

The Rt Hon Liam Byrne MP
Chair, Business and Trade Committee
House of Commons
London
SW1A 0AA

5 November 2025

Dear Liam,

Thank you for your letter of 16 September 2025 following our joint appearance the previous day before the Business and Trade Sub-Committee on Economic Security, Arms and Export Controls.

We recognise the importance of the Committee's scrutiny in these difficult matters and thank the Committee for the opportunity to give evidence and set out the Government's position and ongoing work. The suffering witnessed in Gaza is intolerable, and this Government is committed to trying to bring the conflict to an end. We have consistently called for an immediate ceasefire in Gaza, the release of all remaining hostages, the unrestricted flow of humanitarian aid into Gaza, and the restoration of a process to bring about a just and lasting peace in the Middle East, with security for Palestinians and Israelis alike.

The ceasefire agreement announced by the US in October is a moment of profound significance, relief and hope after two years of suffering. The UK pays tribute to President Trump and Qatar, Egypt, and Turkey for their work to reach this point. We must see this agreement swiftly implemented, the hostages released, a surge in aid for Gaza, and set a path to a just and lasting peace. Please rest assured that the Government will continue to play its part in that process and will regularly update Parliament and this Committee on the situation.

Recognition of Palestinian statehood

To protect the viability of a two-state solution and create a path towards lasting peace for the Israeli and Palestinian people, this Government took the historic decision – alongside a number of key allies – at the UN General Assembly meetings in September, to formally recognise the State of Palestine. We will not recap the statements made by the Prime Minister and the Foreign Secretary at the time of that decision, but it may be helpful for the

Committee to note that we do not anticipate significant changes to the implementation of our export licensing regime and obligations. The UK was already treating Israel and Palestine as distinct destinations for export licensing. The UK Government has a clear position that Israeli settlements in Palestine are illegal under international law. We would not approve export licences which support the settlements and have sanctioned individuals and entities involved in settler violence. Recognition has not caused us to revise any of our assessments on the IHL risks in Gaza.

Export licensing decisions and data

As a result of the decisions taken by the government, since 2 September 2024, we have stopped a wide range of controlled exports to the IDF, including components and equipment for:

- F-15 and F-16 fighter jets.
- Apache attack helicopters.
- Combat and targeting drones.
- Naval vessels involved in the Gaza operations.
- Equipment for IDF ground troops.
- Tanks and other armoured vehicles.
- Troop transport planes and helicopters.

We are not aware of any comparable country taking more action than the UK to stop exports which the IDF might use in Gaza. These exports have been prevented and cannot therefore be used by the IDF in other contexts. The practical impact is that licences for exports which we assess might also be used in the West Bank by the IDF in military operations have also been suspended or refused.

Since the announcement of those restrictions last September, we have continued to keep extant licences under continual and careful review as the conflict has developed and when new information has come to light. This has led to the suspension or amendment of a further six licences, to prevent the possibility of components being used by the IDF in Gaza. These licences cover aircraft components and explosive detection and disposal equipment. A detailed breakdown of the type of licences refused and rejected is provided in Table 1 of the Annex to this letter.

The Government has previously published extensive details on extant Israel export licences, including further details requested by the Committee, released on 28 August. We accept that releasing further licence details on a line-by-line basis would provide further proof that the remaining licences do not relate to military operations in Gaza. However, doing so would also show commercially sensitive details of UK companies' contracts with overseas buyers. It would also have security implications for those individual companies. You will understand the Government therefore cannot provide such information, provided in confidence by companies acting fully within the law.

However, recognising the importance of the Committee's scrutiny in this area, we have provided further detail in Table 2 of the Annex, to the extent we are able to share. This includes a detailed breakdown of the number of licences for individual equipment types where the IDF or Israeli Government is a possible ultimate end-user. As previously set out,

most of the current licences for the Israeli authorities are for trainer aircraft with no combat utility. The small number of remaining licences include air defence systems or components for submarines, none of which play a role in Israeli action in Gaza or the West Bank.

We have also included in this table the export licences for F-35 components to the global programme, of which Israel is a customer. F-35 is the largest defence programme in the world, with 8 Partner Nations and 12 Foreign Military Sales customers and more than 1,200 F-35 aircraft in operation globally¹. The decision in September 2024 to carve out exports to the F-35 global programme was announced to Parliament for the reasons we set out at the Committee hearing. As you will recall, we have stopped direct exports of F-35 components for use by Israel. We continue to ensure the exports to the global programme are consistent with our international obligations, including under the Arms Trade Treaty and the Genocide Convention. This is discussed further below.

Finally, we would note that at the evidence session, Minister Bryant stated that three suspended licences were included in the total number of extant military licences. We would take this opportunity to clarify that these three licences are actually *in addition* to the total extant number.

IHL Assessments

The action we have taken to suspend export licences has been informed by thorough assessments, which we have discussed with the Committee in detail on previous occasions. Our assessments continue to support the conclusion that the Israeli government is not committed to complying with IHL in the Gaza conflict. These assessments are made using information from a wide range of sources, including analysis from multiple government departments, engagement where possible with the Israeli authorities and open-source material. In addition, our assessments consider analysis from a wide range of external sources including the UN, Non-Governmental Organisations, media and organisations on the ground.

