

THE **WORLD**DECR EXPORT CONTROLS AND SANCTIONS FORUM **2025**



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4-5 November 2025, at the offices of Hogan Lovells US LLP, Washington, D.C.

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THE JOURNAL OF EXPORT CONTROLS AND SANCTIONS



**Tom Blass,
Editor,
WorldECR**

Shifting paradigms at a time of great change

As we move toward the end 2025, the world is witnessing profound changes to the underpinnings and application of export controls and sanctions – radical departures from previous administrations' use of legislation and priorities – while global security issues remain heightened and urgent. More than ever, developments in trade and sanctions compliance have brought new and often business-critical challenges for Trade Compliance Professionals and their Advisors to respond to and manage.

It is against this background that *WorldECR* hosts its annual Export Controls and Sanctions Forum. There is much to discuss.

Join fellow trade professionals at the WorldECR Forum as we consider the key issues and themes of the day, including:

- China-US relations – through the prism of export controls and sanctions
- The Trump administration's use of IEEPA to justify tariff hikes on nations including partners and allies (now under challenge)
- The focus on Mexico and other targets of the Fentanyl FEND OFF Act
- Iran: with Snapback triggered – what's next?
- AI: latest on regulators' attempts to control it (and its use as a compliance helpmate)
- The latest with AUKUS (creating commercial opportunities through skilful use of export controls)
- International sanctions developments: with the sanctions against Russia largely targeting its ability to ship oil, what are the latest developments and red flags?

and much more.

As has become established practice, this year's Forum brings together government, industry, policy and legal private practice, to lead the trade compliance debate.

Networking

As in past years, you can enjoy an **optional dinner** on the first evening of the Forum, following a networking drinks reception. To date, this relaxed and informal dinner for speakers, panelists and delegates, held in a local restaurant, has proven a great success. It is optional – there is an additional charge – but it is always a fun end to a long day and a great opportunity to build new contacts.

Register today

You'll find all the registration information at the end of this document (or go to <https://www.worldecr.com/forums/washington-dc/>), but if you do have any questions please don't hesitate to contact my colleague Mark at mark.cusick@worlddecr.com

We look forward to seeing you in DC in November.

Tom Blass
Editor, WorldECR

DC 2025: Speakers and their Sessions



Keynote: Dr Ian Stewart, Executive Director, James Martin Center for Nonproliferation Studies

We are delighted that Dr Ian Stewart will be delivering a scene-setting keynote speech, contextualizing the most pressing and important issues impacting on trade compliance.

Dr Stewart, Executive Director at the James Martin Center for Nonproliferation Studies in Washington, DC, will explore the changing role of the multilateral export control regimes, continuing and new proliferation risks and concerns, and the evolving relationship between emerging technology and regulation.



Mutual dependency or decoupling? China and the United States' relations through the prism of trade controls

Ajay Kuntamukkala, Partner, Hogan Lovells LLP

Larry Li, APAC Regional Counsel, Global Trade Services, TE Connectivity

Amidst the Trump Administration's tariffs on China, Chinese retaliation with counter tariffs and blocking of exports of critical minerals, and ongoing negotiations over trade issues, the economic relationship between the United States and China is fraught with tension and complexity. Alongside these economic challenges lies fundamental disagreement on issues including human rights in Xinjiang and Hong Kong and the future of Taiwan.



This session updates our understanding of the Sino-U.S. relationship for the Trump era through the prism of export controls, sanctions, tariffs, and countermeasures, asking key questions such as: Where does trade controls policy fit in the Trump Administration's approach to China? Will U.S. and Chinese trade controls continue to become more and more restrictive or will there be a detente? What are the trade-offs between export controls and dealmaking between the two sides?

With views from industry and legal practice, this promises to be a must-attend session for any business with an eye on China trade.



Acts of Emergency? Potential new frontiers in national security legislation

Barbara Linney, Partner, Baker Hostetler

By using the International Economic Emergency Powers Act as a justification for the imposition of tariffs, Donald Trump radically redefined perceptions of IEEPA, its scope and its application.

Likewise, recent comments by U.S. Treasury Secretary Scott Bessent suggest that the administration might be considering tariff payments in lieu of export control authorizations in some cases. These are not uncontroversial developments — IEEPA's new application is still being challenged in the courts. What comes next? (is the question, amongst others, posed by Barbara Linney in her presentation.)



