



Committees on Arms Export Controls

Oral evidence: UK arms exports in 2019, HC 1212

Tuesday 16 March 2021

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Members present: Mark Garnier (Chair); Martin Docherty-Hughes; Mr Tobias Ellwood; Chris Law; Mark Menzies; Navendu Mishra; Lloyd Russell-Moyle; Mr Virendra Sharma; Martin Vickers.

Neil Coyle also attended, pursuant to Standing Order No. 137A(1)(e)

Questions 1 - 33

Witnesses

I: Dr Sibylle Bauer, Director of Studies, Armament and Disarmament, Stockholm International Peace Research Institute (SIPRI); Dr Andrea Edoardo Varisco, Acting Director, Dual-Use and Arms Trade Control Programme, SIPRI; and Mr Kolja Brockmann, Researcher, Dual-Use and Arms Trade Control Programme, SIPRI.

Examination of witnesses

Witnesses: Dr Sibylle Bauer, Dr Andrea Edoardo Varisco and Mr Kolja Brockmann

Q1 Chair: A very good morning to everybody and welcome to this evidence session for the Committees on Arms Export Controls. This morning, we are starting our inquiry on the annual report on strategic export controls, the 2019 edition. We have three extremely distinguished witnesses from the Stockholm International Peace Research Institute. If I may, I will ask you to give a quick, 30-second introduction of yourselves. Sibylle, why don't we start with you?

Dr Bauer: Sure. My name is Sibylle Bauer. I am Director of Studies, Armament and Disarmament, at SIPRI. I would like to thank the Committees for the opportunity to give evidence.

Q2 Chair: Thank you very much. Dr Varisco?

Dr Varisco: Good morning. My name is Dr Andrea Varisco. I am Acting Director of the Dual-Use and Arms Trade Control Programme at the Stockholm International Peace Research Institute. Before joining SIPRI



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last year, I was head of analytics for Conflict Armament Research, which is an organisation that identifies and traces weapons in conflict.

Q3 **Chair:** Fantastic, thank you very much. Finally, Mr Kolja Brockmann.

Mr Brockmann: My name is Kolja Brockmann. I am a researcher in the Dual-Use and Arms Trade Control Programme at SIPRI, where I cover arms export controls but also focus on dual use controls and emerging technologies.

Q4 **Chair:** Fantastic. Thank you very much indeed for coming along to join us. We hugely appreciate your valuable input. I should note that we have an important announcement coming out at 11.30, so we will, if it's okay with everybody, try to have a hard ending at 11.25 to give people time to get to the Chamber.

May I start with a general question about the Government's 2019 annual report? What are your observations on the report, especially its content and transparency? Sibylle, let's start with you.

Dr Bauer: Sure, happy to start. Let me give some positive examples of areas where the UK has actually been leading the way on transparency. The first is the searchable database and the quarterly reports—although those are not, strictly speaking, the annual report per se—as well as the data on enforcement and the case studies. Very few countries provide that kind of information. I also welcome the fact that more information has been made available on open licences, even though there is still scope for improvement, as we all know.

A major weakness of the annual report has already been pointed out by previous witnesses, which is that the UK still does not provide data on actual exports. Interestingly, there are data available on exports, because the UK provides them to the UN in the context of the UN Register of Conventional Arms for eight categories of conventional weapon. There, the UK provides quantities for recipient countries, and also the types of weapon.

It has been pointed out that other major exporters struggle with providing data on exports—that is, France and Italy, and to a certain extent, Germany—but there are major exporters, such as Sweden and Spain, that do provide those data, so that is possible.

I would also argue that many smaller countries do this, so if they are able to do it, the bigger countries should also be able to do it—even more so because the data are available. Companies have the data because they are legally obliged to have them for record keeping purposes, so all one would need to do is ask those companies to transfer their data to the licensing authority. That is something Sweden has done for many years.

Then you have customs. The customs authorities either have the data or should have them, because it is their job to verify that the actual exports comply with the licences that have been issued. All you would need to do is make sure that the IT systems were set up in a way so that the data are easily retrievable. That would have the added value that you could cross-



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check data and facilitate enforcement. If you want to consider other countries' transparency practices, look for good examples and be inspired by that, there are quite a few. One example—a bit outside the annual report, but still important—is Germany, where a few years ago it was decided that when the Federal Security Council decide on particularly sensitive exports of arms, they immediately convey that information to Parliament. In fact, they provide very detailed information about the types of weapons, the quantities, the overall financial value and even the names of the companies involved. There have been interesting examples in other European countries.

If I may end on a more philosophical note, often I have noticed that we start with the data that are available, but it would be good to start with the data that we need to make a solid assessment of how the Government implement their policies—starting the other way round. I think an overemphasis has been placed on financial values, but I think often it would be more interesting to look more at the quantities and types of weapons, and perhaps the type of end user—have weapons been received by the military, the police, intelligence or by a company? I will leave it at that for now.

Q5 Chair: That is an incredibly helpful and very broad-reaching answer. To summarise it quickly, we are doing okay in some places, but actually we could do a lot better in a lot of other places. Leading on from that, do you think that the Government are giving as much information as they can get away with, or rather keeping back as much as they can get away with, or do you think that they are genuinely trying to help? What is your view? Obviously we could do better, but do you think the Government are trying to obfuscate?

Dr Bauer: It is very difficult to assess that from the outside. What I would say is that it is partly also a question of resources; it takes quite a bit of effort to compile that information. If the Committees were placing a firm demand for that, I think that should also go hand in hand with making the resources available to update IT systems and so on and so forth. There has also been a trend to improve the provision of certain information in other countries, so it is really valuable to look at what other Governments have been doing and to look at good practices in other countries. It is not always a question of intent but of being prodded and developing further to see what is actually possible.

Chair: Mark Menzies, I think you quickly wanted to come in there. *[Interruption.]* You are on mute, Mark. *[Interruption.]* I am not too sure what has happened to Mark. Would either of the other witnesses like to add a comment? *[Interruption.]* Yes, come in, Mark, but you are on mute.

Mr Sharma: Which is normally difficult.

Chair: I'm not sure if Mark wanted to come in or not. Why don't we move on to Chris Law. Chris, it's your shot.

Q6 Chris Law: Sibylle, you will be thinking that we are focusing on you all

the time, but my questions for you are specifically about enforcement and compliance. What are your general observations about the UK's enforcement and compliance process, over and above what we have already discussed?