Analysis of individual military incidents is only part of the overall assessment. In a highly contested and opaque information environment, where neither side provides us with access to operational detail, it is frequently not possible to make substantive determinations on individual incidents. We take a broader approach, including by assessing the humanitarian situation and how Israel treats detainees, to reach our overall conclusion that Israel is not committed to complying with IHL in Gaza.

RAF reconnaissance flights

You also asked about the role of RAF reconnaissance flights. Since the terrorist attacks against Israel on 7 October 2023, the UK government has been working with partners across the region to secure the release of hostages, including British nationals, who were kidnapped. In support of these efforts, the Ministry of Defence conducted surveillance flights over the Eastern Mediterranean, including operating in air space over Israel and

¹ F-35 Partner Nations: US, UK, Italy, Netherlands, Canada, Australia, Denmark, Norway.

Foreign Military Sales Customers: Belgium, Czech Republic, Finland, Germany, Greece, Israel, Japan, Republic of Korea, Poland, Romania, Singapore, Switzerland.

Gaza from December 2023. The information gathered by these flights was used solely for the purpose of hostage rescue.

Following the agreement of the Gaza peace plan between Israel and Hamas, and the release of remaining hostages, the Ministry of Defence has ceased surveillance flights over Gaza. The last flight took place on the 10 October 2025. You will understand that we cannot comment publicly on intelligence or operational security matters, we will not comment further on detail relating to intelligence matters to protect operational security and preserve MOD's ability to respond to future hostage incidents around the world.

The Genocide Convention

The UK is in full compliance with all our obligations under international law and we take all our duties and responsibilities extremely seriously, including those under the Genocide Convention. In oral evidence to the Committee, we outlined how these issues are considered. The existence of a serious risk of genocide includes the question of intent, which is integral to the definition of genocide as set out in the Genocide Convention. However, consideration of these issues does not change our long-standing position that any formal judgement as to whether genocide has occurred is a matter for a competent national or international court, in the context of a credible judicial process, rather than for governments or non-judicial bodies.

You rightly raise the Independent International Commission of Inquiry's (COI) conference room paper on genocide, published the day after our hearing. The paper is being considered carefully. The COI paper itself notes the ongoing proceedings at the International Court of Justice (ICJ) brought by South Africa against Israel under the Genocide Convention, and notes that the ICJ will make a final judgement in the future on Israel's responsibility under the Genocide Convention. As we have been very clear, the UK expects Israel to abide by the Provisional Measures placed on them by the ICJ.

The Arms Trade Treaty

We have discussed the UK's compliance with our obligations under the Arms Trade Treaty at length in previous evidence sessions and correspondence, and we will not repeat the points made on those other occasions. Our commitment to the Treaty is as strong as it has ever been. The UK's position has been completely consistent and is not unusual. It is based on the rules of interpretation set out in the Vienna Convention on the Law of Treaties, the long-standing and internationally agreed approach to interpreting and implementing treaties. We have a duty under the Arms Trade Treaty to consider the full range of relevant implications of arms export decisions.

F-35 global programme

As the Committee is aware, we have stopped direct exports of F-35 components for use by Israel. For the global programme, F-35 parts are procured through contracts placed under US law by the F-35 Joint Program Office via its two prime contractors, Lockheed Martin and Pratt & Whitney. The US Government via its two prime contractors controls the parts and their distribution across the F-35 enterprise. The UK Government and UK suppliers do not have control of F-35 parts after the point of export from the UK. It is not

possible for the UK unilaterally to ensure that UK-manufactured parts do not reach Israel. The only way to ensure that no F-35 parts produced in the UK reach Israel would be to stop all F-35 exports from the UK to the F-35 programme, which would undermine this critical defence programme and have a profound impact on international peace and security.

As we said at the evidence session, the importance of the F-35 programme to global defence and deterrence cannot be overstated. F-35s are the only fifth-generation fighter to be operated by several allies in Europe and Asia. They are playing a crucial role in NATO defence, keeping our airspace secure. They have intercepted Russian aircraft in Europe and North America on multiple occasions in recent months, including Dutch F-35s playing a critical role in neutralising the threat from Russian drones that violated Polish and NATO airspace in September. It is a vital platform used by our Allies in NATO, our partners in the Pacific and by the Royal Air Force. Undermining the F-35 global programme would significantly disrupt international peace and security, NATO deterrence and European defence. It is for that reason alone that we took the decision to continue exporting to the global programme, in line with our obligations under the Arms Trade Treaty. None of the F-35 Partner Nations who are also States Parties to the Treaty have stopped exports to the F-35 global programme.

For the removal of any doubt, it is worth saying as well that the UK is not in a position to make unilateral changes to the structure of the F-35 global programme and how it operates, in order to limit UK-manufactured parts reaching Israel. Any such change would require consensus from all eight Partner Nations.

