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STANDARDS & GUIDANCE BRIEF · UNITED STATES · REGULATION

# ITAR · 22 CFR 120–130

International Traffic in Arms Regulations

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**IN FORCE** On October 1, 2026, DDTC proposed omnibus amendments that would move some items off the US Munitions List and add exemptions; comments are due November 30, 2026, and the current text applies until a final rule. **Next:** Watch for the final omnibus rule, and review any items you classify under USML Categories II, VIII, X or XX.

## What It Covers

Control of the export and temporary import of defense articles and services on the US Munitions List, including the technical data that describes them.

## Who It Applies To

Manufacturers, exporters and brokers of defense articles, and anyone who handles ITAR-controlled technical data, including the people inside your own building.

## Key Requirements

- Registration with DDTC for manufacturers and exporters of defense articles (Part 122).
- A license or exemption before exporting defense articles or technical data, including release to foreign persons in the United States (a deemed export).
- Jurisdiction and classification against the US Munitions List (Part 121).
- Records kept for five years, and voluntary disclosure of violations (Parts 122, 127).

## What an Auditor Asks to See

- How controlled drawings are marked, stored, and released.
- Your list of foreign-person employees and visitors, and the access controls that apply to them.

## Where Systems Fall Short

- Controlled drawings shared by email with suppliers who were never screened.
- Quality records that include technical data but sit outside the export control plan.

**How QES helps.** Document control set up so that export-controlled data is identified, marked, and released only to people entitled to it. See the gap assessment: qesisbest.com/services.html#gap-assessment · +1 (401) 246-3204 · mweeden@qesisbest.com

**Sources, checked October 24, 2026.** eCFR — 22 CFR Chapter I, Subchapter M (ITAR) — www.ecfr.gov/current/title-22/chapter-I/subchapter-M; Holland & Knight — DDTC publishes ITAR omnibus amendments proposed rule (October 2026) — www.hklaw.com/en/insights/publications/2026/10/ddtc-publishes-itar-omnibus-amendments-proposed-rule.

A summary for orientation, prepared by Quality Excellence Services. It does not reproduce or replace the standard or regulation: read the official text, which governs. Not legal advice.