

## Written evidence submitted by Action on Armed Violence (AOAV)

*Action on Armed Violence is a London-based research charity that has a central mission: to carry out research and advocacy in order to reduce the incidence and impact of global armed violence. A recent investigation by our researcher Murray Jones has thrown up a number of questionable export licences. The lack of transparency within the publicly available data makes it difficult to understand how some licences could have been approved. This concern forms the basis of our motivation to submit this evidence to the committee.*

Our researchers are primarily concerned with the lack of transparency and the inconsistency in the public documentation of export licences. A simple criteria for whether a sale of arms is worthy of scrutiny is to whom it is being sent. In the annual and quarterly ECJU Strategic Export Control reports this is listed as the ‘end user’.

However, there are many problems with this labelling. One is simply inconsistency. Many licences for significant goods, such as lethal weapons, that are licenced for export to countries, on the DIT’s own [restricted](#) list, have no listed end user at all.

For example, in 2019 a SIEL licence was granted for 80 machine guns, silencer, sights worth £157,436 to Trinidad & Tobago. No end user was specified on this in the public records. But in 2016, a licence for the same items, this time valued at £211,189, listed in the footnotes: Licence granted for accessories / spare parts. Armed forces end use.

One could easily assume the 2019 licence was also issued for armed forces end use. Consistent labelling would allow us to analyse repeated deals more accurately. It is surely not a difficult standard to enact.

This example highlights a second issue - the vagueness of the current end user label. There is no specification that the armed forces end user in question is the armed forces of that nation or not. It could be to British military or French who are based in that region. Surely for the transparency of the public record and a system of accountability, whether these guns were sent to the military of Trinidad & Tobago or to another nation is an important distinction.

Similarly, when a SITCL licence, in 2015 and 2018, for hand grenades and small arms ammunition is approved for South Sudan, an observer would presume this was for UN peacekeeping forces in the country. But again, why is this not labelled? Surely it serves the UK’s interests to specify which actors we are supplying arms to in that region and for what purpose.

Below is a list of noteworthy export licences that seem questionable, in terms of their content and their end user. Some of these examples may be perfectly benign and legitimate but due to the labelling concerns I’ve discussed it’s impossible for an observer to determine that.

Notes for reading:

- We have tiered on the basis of potential ethical concerns
- NSEU = No specified end-user
- Licences are SIELs unless stated
- Countries considered below are in the 73 nations listed by the DIT and ECJU as subject to [arms embargo, trade sanctions and other trade restrictions](#)

### Tier 1

#### **Trinidad & Tobago**

- supply of 960 machine guns, 4 licences over 4 years [**£1m+**, NSEU apart from 1 year where it was for **Armed Forces end use**]
  - A [2009 small arms study](#) (p.24) states that there have been “many cases of police and criminals leasing out their guns” with fees being based on “the size of the anticipated earnings from the crime that the borrower intends to commit
  - Police officers involved in sex trafficking to Venezuela, according to a [2019 CARICOM Human Trafficking study](#).
  - T&T infantry use the Sterling L2A3, FN MAG, Bren

#### **Nigeria (ECOWAS embargo)**

- Weapon sights to **law enforcement** agency end user [£290K, April 2020] + hand grenades to **military academy end user** [£66K, April 2020]
  - 12 people protesting police brutality were shot and killed by police in October 2020 - [Amnesty](#) (Mass protests against Nigerian police brutality this year #endSARS)
  - The [ECOWAS convention](#) means: “The UK will not issue an export licence for small arms and light weapons, components or ammunition unless the ECOWAS Commission has issued an exception.”

#### **Kenya**

- Explosive ammunition, snipers, machine guns, pistols, 3000 assault rifles, mortar bombs, 200 more assault rifles, pistols, rifles. **Most unspecified end user.**
  - However, 3000 assault rifles for **government end use [£9.5m, 2017]**
  - Amnesty International said Kenyan police had killed at least 100 people in 2020. Two officers charged with murder after shooting two civilians. [Aug 2020](#)

#### **Hong Kong**

- Riot shield: 4 licences over 3 years, with last in March 2019 (including for "Licence granted for protective equipment for crowd control use. Law enforcement agency end use")
- 4 sniper rifles, **law enforcement end use** [2015]
- tear gas, hand grenades, smoke canisters [OIEL, 2015]

- Tear gas used by police against protesters, UK halted sale of tear gas in [response](#)

### Ghana (ECOWAS embargo)

- Grenades to **armed forces end user [2015, £110,000]** despite ECOWAS ban on small arms and light weapons.
  - Ex-soldier arrested for having grenade given to him ‘by an accomplice’ - [Dec 2020](#)
  - Stray grenades found on beach in Greater Accra region, nearly killed three young siblings - [August 2020](#)
  - Three men arrested in Accra found with at least 7 grenades - [2018](#)

### Lebanon

- 48 snipers, silencers, night sights, mounting + ammo [2015, SIEL, **Armed forces end use**] £2.3m deal
  - “The largely peaceful protests [in Lebanon] since October 2019 have been met by the Lebanese military and security forces with beatings, tear gas, rubber bullets, and at times live ammunition and pellets”. - [Amnesty 2020](#)
  - Lebanese sniper killed Israeli soldier over the border - [2013](#)

### Kyrgyzstan

- 10 Sniper rifles (unspecified user, £6K over 2 deals, 2018/19)
- riot shields for **law enforcement**, explicitly for crowd control (£55K, 2015)
  - Police used rubber bullets, tear gas and stun grenades in election corruption protests in [October](#) this year.
  - [Video](#) of them using riot shields while they do this - More than 120 injured.
  - In 2019, troops were deployed with sniper rifles and machine guns ([video](#)) to arrest the former President after resistance from his supporters. One officer was killed, while 80 people were injured and 53 hospitalised. ([BBC](#))

### Georgia

- sniper rifles (15), silencers, weapons sights. **Law enforcement end user - Licence granted for accessories / spare parts** [£143K, 2017]
- small arms ammo [£100,000, NSEU, 2018]
  - [Police](#) fired on protesters in 2018 with rubber bullets. 160 civilians injured.
  - Photo of Georgian police officer with sniper during hostage situation, [Oct 2020](#) - is this UK made?