Chipping away? AI export controls after DeepSeek

Thea Kendler, Partner, Mayer Brown, and former Assistant Secretary for Export Administration, BIS

Emily Benson, Head of Strategy, Minerva Technology, and formerly of the U.S. Department of Commerce and CSIS

Impetus to up the export control ante was increased at the beginning of the year after China's DeepSeek revealed unexpectedly strong AI capabilities rivalling established U.S. players.



President Trump has set out his approach to the control of exports of advanced chips used for generative AI in his AI Action Plan, while BIS regulations have departed from the norms established by the Biden Administration, the most recent chapter, the long-awaited BIS 50% Rule, considerably broadening the scope of required due diligence. The resulting, evolving legislative landscape has consequences for exporters — and users — of technology both in the United States and beyond.

In this session, Thea Kendler and Emily Benson review the developments to date and consider the impact of likely further changes — both to technology and legislation — which are undoubtedly on the cards.



The future of defense is dual-use!

Tracy Gronewold, Director of Global Trade Compliance, Hillspire

Jeff Merrell, VP Strategic Trade Controls, Rolls-Royce North America

Traditional export control regimes distinguish between controls on military USML goods subject in the U.S. to ITAR, and dual-use CCL goods subject to the EAR. But recent conflicts have revealed critical flaws in many traditional defense platforms. They are too big, too slow, and too expensive. Methods of waging conflict are changing, and new, differently controlled technologies are emerging: Artificial Intelligence (running on advanced semiconductors); tiny, attritable drones; and commercial software.



At a time when common household tools and parts have found increasing use on the battlefield and regulators take steps to extend controls on such, Tracy Gronewold and Jeff Merrell ask, “Is the future of defense dual-use?” It's a provocative question — here unpacked!



U.S. enforcement activity in 2025: Unravelling the lessons from the agencies

Elizabeth Shingler, Senior Manager, KPMG LLP

Each enforcement action tells a unique story — and each can be a goldmine of compliance learning for businesses. In this session, Elizabeth Shingler takes stock of the big-ticket enforcement actions in 2025 (such as the OFAC settlements with GVA Capital, Unicat, and Interactive Brokers, and BIS's agreement with Cadence), peeling away the layers to reveal key takeaways, and considering how they can be applied to daily compliance best-practice.



Borderline issues: Mexico in sights of OFAC

Dawson Law, Founder, Conseil Global Advisors

Since taking office, the Trump Administration has made “cartels” a key focus of its national security and sanctions policy — placing increasing pressure on Mexico to address issues of fentanyl and narcotics trafficking, and the effects of organized crime.

In this session, former U.S. Treasury and OFAC official Dawson Law explains the background to the President's concerns, describes the regional and international reach of the cartels, the extent to which they are entwined with legitimate business, potential touchpoints, and steps the private sector should take so as not to fall foul of developing policy and regulation. Mr Law will also explain the significance of the Foreign Terrorist Organization designation, and the consequence of FINCEN's identification of Mexican banks under the FEND Off Fentanyl Act.

Dawson Law is a former OFAC sanctions policy adviser, a former U.S. Treasury representative to the United Kingdom, and the founder of risk advisory firm Conseil Global Advisors.



Holding it together: Brussels, sanctions and the 'bloc'

Tanja Galander, Partner, GvW Graf von Westphalen (Berlin)

Bettina Mertgen, Partner, GvW Graf von Westphalen (Frankfurt am Main)

Russia's invasion of Ukraine has been Brussels' prime consideration since 2022, and in response the European Union has imposed unprecedented sanctions (18 packages as at writing time) on Moscow. In doing so, the Commission has sought to centralize sanctions policy and practice across the bloc, imposing new thresholds and expectations for enforcement and penalties, and extending its authority to third-country subsidiaries of EU companies — with long-term repercussions for sanctions compliance. And while the Russia sanctions regime has dominated the compliance agenda, other programs also, including the return of the Iran sanctions, triggered by the JCPOA “snapback”, and the relaxation of the Syria sanctions regime, have long-term repercussions for compliance.

In this session, German/EU lawyers, Tanja Galander and Bettina Mertgen review the sanctions progress to date and look to the horizon for the EU's possible next steps and their impact on international business and trade compliance.



DC 2025: Speakers and their Sessions



Kicking the Tires: AI in Export Controls and Red Teaming Assumptions

Dr. David Bray, Chair of the Accelerator at the Loomis Council and Distinguished Fellow, Stimson Center

Kevin Cuddy, Government & Regulatory Affairs Executive, Export Regulation Office, IBM

This session explores two complementary dimensions of artificial intelligence in the context of global trade and security.

