

MEMORANDUM CIRCULAR NO. 25-20
Series of 2025

SUBJECT: GUIDELINES ON RE-EXPORT AND REASSIGNMENT

WHEREAS, pursuant to Section 8 of Republic Act No. 10697, otherwise known as the Strategic Trade Management Act (STMA), the Strategic Trade Management Office (STMO) is created as a bureau under the administrative supervision of the Department of Trade and Industry (DTI) to serve as the executive and technical agency of the national government for the establishment of the management systems for the trade in strategic goods;

WHEREAS, under Section 3 of the STMA, the following activities shall be subject to an authorization issued by the STMO: export, import, transit, transshipment, re-export, reassignment, and the provision of related services;

WHEREAS, strategic goods include all goods listed in the National Strategic Goods List (NSGL) created under Section 4 of the STMA, which comprises of three (3) annexes: Military Goods (Annex 1), Dual-Use Goods (Annex 2), and the Nationally Controlled Goods (Annex 3), as well as unlisted goods covered by end-use controls under Section 11;

WHEREAS, Section 9(d) of the STMA vested the STMO with the power and function to issue or deny issuance of authorizations for the trade of strategic goods and the provision of related services;

WHEREAS under Section 10 of STMA, any person who intends to engage in the re-export or reassignment of strategic goods is required to obtain an authorization when this has been made a condition for the authorization of the exports from the Philippines;

WHEREAS, under the Department Administrative Order (DAO) 19-07, the STMO shall adopt a phased implementation of the activities under the STMA, starting with the registration of stakeholders, export authorization, transit and transshipment authorization, followed by re-export and reassignment; and,

NOW, THEREFORE, this Circular is hereby issued for the information, guidance, and compliance of all covered persons.

1. Covered Activities

This Memorandum Circular (MC) covers the re-export and reassignment of strategic goods. The STMA defines re-export and reassignment as follows:

STRATEGIC TRADE MANAGEMENT OFFICE



- 1.1. *Reassignment* refers to the reallocation of strategic goods previously exported from the Philippines from one person to another within a single foreign country by any means, including the electronic transmission of software and technology.
- 1.2. *Re-export* refers to the export to a foreign country of strategic goods either previously imported to or exported from the Philippines.

2. Covered Persons

- 2.1. This MC shall apply to, and automatically cover, all persons or entities that engage or intend to engage in the export of strategic goods that intend to, or have knowledge that the strategic goods covered by the authorization shall ultimately be reassigned or re-exported.
- 2.2. The exporter shall not be required to apply for a separate authorization for the re-export or reassignment of strategic goods, *provided that*, the exporter has a valid Export Authorization covering the same item, end-use, end-user, country of destination, consignee, and third parties.

3. Authorization Procedure

- 3.1. Any covered person who has not yet secured an authorization for the export of strategic goods shall be required to apply for an Export Authorization from the STMO, subject to the requirements and procedure described in *DTI Memorandum Circular No. 25-17: Guidelines on Export Authorization*, and its succeeding amendments.
- 3.2. The STMO shall include a provision for re-export or reassignment as a specific condition in the issued Export Authorization.

4. Responsibilities of the Authorization Holder

- 4.1. Pursuant to Sections 10 and 11 of the STMA and Rule V of the STMA Implementing Rules and Regulations (STMA IRR), the authorization holder shall ensure compliance with the recordkeeping requirements, submission of related documents, and end-use controls for strategic goods not listed in the NSGL.
- 4.2. The authorization holder shall ensure that the customs broker or its authorized agent submits to the Bureau of Customs (BOC) the following documents before the departure of the shipment of strategic goods: (1) a copy of the authorization, and (2) an extract of the manifest of the carrier. In addition, the license information shall be included in the BOC's Export Declaration form, which is detailed in *DTI Memorandum Circular No. 22-14: Revised Guidelines for Export Clearance* and its succeeding amendments.
- 4.3. The authorization holder shall keep all records of the transaction and/or books of account, business and computer systems, and all commercial and

technical data related to the transaction for ten (10) years from the date of completion of the transaction. The covered person shall refer to *DTI Memorandum Circular No. 21-16: Guidelines on Recordkeeping for STMO Authorization Holders* and its succeeding amendment for the complete recordkeeping requirements and other relevant information.

