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# TRADE AND PRODUCT REGULATORY ALERT

October 01, 2025

DGFT aligns SCOMET List with  
Global Export Control Regimes

# DGFT updates SCOMET list to align with Global Export Control Regimes

The Government has updated its list of Special Chemicals, Organisms, Materials, Equipment and Technologies ('SCOMET'), bringing it in line with the latest international standards of multilateral export control regimes. The Directorate General of Foreign Trade ('DGFT') issued Notification No. 31/2025-26 on September 23, 2025, notifying revision of the SCOMET items in Appendix-3 of Schedule-II of the ITC (HS) classifications of Export and Import Items. These changes will be effective from October 23, 2025

## Key highlights

- **Inclusion of new category:** The revised Appendix-3 explicitly **operationalizes Category 7**, to cover 'Certain Emerging Technologies and related items', and subdivides it into five sub-categories as below:

### 1. 7A (Systems, Equipment and

#### Components), including:

- Complementary Metal Oxide Semiconductor (CMOS) semi-conductors
- Integrated circuits having one or more digital processing units having a Total Processing Performance (TPP) of 6,000 or more
- Parametric signal amplifiers
- Cryogenic cooling systems and components
- Quantum computers and related components and assemblies,

- Computers, electronic assemblies, components containing one or more integrated circuits

### 2. 7B (Test Inspection and production equipment), including:

- Additive manufacturing equipment
- Lithography equipment
- Equipment designed for epitaxial growth of silicon (Si) or silicon germanium (SiGe)
- Semiconductor manufacturing deposition equipment
- Equipment designed for dry etching
- Cryogenic wafer probing equipment, Scanning Electron Microscope (SEM) equipment

### 3. 7C (Materials), including:

- Epitaxial materials
- Fluorides, hydrides, or chlorides, of silicon or germanium
- Silicon, silicon oxides, germanium or germanium oxides

### 4. 7D (Software) specifically designed in relation to notified categories under new Category 7

### 5. 7E (Technology) specifically designed in relation to notified categories under new Category 7

- In addition to the new category, the notification also introduces several other key amendments:
  - i. **New Definitions:** The glossary of terms used in the SCOMET list has been updated with new definitions such as ‘data device’, ‘spacecraft’, ‘spacecraft mission equipment’ etc.
  - ii. **Revised Definitions:** Several existing definitions (such as ‘spacecraft bus’ and ‘sub-orbital craft’) have been revised.
  - iii. **Revision of scope of items:** The scope of items under following categories has been revised for purposes of expansion or clarification:
    - Category 3 (Materials, Materials Processing Equipment and related technologies)
    - Category 6 (Munitions List)
    - Category 8 (Special Materials and Related Equipment, Material Processing, Electronics, Computers, Telecommunications, Information Security, Sensors, and Lasers)

## **DHRUVA INSIGHT**

For the first time India has formally brought next-gen, dual use technologies like semiconductors, quantum computing, advanced materials and automation software under its export control regime. It clearly signals Government's intent in regulating high end technology that are capable of having dual use i.e. civil application and military or weapons-related applications.

The Government has provided a 30-day transition period to stakeholders for understanding changes and making necessary adjustments to compliance processes.

Given the broad and rapidly developing nature of areas like quantum tech, semiconductors, additive manufacturing, firms in advanced tech fields should review carefully whether their products are now controlled. Semiconductor, electronics, chemicals, quantum, R&D and software sectors should specifically review its product portfolio and reassess export licensing obligations to avoid any disruptions to their export operations and penalties for non-compliance.

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