

# THE DUBAI INITIATIVE برنامج دبي

*Policy Brief*

## Export Control Development in the United Arab Emirates: From Commitments to Compliance

Dr. Bryan R. Early



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# **Export Control Development in the United Arab Emirates: From Commitments to Compliance**

Dubai Initiative – Policy Brief

**Dr. Bryan R. Early**

Research Fellow, The Dubai Initiative  
Better Center for Science and International Affairs  
Harvard University

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## Introduction

The swiftness with which the United Arab Emirates (UAE) has launched its civil nuclear program presents a number of challenges for policymakers in seeking to ensure the program's safety and security. At the onset of its efforts, the UAE government consulted with a set of the world's leading nuclear suppliers to develop a framework that would help its nuclear program conform to the highest standards in terms of safety, security, and nonproliferation. The UAE drew on these consultations in making a sweeping set of international commitments in April 2008 to ensure that the sensitive nuclear materials and technologies it would acquire as part of its nuclear program would be securely controlled.<sup>1</sup> While the UAE has been widely praised for the depth and breadth of the nonproliferation commitments it has made, it will be the UAE's efficacy at complying with them by which its success will be judged.

The largest commitment-compliance gap for the UAE government potentially relates to its system of nonproliferation export controls. Export controls are national restrictions that governments place upon their constituencies' exports of sensitive goods and technologies, which generally include arms and dual-use goods that can contribute to WMD programs.<sup>2</sup> Up until the fall of 2007, the UAE did not possess a comprehensive export control law at the federal level—let alone an institutional framework capable of administering it.<sup>3</sup> This allowed the country to be exploited by the A.Q. Khan proliferation network as a nexus for its illicit proliferation activities. As well, Iran has for decades employed front companies and middlemen in the UAE to help it obtain sensitive goods and technologies that U.S. and international sanctions have prevented it from directly acquiring.<sup>4</sup> While the UAE's recent nonproliferation commitments strongly signaled to the international community that it is prepared to adopt more stringent export controls, progress in this area has lagged behind its enthusiasm in moving forward with its planned civil nuclear energy program.

This policy brief examines what the UAE government will need to do to fulfill its international commitments to construct an effective export control system. The first section discusses what an effective export control system entails and what the UAE would need to have in place to live up to the "gold standard" it has set for itself. Next, I assess the extent to which the UAE meets the criteria of an effective export control system. The following section provides a series of recommendations concerning the steps that could be taken to further foster the development of its system of export controls. The conclusion discusses the potential positive spillover that developing its export control system could have for the country.

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1 See: UAE, 2008.

2 For good introduction to export controls and the international obligations that exist to impose them, see: Beck and Gahlaut, 2003: 1-22; Fuhrmann 2007.

3 For a discussion of the rationale behind the UAE's decision to impose export controls, see: McGovern, 2009.

4 See Corera (2006) for an in-depth discussion of how the Khan network employed the UAE in its illicit proliferation activities. Milhollin and Motz (2004) and Swibel (2004) provide brief overviews of past illicit proliferant trade connections between the UAE and Iran.

## Committing to the “Gold Standard” of Export Controls

In moving ahead with its nuclear program, the UAE government has aspired to establish the “global gold standard for peaceful nuclear energy development.”<sup>5</sup> Abdullah bin Zayed Al Nahyan, the UAE’s Foreign Minister, has stated that his government seeks to develop “a model for the deployment of nuclear energy that is based on the highest standards of operational transparency, safety, security, and nonproliferation, as well as the principles of long-term sustainability and cooperation with the IAEA and responsible nuclear supplier states.”<sup>6</sup> Thus, the UAE has committed itself not only to meeting the minimal obligations to impose export controls by international law, but to meeting them at the most exacting of standards.

The UAE’s obligations to impose an effective export control system stem from a series of United Nations Security Council (UNSC) mandates and voluntary commitments that it has made in its bid to attract foreign assistance for its nuclear program. In 2004, the UNSC passed Resolution 1540 that created a universal obligation for all states to impose effective export controls,<sup>7</sup> and, in 2008, the UNSC imposed sanctions that prohibited countries from trading sensitive nuclear materials and equipment with Iran. Importantly, the latter mandate requires an effective system of national export controls to implement. The UAE government further committed itself to becoming an adherent to the Nuclear Suppliers Group’s (NSG) Export Guidelines in April 2008 as part of its proposed plan for acquiring nuclear energy.<sup>8</sup> The NSG’s Export Guidelines constitute the leading consensus-based standards for ensuring that the export of nuclear materials and technologies does not contribute to the proliferation of nuclear weapons.

