

Controlled dual-use items – in English

Israel regulates the entrance of all goods into the Gaza Strip, including items it considers to be “dual-use,” which require special permission to be brought in. The designation as dual-use means that Israel acknowledges that these items have an inherent civilian use, but that they can also be used for military purposes. The list itself includes items that are in fact broad categories, like “communications equipment,” such that the actual number of items restricted for entrance number much higher than the number of items on the list itself.

For several years, there were no clear guidelines governing the process for bringing dual-use items into the Strip. In January 2016, Gisha [submitted](#) two applications under the Freedom of Information Act to the Coordinator of Government Activities in the Territories (COGAT) asking for details on the [procedure for submitting applications](#) (Hebrew) for special permits to bring dual-use goods into Gaza and [figures on the approval and denial of such applications](#) (Hebrew) in the preceding years. In March 2016, we received COGAT’s [response](#) (Hebrew) to the request, indicating that [The Procedure for Bringing Controlled Goods into the Gaza Strip](#) (Hebrew), which was drafted and published by COGAT in 2010, after the flotilla incident, was no longer in effect. This meant that COGAT confirmed that it had no administrative directives or guidelines detailing its powers to prevent the entry of what is referred to as dual-use goods into Gaza. It was not until August 2018 that it published another procedure, [Approval and Coordination of Transport of Goods into the Gaza Strip](#), which provides guidelines on the process of obtaining permission for coordinating entrance of goods, including “controlled items.” Even now that the guidelines are ostensibly published, though only in Hebrew, the practice of bringing in many critical items to the Strip is fraught with difficulty and uncertainty.

The current and official list of dual-use goods and the procedure for filing applications for special permits to bring these goods into Gaza derive from the [Defense Export Control Law](#) from 2007, which generally addresses export permits for military related goods and the [Defense Export Control Order 2008](#) (Controlled Dual-Use Goods Transferred to Areas under Palestinian Civilian Control 5769-2008) (Hebrew).

The dual-use list itself was published only after a long legal battle and concerted advocacy efforts by Gisha. The list was published on COGAT’s website, first in [Hebrew](#), and only after additional requests, in Arabic and later, finally, in English, however, subsequently, with COGAT’s launch of a new website, the Arabic and English translations disappeared. COGAT’s incomplete Arabic translation, which Gisha uploaded to its own site, can be found [here](#). An unofficial English translation by Gisha is below.

In fact, the dual-use list is comprised of two lists. The first contains 56 items requiring “special approval” to be brought into the occupied Palestinian territory in general (that is, Gaza and the West Bank). The second contains 61 additional items specific to the Gaza Strip. These lists are themselves additions to the items listed in the ‘Control List’ of dual-use items provided for in the [Wassenaar Arrangement](#), which is the international standard.

Israel bears responsibility to facilitate the entrance of materials needed for normal life into Gaza, including materials found on the "dual-use list." We encourage those in discussion with Israeli officials and decision-makers to push for transparency about the regulations under this law and increased access of goods into the Gaza Strip.

For more information, please see Gisha’s 2016 report [Dark-gray lists](#).

**Defense Export Control Order (Controlled Dual Use Equipment transferred to Palestinian Civil
Jurisdiction Areas), 2008**

Complete and updated version

**Defense Export Control Order (Controlled Dual Use Equipment
transferred to Palestinian Civil Jurisdiction Areas), 2008**

Pursuant to my authority according to paragraph (2) to the definition “controlled dual use equipment) in section 2 of the Defense Export Control Law-2007, and with approval of the Knesset’s Foreign Affairs and Defense Committee, I hereby order:

1. The items listed in the first addendum are controlled dual use equipment transferred to Palestinian civil jurisdiction areas in Judea and Samaria and the Gaza Strip.
2. The items listed in the second addendum are controlled dual use equipment transferred to Palestinian civil jurisdiction areas in the Gaza Strip only.

First Addendum
(Section 1)

	Common name	Emphasis/other names	Chemical formula
1	Chlorate salts	Emphasis on: Potassium chlorate, Sodium chlorate	NaClO ₃ KClO ₃
2	Perchlorate salts	Emphasis on: Potassium perchlorate, Sodium perchlorate	NaClO ₄ KClO ₄
2A	Perchloric acid		HClO ₄
3	Hydrogen peroxide (concentration of over 18%)		H ₂ O ₂
4	Nitric acid		HNO ₃
5	Musk xylene		C ₁₂ H ₁₅ N ₃ O ₆
6	Mercury (including mercury for medical purposes)		Hg
7	Hexamine	Methenamine, HMTA	C ₆ H ₁₂ N ₄
8	Potassium permanganate	Potassium salt	KMnO ₄

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Please note that the following is a translation of the main items on the document and does not
include footnotes.

