



House of Commons
Foreign Affairs Committee

Guns for gold: the Wagner Network exposed – Government Response to the Committee’s Seventh Report

**Seventh Special Report of Session
2022–23**

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Foreign Affairs Committee

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Seventh Special Report

The Foreign Affairs Committee published its Seventh Report of Session 2022–23, [*Guns for gold: the Wagner Network exposed*](#) (HC 167) on 26 July 2023. The Government Response was received on 26 September 2023 and is appended below.

Appendix: Government Response

INTRODUCTION

1. The Government is grateful to the Foreign Affairs Committee for its report '*Guns for Gold: the Wagner Network exposed*'.
2. In recent years, Wagner has grown in importance, both for Russian foreign policy, and for many countries in which it operates. We agree with the Committee that it has had a destabilising impact, and that Russia's use of Wagner could represent a wider shift towards the Kremlin using Private Military Security Companies (PMSCs) as proxies.
3. The failure of Wagner's mutiny in late June has led to changes in the organisation, including the re-location of many of its personnel to Belarus and the loss of some important revenue sources inside Russia.
4. Wagner has continued to evolve since the Committee published its report on 26 July. Significantly, Yevgeny Prigozhin and other senior leaders of the group died in a plane crash on 23 August. This is likely to add to uncertainty for its members and may accelerate efforts by other organisations to replace it in some areas.
5. In Africa, Wagner did not have a direct role in the coup in Niger on 26 July, but has since been seeking to exploit the coup for its own purposes.
6. On 6 September, the Government laid before Parliament a proposal to proscribe the Wagner Group as a terrorist group under the Terrorism Act 2000. This is intended to make it even harder for the group to operate in the UK, as well as to signal to our partners our view of the organisation's destabilising and malign nature.
7. The Government will pay close attention to the repercussions of these events in the coming months, including how they play out across Wagner's dispersed network in Africa. We agree with the Committee that we now have an opportunity to put further pressure on Wagner and other PMSCs. As the Committee proposes, we will continue to work bilaterally and multilaterally to help countries address the humanitarian, foreign and security policy challenges Russia and Wagner have exploited, as well as to highlight its track record of causing instability and atrocity. We have dedicated new resource to containing and countering Wagner and other Russian proxy PMSCs and are working closely with Allies to maximise our collective impact.
8. The Government's response seeks to address the Committee's recommendations in the order in which they appear in the 'Conclusions and Recommendations' section of the Committee's Report.

INTELLIGENCE AND ANALYSIS

1: We recommend that the Government improve its intelligence-gathering on the Wagner Network's activities in a wider range of countries, particularly in the countries where we have medium-confidence of attempts at Wagner involvement. This intelligence should make use of network-mapping capabilities. A cross-Government taskforce would be particularly useful as the Wagner Network transforms, following the attempted march on Moscow.

Agree.

9. We agree with the Committee that intelligence gathering on Wagner's activities is a priority and have re-examined the extent and scale of our effort. We believe that we have sufficient resources in place to track Wagner. Wagner is multi-layered, complex and dynamic. We regularly assess the group and its impact. We are also in close contact with international partners, academics and think tanks, and access a wide range of open and closed source reporting in order to inform our approach to countering the organisation. Given the fast-moving nature of events surrounding Wagner, that body of work is being continually refreshed, most recently in light of the June mutiny and the demise of Wagner's senior leaders. We are also working to understand the broader threat from Russian proxy PMSCs. The Government makes use of a variety of tools to aid its understanding of these issues, of which network-mapping capabilities form one important element.

10. We will continue to monitor countries who may be at risk of influence from Russian proxy PMSCs and their networks, including those noted in the Committee's 'medium confidence' list. It is important to note that in certain countries where conditions on the ground are unsafe or volatile, or where we have limited bilateral relationships, we face challenges in gathering verifiable information at a cost proportionate to the threat. We continue to engage widely to highlight the negative effects that Wagner has wherever it operates and seek to dissuade countries from employing them or offering any form of support.

11. We agree with the idea to establish a cross-Government taskforce on Wagner and have already done this – see recommendation 7.