End User Verification Systems

As explained at the evidence session, the UK's approach to export licensing under the SELC involves a rigorous forward-facing risk assessment before a licence is issued. These checks consider the nature of the items, the end-users and proposed end use under prevailing circumstances.

Exporters applying for Standard Individual Export Licences, Standard Individual Trade Control Licences and Licences to provide technical assistance are required to provide an End-User and Stockist Undertaking (EUSU) form when submitting their export licence application. The EUSU form has to be completed and signed by the stockist or end-user of the items to be exported and confirms the 'export journey', including the intended end-use and ultimate end-user. It also includes any plans to re-export the goods at the time of submitting the export licence application.

All information on the EUSU must match what is entered in the exporter's licence application. It is an offence for an export licence applicant to knowingly make a statement which is false. We keep licences under ongoing review and are able to suspend or revoke licences as necessary when circumstances require. Where we have evidence that exporters have knowingly provided misleading information, they could be subject to criminal sanction and any licence granted on the basis of this information would become void. If an exporter intentionally submits inaccurate or misleading information, then this may also be taken into account in the assessment of future similar applications.

The Government is constantly looking to see how we can improve the UK's system of export controls. As part of our ongoing contacts with likeminded partners, we seek to understand their systems, and how their experience could inform our own approach. Our system overall is geared to undertake a thorough assessment before a licence is granted, so that exports that are not consistent with our criteria are prevented in the first place. And as stated earlier in this letter, and to the Committee at the session, licences for Israel are kept under continuing careful review in light of all available information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Bryant'.

Sir Chris Bryant MP
Minister of State, Department for Business and Trade

A handwritten signature in black ink, appearing to read 'Luke'.

Luke Pollard MP
Minister for Defence Readiness and Industry

A handwritten signature in black ink, appearing to read 'Hamish Falconer'.

Hamish Falconer MP
Parliamentary Under-Secretary, Foreign, Commonwealth and Development Office

Annex A – Licence Details

Table 1: Licences refused/rejected to Israel between 2 September 2024 and 31 July 2025

The information contained within this annex builds upon that provided within the 28 August 2025 and the 12 December 2024 Management Information Releases: [Export control licensing management information for Israel - GOV.UK](#). As such it should be read alongside these releases with the relevant caveats and explanations of data parameters.

Item	Number of Licences	Description
<u>TOTAL</u>	46 (41 Military)	Refusals made under Criterion 2(c) for items which might be used to commit or facilitate a serious violation of international humanitarian law, and refusals under other Criteria of the SELC, such as where there is risk of diversion.
Military aircraft	19	Includes components for military support aircraft, combat aircraft, combat helicopters, components for military aero-engines, head-up/down displays, and software for general military aircraft components.
Military radars	7	Including components for military radars and targeting equipment.
Naval vessels	6	Including components for combat vessels, offshore patrol vessels, and general naval vessels
Non-military Licences	5	Items for non-military goods including dual-use components for information security equipment, general purpose integrated circuits, image intensifier tubes, and hydrophones.
Body armour	3	Including ballistic plates and military helmets.
Ground vehicles	2	Including components for tanks and ground vehicle military communications equipment.
Equipment for Electronic Warfare	2	Military navigation equipment and electronic warfare equipment.
Signature suppression	1	Material treated for signature suppression.
Missile launch equipment	1	Components for launching/handling/control equipment for missiles.

This management information data should not be considered part of the strategic export controls licensing statistics publication as it has not been produced in the same manner – see [Related statistics](#) for further details.

Table 2: Extant military licences for use by IDF/Israeli Government as of 31 July 2025

The information contained within this annex builds upon that provided within the 28 August Management Information Release: [Export control licensing management information for Israel - GOV.UK](#). As such it should be read alongside this release with the relevant caveats and explanations of data parameters.

Platform	Number of Licences	Description
<u>TOTAL</u>	55	
Trainer aircraft	33	Components for trainer aircraft, which do not have combat utility. Assessments against Criterion 2c of the Strategic Export Licensing Criteria look at where there is a clear risk exports might be used to commit or facilitate breaches of IHL. Trainer aircraft have no combat utility and cannot be used with live weapons without extensive upgrading. Given their purpose for training only, we have concluded that there is not a clear risk those items might be used to commit or facilitate a serious violation of IHL.
F-35 Programme	9	Export licences which cover the export of F-35 components to end-users in F-35 nations, excluding Israel. Israel however remains one potential ultimate end-user, for the reasons outlined to Parliament on 2 September 2024 and discussed with the Committee. The UK does not export munitions or ammunition for the F-35.
Dolphin Class Submarines	5	Components for escape systems, navigation, on-board pressurised air and breathing systems, periscope and propulsion. We do not assess that Israel would use these in their current operations in Gaza.
Training and Testing Goods	5	Extant licences include a range of training items such as flight simulator equipment and chemical, biological, radiological and nuclear training equipment for civilian and military personnel.
Air Defence	3	Extant licences remain for the export of components for Israel's air defence systems, e.g. for the defence of Israeli cities against drones and missiles. We do not assess that Israel could use these components in their current operations in Gaza.