



Luxembourg Defence Industry

Strategy



THE GOVERNMENT
OF THE GRAND DUCHY OF LUXEMBOURG

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1.

1. Introduction

Faced with a severely deteriorated, volatile and unstable security environment, and above all with Russia's war of aggression against Ukraine, which represents a threat to the Euro-Atlantic area unprecedented since the end of the Second World War, the need to revitalise the deterrence and defence capabilities of the *North Atlantic Treaty Organization* (NATO) and within the *European Union* (EU) has become imperative. This development, along with the tense security outlook for the coming years, is in line with the need to strengthen the *Luxembourg defence industrial and technological base* (LDITB).

The production capacities of the defence industry in NATO countries continue to grow, but significant gaps remain to be bridged, particularly in Europe. Efforts must therefore address both demand and supply, without neglecting the aspect of standardisation ensuring interoperability between NATO and even EU armed forces. In practical terms, this may involve aggregating demand, undertaking joint defence acquisition spread over several years, or implementing measures to encourage and facilitate the expansion of industrial capabilities.

Both within the EU and within the framework of NATO, the challenges have been identified and initiatives to address them have been launched. The EU's ambitions regarding the future development of the defence industry are set out in the *EU Strategic Compass*, the *European Defence Industrial Strategy* (EDIS), the *White Paper on the Future of European Defence – Readiness 2030*, and the *ReArm* plan. These ambitions are intended to be implemented through the *European Defence Industrial Programme*, which sets out measures across several areas, ranging from securing value chains to supporting Ukraine and identifying joint projects.

Within the NATO context, Heads of State and Government adopted the *NATO Industrial Capacity Expansion Pledge* (NICE Pledge) at the Washington Summit in 2024. This includes, amongst other things, a commitment to **strengthen the defence industrial base, to cooperate with Ukraine, and to prioritise multinational procurement.** Complementary elements of this commitment are the *Defence Production Action Plan* (DPAP) and the establishment of the *Defence Industrial Production Board* (DIPB) within NATO's structures – the latter serving as a forum dedicated to defence industry

issues. These elements complement instruments such as the *Defence Innovation Accelerator for the North Atlantic* (DIANA) and the *NATO Innovation Fund* (NIF), domiciled in Luxembourg, which aim to support the development of start-ups offering such technologies, as well as to fund high-value-added technologies for NATO. Furthermore, the coordination taking place within the various bodies of the *Ukraine Defence Contact Group* (UDCG) is also worth mentioning. This group's primary aim is to coordinate military aid to Ukraine, but it also serves to identify opportunities for cooperation and to draw shared lessons.

The international framework within which national initiatives are situated is thus clearly outlined. As regards Luxembourg Defence, the *Luxembourg Defence Guidelines 2035* remain the point of reference for defence policy, capability planning, and defence industrial policy. **Support for research and industry is explicitly listed among the objectives** of the Guidelines. Other strategies concerning specific areas, notably **cyber and space**, complement this framework. This strategy constitutes a new key element in this context and highlights the Luxembourg Government's commitment to facilitating the development of a

national defence industry whilst supporting this initiative with a political commitment to ensuring economic and societal returns on defence expenditure.

The other aspects of the Guidelines remain relevant both in terms of capability orientation and our approach to partnerships. **The land, space, air and cyber domains form the scope of our capability efforts.** Particular emphasis is placed on the project for a binational medium combat reconnaissance battalion with Belgium, as well as on the future large-scale project concerning the establishment of an integrated air and missile defence system. In terms of international cooperation, our partners are like-minded countries within and beyond the EU and NATO.



2.

2. Objectives

NATO and EU countries must step up their efforts to ensure Euro-Atlantic security. Cooperation between countries and the complementarity of EU and NATO efforts are crucial in this regard. **For its part, Luxembourg must be able to protect its essential security interests.** Luxembourg must therefore possess the necessary knowledge and capabilities to safeguard its own security and continue to make a credible contribution to the collective effort.

A **solid base of research institutes and companies**, ensuring that Luxembourg possesses the **necessary know-how, technologies and defence capabilities**, is essential for this. Luxembourg will therefore need to raise its level of ambition within the framework of multinational projects and improve the level of integration **of its industry into the defence industry supply chains of its partners.**

This strategy provides a framework for identifying priority technology areas, sectors of expertise and the industrial capabilities required to establish a solid foundation for protecting the country's essential security interests. It sets out guidelines for strengthening the LDITB's involvement and for positioning our indus-

tries and research institutes so that they can contribute to the security of Luxembourg, Europe and the Alliance.