Dr Bauer: On enforcement and compliance, again it is interesting to look at how other countries are doing it, and to break down the individual figures. Let us start with penalties. It is very difficult to compare penalties between countries, first because there is a difference between what is possible in theory and the actual penalties that are decided by a judge or a jury in a particular court case. On both the possible and actual penalties, you see countries that are harsher than the UK and countries that are less harsh. The longest prison sentence in any court ruling on an export control case of which I am aware was given in the Netherlands, and that was a sentence of 17 years, later reduced to 16, in a case of chemicals used in Iran and Iraq. The sentence was such because the usual economic crimes Act was not used but war crimes legislation, so it also depends on the type of legislation that is used in a particular case.

When you look at the prosecutions, as has been cited in previous evidence sessions I have seen, it is true that very few countries actually prosecute export control cases. The UK is one of a small group of countries that has built up very valuable experience in that area. There is at least one country, in addition to the US, that has prosecuted more cases, and that is Germany, where there have been prosecutions every year as long as I can remember.

It is difficult to know exactly how many cases a given country has, because there is no international or European database. Most countries do not even have a central depository for export control cases. It takes detective work to assemble how many cases take place in which country, which is why it is important that the UK does provide some statistics on that.

If you want to look at the enforcement record, again I will come back a few times to the question of resources. If you want to have more prosecutions, you need more investigations, and to have more investigations, you need more detections. Detections very much depend on the number of staff available.

What I've seen across Europe, and also internationally, is that enforcement officers have had more and more tasks piled on their desks, with sanctions and additional restrictions, but very rarely have they had an increase in resources and staff.

One other very useful instrument, if you want to enhance compliance, is company audits. Those should, of course, include those companies that have applied for licences, for example, open licences, but they should also include companies that have not applied for licences. There are different risk assessment mechanisms that you can use to select those companies.



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If you again make a comparison with other countries, German customs, as far as I know, has more than 100 customs officers who are specially trained only to conduct foreign trade audits, to do routine and selective audits. If you want to move ahead with compliance in these areas, you also have to build the number of staff resources. It will be interesting to see how those figures compare with the UK's. I think I will leave it at that, but I'll be happy to come back to that in any follow-up questions.

Q7 **Chris Law:** Thank you, Dr Bauer, that was wide-ranging and gave us a lot of information. In your mind, do you think that the UK has a low level of prosecutions for export control violations? Does that surprise you, given what you have said about resources to make those prosecutions? I know it is difficult to find out, but how does that compare with what you've seen in other countries, particularly in the EU?

Dr Bauer: Given the resource that the UK has, it probably has quite a high number of prosecutions compared with other countries. But the number of prosecutions in many other countries is actually quite low. It is not just a question of resource; it is also a question of many other elements that have to be put in place.

Often, when it comes to a rare export control case, it might be prosecuted in a regional court, where the judge and prosecutor have very little experience in this area. Not enough has been invested in international networks and exchanges between enforcement officers and prosecutors. If you only have a rare case once every 10 years, once you've built up the experience, the case is concluded.

That is an area we might have an opportunity to discuss later, where the UK not having access to EU enforcement networks any more means it will be very important to rebuild some of those networks, and set up international bilateral agreements to ensure that the UK still has access to mutual legal assistance, and still has an exchange with other enforcement officers and has information in that body of experience.

Interestingly, the EU has just decided to produce enforcement statistics. As soon as the new dual use regulation comes into force, they will do that. Obviously, the UK will not be included in those statistics, but it may still be interesting for you to look at those reports, as they will be publicly available. The EU has also decided to set up an enforcement co-ordination mechanism in the context of the dual use regulation, so it will be important for the UK, going forward, to set up parallel mechanisms to be able to still have access to information and those similar networks. It is a very difficult area. If you don't start with the enhancement of detections, you will never get to more investigations and to more prosecutions. The ultimate goal is, of course, prevention and deterrence—it is not to send all the company executive officers to prison.

Q8 **Chris Law:** A last question from me. From your research, what types of military and dual-use items most often lead to prosecutions of compliance failures?



Dr Bauer: I have not seen any studies that have focused on particular military or dual-use items that have been more often subject to cases than to others. What I think is really important for enforcement is that you take a risk-based approach, because it is completely impossible to detect all breaches and it is impossible to monitor and verify everything, so you need to really focus on breaches that have potentially serious consequences. That is closely related to how the UK perceives that in terms of defence and foreign and security priorities, and international sanctions and regulations that are in place. That would be my response to that, but also, as I said, it would be a very good step forward if there was an international database of export control cases, because that would make it much easier to analyse and identify what kind of items lent themselves to breaches, and to build up that international body of experience, but so far no country has really taken the initiative to set up that exchange mechanism or database.

Q9 **Mr Sharma:** How do you achieve the right balance between focusing on the licence application per se and the application of the consolidated criteria, and focusing on enforcement and compliance once a licence has been granted?

Dr Bauer: It is a very interesting question. I would not frame it in terms of a balance between those two processes, because I think the pre-licensing phase and the post-licensing phase are equally important. They have to be properly implemented and they also have to be properly resourced.

If I may say so, I think countries also have different risk thresholds when it comes to the pre-licensing process. Once a country has taken a licensing decision, you can never fully eliminate any risk afterwards without a crystal ball.

We all know that weapons have a very long life-cycle—my colleagues will also speak to that. Since weapons are around for decades, since you can't predict military coups or situations that may get unstable, the situation may change in the recipient country and that is exactly why post-shipment controls are important.

You need to be very prudent at the pre-licensing stage and then you also need to have a mechanism in place post licence, but you can't say that one is more important than the other.

Q10 **Mr Sharma:** You briefly touched on this point, but should there be more focus on the end use of the exported item?

Dr Bauer: Absolutely. I think that is one of the crucial areas, but that is both in the pre-licensing phase and in the post-licensing phase, because once the items have left your territory, there is less you can do. That is why the consolidated criteria and the pre-licensing assessment phase are so very important, and it is always better to err on the side of caution than to regret the decision later on, because that can have very serious implications, not just for the situation in the recipient country, but also for the UK's security.

Once you are in the post-licensing phase, there are a number of steps that you can take. I will leave it to my colleagues to speak to that in more detail; I know that Andrea has a lot to say on that.