SANCTIONS

2: We recommend that the Government move faster and harder in sanctioning Wagner-linked individuals and entities. Specifically, it should:

- a) Sanction all individuals and entities provided in Appendix 2, which the United States and European Union have already targeted but which the UK has not;**
- b) Consider bringing forth sanctions on civilian enablers and corporate 'frontmen' for the network's activities; and**
- c) Close enforcement gaps.**

We implore the Government to urgently assess these names and impose sanctions on these individuals and entities if the necessary threshold is met.

Partially agree.

12. *The Wagner Group was designated in its entirety under the Russia (Sanctions) (EU Exit) Regulations 2019 in March 2022. Yevgeny Prigozhin, its then leader, was designated under The Libya (Sanctions) (EU Exit) Regulations 2020 in December 2020.*

13. *We continue to use sanctions policy to deter and disrupt malign Wagner activity. On 20 July, the UK designated 13 individuals and businesses involved with the Wagner Group in Mali, Central African Republic (CAR) and Sudan. They include Konstantin Pikalov, Prigozhin's 'right hand man', as well as Al-Solag mining, a Wagner front company not designated by the EU or US. The designations limit their financial freedom by preventing UK citizens, companies and banks from dealing with them, alongside freezing any assets held in the UK, and imposing travel bans on the individuals.*

14. *The Government's ability to sanction individuals and entities depends on being able to build individual cases in line with the statutory requirements of the relevant geographic or thematic sanctions regime. These may differ from the grounds available to the United States and the European Union. Each country's sanctions regimes are different, and each country uses them for different purposes and has different approaches in applying sanctions. For example, the UK relies on 'ownership and control' provisions, which means that subsidiaries are not designated separately.*

15. *The Government welcomes the analysis provided in Appendices 1 and 2 of the FAC's report and will consider this in detail when considering further action.*

3: We recommend that the Government establishes a specific and regular mechanism for coordinating with the United States and the European Union over Wagner-linked sanctions; it should report back to us on what these mechanisms are, and how frequently and effectively they are being used.

Disagree.

16. *The Government recognises the importance of close coordination with the EU and US to maximise the effectiveness of UK sanctions but strong coordination mechanisms are already in place. Since President Putin's invasion of Ukraine, we have ensured the close alignment of UK, US and EU sanctions policy. This increases the impact of our sanctions.*

17. *We have frequent working level engagement both between capitals, and through our dedicated sanctions attachés networks in our posts in Washington and Brussels, regarding all aspects of sanctions. In addition, we have established a quarterly bilateral format on sanctions with the EU to promote cooperation and coordination and set forward strategy. Similarly, we have recently established a UK-U.S. Strategic Sanctions Dialogue. On 19 July, senior UK sanctions officials attended the inaugural dialogue hosted by the US Department of State in Washington DC. Departments and agencies discussed priorities across geographic and thematic sanctions regimes, including Wagner.*

18. *As these mechanisms already enable close co-ordination on Wagner, we do not judge there to be a need for a further mechanism. We will, however, keep the option of a specific mechanism for Wagner under review.*

We further recommend that the Government prioritises introducing and enforcing travel bans for Wagner-linked individuals as a likely deterrent to involvement in the network, in particular working with Turkey, a popular holiday destination for Russians.

Partially agree.

19. *We agree that travel bans have some deterrent effect, as well as an impact on the operations and morale of those designated and their networks. Designations made under UK autonomous sanctions regimes involving a travel ban on an individual only apply in relation to the UK. The individual becomes an excluded person under section 8B of the Immigration Act 1971, meaning that they must be refused leave to enter or to remain in the United Kingdom. UK designations involving travel bans would therefore have limited, if any, effect on Wagner-linked individuals' travel to Turkey. We will continue to discuss with our international partners possible sanctions or travel bans they could adopt, as well as other steps to hold the Wagner Group accountable and to counter its destabilising and destructive activities.*

PROSCRIPTION

4: Urgently proscribe the Wagner Network as a terrorist organisation. As a 'stick', the Government should proscribe the Wagner Network as a terrorist organisation, recognising that—while there are risks of doing so—there are also risks of failing to do so, when the Network appears to meet the legal criteria.

Agree.