4.4. The authorization holder shall strictly adhere to the following general authorization conditions imposed by the STMO, to wit:

4.4.1. The authorization shall be valid for the duration specified in the authorization, unless otherwise revoked, suspended, or annulled by the STMO.

4.4.2. The authorization may be revoked or suspended by the STMO upon a finding that any of the grounds enumerated under Sections 9 and 11, Rule IV of the STMA Implementing Rules and Regulations (IRR) exist, notwithstanding the prior issuance of the authorization.

4.4.3. The strategic goods listed in the authorization shall be shipped only to the countries of destination and/or specific end-users stated in the license, subject to conditions stated under DTI-STMO MC 20-13, 26 October 2020 DTI Secretary Advisory to all persons who might be transacting business with sanctioned individuals and entities, and 08 March 2022 DTI Advisory on unilateral sanctions recently imposed by certain states.

4.4.4. The strategic goods listed in the authorization shall be used exclusively for the stated end-use and shall not be used in the development, production, handling, operation, usage, maintenance, storage, detection, inventory, identification, or proliferation of weapons of mass destruction and their delivery systems.

4.4.5. **Re-export/ re-transfer/ reassignment shall be conducted only with prior written authorization from the importing country's export control authority.**

4.4.6. The authorization holder shall ensure strict compliance with the following:

4.4.6.1. Adhere to the provisions set forth under Republic Act No. 10697 or the Strategic Trade Management Act, its Implementing Rules and Regulations, STMO Guidelines, and other relevant issuances.

4.4.6.2. Notify all parties listed in this authorization of the specific license conditions that apply to them.

- 4.4.6.3. In the event of any changes in the information contained in this authorization, the authorization holder shall apply for authorization amendment prior to shipment.
 - 4.4.6.4. In case of discovery of a breach or violation, the authorization holder shall be required to promptly notify the STMO of such breach or violation in accordance with the Guidelines on Voluntary Self-Disclosure.
 - 4.4.7. The authorization holder is subject to an STMO compliance visit and shall provide a periodic report, through the e-licensing system, regarding the usage of the authorization on or before a set deadline, and as requested by the STMO.
 - 4.5. The authorization holder shall also adhere to the identified relevant special authorization conditions imposed by the STMO, such as, but not limited to, the submission of a delivery verification certificate or similar document issued by the appropriate authority/ authorities of the destination country, proof of delivery, and/or any other required documents. All submissions shall be submitted through the STMO e-licensing platform.
 - 4.6. Such other responsibilities as may be listed in Section 10 of the DTI *Memorandum Circular No. 25-17: Guidelines on Export Authorization*, and its succeeding amendments.

5. Suspension, Return, and Grounds for Annulment, Revocation, Limitation, or Modification of Authorization

- 5.1. The authorization holder shall refer to the applicable provisions stipulated under Sections 9, 11, 12, and 13 of the STMA IRR for the suspension, return, grounds for annulment, revocation, limitation, or modification involving STMO-issued export authorizations.
- 5.2. If the person issued an export authorization requests revocation, a letter stating the reason must be submitted to the STMO via the e-licensing platform.
- 5.3. The STMO shall automatically revoke the export authorization upon receipt of the request or upon meeting any of the grounds enumerated above. The STMO shall notify the person of the decision through the e-licensing platform.

6. Penalties for Noncompliance

Any violation of the provisions of this Circular shall be subject to applicable administrative and/ or criminal penalties under the STMA, including other applicable laws, rules, and regulations.

This Circular shall take effect immediately.

18 December 2025, Makati City.

Recommending Approval:


DOMINA PIA S. SALAZAR
Assistant Director

Approved by:

ATTY. JANICE SACEDON-DIMAYACYAC
Director