In order to ensure that essential security interests are protected, it is important to ensure that the LDITB is structurally integrated into international supply, production and maintenance chains for defence equipment. Furthermore, strengthening the national industrial production base is a key means of ensuring a degree of strategic autonomy and the resilience of the LDITB. To this end, **it should be emphasised that industrial participation may be implemented in accordance with Article 346 of the *Treaty on the Functioning of the European Union* (TFEU), which may be invoked both to provide a framework for this involvement in international chains and to support the strengthening of domestic production necessary to safeguard essential security interests.**

As a reminder, the Defence Guidelines define Luxembourg's essential security interests as follows:

- safeguarding the integrity of the territory, independence and sovereignty of Luxembourg;

- safeguarding the freedom and security of the population in a stable, open and dynamic society;
- protection of the foundations of Luxembourg's prosperity, economic security and strategic supplies; and
- resilience of society, the State and public services.

However, the national and collective security of Allies depends on constant investment in advanced technologies and a strengthened defence capability. The defence of territory, both at national and international level, **requires state-of-the-art military equipment, the production and maintenance of which rely on the defence industry.** This industry is essential to guaranteeing national sovereignty and that of our allies in the face of current and future threats.

Indeed, at the 2024 Washington Summit, NATO pledged to accelerate the growth of industrial capacity across the Alliance, thereby strengthening NATO's ability to meet defence requirements in an increasingly uncertain and hostile security environment. As mentioned above, the European

Union has also adopted EDIS, with the aim of making the Union more responsive and resilient to threats. This strategy highlights the need for a radical change in the speed and scale of military equipment production.

The development and strengthening of the LDITB contributes fully to Luxembourg's security, resilience and economic prosperity. It should therefore be noted, in line with the essential security interests already defined, that the following areas also constitute fundamental interests for ensuring the nation's long-term protection, in keeping with current challenges and the central role of the LDITB.

Thus, the essential security interests identified by this strategy are as follows:

- **Maintaining decision-making strategic autonomy**

It is essential to ensure Luxembourg's ability to make decisions and act independently in the face of threats, by developing niche capabilities and relying as much as possible on its own means and resources, particularly in the defence sector.

■ **Securing the supply of raw materials and sensitive technologies**

It is essential to guarantee reliable, sustainable and secure access to the critical resources and technologies required for the manufacture, maintenance and development of defence equipment.

■ **Promoting local research and innovation**

It is essential to actively support the development of skills, knowledge and technological innovations within Luxembourg's research institutes and companies, in order to ensure the adaptability and renewal of defence capabilities in the face of evolving threats.

■ **Ensuring the resilience of critical supply and value chains**

It is essential to maintain the continuity, robustness and flexibility of production flows, even in times of crisis, in order to ensure the constant availability of equipment and services essential to defence.

■ **Strengthening the LDITB**

It is essential to consolidate and develop national capabilities- in terms of expertise,

technical equipment and organisation - in order to ensure a significant and sustainable contribution to national and collective security.

■ **Contributing to European and allied collective security**

It will be imperative for Luxembourg to strengthen existing national and international partnerships and to establish new partnerships to improve the protection of Luxembourg's essential security interests, as well as those of its partners and allies.

It is essential to safeguard collective security beyond national territory by actively cooperating within EU and NATO, in particular through bilateral or multilateral partnerships. Given the current geopolitical situation, Luxembourg must contribute to strengthening interoperability, resilience and the collective deterrence and defence posture of the Euro-Atlantic area.



3.

3. Vision

Luxembourg is one of the most open economies in the world and is firmly anchored within Europe. In view of the geopolitical security situation described above, the Luxembourg Government aims to strengthen and support the LDITB. **Luxembourg's defence industry will develop and produce defence services and capabilities and integrate more closely into the supply and value chains of partner countries.** Characterised by its dynamism in innovation and advanced technological solutions, it will continue to specialise, occupy niche sectors and develop technological excellence in sectors identified as strategic and priority areas. With this in mind, it is crucial to support and strengthen these sectors, as they are likely to provide an operational advantage to the Luxembourg Armed Forces, whilst also ensuring the protection of essential security interests as defined above. Luxembourg's defence industry will be robust and a reliable partner for its European and transatlantic allies. It will build on existing expertise whilst placing **particular emphasis on research, development and innovation. The focus will be primarily on purely military technologies,**

without excluding 'dual-use' technologies and applications.