Dr Varisco: Thank you, Sibylle, and thank you for the question. As my colleague Dr Bauer was saying, there are a series of measures that an exporter state can put in place to prevent or mitigate the risk of diversion of its items. By diversion, we mean the item moving from the legal to the illicit world or illicit end users, ending up in the hands of unauthorised end users or being used in an unauthorised way. Some of these measures are taken, as we were discussing, before export. End users' assurances are one of them; risk assessment is another. Others, as we have recently published, are taken after export, so we call them post-shipment control measures. There are a series of different measures. They can be the issuance of delivery verification certificates, the inspection of goods on arrival, regular checks of NGO reports, media, intelligence, but also the physical, on-site inspection of the weapons in the recipient countries. Some European countries are doing it already.

In that respect, end user assurances are one of the steps that are used, one of the measures that are used throughout the life-cycle of weapons. Usually, end users have some common key elements, which are the basic elements that have been codified at EU level recently, also the OSCE and the Wassenaar Arrangement, but also some optional assurances. One of them can be a commitment for the end user to allow post-shipment on-site verification of the exported goods in the recipient states. You will see that end user assurances are one of the steps. The goal is not only controlling and preventing diversion, but establishing a mutual trust-building relationship between exporters and importers. If those assurances are not taken care of or are not taken into consideration, this creates a possible issue in the relationship between exporter and importers. Indeed, the assurances in the end user can be used to monitor weapons after the shipment.

Q11 **Navendu Mishra:** If I may go to Mr Brockmann first, regarding some type of post-shipment verification such as on-site inspections, how effective can any end user's assurances be?

Mr Brockmann: It is perhaps difficult to gauge to what extent they can be effective. As part of the work that we have conducted, there are certainly examples of other European states that have now had quite a few years of experience with this and, up front, I can say they are rather positive in their assessment of this.

I would particularly point to Switzerland and Germany here as the two larger countries and sizeable exporters of military items that have been doing this for a few years. Maybe to connect back to the previous question, there are elements of this being a measure to ensure that the licences are being complied with—that the provisions that are put in end user certificates and the assurances are being complied with.



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However, I see this in a larger context, and that is what particularly the Germans and Swiss refer to as mutual trust building. They see this not only as measures that enable them to go in and verify that the military material has reached the end user and has stayed with the end user that is authorised by the licence, but they are also looking at this to, first, be a measure that helps them deter those going somewhere else. So this is particularly obviously, then, for re-exports, because that is something that happens by the state.

Also, it provides quite a stick for the state to pay better attention to ensuring that there is no diversion in other ways as well for those items—that they are not lost. It has those two components of verification, but also the prevention aspect. This is all tied into this more trust-building component. I am happy to speak more about that, but that is obviously a component. They do not want such a tool to be perceived as negative and too intrusive by the state, but it should be a part of a dialogue. It should help provide more information and help a dialogue on that issue. That all goes back to how effective such a tool can be. It is a tool that does not absolve the state from also paying really important attention beforehand. It is also very much not a tool that should lead a state to take a more lenient decision in the pre-licensing phase. This is important, and some states stressed this quite a bit when we conducted interviews in the project. They have said this is something that is the baseline, and if we are seeing negatives, those are negatives that we can take into our assessment. But it is not something that we would use to have a licence where we have concerns, and then we would put post-shipment controls on it so we can do it. No, it is more that this is part of the whole set-up, and it should not make it easier for some licences to be given—in that sense.

Q12 Navendu Mishra: Thank you, Mr Brockmann. I take the point you make about the fine balance between on-site inspections and—*[Inaudible.]* Dr Varisco, would you like to come in on this before we move on?

Dr Varisco: I think my colleague said most of what we needed to say. I agree with him that having on-site inspections is not a way to grant licences without carrying out a careful risk assessment beforehand.

Q13 Mr Ellwood: Thank you very much, and it is a pleasure to see you today. I want to explore a little bit about the report that you guys put together on the behind-the-scenes inspections, which is where a lot of the detail comes in about how we ratify and understand what is going on. You speak of perhaps the three aspects of this—verification, prevention and mutual trust building. I wonder whether we can explore a little bit about the balance between those three areas. Dr Varisco, do you want to go first?

Dr Varisco: When we were doing our interviews and our report, we identified three main goals for on-site inspections. One is, as we said, verification—verifying that the weapons remain in the hands of the legitimate end user. A second was prevention. If recipient countries are aware that there can be an on-site inspection of the materiel, there is a prevention element that probably deters them from re-exporting or



diverting those weapons. There is a third goal, which is trust building. Trust building can be seen in two ways. In a positive way, it involves building, over time, a relationship between exporters and importers, but there is also a trust-building element whereby negligence on the part of the recipient—for instance, by not allowing a post-shipment on-site inspection, or by not showing that the weapons are present in the country—can bring the exporter to have some different measures. Those can include stopping licences to the particular recipient, or sharing information with other exporters to make them vigilant about the potential issues. This is possible, and some countries told us that this is done within COARM at the European level. In terms of the UK, it will be another mechanism, but there is this kind of possibility.

Q14 Mr Ellwood: We are all familiar with what happened with Iran, and that was very much connected with the International Atomic Energy Agency. But on a general-terms basis, who does the inspections here in the UK?

Dr Varisco: As far as I am aware, the UK does not have this programme in place, or at least we have not studied this programme in the UK. We looked at how this programme is carried out in Switzerland, Germany, the Czech Republic, Spain and Sweden. Of course, the United States has been doing this for 30 years now, and they physically inspect military materiel after export in the recipient countries.

Mr Ellwood: Sorry, my question was who actually—

Dr Varisco: Yes, I am getting there. So, usually what we have seen is that in Switzerland, for instance, the Swiss State Secretariat for Economic Affairs does the inspections with the help of embassies, consulates and missions. In the Czech Republic, you have personnel from the local embassies. In Germany, you have BAFA, the Federal Office for Economic Affairs and Export Control, with diplomatic representatives and support from the German Federal Foreign Office and German embassies. In Spain and Sweden they are about to start—at least Spain is about to start—this type of inspection. You will have personnel from the related agencies in Spain. It is called the Interministerial Committee for trade and control of defence equipment and Dual-use Technology, whereas in Sweden it is the Inspectorate of Strategic Products. This is in line with all the indications that have been done in several instruments at OSCE level, UN bodies, and the Wassenaar Arrangement where it is suggested that diplomatic personnel will carry out these inspections. In only one case, the UN CASA, the Co-ordinating Action on Small Arms, actually identified as a possibility to have a mutually agreed third party to conduct this inspection.

