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Help Desk





The Special Comprehensive License (SCL)

Part 752 of the Export Administration Regulations (EAR)

Today's Topics

- **What is a SCL?**
- **What activities are covered under a SCL?**
- **What items are allowed under a SCL?**
- **What countries are eligible for a SCL?**
- **Steps to take in applying for a SCL?**
- **The application review process.**
- **The Internal Control Program (ICP).**

What is an SCL

A Licensing mechanism that may be used instead of repeating the submission of individual license applications that may cover multiple exports and reexports of items subject to the EAR.

A special privilege reserved for companies with a solid licensing history, an internal control program, and the ability and corporate commitment to implement certain screening responsibilities for the SCL Holder and SCL Consignee through the use of an ICP.

Authorized specific exports and reexports that are otherwise prohibited under an individual license.

What Activities are Covered

- **Service activities:** spare and replacement parts for servicing and/or stocking
- **End-user activities:** for use as capital equipment
- **Distribution activities:** items for sale and/or resale by designated SCL consignee(s)
- **Other activities:** considered on a case-by-case basis

What Items are Allowed under a SCL

All items subject to the EAR, including items eligible for License Exceptions described in Part 740 of the EAR.

A list of items that are not eligible can be found in Part 752.3

Items controlled for nuclear nonproliferation reasons may be authorized on a case-by-case basis.

What Countries are Eligible for a SCL

All countries are eligible under a SCL except:

- **Cuba**
- **Iran**
- **Iraq**
- **North Korea**
- **Sudan**
- **Syria**
- **and other countries BIS may designate on a case-by-case basis**

Steps To Take in Applying For a SCL

- **Contact BIS's EMCD Director by phone or fax and give an overview of your license scenario.**
- **Pre-application Consultation may be set-up.**
- **A pre-application package will be mailed to you.**

Application Review Process

- **Analyze your past export and reexport transactions.**
- **Inspect your export and reexport documents.**
- **Interview company officials of both the applicant and the consignees.**
- **Implement an ICP based on what was recommended in your preconsultation meeting.**

Internal Control Program (ICP)

Part 752.11

- **The SCL Holder and the Consignee(s) must maintain an ICP.**
- **The elements of your ICP will reflect the complexity of the activities authorized under the SCL, the countries and items involved, and the relationship between the SCL holder and the approved consignees.**
- **Some elements may be waived by BIS.**

Elements of an ICP

Part 752.11

The specific elements will depend on the complexity of your activities, countries, items involved, and the relationship between the SCL Holder and the approved Consignees.

- 1. Corporate Commitment**
- 2. Identification of Personnel/Responsibilities**
- 3. Communication Requirements**
- 4. Denied Persons Screen**
- 5. Items and Country Compliance Screen**
- 6. Compliance Reviews**
- 7. Nuclear End-Use Screen (cont'd)**

Elements of an ICP

Part 752.11

8. Record Keeping
9. Transaction Flow Screens
10. High Risk Shipment Requirements
11. Notification of Noncompliance
12. Diversion Risk Red Flags Screen
13. Rocket System and Unmanned Air Vehicle End-Use Screen
14. Chemical and Biological End-Use Screen
15. Antiboycott
16. Entity List Screen
17. Special Designated Global Terrorist

EMCD SERVICES



PROVIDE FREE COMPLIANCE GUIDANCE

Provide guidance on “best practice” export compliance strategies to assist you in developing, or enhancing, your compliance program.

PROVIDE FREE COMPLIANCE ADVICE

Review written compliance manuals and provide recommendations on how to strengthen your compliance policies, procedures, and overall program.

CONDUCT COMPLIANCE OUTREACH

Through seminars and one-on-one telephone counseling, we are available to answer your questions and assist you in your export compliance efforts.

SPECIAL COMPREHENSIVE LICENSE (SCL)

Provide SCL counseling and evaluate SCL Internal Control Programs.

VALIDATED END-USER (VEU) REVIEWS

Provide guidance and assistance on VEU submissions and conduct compliance reviews of VEU advisory opinion applications.

**The Export Management and
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