In the short term, the aim is to support existing stakeholders (*Luxembourg Industry and Research Capabilities for Security and Defence catalogue*¹) with the support of the Directorate of Defence, the Ministry of the Economy and the Ministry of Research and Higher Education for the development of national and multinational defence capabilities.

In the medium and long term, the aim is to **strengthen research, development and innovation capabilities** and to **support the establishment of the infrastructure required** by the sector. Consideration will also be given to supporting and promoting **the establishment of new defence companies** within the country. Luxembourg Defence currently imports almost all the products and services it requires to meet its needs, and it is therefore important to establish these companies, which will contribute to national security and sovereignty.

¹ See <https://luxinnovation.lu/resources/luxembourg-defence-capabilities-research-and-industry>



4.

4. Priority areas for capability development

The priority areas for capability development were set out in the Defence Guidelines and in the new capability targets assigned to Luxembourg. As a reminder, the capabilities that Luxembourg will seek to develop and acquire will be essential for the protection of Luxembourg's vital security interests. They will be in line with the *NATO Defence Planning Process* (NDPP) and the EU's *Capability Development Plan* (CDP) and will, for the most part, stem from one of **the four priority areas** listed below. Simulation, training, logistics and maintenance capabilities related to the capabilities arising from the priority areas below will also be considered a priority.

4.1. Land

The land domain is the one which, historically and for many years to come, will continue to play an **important** role for Luxembourg Defence. In addition to the reconnaissance capabilities of the Luxembourg Armed Forces, **new capabilities relating to the binational medium combat reconnaissance battalion** will need to be developed in the coming years. Whether these are logistical capabilities,

vehicles, weaponry, missiles and ammunition, or any other capabilities necessary for the effective functioning of the Armed Forces and the binational battalion, Luxembourg will need to adapt in order to integrate a significant number of land capabilities previously not present.

4.2. Air

Transport and support capabilities such as the A400M and the A330 MRTT, or programmes such as the *Allied Early Warning & Control* (AEW&C), demonstrate the strategic importance of the air domain for Luxembourg. Nevertheless, it is important to emphasise that the development of this domain, towards **new capabilities such as air defence or new types of drones, or participation in new programmes such as the Alliance Future Surveillance and Control (AFSC)**, will pose a considerable challenge for Luxembourg. Given the importance of the air domain, it will nevertheless be necessary for Luxembourg to continue **developing its expertise in all types of air capabilities, particularly in the field of integrated air and missile defence**.

4.3. Space

For many years, Luxembourg has been developing cutting-edge space knowledge and capabilities in both the civil and defence sector.

As set out in its 2022 *Defence Space Strategy*, Luxembourg will continue to develop its satellite communications capabilities as well as its observation and surveillance capabilities, both from the ground and from space.

In order to maintain and enhance Luxembourg's position in the field of space for defence, it will be essential to explore the development of new technologies and capabilities in close collaboration with the LDITB.

4.4. Cyber

In the cyber domain, Luxembourg published a *Cyber Defence Strategy* in 2021, clearly defining the priorities and the path forward for cyber defence capability development. The continued development of innovative capabilities in the coming years will remain a priority for the cyber domain.

These capabilities will enable Luxembourg Defence to achieve its targets and contribute further to national cybersecurity initiatives to continue strengthening the resilience of national infrastructure.

To achieve these ambitious objectives, Luxembourg Defence will rely on a LDITB comprising companies and research entities highly specialised in fields such as artificial intelligence, cloud computing and quantum technologies.



5.