20. *On 6 September, the Government laid a draft proscription order which has now been approved in both Houses and came into force on 15 September. The order added Wagner Group to the list of proscribed organisations listed in Schedule 2 to the Terrorism Act 2000. Proscription makes it a criminal offence for a person in the UK to belong to a proscribed organisation, support a proscribed organisation or wear clothing or carry articles in public which arouse reasonable suspicion that an individual is a member or supporter of a proscribed organisation. Certain proscription offences can be punishable by up to 14 years in prison, or an unlimited fine. Wagner's assets can also be categorised as terrorist property and are liable to be seized.*

21. *This step underlines our intent to act against Russian aggression in Ukraine, in which Wagner has played an important role, as well as against Wagner's wider activities, which have been repeatedly linked to human rights violations.*

22. *The Government judges that Wagner commits and participates in terrorism. This includes the use of serious violence against Ukrainian Armed Forces and against civilians to advance Russia's political cause. Following Russia's invasion of Ukraine in 2022, Wagner Group's forces were deployed as a force multiplier to support the Russian military, receiving financial, logistical and military support from the Russian state. Wagner Group played a central role in combat operations against Ukrainian Armed Forces to seize the city of Popasna in May 2022, and during the assault of Bakhmut, which was occupied by Russian forces by*

June 2023. Wagner Group has been implicated in serious acts of violence and damage to property while working in a variety of African countries, demonstrating Wagner's broader involvement in terrorism.

ALTERNATIVE OFFER

5: The Government should offer a genuinely compelling alternative to priority countries in need of investment and security partnership, in collaboration with partners. Priority countries are especially likely to be neighbouring countries to those where the Wagner Network is engaged. A compelling alternative may involve customising packages of military, aid and trade support to specific countries, particularly in the Sahel region.

In its response to this report, the Government should set out the factors it will assess in determining whether countries are priorities for UK security partnerships. These factors should include (but not be limited to):

- a) the UK's capacity for influence in a specific country;**
- b) the level of security challenge faced by a country (in the short, medium and long term);**
- c) the level of demand for a bilateral/multilateral security partnership within a country;**
- d) the possible regional implications of the country's 'capture' by a Russian or other malign proxy; and**
- e) the level of willingness on both sides to uphold transparency and standards of good governance as part of any future partnership.**

Partially agree.

23. In some highly insecure countries, Wagner offers protection services to the government and fights alongside local soldiers on offensive operations. Unlike respectable security providers, Wagner frequently ignores its obligations in areas like accountability, protection of civilians, and adherence to International Human Rights and International Humanitarian Law. The cost often involves giving Wagner access to natural resources, which they often exploit in a predatory manner.

24. Western, including UK, security assistance is not like for like. Our aims are to promote stability and human security. Accountability and respect for the rule of law is central to our offer. The UK seeks to provide long term diplomatic, defence and development support to our partners. We seek sustainable outcomes in a manner which is compliant with international human rights law and not exploitative of our African partners. This requires a holistic approach to the multiple issues affecting the Sahel and elsewhere in Sub-Saharan Africa, rather than responding to Wagner or other Russian proxy PMSCs in isolation. Wagner Group feeds off wider instability, poverty and weak governance; by developing a more holistic approach, we work in partnership to address some of those underlying factors.

25. The Government's Africa Strategy focuses our efforts around a set of top-level objectives, including building defence and security partnerships. We aim to deepen relationships with

African countries, listening to their individual ambitions, and tailoring our offer for each country. We differentiate our engagement across the continent. That means a greater focus on states such as Nigeria, South Africa, Kenya, Ethiopia and Ghana.

26. We draw on a range of available levers to strengthen security and stability in countries at possible risk of Wagner Group in Sub-Saharan Africa. We support our African partners and regional security through strategic security and defence relationships with countries such as with Nigeria, Ghana and Kenya, supporting them to address the drivers of conflict and instability, and coordinating closely with likeminded states and international organisations. In addition, we also work with other partners to provide support through humanitarian, development and stabilisation programmes, and significant contributions to multilateral and African-led peacekeeping and conflict prevention. In financial year 2022/23, for example, the Conflict, Stability & Security Fund Africa spent £63.7m in ODA and non-ODA, with a focus on addressing violent extremism, stabilisation and peace support training.

