



## SCOMET Update 2025: Amendment to Appendix 3 (SCOMET items) to Schedule - 2 of ITC (HS)

INSIGHTS

September 25, 2025

Dear Reader,

We are writing to you with an important update regarding the list of Special Chemicals, Organisms, Materials, Equipment, and Technologies (**SCOMET**) items regulated by the Directorate General of Foreign Trade (**DGFT**), India.

<b>Background</b>	<p>The DGFT maintains a list of SCOMET items (<b>SCOMET list</b>) i.e., dual-use items which have potential applications in both civil as well as weapons of mass destruction. Currently, the list organizes the SCOMET items under eight (8) categories. The export of these items is permitted only against an export authorization (unless the export of the concerned item is prohibited or permitted subject to fulfilling certain conditions).</p> <p>On September 23, 2024, the DGFT vide notification no. 31/2025-26 revised the list of SCOMET items (<b>Revised SCOMET list</b>). The relevant notification and the Revised SCOMET list are available <a href="#">here</a> and <a href="#">here</a> respectively.</p>																				
<b>Scope of the Amendment</b>	<p><b>I. Addition of items under Category 7</b></p> <p>Through the above notification, the DGFT has operationalized <b>Category 7</b>, which was previously reserved (i.e. did not cover any items), by adding new items to the existing SCOMET list. The following items, i.e., 'Certain Emerging Technologies and related items' are listed now under Category 7:</p> <table><tr><th colspan="2">Category 7: Certain Emerging Technologies and related items</th></tr><tr><td colspan="2"><b>7A Systems, Equipment and Components</b></td></tr><tr><td colspan="2"><b>7B Test, Inspection and Production Equipment</b></td></tr><tr><td colspan="2"><b>7C Materials</b></td></tr><tr><td colspan="2"><b>7D Software</b></td></tr><tr><td colspan="2"><b>7E Technology</b></td></tr></table> <p><b>II. Introduction of new terms and expansion of existing terms of the Glossary to the SCOMET list</b></p> <p>The DGFT through the above notification has introduced new terms defined under the Glossary. A list of such terms is provided below:</p> <table><tr><th>New Terms</th><th>Definition</th></tr><tr><td>"Data device"</td><td>Equipment capable of transmitting or receiving sequences of digital information.</td></tr><tr><td>"Maintenance Level I"</td><td>The failure of an inertial navigation unit is detected on the "aircraft" by indications from the Control and Display Unit (CDU) or by the status message from the corresponding sub-system. By following the manufacturer's manual, the cause of the failure may be localised at the level of the malfunctioning Line Replaceable Unit (LRU). The operator then removes the LRU and replaces it with a spare.</td></tr><tr><td>"Maintenance Level II"</td><td>The defective LRU is sent to the maintenance workshop (the manufacturer's or that of the operator responsible for level II</td></tr></table>	Category 7: Certain Emerging Technologies and related items		<b>7A Systems, Equipment and Components</b>		<b>7B Test, Inspection and Production Equipment</b>		<b>7C Materials</b>		<b>7D Software</b>		<b>7E Technology</b>		New Terms	Definition	"Data device"	Equipment capable of transmitting or receiving sequences of digital information.	"Maintenance Level I"	The failure of an inertial navigation unit is detected on the "aircraft" by indications from the Control and Display Unit (CDU) or by the status message from the corresponding sub-system. By following the manufacturer's manual, the cause of the failure may be localised at the level of the malfunctioning Line Replaceable Unit (LRU). The operator then removes the LRU and replaces it with a spare.	"Maintenance Level II"	The defective LRU is sent to the maintenance workshop (the manufacturer's or that of the operator responsible for level II
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"Maintenance Level II"	The defective LRU is sent to the maintenance workshop (the manufacturer's or that of the operator responsible for level II																				