Dr. David Bray will examine the practice of red teaming — deliberately challenging assumptions and stress-testing systems — and how it applies to AI development and deployment. Drawing from military and cybersecurity contexts, he will highlight the importance of human judgment in adversarial scenario planning and the risks of over-reliance on AI without robust human oversight. His talk will emphasize the need for interdisciplinary approaches to ensure AI systems are resilient, ethical, and aligned with strategic objectives.

Kevin Cuddy will focus on how AI technologies — including agentic AI and automation — are transforming export compliance. He will discuss practical ways export control professionals can leverage AI to streamline classification, licensing, and screening workflows, reduce human error, and enhance responsiveness to regulatory changes. The presentation will also explore how companies can incorporate AI-driven tools into their compliance programs to improve scalability, auditability, and risk management.

Together, the session will provide a forward-looking view of how AI can both support and challenge export control frameworks — and how professionals can prepare for a future where human and machine intelligence must work in tandem.



Communicating compliance

Sahra Su, Lead Senior Legal Counsel, Global (Export Controls & Trade Sanctions), SAP

Vedia Edelmann, Head of the Regional Trade Law Office, DHL — Global Business Services

When events occur that have major implications for sanctions and trade controls, it is imperative that there is common company-wide understanding of their significance — communicated both internally and to stakeholders.

Communication failures can lead to reputational damage, poor compliance policies and mixed messaging to customers and investors — and yet, though critical, this is an often-overlooked area of compliance.

Drawing on their extensive experience and on case-studies and hypotheticals, Sahra Su and Vedia Edelmann will set out the key lines of communication, and organizational responsibility required when dealing with major change and developments.





Sanctions Horizon Scan 2026: panel discussion

2025 has seen continued ratcheting-up of sanctions against Russia, the triggering of “snapback” under the JCPOA, and increased U.S. focus overseas — on Latin America, in particular Mexico and Brazil, and on other third-country measures, such as tariffs on India, and designations of Chinese refineries in the context of Russian and Iranian sanctions.

As we edge toward 2026, our panellists will ask: What are the geopolitical hotspots likely to give rise to changes in export controls and sanctions? How might “snapback” translate into UN and member state measures? Will increased pressure on Israel manifest as sanctions? And could the BRICS start to respond?

This session sees panellists scanning the horizon for signs of change and advice on business preparedness and supply chain resiliency.



Maximizing data riches: Finding, extracting, and putting trade data to use

Pete Heine, Senior Adviser, Pacific Northwest National Laboratory

In July, the European Union published a Strategic Trade Atlas to promote understanding of global trade flows of strategic goods — i.e., goods of militarily strategic value, including dual-use goods. This isn’t the only source of comparably rich data, but collectively, they’re largely untapped by regulators and industry alike.

In this session, Pete Heine locates the data and sets out use-cases, arguing that intelligent application can enhance both the effectiveness, and the efficiency, of strategic export control efforts.



AUKUS now – opportunity and security?

Ajay Kuntamukkala, Partner, Hogan Lovells LLP

Lizzie Patterson, Senior Manager, International Affairs, Aerospace Industries Association

AUKUS, the three-way security pact between Australia, the UK and the U.S., carries profound implications for geopolitics and security in the Asia Pacific region and relations between the three signatory countries.

Pillar One of AUKUS — providing the necessary technology and capacity to assist Australia acquire a fleet of nuclear powered submarines by the 2030s — has required a new approach to export control. Is it working? Have the US, U.K. and Australian AUKUS licences delivered for contractors? And what are the long-term prospects for AUKUS and its compliance demands on primes and sub-primes throughout the defense supply chain who are looking to exploit the long-term opportunities that AUKUS presents?

These are among the questions considered as Ajay Kuntamukkala and Lizzie Patterson discuss the state of play.



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Registration fees

For delegates from industry/academia/government: \$695

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Optional dinner upgrade: add \$140

Timetable

Day 1: light breakfast and registration from 8.00am; Chairman's welcome 9.00am; drinks reception 5.30pm; optional dinner 7.00pm

Day 2: light breakfast from 8.20am; sessions start 8.50am; close 12.30pm

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Mark Cusick at mark.cusick@worldocr.com

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Registration policy

Delegates may not 'share' a registration without the organiser's authorization.

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