OFFICIAL DEVELOPMENT ASSISTANCE

6: The Government should revive its previous commitment to channel 50% of Official Development Assistance to fragile and conflict-affected countries and regions. The Government should also revive its 2019 manifesto commitment to spending 0.7% of the UK's Gross National Income on Official Development Assistance at the earliest opportunity, in light of refugee and asylum pressure in multiple countries.

Partially agree.

27. We believe that it is not possible to end extreme poverty in low and middle-income countries without also tackling conflict and fragility. Issues of Fragile & Conflict Affected States are therefore central to the International Development Strategy (IDS), which aims to tackle the causes of crises and build the long-term foundations for lasting development.

28. Official Development Assistance (ODA) allocations are directed towards the strategic priorities of the IDS. Of the FCDO's ten largest planned bilateral ODA allocations in 2023–24 and 2024–25, eight are on the World Bank's list of Fragile & Conflict Affected Situations. But we currently have no plans to reintroduce the FCAS spending commitment.

29. The Government is committed to spending 0.7% of Gross National Income on ODA once the fiscal situation allows. In July 2021 MPs approved two fiscal tests to be met before returning ODA to 0.7% - these were that, on a sustainable basis, the Government is no longer borrowing for day-to-day spending and that underlying debt is falling. At the Autumn Statement 2022, the Government provided an additional £2.5 billion ODA over two years to help meet the significant and unexpected costs associated with supporting refugees from Ukraine and Afghanistan.

COORDINATION

7: Take a more strategic and coherent approach to addressing the challenges of the Wagner Network and other proxy 'PMCs' by establishing a taskforce and further empowering the Office for Conflict, Stabilisation and Mediation to protect UK interests. Move faster and harder to sanction Wagner-linked actors, including those we list, and consider further sanctions on civilian enablers and corporate 'frontmen'.

The Government should take a more strategic and coherent approach to addressing the challenges of this Network and other proxy 'PMCs' by:

- a) Assigning clear responsibility for the Wagner Network and adjacent 'PMCs' to a senior official in the Russia Unit, whose primary job it is to ensure that all levers of government are working together to tackle the challenges of Russia-aligned PMCs;**
- b) Establishing a cross-Government lead on Private Military Companies, operating from the Cabinet Office's Office for Conflict, Stabilisation and Mediation, focused on analysing this trend, mapping activity globally, and bringing together different geographic desks and teams across the MoD, Treasury, intelligence community and FCDO as appropriate to assess threats to British interests, and to identify British responses as appropriate;**
- c) Establishing a taskforce for addressing the challenges posed by the Wagner Network and other linked PMCs, to enable swift cross-government collaboration.**

Agree.

30. We have a team dedicated to coordinating the Government's response to the cross-cutting challenge posed by Wagner Group and Russian use of PMSCs as proxies. This team is also focused on driving forward international cooperation on the issue. Responsibility for this work is assigned to a specific Senior Official in the HMG Russia Unit, accountable to departments through the HMG Russia Strategy.

31. The team does not sit under the Office for Conflict Stabilisation & Mediation (OCSM), but works with and alongside OCSM. OCSM (which is part of the FCDO rather than the Cabinet Office) is responsible for developing new approaches to reduce conflict and instability, minimising the opportunities for state and non-state actors to undermine our interests. OCSM capability therefore focuses on providing analysis and advice on the enablers and drivers of conflict, including conflict actors, such as PMSCs. This includes monitoring activities of groups like Wagner, capturing evidence to inform our response to conflict, exploring how PMSCs impact conflict dynamics and peace dialogues, and working with partners to build resilience to counter vulnerabilities that conflict actors might exploit. Given reports of Wagner committing conflict-related sexual violence in Ukraine, CAR and Mali, our efforts under the Preventing Sexual Violence Initiative (PSVI) focus on strengthening justice and accountability for survivors. For example, in Ukraine, we are supporting the Office of the Prosecutor General to investigate and prosecute these crimes in a survivor-centric manner more effectively. The Government will continue to monitor the situation and address it through delivery of our PSVI strategy, which was launched in 2022.

