

Global Trade & National Security

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One-Year Suspension of End-User Controls for Affiliates of Listed Entities

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On November 12, 2025, the Bureau of Industry and Security (BIS) at the Department of Commerce published a one-year suspension of the “Expansion of End-User Controls to Cover Affiliates of Certain Listed Entities” rule (the Affiliates Rule). The suspension is effective from November 10, 2025, through November 9, 2026. This action temporarily pauses changes to export control regulations that would have extended Entity List restrictions to foreign affiliates owned (directly or indirectly, individually or in the aggregate) at least 50 percent by listed entities or by unlisted entities subject to license requirements.

Key Provisions of the Suspension:

The Affiliates Rule, published on September 30, 2025, expanded the scope of Entity List restrictions to cover certain affiliates of listed entities. Under the rule, these affiliates would have been automatically subject to the same license requirements and restrictions as their parent entities.

BIS is suspending all changes made to the Export Administration Regulations (EAR) by the Affiliates Rule for one year. During this period, the previous regulatory status for affiliates of listed entities will remain in effect.

Reimposition of Controls:

The suspension is scheduled to end on November 9, 2026. Effective November 10, 2026, BIS will reimpose the license requirements and related provisions from the Affiliates Rule, restoring the expanded controls to the EAR. The final rule specifies the regulatory instructions for reimposing these controls, which will be identifiable in the regulatory text as effective November 10, 2026.

Next Steps for Exporters and Compliance Teams:

- Review current export activities involving affiliates of listed entities to determine the impact on licensing requirements.
- Prepare for the reimposition of controls effective November 10, 2026, and monitor BIS announcements for any changes or extensions to the suspension period.
- Ensure compliance systems are updated to reflect the temporary regulatory status, and anticipate future changes.

For further guidance on navigating export controls and preparing for regulatory changes, consult with your global trade compliance advisors.

Contacts

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