5. Areas of knowledge, technology and industry to be integrated into Luxembourg's defence industrial and technological base (LDITB) to support the protection of essential security interests

In order to support the development of capabilities across the four priority areas defined in Chapter 4, it is **essential to strengthen the LDITB**, whilst taking into account **existing skills and expertise**. Defence companies will be key partners in this process. The major challenges facing both industry, particularly **SMEs**, and Luxembourg Defence will be **the education and development of defence-specific skills**, as well as **attracting talent** with these skills. The areas that will receive particular focus are as follows:

5.1. Defence-related products

At this stage, the LDITB has only a limited number of players producing defence-related products. However, the national ecosystem includes a significant number of companies active in the manufacture of

components specifically designed for these products. Given the changing geopolitical context, the strengthening of commitments to NATO and the firm determination to bolster the security and sovereignty of the country, the EU and the transatlantic alliance, the legal framework will now be open to the establishment of new activities in the field of defence-related products.

5.2. Materials and Production Technologies

Luxembourg has a long **tradition of production, development and research in the field of materials**. Historically dominated by **steel and metals**, other sectors have developed, including **composite materials**. Highly innovative companies have established themselves, often supported by public research.

Given the importance of new materials for the defence sector and capability development, particular emphasis will be placed on the development and production of **high-performance materials**. One example is **ultra-lightweight composite materials**. **Production technologies** also have a significant impact on the performance and costs of materials and products. Their integration into the national strategy is therefore essential. **3D printing** is one such example. Luxembourg will support public research and companies in this field, so that these stakeholders can develop innovative solutions and access defence markets whilst supporting national capability development.

5.3. Automated and autonomous systems

Existing research in Luxembourg in the field of intelligent and autonomous systems provides a solid foundation for the development of autonomous vehicles for defence purposes. By strategically refocus-

ing current interdisciplinary research **in robotics, artificial intelligence (AI) and advanced manufacturing**, the aim will be to develop mission-critical military applications that build on existing technological capabilities. Existing expertise in artificial intelligence, machine learning and autonomous navigation developed for the civilian sector can be directly applied to defence requirements, with a focus on developing secure and resilient autonomous systems for military environments. Potential defence applications could include **advanced drones, autonomous ground vehicles for patrol and logistics, or adaptive military robotics for hazardous terrain**. Emphasis could be placed on cooperative vehicles and systems incorporating **AI** for deployment in extreme environments, which could meet defence requirements for robust and adaptable autonomous platforms capable of operating in complex and unpredictable conditions. All capabilities incorporating AI must also comply with the ethical and political criteria for autonomous weapons systems, as defined in the 2023 recommendations on the subject².

² List of recommendations and follow-up actions from the interministerial working group on lethal autonomous weapons systems, approved by the Government Council and presented at the press conference on 11 September 2023

5.4. Cybersecurity

A high level of cybersecurity expertise is required to operate detection and protection tools that not only analyse individual events but are **also** capable of **detecting obfuscated, strategically timed and coordinated attacks**. The target of such an attack is not necessarily limited to the entity itself, but **in many cases includes the** entity's **sub-contractors**, as these are, given their size, less mature in their detection and defence capabilities.

To increase the resilience of the national economy's value chains, which include defence industry suppliers, Luxembourg must continue to invest in infrastructure and services to reduce the individual protection efforts of the entities concerned. A focus should be placed on areas such as cyber threat intelligence, AI, and initiatives for information sharing and continuous training in cybersecurity.

The development of these services and technologies in Luxembourg **will substantially strengthen the capabilities of local companies** in this field. This will not only **increase the resilience of the ecosystem but also enhance the expertise of service**

providers capable of offering services to their peers.

5.5. Space technologies

The space sector has been a priority in Luxembourg's economic diversification policy for several decades. This policy has enabled the development of an ecosystem with diverse capabilities, ranging **from components, subsystems and orbital systems, ground infrastructure, and solutions for the operation and monitoring of space infrastructure**, to the development **of platforms and applications** for the use of this **infrastructure and satellite data**.

The technologies, products and services developed to date will support capability development in the defence sector. The industrial development of the space sector will contribute to the protection of Luxembourg's essential security interests.

Luxembourg Defence already uses secure communications systems and satellite-based Earth observation capabilities. Other areas may be subject to development and support for innovative solutions applicable to defence users, notably **quantum**

communications and, in particular, **quantum key distribution** via satellites, **in-orbit services and space surveillance**.

NATO and the EU have recognised space as a strategic domain for defence-related activities. At European level, significant resources will be deployed to **strengthen European sovereignty and reduce technological dependencies** in the fields of space and defence. Luxembourg will strengthen its position at international level and continue to contribute to the space defence strategies of these organisations.