32. OCSM's work is important in building the UK's understanding of conflict and how to resolve the problems posed by entities such as Wagner. But HMG Russia Unit will continue to co-ordinate efforts to constrain and counter Wagner Group and other Russian proxy PMSCs given their relationship with the Russian state.

DISRUPTION

8: We recommend that the UK Government takes advantage of the current uncertainty and seeks to disrupt the Wagner Network. In particular, at a moment when its usual supply channels from the Russian Ministry of Defence are in doubt, the Government should do all within its power to restrict the flow of arms and other military equipment to the Wagner Network, to reduce the viability of future combat operations. The UK Government should also share intelligence with host Governments to demonstrate the ineffectiveness of the Wagner Network and to demonstrate how it is a tool of enrichment for the Russian state.

Agree.

33. We welcome the Committee's recommendation and in recent months, we have increased our efforts to use the FCDO's overseas network and strategic communications channels to highlight Wagner's human rights' abuses and its destabilising role. We have also stepped up our assessment and policy co-ordination with Western and regional partners. We plan to continue these activities following Prigozhin's death – an event that may create new opportunities.

34. We use a variety of tools to disrupt Wagner and other Russian proxy PMSCs. They include short and long-term initiatives aimed at breaking the business model of proxy PMSCs. These are complemented by efforts to challenge the narrative that these groups are in any way beneficial, improve the multilateral and international response, and build capacity in countries that might be at risk.

35. We have already introduced sanctions against Wagner Group and certain affiliates and will consider if and where further designations might be appropriate. We will also continue to work with our partners to improve sanctions enforcement. In addition, Wagner Group also utilises illicit wealth networks, particularly connected to its operations in Sudan and the Central African Republic, moving gold and precious stones to third countries to be 'washed'. The UK has long been a leader in international efforts to tackle illicit finance, and we are using established co-operation mechanisms to discuss what more we can do to counter it.

NON-RUSSIAN PMSCS

9: The Government should improve its understanding of other PMCs and Private Security Companies (PSCs) connected in particular to Russia and China, and from all states. This is likely to be a growth industry, with more Governments seeking to create PMCs to secure their geopolitical and economic interests. The Government should provide further information on how its new approach to countering state threats, outlined in the Integrated Review Refresh, will tackle the challenge of states' malign use of proxy PMCs.

Partially agree.

36. As outlined in the Integrated Review Refresh, our new approach to countering state threats encompasses four strands:

a. protecting ourselves, allies, and partners from the impact of this activity;

b. engaging domestically and internationally to raise awareness of state threat activity and to deepen cooperation on countering it;

c. building a deeper understanding of states' activities and capabilities, as well as routes to respond effectively; and,

d. where appropriate, competing directly with state threat actors by contesting their attempts to undermine the rules-based international order and erode our security, prosperity, and values.

37. *This approach provides a framework for responding to emerging threats as well as traditional ones. As part of this new approach, we will take a whole of government view, using our full range of powers available to tackle the threats faced from organisations such as the Wagner Group.*

38. *On PMSCs specifically, lines of effort include: building a deeper understanding of activity and capability of PMSCs and their links to states; increasing our resilience and protecting the UK from the threat of PMSC activity; deepening cooperation with our partners and allies to increase international effort against malign use of PMSCs, as well as working in international fora to prevent the use of proxy PMSCs from being normalised; and, contesting the ability of PMSCs to operate in malign ways by using the full range of powers available, such as sanctions and proscription.*

39. *China has not followed the Russian example in its use of PMSCs and we are unaware of China using PMSCs to support military operations. While it has used private security contractors to protect its overseas infrastructure and the assets of Chinese companies around the world, this is distinct to the activities of Russian proxy PMSCs such as Wagner. We agree with the Committee that it is important to track the development of both Russian and Chinese PMSCs.*

STRENGTHENING LEGAL FRAMEWORKS

10: In its response, the Government should set out the steps that it will take to strengthen the international legal framework governing PMCs' activities, drawing on the UK's deep legal expertise. Its response should address the following aspects:

i. how the UK will take steps to move forward the debates around the definition of 'mercenaries' and PMCs. To address the first point (i), the Government should revisit its position on the UN Mercenaries Convention and ratify it, or else propose specific revisions that would make ratification acceptable. The Government could also participate actively in ongoing international debates around a draft convention on private military and security companies (PMSCs).