The development of a country’s export control system can be evaluated in terms of three different dimensions: the legal foundations upon which it is based, the degree to which it has been effectively institutionalized, and how rigorously it is implemented.<sup>9</sup> The legal development of a country’s export control systems can be assessed in terms of how comprehensive a country’s export control laws are in terms of what commodities they restrict, the types of transactions they restrict, the authorities they establish and/or empower to monitor, regulate, and enforce the restrictions, and the legal framework they provide for the punishment of those who violate the restrictions. The institutional development of a country’s export control system relates to the degree to which the system has been bureaucratized. A country must have institutions devoted to monitoring and regulating the international trade that passes through its borders, institutions that will evaluate and issue permissions to trade in restricted goods, and institutions capable of enforcing violations of its export laws. Beyond having the requisite laws and institutions in place, a country must effectively implement its export controls. It must consistently and comprehensively regulate the trade that occurs in the goods it has restricted, preventing illicit transactions, granting licenses for and regulating legitimate business, as well as identifying and punishing violators of its laws.

5 Embassy of the UAE in Washington, DC, 2009.

6 Bin Zayed Al Nahyan, 2008.

7 For more on UNSCR 1540, see: Fuhrmann, 2007; Bergenäs, 2008.

8 The NSG is a multilateral export control regime constituted of the world’s leader suppliers of nuclear technology. For the UAE’s commitment to adopt the NSG’s Export Guidelines, see: UAE, 2008: 4.

9 For more on this three-part approach for evaluating the development of countries’ export control systems, see: Stinnett et al., 2009. More detailed rubrics for evaluating export control development can also be found in: Bertsch and Grillot, 1998; Beck et al., 2003; Fuhrmann 2007.



Close, cooperative relationships between governments and their commercial sectors are essential components of well-functioning export control systems. Governments need to publicize and explain their export control laws to their commercial sectors, their agencies must coordinate their regulatory processes with the firms and industries they govern, and the implementation of export controls must be fair, transparent, and efficient to convince private sector firms to buy into their government's controls. In the most well-developed export control systems, institutionalized self-policing by private sector firms occurs in tandem with government regulation.<sup>10</sup>

Constructing a well-functioning export control system also requires a significant degree of technical expertise and tacit knowledge in its design and in the training of the officials that administer it. For example, a country's customs agents at its ports must be able to recognize and differentiate between sensitive dual-use goods that are subject to restrictions and those goods that can be freely traded. As well, the licensing officials responsible for approving transactions involving restricted goods must be able to evaluate the proliferation risks posed by a particular good and its *claimed* end-users in Country X. Indeed, many countries have required extensive external assistance in building their export controls systems (e.g., Poland, Estonia, and Armenia). Previous examples suggest the process of developing the indigenous expertise to effectively manage an export control system can take upwards of a decade. Obtaining a "gold standard" export control system is a time- and resource-intensive undertaking, one that cannot be purchased outright nor put into place and then forgotten about.

## The Ongoing Development of the UAE's Export Control System

The UAE government's prominent challenge in constructing an effective national export control system that keeps pace with the development of its civilian nuclear program relates to its confederated political structure and the relatively recent initiation of its efforts. Under the UAE's confederal structure, each of the government's seven emirates retained the authority to operate their own individual customs authorities. Indeed, it was not until 2003 that the UAE's national government even created the Federal Customs Authority. The UAE's decentralized system for governing its international trade presents a number of coordination and implementation challenges for the federal government in creating a comprehensive national export control system. Furthermore, the UAE government only recently initiated its efforts to put an export control system into place. The UAE's first comprehensive law on nonproliferation export controls only went on the books in September 2007. Though the content of the new law is promising, neither its institutionalization nor its implementation will occur overnight. The rest of this section provides an overview of the current development of the UAE's export control system in terms of its legal foundations, institutionalization, and implementation, in addition to discussing the issue of government outreach.