If I may add another practical issue, in terms of resources, most of those examples that I talked about are resourced through the budget of the related agency. In only one case it is part of the licence costs.

Q15 Mr Ellwood: Thank you for that. Mr Brockmann?

Mr Brockmann: May I elaborate a bit on that, and point out a few peculiar examples in this case? It is very often the licensing authority that is the central place where it is organised, where the process is being set



up, but of course, because we are talking about something that is happening in a receiving country, the diplomatic staff of the embassies in the country, and in most cases also the Foreign Ministries of the countries, are also involved. This process can reach out to many parties in setting it up. That is because it often involves trying to find the right counterpart in the receiving country and making them understand who is coming and why. Setting up the logistics can be quite a task. This is also not a very quick process. That is why many of the different agencies and ministries are therefore usually involved.

When you talk about the actual inspections on the ground, often this is the specific allocated officers in the licensing authority, but it also depends on whether they are accompanied by someone from the embassy on the ground. For instance, Switzerland uses its defence attachés in this process. Many other countries don't, and here the important difference is that the Swiss defence attachés are specifically not involved in any promotion of the national defence industry, so they are very separate from that, whereas in other countries they aren't. So it always depends a bit on how the different roles are allocated in countries that will be involved. Certainly a good skill level in that area is very helpful. Some of the colleagues that we have interviewed have said that if they have had a background in customs enforcement or customs intelligence as well as military backgrounds, that is then very helpful for the specific inspections.

Some countries have also tapped into their industry to basically get a briefing on what they are going to inspect on the ground, because they need the information on where the markings are that they are going to check so that they can go down the list and check the different weapons that they are inspecting, or in case it is major systems there might also be more information that they require in order to do an appropriate check on the ground. I will leave it there.

Mr Ellwood: That is very kind—thank you very much for your help.

Q16 Lloyd Russell-Moyle: This is very interesting. When diversion is identified, do the countries doing activity at the moment then follow where that diversion has gone, or do they just identify that it is no longer where it is meant to be—does that make sense? If they do follow where the diversion has gone, what do they use to establish that route? Do they use the same investigative tools, or do they then use a wider agency, development/aid agencies, or open-source reporting bodies such as Bellingcat? I am interested in what the next steps are once they have determined that the items are not where they are meant to be.

Dr Varisco: I can answer that. When you talk about the countries, I imagine that you are referring to recipient countries, but also the exporters can to some extent be informed about a case of diversion and I will get to that. Usually, the exporting countries may become aware of a diversion through their diplomatic channels, through intelligence personnel, through embassies, through a network that they might have in recipient countries, but also through the reports of NGOs and media, as you mentioned. They might also receive trace requests from UN experts or



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from other organisations that trace weapons. A trace request is basically an official request to the exporter to ask where the weapon was exported to, and indeed, it is a piece of information that the country receives. For importing countries, I would say that the channels are similar, with the addition that, provided that they have a very good record system, they can detect pretty easily that something has been stolen or diverted.

In terms of identifying where the location is, as I was saying, I worked for an organisation that used to identify and trace weapons in conflict-affected areas. That is now usually retraced retrospectively. Once the weapons are recovered, or recaptured—or at least, this is what my previous organisation used to do because it had a presence on the ground compared with open-source intelligence—usually you know where the weapon is at that point. There have been some developments in technology. I am thinking about, for instance, RFID—radio-frequency identification—but to be perfectly honest, I am not an expert on those, so you will probably need to talk to someone from the industry or some colleagues who have worked more on tracking weapons through technology.

Q17 **Lloyd Russell-Moyle:** When that is identified, what can countries do? Is it just a case of informing future licences, or can they actually go after those items to try to recover them? Is there any point in bothering to go after those weapons to recover them, or is it too difficult?

Dr Varisco: I think there is a point in going after those weapons: to understand their origins, and also, if you recapture them, they are in your hands and not in the hands of illicit actors. That is the main point, particularly when you are in conflict areas.

Q18 **Lloyd Russell-Moyle:** Do any countries recapture diverted weapons?

Dr Varisco: Absolutely. When you are in a conflict situation, for instance, one of the actors is a non-state actor, so they will most likely have diverted weapons, regardless of whether those weapons were diverted internally in that country or from outside. You have battlefield capture, where you get the weapons from those armed actors. I can talk even more about identification and tracing of weapons in conflict areas. As I was saying, I worked for an organisation that did this in more than 25 conflict-affected countries and I was heading a unit that was looking at the data coming from the ground, and I also did some inspections on the ground. We documented more than several thousand items. In addition, there are other organisations that do this—you have NGO reports and increased scrutiny of what is circulating in conflict, but also how it is used.

I would not limit this to conflict areas. If this is done in an area which is not in a conflict, I think it might be even more telling and important, because in a conflict situation you expect a certain degree of diversion. You expect a sort of battlefield capture, or an exchange of materiel between the two parties when they are actively engaging in conflict. Whereas if you have on-site inspections in an area that is not in conflict, and you don't find the weapons there, you can have some indications of



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other potential problems that can lead to diversion. There might be a violation of user certificates and a re-transfer of the weapons. It might be an issue of physical security and stockpile management. You can also try to find some policy or technical solution also in conjunction with the recipient country that tries to address the problem. It might be providing more assistance on physical security and stockpile management to make sure that there are no losses of weapons from the recipient country.

So yes, it is very important. If I can make a last point, the life-cycle of a weapon is very long. If I remember properly, as part of my previous work, we published a report on the weapons used by Islamic State; we disaggregated the data of the weapons that were captured from Islamic State and more than 35% were manufactured between 1980 and 1989, around 30% from 2000 to 2009 and around 20% from 1970 to 1979. If you sum up the '70s and '80s, you have more than 50% of the weapons in the hands of one of the major terrorist groups operating in recent years that were 30, 40 years old, so it is important to know where the materiel is.

Q19 Lloyd Russell-Moyle: Thank you. Mr Brockmann, do you want to come in at all?

Mr Brockmann: If I can maybe bring this back to the post-shipment inspections question, what needs to be clarified is that the on-site inspection systems are not enforcement as such. Sometimes, the officers that go may have a background in that, but in general when they go in, they don't have jurisdiction in that country. They do an agreed verification of the materiel that it has also been agreed will be inspected. In that sense, that is most of what they do.

