

Military broker	Belgium	Luxembourg	Netherlands
Legislation	Law of 5 August 1991, amended by the Law of 25 March 2003, and the implementation decision of 8 March 1993 Law of 8 June 2006 (Weapons Act)	Law of 15 March 1983 Règlement Grand-Ducal 13 April 1983 (New legislation expected within several months)	Strategic Services Act of 29 September 2011
Subject to control	Preliminary accreditation as arms trader Broker should obtain a prior authorisation. Brokering activities are not controlled.	Preliminary accreditation as arms trader Brokering activities require prior authorisation	Preliminary accreditation as arms trader Brokering activities require prior authorisation
Items	Items on the CML Items listed in the annex to Law of 8 June 2006	Goods mentioned in category 1 of the Law of 15 March 1983 (i.e. category A in Annex 1 of the Firearms Directive) : forbidden Goods mentioned in category 2 of the Law of 15 March 1983 (i.e. category A, B, C and D in Annex 1 of the Firearms Directive) : accreditation + authorisation Other type of military / defence related goods (CML): accreditation + authorisation	Wassenaar Arrangement Munitions List/CML
Timing of authorisation	Approx. 6 months (accreditation: 4 months; licence: 2 months;) Licence as arms trader followed by accreditation as arms broker	6 weeks – 3 months (depending on complexity)	8 weeks (accreditation as arms trader may be waived)
Extra-territorial controls	Yes	Yes	Yes
Reporting of transactions	No	Yes	Yes
Record keeping	Yes	Yes, at least 10 years	Yes, at least 10 years
Sanctions	As licensed broker <ul style="list-style-type: none"> ■ Imprisonment of 1 month to 5 years and/or fine of 10,000 EUR – 1,000,000 EUR ■ Ban on brokering activities As accredited arms trader <ul style="list-style-type: none"> ■ Imprisonment of 1 month to 5 years and/or fine of 100 EUR – 25,000 EUR 	Imprisonment of 8 days to 5 years and a fine of 251 EUR to 250,000 EUR (New law / current draft bill: Imprisonment of 5 years to 10 years and a fine of 25,000 EUR to 1,000,000 EUR)	Misdemeanor (breach without willful intent) <ul style="list-style-type: none"> ■ maximum prison sentence of one year; maximum fine of 20,250 EUR; or community service Criminal offence (breach with willful intent) <ul style="list-style-type: none"> ■ maximum prison sentence of six years; maximum fine of 81,000 EUR; or community service If statutory penalty is considered inappropriate in relation to seriousness of offence, maximum fine of 810,000 EUR or 10% of annual income may be imposed