

## 2025~2027: A Summary of AI Hardware Export Control from the West

### ■ Country Tiers and Restrictions

| Tier   | Description   |
|--------|---|
| Tier 1 | Australia; New Zealand; Canada; United Kingdom<br>Belgium; Denmark; Finland; France; Germany; Ireland; Italy; Netherlands; Norway; Spain; Sweden<br>Taiwan Province; South Korea; Japan |
| Tier 2 | Countries like Singapore, India, and Israel with controlled access and specific limits.   |
| Tier 3 | Restricted countries (e.g., China, Russia, Belarus) with strict bans on advanced AI hardware.   |

### ■ Key Limits for Tier-2 Countries

| Limit     | Description   |
|-----------|---|
| 26.9M TPP | Annual TPP exemption limit for individual organizations in Tier 2 countries (equivalent to ~1,700 H100 GPUs). |
| 790M TPP  | Three-year (2025~2027) cumulative national limit for Tier 2 countries (equivalent to ~50,000 H100 GPUs).      |

### ■ Regulations Summary

| Condition                  | Requirement   | Legal Basis  |
|----------------------------|---|--------------|
| Purchase ≤ 26.9M TPP       | Submit self-declaration (use + no tech transfer), exporter files with BIS.      | Source 1, 44 |
| Purchase > 26.9M TPP       | Apply for BIS license with detailed technical parameters and end-use proof.     | Source 1, 5  |
| Involves AI model training | Requires BIS special license regardless of TPP (Presumption of Denial applies). | Source 1, 44 |
| Involves Tier 3 entities   | Triggers "Red Flag Warning," transaction must pause and be reported to BIS.     | Source 1, 44 |

### ■ Example Case: National University Hospital, Singapore

Year: 2024

Purchase: 800 A100 GPUs for genomic analysis

Total TPP: 5,734,400

1. Submit "LPP Annual Certification" to NVIDIA to confirm remaining TPP.
2. Sign "End-Use Declaration," ensuring no AI training is involved.
3. NVIDIA files with BIS post-shipment; no additional review triggered.

Tier 2 countries can submit applications for approval to import AI cards through the Bureau of Industry and Security (BIS) SNAP-R (Simplified Network Application Process - Redesign) portal. This is the official platform for filing export license applications under the Export Administration Regulations (EAR).

### ■ Key Notes on Approval Process

- Applications exceeding 26.9M TPP or involving sensitive use cases (e.g., AI model training) are subject to more stringent review.
- Tier 2 countries have a cumulative cap of 790M TPP (~50,000 H100 GPUs) for 2025–2027, and applications exceeding this will likely be denied.
- The BIS has a "presumption of denial" policy for applications involving Tier 3 entities or unauthorized uses.