They do some other measures: they might then ask questions and interview some of the personnel. They see how the storage works. They get a whole lot of information about the quality of the system in place, and how the end user treats the weapons, for example. There is a lot of information beyond even the potential absence of some items that can come out of it and that goes into every new licence assessment.

In cases where weapons get lost—in general, this is something that happens—you see how that is being explained and what records the country can supply. All that provides a lot more information than would otherwise be available, and provides a much broader risk assessment and forms part of the risk picture for subsequent risk assessments.

As for the penalties, it can lead to current licences being suspended and future licences being denied. In that sense, it is very much a feedback loop that comes around afterwards. In most cases, it should be in the interests of both countries to see about the recovery of weapons, where it is still possible, if there are absences that cannot be sufficiently explained. Andrea went into that so I will leave it at that.

Q20 Lloyd Russell-Moyle: Is it just the receiver—in other words, that the licences might not be approved for that recipient—or can the shipper have



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their licences questioned in the future? Does that make sense? Where is the burden of liability, or is it a shared liability in which the shipper has to take some responsibility on the matter of where the licences go?

Dr Varisco: In the cases studied by us, the state responded to us that it was the end user. The fact that the end user did not agree to a visit led an exporting country to the conclusion that they would stop licences for the end user and that other member states would be informed of that, to make sure that they are vigilant.

Q21 **Lloyd Russell-Moyle:** So the shipper or producer does not have any liability if things go wrong.

Dr Varisco: I imagine that if, as part of the investigation, the responsibility is considered and the actual shipper is found to be the entity diverting the weapons then you would be vigilant and there would be a red flag on the shipper.

Lloyd Russell-Moyle: Thank you.

Q22 **Mr Sharma:** Dr Varisco and Mr Brockmann, you have touched on my question, but there is still room for more elaboration. Which countries do shipment verification or on-site inspections well? What are the lessons and challenges identified in the country studies in your report?

Mr Brockmann: Perhaps I can go first and pick up the main examples again. From the view we are discussing, in particular, and in the context of the UK, Switzerland and Germany are certainly the two major examples worth looking at. They are the two that have been positive about their experience. There are many challenges, and I will leave it to Andrea to talk about that, but it is obviously quite sensitive for a receiving state to have someone else coming in and looking at their military materiel in their country. There are sensitivities associated with that.

Both Switzerland and Germany have had these systems in place for a few years. The Swiss had already introduced the part on the licences or end user certificates in 2006, and then in 2012 they started doing the inspections. I think they have done 46 of them in 32 different countries. That has obviously been suspended in the context of the pandemic, but that is quite a considerable number of visits. The Swiss cover exports of all of what they say are "finished items" on their war materiel list, and all exports that go to state entities.

Referring to that last question, the counterpart there is always the state entity. They use a risk matrix to determine where they want to apply on-site inspections, so they look into different factors in terms of categorising countries where they might deem it necessary to actually go in and conduct the inspections. That depends on the diversion risk they see and on previous cases, where there has been armed conflict in the state or in surrounding areas, but they also consider regional stability and human rights factors, and that leads to a risk assessment. Obviously, there's a group where they wouldn't export in any case, so that doesn't change. But in the group where there are limited concerns and exports are considered,



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that is where they see most of the cases that [inspections] should take place.

The Swiss aim to do five to 10 on-site inspections per year. That's very much the outcome of their analysis. We've seen that every country basically tries to look at how much to export in terms of the shipments; in terms of the volume; in terms of the types of things they're exporting; in terms of which of these things they see as particularly sensitive. This goes back to what Dr Bauer said, that you can't control everything—it's always trying to look at what the actual, sensitive things are where there are risks.

This is something that every country will need to figure out, depending on how those different things pan out for each of them. Again, the Swiss see this very much as a confidence-building measure in part, that's part of their framing of this, they're promoting it in the multilateral organisations at the UN and so on. They have been very positive about this.

I think it's hard to bring it down to numbers, in terms of whether there have been less cases—that's not something I think you can easily apply to this. So far, from what we've heard and what they say, it works very well; there's less and less resistance, their customers have got used to the practice and it's quite established. In that sense, it's a system has both helped them raise the acceptance and improve their trust with the recipients.

The Germans, on the other hand, have a little less experience in that they started implementing the inspections in 2017. Obviously, they then had to stop because of the pandemic. They have done nine inspections, in nine countries. In terms of coverage, Germany differs a bit. In the beginning, in what they declared a pilot phase, they've limited this to small arms, light weapons, and some special firearms such as sniper rifles and revolvers. So they chose a smaller group of products to look at, but they are also concerned about where they are seeing this.

The number of nine inspections may be a bit misleading because the Swiss numbers would also have been low in the first two years. Obviously, you introduce the system, then the end user certificates need to get issued with that obligation in there, then those shipments actually need to go through. It takes a while before the system gets rolling, and it's been cut off now by the pandemic situation.

The Germans have said that particularly in the countries where Switzerland has conducted inspections, it has been a lot easier. The more countries that have been doing this, the less resistance and more understanding on the part of the recipient countries has grown. They have not seen any reasons to discontinue the programme. We would have hoped that by now Germany would have published their report on the pilot phase, which would be of interest to the Committees here, but this has yet to be published. This would, of course, be something that would provide an interesting perspective, to reflect on the experiences Germany has had during the two years of the pilot phase. That would perhaps be of interest



in this case as well.

Mr Sharma: Thank you.

Dr Varisco: If I may very briefly mention another example in Europe, Czechia—the Czech Republic. They see the practice as a very efficient and cost-effective way to prevent post-export diversion. They usually add a clause in the end user certificates that are provided by the receiving countries, or they have a written permission to conduct these inspections. They usually have personnel from their local embassies to go and do these checks and they carry out around 10 inspections per year, which is approximately 1% of their total licences. Usually these inspections come one or two years after the goods are shipped.

When it comes to challenges and lessons, of course there are some challenges, and it's fair not to underestimate the potential challenges. Indeed, our publication is part of a longer project and one of our future areas of research would be exclusively on trying to understand what the challenges are for conducting on-site inspections.

Of course, there can be political and diplomatic challenges, or issues regarding extraterritoriality and national sovereignty, jurisdiction and, as we were saying, building trust in the recipient. Sometimes, there has been a lack of responsiveness on the recipient's part, even for countries such as the United States, which have been doing this for quite a long time now. And of course there are practical challenges, which we talked about: the cost, the capacity, the logistics, and the security, in some cases.