9	Sulfuric acid, excluding sulfuric acid found in finished car batteries	Battery acid Oleum	H ₂ SO ₄
10	Potassium cyanide		KCN
11	Sodium cyanide		NaCN
12	Sulfur		S
13	Phosphorus	White phosphorus, red phosphorus	P
14	Aluminum powder	Aluminum	Al
15	Magnesium powder		Mg
16	Naphthalene		C ₁₀ H ₈
17	Fertilizers and chemicals		
	(a) Ammonium nitrate (solid and liquid)		NH ₄ NO ₃
	(b) Potassium nitrate (solid and liquid)	13-0-46 fertilizer, saltpeter, Niter	KNO ₃
	(c) Urea (solid and liquid)	Carbamide	CH ₄ N ₂ O
	(d) Urea nitrate (solid and liquid)		CH ₄ N ₂ O-NO ₃
	(e) 17-10-27 fertilizer		
	(f) 20-20-20 fertilizer		
	(g) Any solid fertilizer containing one of the chemicals listed in bullets (a)-(c)		
18	Nitrate salts of other metals		
	(a) Sodium nitrate (solid)	Chile saltpeter, soda niter	NaNO ₃
	(b) Calcium nitrate (solid), including with extra chalk	Kalk amon	Ca(NO ₃) ₂
19	Pesticide materials		
	(a) Lannate	Methomyl	
	(b) Endosulfan		
20	Nitrate salt		
21	Methyl bromide		CH ₃ Br
22	Potassium chloride		KCl
23	Formaline	Formaldehyde	CH ₂ O
24	Ethylene glycol		C ₂ H ₆ O ₂
25	Glycerine		C ₃ H ₈ O ₃
26.	Platinum boards, titanium boards and graphite boards under 10cm thick;		
27.	Communications equipment, communication support equipment, or equipment with communication functions;		
28.	Equipment that can, while activated, interfere with communications networks;		

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29. Infrastructure equipment for communications networks;
30. Lathes for removal of metal;
31. Spare parts for lathes and accompanying equipment for lathes;
32. Machinery used for one or more of the following functions: milling, screwing, iron rolling;
33. Casting furnace with heating capacity exceeding 600 degrees Celsius;
34. Aluminum rods, circumference between 50 to 150mm;
35. Metal pipes, with or without seams, whose circumference is under 333mm;
36. Metal balls whose circumference is above 6mm and metal bearing holding metal balls with above 6mm circumference;
37. Optical binoculars;
38. Telescopes, including telescopic sights (including marks);
39. Laser range-finders;
40. Laser markers;
41. Night vision equipment;
42. Underwater cameras and sealed lens;
43. Compasses and navigation equipment, including GPS;
44. Diving equipment, including diving compressors and underwater compasses;
45. Water skis;
46. External sea propulsion engines above 25HP and parts whose primary use is for said engines;
47. Parachutes, windsurfers and model airplanes;
48. Hot air balloons, DIRIGIBLE airships; hand-gliders, model airplanes and other flying vessels are not powered by engines;
49. Equipment and measurement tools to measure gamma rays and X-rays;
50. Equipment and tools of physical and chemical analysis;
51. Telemetric measurement equipment;
52. Motorized all-terrain vehicles (ATVs);
53. Weapons and ammunition aimed for civilian use, such as hunting, scuba diving, fishing and sport, daggers, swords and folding knives over 10cm;
54. An item or a set of items that spew fire or detonate, including fireworks;
55. The items on the list as defined in the Defense Export Control Law (Controlled Dual-Use Equipment) - 2007;
56. Uniforms, symbols and badges.

Second Addendum

(Section 2)

1. Fertilizers or any mixture containing choleric potassium with concentrations greater than 5%.
2. Fibers or textiles containing carbon (carbon fibers or graphite fibers), including the following:
 - a. Chopped carbon fibers;