The UAE's *Federal Law No. 13 of 2007* establishes a comprehensive set of controls governing the export, re-export, transit, and transshipment of dual-use goods through its territories.<sup>11</sup> The law also explicitly extends to the UAE's

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<sup>10</sup> For a more detailed introduction to the components of effective export control systems, see: Beck and Gahlaut, 2003: 1-22.

<sup>11</sup> The text of the UAE's Federal Law No. 13 of 2007, as amended by Federal Decree No. 12 of 2008 is available in Arabic

free trade zones (e.g., JAFZA) and covers the brokerage of transactions involving restricted dual-use goods. The export control law also addresses the export of intangible goods, like software and blueprints, which will protect sensitive technologies from being proliferated. Additionally, the law contains a “catch-all” clause that provides Emirati authorities with broad discretion in preventing transactions that may contribute to proliferation. Violations of the law carry both administrative and criminal punishments, which include stiff fines and jail time. The export control law passed by the Emirati government provides a broad but technically nuanced foundation for the country’s export control system. It also mandates that emirate-level authorities must work with federal ministries in enforcing the law. By explicitly extending the law to the country’s free zones and including the brokerage of transactions involving restricted goods, the export control law specifically addresses vulnerabilities that proliferators had exploited in the past. While *Federal Law No. 13* and follow-up legislation in 2008 provided the broad foundations for an export control system, they left the development of many practical regulations concerning the laws’ institutionalization and implementation to a high-level committee that would subsequently be formed.

In February 2009, the UAE’s Council of Ministers established the Commission on Commodities Subject to Import and Export Controls. The Commission is composed of officials from a host of federal ministries with a stake in the export control issues, and headed by a minister of state for foreign affairs. This commission met for the first time on May 11, 2009.<sup>12</sup> Given the breadth of the responsibilities charged to the commission for the institutionalization of the country’s export controls, including the development of the licensing system that will be used to regulate trade in the items restricted by the export control law, little progress can be expected in the brief period that the commission has existed. So while the commission’s formation signals that the UAE government is moving forward with the process of institutionalizing its export control system, the development of a coherent set of standardized rules and procedures for operationally managing the country’s export control system remains a work-in-progress. And while the commission contains representatives from a number of ministries that could potentially be involved in the administration of the country’s export control system, no clear framework of institutionally delineated responsibilities between them appears to exist nor does a plan for coordinating with emirate-level authorities, which will be conducting much of the on-the-ground enforcement of the controls.<sup>13</sup>

Developing an efficient and ultimately effective model for coordinating between the various stakeholder institutions at the federal and emirate levels poses one of the commission’s greatest challenges. Beyond this task, the commission will then face the challenge of creating the institutional and individual competencies across the various levels of the country’s export control system that will provide those charged with administering the country’s export control laws with the capacity to do so. This suggests that the UAE will have to undertake a massive training effort that will extend across the multitude of federal agencies involved in the administration of export controls and across all seven of its emirates.

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at the UAE Ministry of Justice’s website at: <http://www.elaws.gov.ae/EnLegislations.aspx>. The analysis of the law relies upon an unofficial but vetted English translation of the law obtained by the author.

12 “UAE Enhances Federal Export Law,” 2009.

13 “UAE Enhances Federal Export Law,” 2009.



Though the UAE government claims to have taken a number of actions taken to curb proliferant trade since 2007, these enforcements appear to have occurred on an ad hoc basis rather than as an extension of a fully operational export control system. According to the *Wall Street Journal*, Emirati officials assert that they have shut down 40 Iranian companies operating out of Dubai that were engaging in trade that violated their export control laws and blocked more than 10 proliferation-sensitive transfers to Iran.<sup>14</sup> More generally, it appears as if Dubai has also undertaken the greatest efforts to train its frontline officials (e.g., customs officials) in the identification and handling of proliferation-sensitive goods.<sup>15</sup> Such enforcement efforts illustrate the Emirati government's willingness to shut down proliferant trade when it receives actionable information about such activities occurring within its borders. Indeed, a number of the enforcement activities undertaken by the UAE government relied upon intelligence and information from foreign governments, with which it has established cooperative relationships on these issues.<sup>16</sup> Yet, the ad hoc enforcement of export control violations constitutes only a small step towards the ultimate goal of a standardized system of controls capable of regulating all trade in proliferation-sensitive goods. Indeed, the deputy director of the UAE's Federal Customs Authority expressed frustration in the fall of 2008 over the fact that the UAE did not have the expertise to identify the dual-use goods that it was mandated to restrict by virtue of UNSCR 1803.<sup>17</sup> The lack of institutionalized systems for licensing controlled exports and coordinating their enforcement will limit the Emirati government to punishing the symptoms of lax controls rather than addressing their fundamental cause. If the UAE aspires to a "gold standard" system of export controls, it must propagate a culture amongst its commercial constituencies aimed at preventing rather than just punishing violations.