5.6. Logistics and military mobility

Building on its central location in Europe and investments in the logistics sector, Luxembourg has developed the expertise and infrastructure and attracted the players that have enabled the country to position itself as **a major logistics hub in Europe**. **The airport and the Euro Hub Sud** with its multimodal terminal are two examples of key infrastructure for the efficient and agile management of goods. These resources can play an important role in the context of defence missions, particularly in times of

crisis. Thus, Luxembourg may be called upon to support **NATO forces transiting through its territory**, which may involve considerable logistical support. In this context, the strengthening of Luxembourg Airport's role in defence activities, taking into account the issue of military mobility, will be analysed.

Studies on river transport will also be carried out to complement those conducted for road and rail transport.

5.7. Circularity and supply security

Luxembourg is positioning itself as a major player in the field of data for circularity. As the creator of the *Product Circularity Data Sheet* (PCSD) and the initiator of the ISO 59040 standard, the Grand Duchy aims to apply these principles to the defence sector as well. As the approach has been examined at the level of the European Defence Agency, it can be concluded that clear and verified data helps **to maximise resource efficiency and minimise waste**, thereby contributing to a circular and more sustainable economy.

Building on its experience in this field, Luxembourg aims to position itself as **a centre of expertise in circularity for the defence sector**. Circularity will enable Luxembourg and Europe to reduce their **dependence on imported materials, and to increase their flexibility and agility** by sourcing **resources** locally to rapidly manufacture the products required by the defence sector or to supply production lines, thereby **reducing the risk of shortages**. This approach will provide a competitive advantage, strengthen the **resilience of the armed forces** and contribute to environmental protection.

5.8. Cross-cutting technologies and services

Beyond the aforementioned priority areas, Luxembourg is developing other capabilities that need to be integrated into capacity-building efforts. Under the 2023-2028 coalition agreement, the Government has committed to promoting innovation in order to position Luxembourg sustainably at the forefront of new technologies, particularly in the digital sector. **AI, data and quantum technologies** constitute the three strategic priorities that Luxembourg aims to

develop through dedicated and aligned strategies. Building on a strong international outlook, proven economic dynamism and an unrivalled, highly reliable digital infrastructure, the national ambitions regarding the exploitation of data, AI and quantum technologies are to consolidate Luxembourg's position as a European pioneer of the digital transition, capable of serving as a model and reaping the benefits offered by digital technologies. The vision aims to support digital sovereignty, technological and economic progress, and to promote the well-being of citizens.

5.9. Energy

National defence and security also rely on a reliable and robust energy supply. Luxembourg will continue to develop the country's energy production and supply. Particular emphasis will be placed on sustainability, including the production of renewable energy and its storage, notably in batteries or in the form of hydrogen and its derivatives.



6.

6. The defence innovation pipeline

Luxembourg is continuously developing its innovation ecosystem and rapidly evolving towards a knowledge-based economy. The University, public research centres and incubators are just a few key examples. The Government will also continue to support **innovation in the defence sector**. By building on existing strengths and addressing identified gaps, the country aims to establish an **innovation pipeline for the defence sector**. The aim is **to support the creation of, and attract, innovative start-ups and scale-ups**, and to enable them to **grow** so that they become **significant players and trusted partners for Luxembourg, European and transatlantic defence**.

Luxembourg will also include the defence sector, and in particular innovative activities, in its **talent attraction initiative**, with a view to training, attracting and retaining the talent required for the sector's development.

A **review of existing and future intellectual property generated by public research** in Luxembourg will be carried out on a reg-

ular basis to identify innovations with **potential for the defence sector** in Luxembourg or in allied countries.

The Directorate of Defence will support the innovation pipeline by providing advice and support for the experimentation and testing of innovative solutions and, where possible, by acting as a potential first customer for existing or future solutions.

The innovation pipeline comprises various elements:

6.1. Funding

6.1.1. Defence Innovation Fund

An **investment fund** will be established to **support promising start-ups**. Acting as a **fund of funds and co-investor** in companies, the fund will support the development of the defence ecosystem and stimulate innovation by specialising in the fields and technologies highlighted in this strategy.

Target companies will be identified through the fund, various market research bodies, incubators, spin-offs from public research, or any other opportunities that arise.