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- b. Carbon roving;
 - c. Carbon strand;
 - d. Carbon fabric tape.
3. Glass fiber-based raw materials, excluding plain glass wool used for insulation during construction, and including the following:
 - a. Chopped glass fibers;
 - b. Glass roving;
 - c. Glass strand;
 - d. Glass fabric tape;
 - e. S-Glass;
 - f. E-Glass.
 4. Sailing vessels.
 5. Fibers or fabrics featuring polyethylene fibers, also known as Dyneema, excluding insulation polyethylene boards as a finished product.
 6. Retro detection devices.
 7. Gas tanks.
 8. Drilling equipment.
 9. Equipment for the production of water from drilling, excluding water pumps designated only to the Water Authority.
 10. Vinyl ester resins.
 11. Epoxy resins.
 12. Hardeners for epoxy resins containing amide or amine chemical groups, including the following materials, but excluding SIKA filler + curing agent:
 - a. DETA – diethylenetriamine;
 - b. TETA – triethylenetriamine;
 - c. AEP – aminoethylpiperazine;
 - d. E-11 – Ethyleneamine;
 - e. T-403 – jeffamine;
 - f. Catalyst 4, 5, 6, 22, 23, 105, 140, 145, 150, 179, 190, 240;
 - g. D.E.H 20, 24, 25, 26, 29, 52, 58, 80, 81, 82, 83, 84, 85, 87;
 - h. XZ 92740.00.
 13. Vinyl ester accelerants, including the following:
 - a. DMA – Dimethylaniline;
 - b. Cobalt Octoate;
 - c. Mekp – Methyl ethyl Ketone Peroxide;
 - d. AAP – Acetyl acetone peroxide;
 - e. Cuhp – cumene hydroperoxide.
 14. M or H type HTPB (hydroxyl-terminated polybutadiene).
 15. Water disinfection materials - solutions with a concentration of over 11%, including hypo-chloride (HTH) and bleach with a disinfectant concentration of over 11% concentration, excluding sand glass for disinfection and filtering.
 16. TDI - Toluene diisocyanate.
 17. Portland cement (bulk or bags or drums).
 18. Natural aggregates, quarry aggregates and all foundation materials.

19. Prepared concrete.
20. Concrete elements and/or precast and/or tensed concrete.
21. Steel elements and/or construction products.
22. Iron for foundations and pillars of any circumference, including welded steel mesh.
23. Steel cables of any thickness.
24. Forms for construction elements of plastic or galvanized steel.
25. Industrialized forms for concrete pouring.
26. Beams from composite materials or plastic with a panel thickness of 4mm and thicker.
27. Thermal insulation materials and/or products, excluding roof tiles, plaster/mortar glue, mosaic tiles, building stone/coating stone/exterior stone, plaster roofing panels, polyethylene insulation panels, glass wool and moisture insulation fabric.
28. Concrete blocks, silicate, Ytong or equivalent of any thickness.
29. Building sealing materials or products which include epoxy or polyurethane components, excluding acrylic silicone, acrylic filler for ceramics, plasticine, BOND BD sealing solution.
30. Asphalt and its components (bitumen, emulsion) in bulk or in packages of any sort.
31. Steel elements and/or steel working products for construction, excluding galvanized steel up to 0.4cm thick.
32. Elements and/or products for channeling and drainage from precast concrete with diameters of over 1 meter.
33. Trailers and/or shipping containers.
34. Vehicles, except for private vehicles, but including 4X4 vehicles, two-wheeled vehicles and construction vehicles.
35. Optic equipment, infra-red cameras, thermal cameras and night-vision cameras.
36. Gas-operated pumps.
37. Electric air-blowers.
38. Copper, stainless steel and aluminum panels, including mesh, pipes and rods from copper, stainless steel and aluminum.
39. Electrodes, including PH meters, graphite electrodes, platinum-covered electrodes, MMO electrodes, excluding blood-testing electrodes.
40. Scanners, including X-RAY machines.
41. Dirty water pumps, with a pumping capacity of 10 liters per hour and above.
42. Vacuum pumps.
43. Various materials for the plastic industry, including Polyester, Polyurethane and Epoxy resin.
44. Walk-through metal detectors.
45. Welding machines, including melting electrodes.
46. Metal detection equipment (GPR).
47. Metal pipes, with or without seams, with diameters of under 350mm.
48. Equipment and tools for physical or chemical analysis, excluding blood analysis.
49. Wood planks that are 1cm thick and 5cm wide.
50. Uninterrupted Power supply (UPS) parts.

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51. Fiber-reinforced plastic panels of any thickness; non fiber-reinforced plastic panels over 1cm thick.
52. Smoke detectors with radioactive material.
53. Dichromate salt.
54. Barium Chloride.
55. Ammonium Chloride.
56. Castor oil.
57. Iron Oxide.
58. Softeners (D.O.A, D.O.P).
59. Asbestos insulation.
60. Winches and lifting equipment.
61. Graphite powder.

September 28, 2008

Ehud Barak
Defense Minister