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In this regard, one of the areas in the most dramatic need of improvement relates to the UAE's lack of outreach to the commercial sectors its export controls are supposed to regulate. To date, the Emirati government has done little to publicize the export controls it has put into place. English translations of the UAE's export control laws and control lists are not publically available via the federal government's electronic resources or emirate-level customs agencies.<sup>18</sup> As well, the UAE appears to have few resources devoted to educating its commercial sectors about what complying with its export control laws would entail. Lastly, there is little transparency about the enforcement actions undertaken by the UAE government. The Emirati government has not publicized the identities of the parties that violated its export control laws and what punishments they received. In the United States, for example, "naming and shaming" is viewed as a valuable strategy in deterring companies from violating export control regulations.<sup>19</sup> Firms' compliance with the UAE's export controls is apt to be low until the following conditions

14 Solomon and Cocker, 2009.

15 McClenaghan, 2008a.

16 This insight was provided in a number of interviews conducted by the author in the UAE in May of 2009. This point was also publicly made by the Deputy Director of the UAE's Federal Customs Agency Saeed Khalifa Saeed al Marri. See: McClenaghan, 2009b.

17 McClenaghan, 2009b.

18 Dubai Customs comes the closest to providing these resources, but even the information contained in its *Partner's Guide: The Guide to Safe Export* pamphlet provides little in the way of specifics regarding the UAE's actual controls. See Dubai Customs (2008).

19 For an example of the U.S. Government's naming-and-shaming strategy of improving export control compliance, see the U.S. Department of Commerce's *Don't Let this Happen to You!* publication (U.S. BIS, 2008).

are met: 1) they are aware of and understand the UAE’s system of export controls; 2) they know exactly what is required of them to comply with the UAE’s controls; and, 3) the perceived costs of noncompliance are high enough to largely outweigh the risks of their violation. The last point depends not only on having stiff penalties on the books, but also potential violators’ perceptions of their likelihood of being caught and actually punished.

## Recommendations

This section presents a number of recommendations for Emirati policymakers in moving forward with their goal of developing an effective, efficient export control system. These recommendations address both the approaches that policymakers should adopt in developing their system and the end-goals they should pursue. While not a full roadmap for the path ahead, this advice may provide guidance to Emirati policymakers in moving ahead with their goal of developing a “gold standard” export control system.

***Promote Realistic Expectations, Exercise Patience:*** Constructing an effective export control system is not something that occurs overnight. The Commission on Commodities Subject to Import and Export Controls should adopt a deliberate approach in pacing the developments it seeks to undertake. Developing new systems of regulations and procedures, building the institutional and individual competencies necessary to administer them, and then imposing this new regulatory scheme upon a populace that is unfamiliar with it are time- and resource-intensive tasks. While the commission can make steady progress in the development of the UAE’s export control system, it should convey to its political stakeholders that the system will develop incrementally. Sacrificing quality for quickness may appease foreign nuclear suppliers in the short-run, but could create long-term vulnerabilities that could come back to haunt the UAE in the future.

***Import Expertise, but Emphasize Indigenization:*** The UAE government should avail itself of foreign assistance from international organizations, non-governmental organizations, and countries like the United States in the development of its export control system. The technical expertise, tacit knowledge, and training capabilities that the UAE needs to construct an effective export control system can be mostly acquired from foreign sources—many of which are happy to provide it. To date, the UAE has already engaged in consultations with the Nuclear Suppliers Group and participated in a number of export control training programs conducted by the U.S. government.<sup>20</sup> In contrast to the UAE’s approach of hiring experienced nuclear regulators from foreign countries to oversee its Federal Authority for Nuclear Regulation,<sup>21</sup> the UAE should not rely on foreign contractors to run its export control system, due to the foreign policy and national security considerations it involves. Foreign expertise in this area must be used to develop indigenous competencies amongst UAE’s own officials—competencies that must then be ensconced in the agencies involved in administering the export controls.