Partially agree.

40. *In 2002, the Office of the High Commissioner of Human Rights panel of experts recommended amending the UN Convention on Mercenaries to clarify its definition of mercenaries. The UK supports the need for clarification. However, no better definition has since been agreed. We will engage with the International Code of Conduct Association to advance the debate around definitions of mercenaries, malign actors, private military companies and private security companies.*

41. *The UN Convention on Mercenaries in its current form is unlikely to provide a workable basis for regulation under UK law. The UK will, nevertheless, continue to monitor progress of the Convention seeking suitable opportunities to engage in future.*

42. *The UK participated actively in discussions with other states at the 4th session of the UN Intergovernmental Working Group (IGWG) on PMSCs (April 2023), which focused on a draft international regulatory framework regarding the activities of PMSCs. In the negotiations at the 4th session, the UK proposed new language to the draft framework, with the aim of moving the negotiations forward. We are working towards the renewal of the mandate of the IGWG at the 54th session of the Human Rights Council (HRC) in September. The UK is committed to seeking a framework that supports a well-regulated PMSC industry. We also support the involvement of technical experts to help create such a framework.*

43. *The UK will continue to engage actively in discussions at the HRC on the UN draft framework on PMSCs. We will seek to create an instrument that explains what constitutes a 'responsible', law-abiding PMSC, and differentiate this from the activities of irresponsible, malign actors whose activities undermine the proper functioning of the sector.*

ii. how the UK will work to improve the accountability of Wagner fighters in more countries. The Government may be able to address the second point (ii), by drawing lessons from work to bolster accountability of Wagner fighters in Ukraine. The UK Government should use its significant support to the Office of the Prosecutor General in Ukraine to identify mechanisms to prosecute the Wagner Network. A prosecution in this theatre would serve to help deter the sense of impunity abroad.

Agree.

44. *We agree on the importance of holding Wagner to account for its actions. In some areas, the International Criminal Court (ICC) has an existing authority to investigate situations where Wagner is present (including Mali and Central African Republic) and Wagner's activities are within scope of that investigation. This also applies to Wagner fighters in Ukraine. The ICC deals with individual criminal responsibility. The Government is a firm supporter of the ICC, providing additional voluntary contributions to its Trust Funds above our annual budget contribution.*

45. *The UK's efforts to strengthen the accountability of Wagner fighters in Ukraine also include setting up the Atrocity Crimes Advisory (ACA) Group, through which the UK coordinates its support to the Ukrainian domestic legal system. The UK has so far provided £2.5 million to support domestic investigations in Ukraine, including work through the ACA Group, which covers areas such as funding mobile evidence-gathering teams and providing training in international humanitarian law to the Ukrainian judiciary and national police. We will continue to support work to prosecute individuals for atrocity crimes in Ukraine, including Wagner fighters.*

46. *The UK has consistently called out the Wagner group's actions in statements in the UN Security Council, such as regarding [Libya in 2020](#), [CAR in 2021](#) and [Mali in 2022](#). We have made statements at the Human Rights Council (HRC) calling for perpetrators of abuses to be held to account, such as [at UN HRC52 on Mali](#) and [at UN HRC53 on CAR](#). We will continue to work with our international partners to look for opportunities at multilateral forums to call out human rights violations and abuses and call for perpetrators to be held to account.*

iii. how the UK will promote greater accountability and responsibility of states where PMCs are headquartered, if PMCs engage in destabilising activities.

47. *We agree that it is important to promote the accountability and responsibility of states where PMSCs are headquartered. The UK fully supports the Montreux Document, which refers to such states' obligations under international humanitarian law and international human rights law. The UK encourages all states to state their support for the Document and will continue to promote the Document as a means of raising industry standards and helping states and PMSCs to meet their obligations and conduct practices in line with human rights. Russia is not a signatory to the Montreux Document, but China has signed up. Russia is unlikely to adhere to any agreed UN regulatory framework on PMSCs. Even so, this is an important initiative for the UK to pursue. In broadening the international consensus on the appropriate use of PMSCs, it will serve to further isolate Russia by making clearer why its uses of proxy PMSCs are undesirable. We will continue to engage in discussions with on the draft regulatory framework at the IGWG on PMSCs, which includes obligations for 'Home States' with regards to PMSCs.*

The Government should provide the evidence base that leads it to believe in the effectiveness of its mostly voluntary model of PMC regulation.