I would also add another challenge—there might be commercial challenges. Industry might be afraid of losing contracts because there is an on-site inspection as part of the contract and as part of the licensing procedure. So, there are also those considerations. Also, of course, some countries don't find it necessary, or they have a scepticism about the value of these inspections.

These are the challenges and, as I said, it is fair not to underestimate them. On the other hand, though, I don't want to overplay them either, because if we look at a European level, you have more and more countries that are interested in adopting these measures, or that have adopted them in the last 10 years or so. Some of them have a reasonable size. We saw the example of the Czech Republic, when they did it in a cost-effective way.

I would say that the lesson would be to establish a sort of framework of co-operation and building trust, as I was saying, between exporters and importers, exchanging lessons learned and good approaches, but also sensitising the recipient to the practice. We have seen, for instance, that Germany found it easier and quicker to have on-site inspections when Switzerland had already done it in the same country, because the recipient already knew what the process entailed.



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I think this trust-building relationship is important to minimise the perception of an invasive visit, and conversely to build up a framework of mutual co-operations, which is aimed, in the end, at preventing diversion.

Q23 Mr Sharma: Very briefly, if the UK were to adopt post-shipment verifications, in your view which system would work best for the UK?

Dr Varisco: I think my colleague Kolja spoke about two comparable examples, which are Switzerland and Germany. Switzerland might be interesting, because it's outside the European Union as well, like the UK.

There is one thing that I would like to add, though, because I know that as part of the challenges one of the arguments is, "We cannot really inspect everything. We have x-thousand licences." The point of on-site inspection is not inspecting all the materiel that has been exported or licensed, only a small part. Even in the United States, where you have the Blue Lantern programme, which has been running for 30 years and is well funded, conducts around 100 post-shipment inspections per year—in 2019 there were more than 100—which is equal to 0.5% of their licences. The Czech Republic is the same—around 10 inspections a year, which is equal to less than 1% of their total licences.

As my colleague was saying, there is a methodology in deciding which kinds of shipment need an on-site inspection, or there are units within Government that are tasked with that function. In Switzerland, for example, they use a country risk matrix. In other areas there are limitations on the materiel that countries would like to inspect. In Germany, they mostly inspect small arms and light weapons. It is slightly different in the Czech case. And there is a profiling of end users or countries that can be considered perhaps at risk. One thing to keep in mind is not to start from one day to the other and inspecting everything—it is an on-site check on a small amount of the materiel exported.

Mr Brockmann: Very briefly, I would reiterate that it needs to be a tailored system. There are elements that will exist across different methods, but it depends very much on the given situation. When Switzerland introduced checks, the United States was the only example out there that it could look to. They had consultations with the US but they found that they were not able to replicate the US system, so they built up their system basically from scratch—that is how they phrased it. The Germans had more countries to talk to and I think that they have been much informed by the Swiss system, but they have taken a number of specific decisions that go in different directions or that are tailored to the German situation. If the UK were to adopt such a system, I think that would be the same outcome.

I think Germany and Switzerland provide systems that can be comparable and interesting, in the sense that they would inform a UK decision, but the UK would also need to find a balance in some areas, and not just in terms of how many inspections were to be conducted, but in terms of how such a system could be set up internally. It would need to decide which particular Department would be responsible, how the inter-agency work would be



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organised and about diplomatic involvement of the [foreign] Ministry and local staff. In that sense, it is hard to say, "This is the system to adopt," but you need to look at all the aspects to find a tailored system that could work well for the UK.

Q24 Mr Sharma: How practical would it be to implement a system of on-site inspections for countries that are on the UK Government's list of countries of concern or that have not signed the arms trade treaty? Who wants to go first?

Dr Varisco: I can answer this. As we were saying, on-site inspections are usually done only in a selected number of cases. If a country is a country of concern, I would argue that maybe it would be the first case that the UK should look at. When it comes to link exports to membership, or being party to the ATT, I have a couple of things to add quickly. First, implementation of the ATT is not at the same level among different countries, even among state parties of the ATT or countries that have signed it. Secondly, there may be considerations to make to understand the potential consequences of such a decision for the UK and its clients; I am not sure that all of them are part of the ATT.

Mr Sharma: Thank you.

Chair: These questions are absolutely fascinating and your answers are absolutely brilliant, but we probably need to press on a little bit more quickly if we are going to make the 11.25 deadline. Over to you, Lloyd Russell-Moyle, for your second shot.

Q25 Lloyd Russell-Moyle: Again, these questions are for Mr Brockmann and Dr Varisco, but please do step in if you have anything else to say. I will ask all the questions together.

You just mentioned that we could adopt some of the German or Swiss models. My understanding is that they predominately look at inspections of small arms and light weapons, rather than some of the more complex items. Some of the NGOs have told us that components and subsystems present particular additional complexities because it is difficult to trace what is being done with them.

In terms of post-shipment verification, what do you recommend that we could adopt, or what do you suggest that Britain could adopt relatively easily? Are you saying it is just for small arms or for dual items as well? How do you think that you could then look at particularly component parts and subsystems? Or is it the case that you just choose the things that you can do easily, and for the time being you do not do the other bits?

Mr Brockmann: Maybe I can start on that. I see two things here. On the one hand, it is not necessarily just about it being easier and doable in terms of the decisions, particularly for small arms and light weapons. I think that is very much informed by the particular impact that they have in conflict situations. They are the main weapon which actually causes much of the harm outside of the battlefield use as well. The diversion of those creates many, many problems that are not just in the military area



but if they go into other areas, and we are seeing that in gender-based violence and other areas.

The impact of small arms is incredibly large, so in that sense there are a lot of reasons why one should focus on those. Also, they are of course physical items that can be inspected. There are regimes in place to do that. Stockpile management should be established in any receiving country. So it makes sense to put a verification component on that.

With regard to the difficulties in what is covered, of whether dual use items or components, there are certainly issues. Some countries in a few circumstances do check some major components, which may then be integrated into other systems. Obviously, that brings more challenges because the process is then figuring out how can that inspection can be done. Can they just—depending on what it is—open up and look to see that it is integrated, see what system it is, is it with the end user and that is basically the process, or do you have other issues? Because if it is built into another system, then you need to see whether you actually have the inspectors, would they be able to look at that or is there proprietary information and military assistance that they do not want to show. There are a lot of issues when you break it down to the component level in terms of depending on what the major system is that they are being built in.

