištu od 1995. kao poznati proizvođač bešavnih satičnih boca za tehničke plinove. U novije vrijeme usvojen je program za proizvodnju CH4 boca za prirodni plin, koje se primjenjuju u automobilskoj industriji. Poznato je da je tvrtka ranije izvozila do svog proizvodnog programa u Iran.

Uvod Osnovni filtri Izbra subjekta (EORI) Dodatni filtri Analitika Izpisi EUL Izpisi EUL (R47,R44) Izpisi EUL (R30) Viesbina (R44,P18,P2)

Pregled kontrol Analiza - DRŽAVE U/I Postopek 42, 63 ISKALNIK Peskovnik Analiza Vrednosti

OBDOBIJE: 1.6.2012 30.6.2013

Polja	Vrednosti	R36	R37	R37P2	Vredj	MIN OZNAKA
Datum	>=1.6.2012 <=30.6.2013	0	1000	0	0	125100102625108952
ITEM_RBP2ITC2	CYLINDER SYSTEM D.O.O.	100	0780	A01	1	1351001026251017549
M		110	1007	A03	2	095100101825000018
		115	1021	A04	3	095100101825000026
		110	1023	A05	4	095100101825000034
		120	1040	AS1	5	095100101825000042
		125	1140	AS2	6	095100101825000050
		140	2100	B01	7	095100101825000059
			148	B02	8	
			190	B03	10	
			190	B04	11	

DRZ. NAM. DRZ. ODPIB. DRZ. POREKLA

Ventili za klor (Cl₂)

Klor je pod običajnim pogoji (molekule) rumeno-zelen p privlačnost elektronov in tret negativnost med vsemi element klor močan oksidator. Na Zem redke, in je običajno rezult postredne oksidacije kisika. Klor se običajno uporablja pri spektra industrijskih in po Uporablja se na primer, za izdel za suho čiščenje in razmaščen kmetijskih kemikalij, farmi insekticidov, belil, gospodinskih klor se zelo uporablja tudi za č zaradi močne oksidacije, pred vode v bazenih. Klor je strupen plin, ki draži d težji od zraka, se nabira na dnu prostorov. Klor je kot plin moč reagira z vnetljivimi materiali.



Thank you for your attention

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