48. *The UK supports using a mix of existing legal and regulatory measures and voluntary global initiatives to raise standards in the PMSC industry. The UK has played a leading role in developing and implementing voluntary global initiatives to regulate PMSCs, such as the Montreux Document which sets out international legal obligations and good practices for states with regards to PMSCs. 58 States and three international organisations currently support the Document. The International Committee of the Red Cross have said the Document reaffirms international law, encourages adoption of national regulations on PMSCs and advises on how to do this, and through this “enhances the protection afforded to people affected by armed conflicts but also by post-conflict and by other comparable situations”.¹*

49. *The UK had a key role in drafting the International Code of Conduct for Private Security Service Providers (the Code) and supported the launch of the International Code of Conduct Association (ICoCA) to monitor compliance with the Code. Over 600 companies are signed up and ICoCA has over 100 members. The Code is not binding and companies sign up voluntarily. Those signing up agree to follow its principles, including codes of conduct for personnel on areas such as the use of force and vetting personnel and training. The Code and ICoCA promote the highest standards in the PMSC sector. The voluntary route helps provide the constructive and collaborative relationships necessary to raise standards quickly in a rapidly growing PMSC industry. UK funding during 2021–23 has enabled ICoCA to build the capacity of PMSCs, private providers and their clients in line with the Code, such as through the Prevention of Sexual, Exploitation and Abuse training course completed by 1,800 people from 52 companies in Africa, Europe and the Middle East. This built attendees' capacity to deal with sexual violence and prevent abuses from occurring in their in-country operations. ICoCA has engaged with private security regulatory authorities advocating for increased oversight and accountability in the private security sector in Ghana, Kenya, Nigeria, Tanzania, Mozambique and in the Democratic Republic of the Congo, including participation in drafting a new law.*

1 International Committee of the Red Cross, [The Montreux Document in a nutshell](#).

50. *The Voluntary Principles (VPs) on Security & Human Rights have also proven effective. These are a set of principles guiding companies on providing security for their operations while respecting human rights. The UK devised the VPs with other governments and is a member of the Voluntary Principles Initiative, which promotes the VPs' implementation. Although voluntary, there are in-country Working Groups working with companies, NGOs and states to implement the VPs in Peru, Ghana, Nigeria and Brazil. The UK has worked to implement and promote the principles globally, such as by funding training for 200 troops in the Mozambique Defence Armed Forces in 2022 on compliance with human rights norms. Through project funding, the UK also supports working groups in the DRC and Mozambique to address complex in-country security and human rights challenges.*

51. *These examples show the positive impact of voluntary regulations on PMSCs. We will continue to assess the impact of existing measures and whether improvements can be made.*

CURRENT OPPORTUNITY

11: We recommend that the Government seizes this opportunity and works with international partners to deter countries from engaging with the Wagner Network, using a carrot and stick approach.

As the Government improves its intelligence on the Network, it should declassify it strategically and share it with countries that are considering engaging with the Wagner Network, to demonstrate the organisation's destabilising effects, following the lead of the United States administration.

Partially agree.

52. *We agree on the need to tackle Wagner, and that this will require co-ordinated action with our partners, and a mix of incentives and levers, some of which we have set out in our response to recommendations 2, 4, 5, 6, 8 and 10. We also agree on the potential value of declassification and sharing of intelligence, though clearly it is not always possible to do so, as a result of the risks either to UK equities or to those of Allies who have shared information with the UK. Of course, countries who choose to work with Wagner are often aware of the risks from the wealth of material on the negative effects of their operations in the media, or from international bodies such as the UN. More generally, we believe that there is a real value in exposing the egregious and self-serving activities of the Wagner Group, in whatever form it may transition to, as well as other proxy Russian PMSCs, and in the last few months have stepped up both our channels for communicating on this, for example in Africa, and our use of them.*