If we are going beyond that and looking more to technology, whether it is software or related to cyber-tools—obviously there have been big questions around both in the export control discussions. Frankly, it is more difficult to use post-shipment inspections on this. There are audit procedures that can look at some of these things. Obviously, there are also other techniques to look at things after the export. Inspections, in that sense, work best if you are talking about physical items. It can go beyond, but it might make it more difficult to set up inspections if we are talking about component level or if we are talking about technology.

So for those cases there needs to be at least a combination. If not, other tools are maybe a bit more effective in determining some of these. Again, it is a bit dependent on what exactly the case is and the technology or component, but maybe that is a reflection on that.

Q26 **Lloyd Russell-Moyle:** I assume that the answer is the same, because I was going to ask about training and logistical support. Can you do post-shipment verification and how do you verify or monitor that? I assume, then, that that is the same as what you are saying with technology. It might well be that there are other tools that you need to focus on for things such as training and technology and information transfers.

Dr Varisco: So far in our research, most of the countries have focused on the tangible items, on the military materiel per se, rather than on something less tangible, such as training. It is certainly an interesting area, but it is something that, in our examples at least, has not been covered or we have not received any answers in that respect.



Q27 Lloyd Russell-Moyle: And I think the answer is good, that small arms and light weapons are the most likely to be diverted and the most likely to cause death and therefore the ones that you want to follow up. They are also not some of the big-ticket items from Britain in terms of the big manufacturing issues, so there is less of an issue there. However, we do do a number of small and light weapons on Government and foreign military sales. Do other Governments do post-verification on Government or foreign military gifting of military equipment, or do they treat them separately from the commercial sales?

Dr Varisco: No. The risk of diversion, re-export of military materiel after export is present, regardless of the type of transaction that has been done at the moment of transfer. Indeed, the United States—this is something you might look into—is doing two programmes: one is Blue Lantern, on commercial sales; and another, which has been running for 20 years, is called Golden Sentry. This has been running now for 20 years. It is under the Department of Defence and is specifically doing end user monitoring on foreign military sales.

Lloyd Russell-Moyle: I was very impressed when I saw that in the US two years ago when we visited, so thank you for that.

Q28 Mark Menzies: This question is for Dr Varisco and Mr Brockmann. Is it realistic to try to conduct on-site inspections in conflict zones, and do any countries undertake such inspections?

Dr Varisco: I can answer that, as I used to work for an organisation that did that. There are two aspects here. At least, this is my opinion. One is identifying and tracing weapons in conflict areas, and this is possible. As I was saying before, I was working for an organisation that did it in more than 25 conflict-affected countries. I was part of some of those missions and the unit I was heading was receiving the data from all those missions. When I left, we documented several thousand weapons.

In addition, you have the work of the UN panel of experts, you have the work of other NGOs, other media, and you have, of course, intelligence and military personnel who can also be present in conflict areas. So I would say that there is an increased scrutiny of the materiel circulating in conflict and also of the end use of this materiel.

The second point is specifically on-site inspections of military materiel in conflict. If you think about how the definition of on-site inspection is checking the physical presence of the weapons in the hands of the recipient. Whereas by monitoring weapons in conflict, you look at everything—you look also at weapons in the hands of non-state armed actors—when it comes to on-site inspections, you look at legitimate users of the weapons that are recipients to make sure they still have the weapons in their possession.

The main example that comes to my mind here is the joint verification teams in Somalia, where you have teams composed of international experts and members of the Federal Government of Somalia who do on-site spot checks of weapons, to make sure that the weapons are in the



hands of the related unit of the security or defence force of Somalia. Even in this case, this is feasible.

Mr Brockmann: Maybe just to take a step back on that, one of the challenges and things to look at is obviously the security and the situation of the personnel who go out and do an inspection. This is something that very much comes out of the setting up and planning of an on-site inspection. From the interviews that we have conducted, in many cases, this is absolutely no problem; it is very easy. In some cases, it can be more difficult, particularly if there are internal instabilities and things that need to be worked out, such as who provides security for those going in on the ground, whether they have diplomatic protection, and those sorts of things. That is very much is part of the process, which sometimes is a bit long, or setting up an inspection.

Often it also means that the weapons actually need to be collected, to be brought to one location to be inspected, because, depending on the type of end user, it is natural that they will be spread throughout a country. If it is a large country—if we are talking about India or Brazil, for example—the distances might be quite large, and sometimes that means you might have to have multiple locations during the inspection, to which parts of the weapons are then brought together, and you can either do a full check or you can do a randomised check of specific numbers of them. There is obviously something that needs to be valid and where one needs to find practice. We have heard from our interviewees that, yes, this has sometimes been difficult, but so far they have always managed to find an arrangement with the state to do this in a way that is possible.

Of course, there may be extreme circumstances in conflict where this might be even more difficult, and there might be issues in place there. I do not think I can speak to that too much, because we have not heard many examples of that in what we looked at. Certainly, the security aspect and working out the arrangements on the ground is part of the work and the challenge in doing it, but countries have found ways to make that work. This is part of doing this in agreement with the receiving state, and if that is the case, they also have an interest in ensuring the security and making it work in that sense.

Q29 **Mark Menzies:** Thank you. My next question is again to both of you. Do you think that post-shipment verification, including on-site inspections, is seen as a panacea for controlling how and where these exports are used, and would it make a difference?

Dr Varisco: Personally, I do not see it as a panacea, but I see it as an important step, as we were saying almost one hour ago when we started this conversation. Together with assessing the risk of diversion beforehand, I see it as an important step to prevent or mitigate at least the risk of diversion. As I was saying, in practical terms, some of the military equipment usually has a long life-cycle—a long time span—so the risk of diversion is always present, even 20 or 30 years after. On-site inspections can be one of the measures whereby a country can establish a framework of co-operation with some recipients. A long-term framework of



co-operation can also identify some potential issues in the recipient countries, in terms of accountability, in terms of physical security and stockpile management, and can to some extent mitigate these risks. Of course, the risk of diversion per se never disappears. You don't know what might happen in the recipient countries in 10 or 20 years.

Chair: If I might leap in here, we have three more questions and just five minutes for those questions, so I will press on to Virendra and then on to Martin Docherty-Hughes. If we could keep questions and answers brief, that would be terrific.

