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The Rt Hon Liam Byrne MP
Chair, Business and Trade Sub-Committee on Economic Security, Arms and Export Controls
House of Commons
London
SW1A 0AA

21 July 2025

Dear Liam,

I am writing to follow up on the recent oral evidence session on UK Economic Security on Wednesday 9 July with more detail on a number of questions that were raised.

Arms Export Licensing Restrictions in relation to Sudan

I have noted the concerns, and I would like to provide reassurance to the Committee that Sudan remains a priority for this Government. The UK is doing all it can to end the conflict in Sudan, working with all partners to achieve that. In April, the Foreign Secretary hosted the London Sudan Conference, attended by a number of regional and international partners.

The UK has a longstanding arms embargo and other sanctions covering the whole of Sudan, implemented following the UN embargo on entities operating in Darfur, first imposed in 2004. We also now implement the separate UN embargo for South Sudan, which we worked closely with the US and other UN Security Council members to renew in September 2024.
These arms embargoes apply to all military goods and technology, as well to the provision of technical assistance, brokering services and financial assistance related to the supply of those goods and technology.

All export licence applications for military and dual-use items for Sudan and South Sudan are assessed against both the sanctions in force and against the Strategic Export Licensing Criteria (SELC) – a licence would not be granted unless it was consistent with both.

In 2024, no export licences were granted for any (military or dual use) equipment to Sudan. There were three licences for military equipment for South Sudan – relating to helmets, body armour and bomb disposal equipment for use by international organisations and NGOs and therefore fully consistent with the arms embargo.

The full scope of the sanctions, details of the UK's implementation, and any exceptions that would allow licences to be granted, are set out in detailed guidance available on gov.uk:

- Sudan sanctions: guidance - GOV.UK
- South Sudan sanctions: guidance - GOV.UK

UK Arms Export Licences for the UAE

Members of the Committee queried UK arms export licences for the UAE. We take our export control responsibilities extremely seriously. As I told the Committee, we are not aware of any UK military equipment licensed for export to the UAE being diverted to Sudan. Accordingly, we have not refused or revoked any licences to the UAE related to this issue. However, we keep all extant export licences under close and careful review as a matter of course and would treat any such reports with the utmost seriousness.

We carefully assess each export licence application against the SELC. This includes an assessment of the risk of diversion to an embargoed destination. We would also take into account any evidence of the recipient country diverting other (non-UK origin) equipment to a proscribed destination in determining the risk of diversion of the equipment that was the subject of the export licence application.

We will not grant a licence unless the end-user provides a signed undertaking stating “the goods will not be re-exported or otherwise re-sold or transferred to a destination subject to UN, EU, UK, OSCE embargo where that act would be in breach of the terms of that embargo”. We expect end-users to honour that commitment. If they do not, we can suspend or revoke any relevant licences and will factor that into decisions on any future licence application for that end-user. If the UK exporter were complicit in any breach of their licence then they could be subject criminal prosecution.

Gold and Illicit Finance

Members of the committee raised concerns about illicit finance and gold flows, which are helping to finance this conflict. We are clear that the trade of illicit gold funds conflict, undermines the rule of law, and perpetuates human rights abuses. We have taken concrete action to tackle this, including freezing the assets of nine commercial entities linked to the warring parties, two of which targets gold mining companies. In 2023, the UK also sanctioned three Russian-linked gold mining entities operating in Sudan.

UK-GCC Free Trade Agreement (FTA)

Members of the committee also asked questions about the FTA. The UK has been in negotiations for a Free Trade Agreement with the Gulf Cooperation Council, comprising Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates since June 2022.

A closer trading relationship with the GCC can increase UK influence and help us to have open conversations on a range of issues, including human rights. We remain committed to the promotion of universal human rights and raise concerns with our Gulf partners through Ministerial and diplomatic channels.

When negotiating FTAs, the UK takes into account its existing laws and regulations. This includes the UK Sanctions and Anti-Money Laundering Act 2018 which provides the legal basis for making sanctions within the UK. We work closely with the FCDO to ensure that our treaty text is consistent with our sanctions legislation.

I hope this reply is helpful to provide further detail on the points raised by the Committee on this issue.

Yours sincerely,

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