	<p>maintenance). At the maintenance workshop, the malfunctioning LRU is tested by various appropriate means to verify and localise the defective Shop Replaceable Assembly (SRA) module responsible for the failure. This SRA is removed and replaced by an operative spare. The defective SRA (or possibly the complete LRU) is then shipped to the manufacturer.</p> <p>‘Maintenance Level II’ does not include the disassembly or repair of specified accelerometers or gyro sensors.</p>
"Non-repetitive pulsed"	"Lasers" that produce either a single output pulse or that have a time interval between pulses exceeding one minute.
"Satellite"	A "spacecraft", other than a "space vehicle", designed to operate in orbit around Earth or another celestial body; "satellites" include orbital space stations.
"Spacecraft"	<p>A craft designed to operate in, persist in or transit through space in the form of a "satellite", "space probe", or "space vehicle".</p> <p><b>Note:</b> "Spacecraft" does not include landers, rovers, or other craft, limited by design to operate on or beneath the surface of, or in the atmosphere of an extra-terrestrial celestial body, or "sub-orbital craft".</p>
"Spacecraft mission equipment"	<p>Equipment, designed to be located on a "spacecraft bus", and to perform a mission in space or to enable the "spacecraft" to perform its mission (e.g., communications, observation, science, transport)</p> <p><b>Technical Note:</b> "Spacecraft mission equipment" is sometimes referred to as a spacecraft payload.</p>
"Space probe"	A "spacecraft", other than a "satellite" or "space vehicle", designed not to return to Earth.
"Space vehicle"	<p>A "spacecraft" designed to provide transport for cargo or passengers.</p> <p><b>Note:</b> "Space vehicles" include craft designed to safely return to Earth.</p>
"Strong mechanical bond"	A bond having a bond strength equal to or greater than propellant strength.
"Wall-plug efficiency"	The ratio of "laser" output power (or "average output power") to total electrical input power required to operate the "laser", including the power supply/conditioning and thermal conditioning/heat exchanger.

Existing Terms	Revised Definition <sup>1</sup>
"Spacecraft bus"	Equipment that provides the support infrastructure of the "spacecraft" and location for the <i>"spacecraft mission equipment"</i> .
"Sub-orbital craft"	<p>A craft having an enclosure designed for the transport of people or cargo, which is designed to:</p> <ul style="list-style-type: none"> <li>Operate above the stratosphere;</li> </ul>

<sup>1</sup> Newly introduced language is *italicized* for reference.

- Only perform non-orbital trajectories
- Land back on Earth with the people or cargo intact.

### III. Revisions to the scope of the existing SCOMET items

The DGFT through the above notification has also revised the scope of SCOMET items falling under various sub-categories. Such revisions entail either expanding or clarifying the scope of items. An indicative list of the sub-categories which have undergone revision is provided below.

Category	Sub-category
Category 3: Materials, Materials Processing Equipment and related technologies	3D001
	3D015
Category 6: Munitions List	6A007
	6A008
	6A010
	6A011
	6A019
Category 8: Special Materials and Related Equipment, Material Processing, Electronics, Computers, Telecommunications, Information Security, Sensors and Lasers, Navigation and Avionics, Marine, Aerospace and Propulsion	8A108
	8C102
	8B201
	8B204
	8B206
	8A301
	8A302
	8C305
	8E303
	8A403
	8E501
	8A5
	8A502
	8A601
	8A603
	8A605
	8A605
	8A801
	8A802
	8A912

	<div>8B9</div> <div>8B903</div> <div>8B904</div> <div>8D905</div> <div>8E903</div>
<b>Date of Implementation</b>	To provide transition time to the relevant businesses, the changes made to the list of SCOMET items under the aforementioned notification are to enter into force from October 23, 2025, i.e., 30 days from the issuance of the notification dated September 23, 2025.
<b>ELP's Remarks and Way Forward for companies</b>	<p>The amendments to the SCOMET list introduce Category 7 under which the exports of items related to quantum computing, cryogenic electronics, semiconductor manufacturing, and additive manufacturing will now require export authorization. These amendments bring Indian export controls in line with the multilateral export control regimes to which India is a member and align it with other jurisdictions.</p> <p>For example, the European Union recently <a href="#">announced</a> similar amendments to its Delegated Regulation on dual-use export control.</p> <p>Considering these amendments, Indian companies engaged in export of the controlled items will be required to obtain export authorization before undertaking any such exports. For this, the exporters would need to submit an application in the prescribed format to the DGFT, Department of Atomic Energy (<b>DAE</b>), or the DDP, as applicable to the items concerned. The procedure to file the said application is laid down under the Foreign Trade Procedure, which is available <a href="#">here</a>.</p>

For any queries or comments on this update, please feel free to contact us at [elptrade@elp-in.com](mailto:elptrade@elp-in.com) or the authors: [sanjaynotani@elp-in.com](mailto:sanjaynotani@elp-in.com), [ambarishsathianathan@elp-in.com](mailto:ambarishsathianathan@elp-in.com), [harikabakaraju@elp-in.com](mailto:harikabakaraju@elp-in.com) and [shantanusingh@elp-in.com](mailto:shantanusingh@elp-in.com).

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