Q30 **Mr Sharma:** My questions will be brief. What are the challenges for post-shipment verification, including on-site inspections of technology advances and the future character of conflict? Will new international agreements be required? To Dr Varisco or Mr Brockmann.

Mr Brockmann: I think this is a very important issue, but I would say that it is something that also goes very much beyond the context of post-shipment on-site inspections.

As I said, if we are talking about small arms, light weapons, sure, we will see technological advances, but they will continue to be physical items and, unfortunately, they will also continue to have this very significant impact in conflicts and beyond. In that sense, I don't see too much of an issue in terms of the technological development.

In the context of changing types of warfare, if we are talking about cyber operations, obviously post-shipment verification measures are very limited in what they can do. If it is linked to physical items in some other emerging technology areas, it is still something to think about. For example, if we are talking about additive manufacturing—3D printing, which is very advanced now and uses metal, and can be used in the nuclear technology context, in missile technology and so on—we do see that this might be something that could be helpful.

There are other verification measures—for example, some companies at one point put GPS in the machines, so that if they were then moved from where they were supposed to be, they would have an automatic shutdown. Of course, if these types of thing are not as standard, it is difficult to have them there.

I have a quick example. The Netherlands does post-shipment controls in some cases on machine tools. So, if they have major production equipment that they think is very sensitive, they conduct checks as well. They have someone from their embassy in that receiving country go and inspect those. If we are talking about that type of technology, they can be helpful. If we are talking about the intangible range, it is more difficult.

Here, I would also point to the discussions that go on in the export control regimes, where emerging technologies, such as artificial intelligence and quantum computing and so on, are very much on the agenda right now. They are discussing how export controls can cover that—whether there are things that need to be there that go beyond it.

We have recently looked into the responsibility of scientists and how one can try to balance working with scientists and having a responsibility with the export control obligations and compliance systems of companies. Really, in those cases, there is quite a wide area of risks, so it needs quite a comprehensive approach from different areas.

Q31 Martin Docherty-Hughes: Dr Varisco, I will come to you first, and then to Mr Brockmann. This is about Brexit and its impact—the UK’s withdrawal from the European Union and its impact on arms control policies and processes. To what extent has there been divergence? Also, has there been any impact on exports to Saudi Arabia?

Dr Varisco: Well, I will respond very briefly about Brexit and the impact on the UK. I think to some extent in terms of the UK consolidated criteria and the way that these are interpreted, and also how the European common position is interpreted among different countries, you have seen that there have been different decisions by different countries on the issue that you were talking about—like exporting weapons to Saudi Arabia. The UK nevertheless remains part of the regimes, as we were saying, and the consolidated criteria are fully compliant with the obligations of the arms trade treaty—there are obligations at the international level, so at a wider level than the EU.

In terms of what we were talking about before—specifically on-site inspections and work on diversion—I think there are a couple of things to add. The first is that the EU has just published a Council decision on end user certificates, which includes the possibility to have on-site inspections, as part of the EUC as an optional element. The UK can do it, regardless of the fact that it is no longer in the EU, because those elements have also been codified at the OSCE level, at Wassenaar Arrangement level, so it is not a big change in this respect.

There might be a couple of issues where the UK can be outside the framework of the EU. The first is iTrace, which is a programme that has different elements and conducts field investigations on diverted materiel in conflict areas. Some of these objectives are more general, while others are more targeted to EU member states, so you should check with the implementers if this creates a potential consequence for the UK. One of the elements is also the possibility for iTrace field investigation teams to conduct on-site inspections.

The second is assistance; the EU has different programmes on assistance—one related to the arms trade treaty, which is run by the Germans and by France—and the UK will no longer be part of these assistance programmes. This might be related to what we were discussing before, because we found in our interviews with the Germans that they wanted to provide more sensitisation on on-site inspection as part of their outreach work, or maybe linking it to work on physical security and stockpile management—so trying to take a holistic approach to the problem of diversion in recipient countries and re-export.



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I will probably leave it to my colleagues to speak more about changes in COARM and denial notification, and all those other aspects that Brexit will entail for the UK.

Q32 Martin Docherty-Hughes: Thank you. Mr Brockmann, do you have anything, finally, to say on that?

Mr Brockmann: I will keep it brief. Obviously, right now, the criteria are still in line; there is the possibility that there might be divergences in the future, but it will very much be for the UK to decide how it wants to align—or not align—with the EU, and that is obviously something that we can't speak to right now.

On the dual use side, we have the dual use recast, so the dual use regulation of the EU is being reformed, and that will enter into force rather soon. That will be something where there may be some divergences coming out of it, but, again, for me this very much goes to the question of how the UK will build its future relationship with the EU, and how much it wants to align policies and try to engage on these specific questions with the EU.

There are some precedents, in terms of how access and engagement can be structured with non-EU members, and that will be something for the United Kingdom to work out—what is the appropriate measure there.

Q33 Martin Docherty-Hughes: Dr Bauer, do you have anything to add to that?

Dr Bauer: Yes. I think we need to wrap up in a minute, so I will try to be very brief; my colleagues have covered most of it.

On the consequences of the withdrawal, there are actually some legal complications that may feature in future prosecution cases, which I cannot go into now. But what the UK will really need to focus on is rebuilding the access to information and networks that it is losing through the withdrawal. It will not be in the relevant EU working parties any more, it will not be part of the new enforcement co-ordination mechanism, and it no longer has access to the EU denials database and the consultation mechanism. What could be explored is a model like that of Norway, which has access to that information and meets the EU regularly.

On the enforcement side, as I hinted earlier, the UK would need to seek agreements with the EU or with individual EU member states to have mutual legal assistance and customs co-operation, to be able to take effective enforcement forward. But if there is more interest in that, we can also share more observations in writing, as we are running out of time.

Martin Docherty-Hughes: Thank you, Dr Bauer. I think it is notable that you mentioned Norway, but given that Norway is in EFTA and the United Kingdom will not even be anything close to that, it gives somebody like me a bit of cause for concern. Back to you, Chair.

Chair: Thank you very much. I knew we would have to get Brexit in at



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some point in our meeting. Thank you very much indeed. We are incredibly grateful for the evidence that all three of you have given, which is absolutely fascinating and really very insightful and enlightening. If you have anything to add, Dr Bauer, it would be very helpful if you put something in writing, either individually or from all three of you. That would be very helpful for our ongoing inquiries. At this point, I will draw the session to a close. We are just a few minutes overdue from our hard finish, but thank you very much indeed.