***Employ a “Weakest Link” Mentality:*** Export controls are always vulnerable to being undermined by the existence of gaps in their coverage. Vast disparities exist in the amount of international trade conducted by each of the UAE’s seven emirates, as do the size of each emirate’s customs agency and the resources

<sup>20</sup> See: “UAE, Nuclear Suppliers Group Discuss Trade Rules,” 2009; U.S. GAO, 2007.

<sup>21</sup> Horner, 2009.

devoted to them. Dubai has the most well-developed customs agency and appears to have taken the lead in training its officials to deal with export control issues. This is important because Dubai conducts the greatest amount of international trade, but potential proliferators can readily shift their business to other emirates whose enforcement may be more lax than Dubai's. The overall strength of the UAE export system will be defined by its most vulnerable point. To achieve a uniformly high national standard of implementation, Emirati policymakers will likely have to employ varied strategies across all seven of its emirates to account for the disparities between them.

***Make Governmental Outreach a Priority:*** Export controls are likely to be unfamiliar to many of the firms that do business in the UAE and potentially unwelcome to those that are familiar with them. As such, the Emirati government must make a concerted effort to reach out to the commercial sectors affected by its new export control laws. At the minimum, the Emirati government should immediately increase its efforts to promote awareness of its export control law and the restrictions it imposes. A more robust effort would entail government-sponsored programs aimed at educating firms about export controls and how they can best comply with the Emirati government's policies. In this effort, the UAE could potentially enlist the support of NGOs or partner with individual emirates' chambers of commerce. In doing so, the Emirati government can seek to diminish the number of unintentional violations that may occur in the country out of ignorance, freeing it to focus more of its attention on willful violators.

***Make the Enforcement of Export Controls Transparent:*** The Emirati government has a number of audiences whose behaviors may be affected by how stringently it imposes its export controls. Chief among them are the supplier states that will be sharing their nuclear technologies with the UAE and the firms that do business with or in the UAE. By transparently revealing the identities of the parties caught violating its export control laws and publicizing their punishments, the Emirati government can raise awareness concerning its new laws, signal its resolve in enforcing them, and raise the prospective costs for violations. Such a strategy could help prevent and/or deter potential violations and may also prevent discriminatory application of the law. This policy will have the further benefit of verifiably demonstrating to nuclear suppliers that the UAE government is enforcing the export control laws it has on the books.

## Conclusion

The UAE's export control system remains a work-in-progress, but it appears to be steadily improving. While a sound legal foundation for the country's export control system has been forged, significant work remains in areas of institutionalization and enforcement. Building the institutional capacity and expertise to effectively implement its export controls will not occur overnight. The Emirati government should continue to leverage cooperation with the NSG and countries with established export control systems to its advantage in developing its export controls. Rather than merely importing foreign experts to operate its export control system, however, the UAE's ultimate focus must be on indigenizing the knowledge and expertise foreign sources can provide to it. Achieving the "gold standard" export controls may also require the Emirati government to set additional benchmarks for governmental outreach and administrative transparency.

Rather than merely importing foreign experts to operate its export control system, however, the UAE's ultimate focus must be on indigenizing the knowledge and expertise foreign sources can provide to it.

that extend beyond what it has done in this regard in other areas of governance.

The UAE's goal should be to build a robust, effective export control system that will endure long after it has established entrenched relationships with nuclear suppliers and the international spotlight on Iran has faded. Given the rapidity with which the UAE has moved forward with the development of other governmental sectors related to its nuclear program, there is little doubt that the UAE possesses the resources to effectively develop its export controls. If the Emirati government truly wants to establish a "gold standard" export control system, though, it will take a serious commitment of its time and resources. That being said, it is a worthy goal and one that may *one day* be very much obtainable.

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# THE DUBAI INITIATIVE

The Dubai Initiative is a joint venture between the Dubai School of Government (DSG) and the Harvard Kennedy School (HKS), supporting the establishment of DSG as an academic, research, and outreach institution in public policy, administration, and management for the Middle East. The primary objective of the Initiative is to bridge the expertise and resources of HKS with DSG and enable the exchange of students, scholars, knowledge and resources between the two institutions in the areas of governance, political science, economics, energy, security, gender, and foreign relations related to the Middle East.

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