6.1.2. Support for research, development and innovation projects

Research, development and innovation (RDI) aid schemes enable the co-financing of RDI projects by covering all costs directly linked to the projects or programmes. This aid is available to companies of all sizes and also covers the defence sector. Support may also be granted to a company carrying out an R&D project funded by the European Defence Fund or the European Defence Industrial Development Programme.

6.1.3. Joint calls for R&D projects in the defence sector

Calls for projects specifically aimed at developing defence capabilities will continue to be organised, in collaboration with the *Luxembourg National Research Fund* (FNR) and targeting the technologies highlighted in this strategy.

6.2. The Defence Campus

In order to attract innovative defence companies and provide them with premises and support tailored to their needs, a **Defence Campus** will be established to serve as a **hub for innovation and industrial growth as well as a business park**. Following the example of the Automobility Campus and the Space Campus, the Defence Campus will offer a **stimulating environment conducive to innovation and business development**, whilst ensuring an **adequate level of security**.

The Campus will be able to host activities across various fields of knowledge, technology and industry in Luxembourg to support the protection of essential security interests. These activities, which require a high level of security and state-of-the-art infrastructure whilst utilising innovative technologies, will be able to benefit from the Campus environment and contribute to its development.

The companies based on the Campus will primarily be **those that supply the**

Luxembourg Armed Forces with innovative solutions through contractual agreements. Supporting the growth of these companies in an appropriate and proactive manner will have an impact on the **human resource** requirements **of the government bodies involved.**

The management of Defence Campus projects and the support for companies will be jointly provided by the Directorate of Defence and the Ministry of the Economy. Other national stakeholders specialising in supporting innovative companies and public research may also contribute as partners or service providers.



7.

7. Legislation and regulations

7.1. Administrative simplification

Support for companies operating in the defence sector will be strengthened by providing them with the necessary information and resources, **simplifying their procedures**, encouraging innovation and promoting greater collaboration with public authorities and other stakeholders in the sector.

7.2. One-stop shop - access to information

A **section dedicated to the defence industry will be created on guichet.lu** to centralise all resources, information and administrative procedures relating to companies in the defence sector, providing in particular information on:

- the regulations applicable to the defence sector;
- the support programmes available to encourage innovation;
- support structures;
- administrative procedures.

7.3. Administrative procedures

- **Administrative procedures will be centralised** in a dedicated section on guichet.lu to simplify access to public services. Companies will be able to access them easily and quickly without having to search for information across multiple channels.
- **Efforts to digitise** administrative procedures will continue with the aim of offering simpler and faster procedures to companies, thereby reducing the administrative burden as far as possible.

7.4. Effectiveness of applicable legislation and regulations

A legal framework specifically designed for the production of defence-related products and their components is being put in place, and the effectiveness of the legislation in force will be regularly assessed. Given the rapid evolution of defence technologies and geopolitical volatility, the legislative

framework may, if necessary, be adapted at any time, with the responsiveness required to meet the sector's needs.

7.5. Export controls

The Office for Export, Import and Transit Controls (OCEIT) is in **daily contact with Luxembourg companies** active in the defence sector, in particular to issue authorisations for the import or transfer of defence-related and dual-use goods (products, software or technologies) to EU Member States or third countries, in accordance with national and European laws and regulations.

The OCEIT also regularly organises **information and awareness-raising sessions** for these companies, as well as for stakeholders in the field of research and development, to provide information on the complex legal obligations in the field of export control.



8.

8. Governance

This strategy is underpinned by political governance ensuring that industrial measures and choices serve defence and security objectives that are coherent, responsible, fully aligned with national priorities and in compliance with international treaties.

8.1. Ministerial Committee

Responsible for the implementation of this strategy are:

- the Minister responsible for the Economy;
- the Minister responsible for Defence;
- the Minister responsible for Foreign Trade;
- the Minister responsible for Research and Higher Education.

The *Ministerial Committee* shall meet at least twice a year and whenever necessary to assess progress, guide developments and, where appropriate, adjust implementation.

8.2. Interministerial working group

Coordination of the strategy's implementation is entrusted to an interministerial working group **comprising representatives from the relevant ministries and any other persons appointed by the ministerial committee.** The working group will meet regularly and **ensure the proper execution of the actions and projects approved by the ministerial committee.** The working group will propose an action plan for the implementation of this strategy to the ministerial committee and will ensure its implementation following adoption by the committee.

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