### Mali (ECOWAS embargo)

- Small arms ammo **law enforcement end user** [£26,702, 2016]
  - ECOWAS country - Convention on light weapons and small arms
  - Mali Police shot and killed 11 protesters in [July 2020](#) (Amnesty)
  - Mali Police [tear gassed](#) anti-government protesters in August 2020
  - Riots erupt after a police officer shoots 18 year old dead in western city of Kayes. ([May 2020](#))

## Sierra Leone (ECOWAS embargo)

- **OITCL from China, 2017:** assault rifles, hand grenades, machine guns, anti-riot guns, military combat vehicles and pistols with **no specified end user**.
- The embargo is specifically for **small arms**.
  - 4 children killed by abandoned grenade in [2011](#)
  - 4 protester shot and killed, 10 wounded by police, July [2020](#)

Throwback: *Sierra Leone children carry British guns*, [May 2000](#): “After the UN dropped its embargo on arms supplies to Mr Kabbah's forces, Britain shipped £10m worth of weapons to Freetown last year. They included 132 general purpose machine-guns with 2m rounds of ammunition, more than 2,000 mortars, and 7,500 rifles, with 800,000 rounds of training ammunition. They were intended as training weapons but are being used in combat, and not always by those they were intended for.”

## Togo (ECOWAS embargo)

- components for military combat vehicles [2019 +2016, Licences granted for components / accessories / spare parts. **Military (Army)** end use, £41K & £58K];
- ECOWAS country yet approved for 2015 OIEL (19 countries) of: assault rifles, combat shotguns, pistols, rifles, small arms ammo, sniper rifles in an unlimited licence
  - Togo has lived under a military dictatorship/family dynasty for more than 50 years with the government [spying on, arresting and even killing activists](#).
  - A 9 year old boy died after [security forces attacked protesters](#).

## Oman

- Tear gas [**law enforcement end use**], 5 licences over 5 years, including £16.6m deal in 2015;
- 4 machine guns to **law enforcement** in Jan 2020
  - According to [HRW](#): “The authorities target peaceful activists, pro-reform bloggers, and government critics using short term arrests and detentions and other forms of harassment.”
  - Two people died after police fired rubber bullets and tear gas at protesters - [2011](#)

## Azerbaijan

- 100 pistols [**2018 SITCL from Austria, NSEU** ]
- assault rifles, machine guns, military combat vehicles, 1 sniper rifle [**2014 SITCL from Israel, NSEU**]
  - Despite 1992 OSCE embargo

## Armenia

- Small arms ammo [£10,500, 2017, NSEU]
  - Despite 1992 OSCE embargo

## Tier 2

### Turkmenistan

- combat vessel components [£476K, 2020]
- tech, equipment and software for combat helicopters for **Government** end use [OIEL, 2017]
  - The dictator [flies](#) his own helicopter to and from his macho bicycle stunts.
  - Reporters without Borders ranks Turkmenistan at 179th of the 180 countries it covers, above only the DPRK. In 2019, it was in last [place](#).

### Serbia

- **many licences from 2018-20, all NSEU**, Noticeably high value deals:
- launching equipment for missiles (£33.6m),
- 4 snipers + silencers (£35K),
- UAVs (£20m)
- six deals for military aircraft ground equipment (£30.6m)
  - None specify an end user, but I found a 2013 DSO Market Brief [doc](#) encouraging traders to break into the Serbian defence sector, giving detailed info on how it can be done and advising contact with the embassy-based defence attache
  - Serbia has recently bought Chinese drones - and its market is being fought over - [RUSI, Jan 2021](#)
  - Infamous Serbian arms dealer, Slobodan Tesic, still [works with the Serbian government](#) in the arms trade. The US embassy in Belgrade voiced concern at his “potential influence over Serbia’s export control system” - Aug 2020

### China

- **£20m over 5 years of:** Components for combat naval vessels [**Navy end use**]
- imaging cameras [645 licences since 2015], many for **government end** use.
- Interestingly, two imaging camera [licences in 2015](#) provided for ‘sporting/hunting purposes’ were revoked in 2019
- Also, one licence for a military helicopter in 2018 for “**personal use**” (??) - £180,000
  - The **1989 embargo includes:** ‘military aircraft and helicopters’ & ‘any equipment which might be used for internal repression’.
  - The [Chinese Navy](#) ‘is the world’s largest, more than tripling in size over the past two decades. It has embarked on aggressive expansionism in the South and East China Seas with frequent military drills, and in the Taiwan Strait with near daily incursions into Taipei’s air defence identification zone’.

### Bosnia

- 4 Sniper rifles [£21K, 2016] and riot shields [£3K, 2016] **law enforcement end user** and machine guns [2018, **SITCL from Romania**]
- 5 sniper rifles [30K, 2016] to unspecified end users.

- In 2014, Bosnian police repeatedly hit a journalist, who was filming the protest, with his riot shield - [HRW report](#)

### Moldova

- 2018: anti-riot/ballistic shields [Licence granted for end use by a **law enforcement agency**]. Again in 2019, with NSEU] £7+23K
  - Police used shields and fired tear gas at anti-government protests in [2015](#)
  - Police investigated for beating and tear gassing protesting veterans - [July 2020](#)

### Burkina Faso

- **2019:** anti-riot/ballistic shields [Licence granted for end use by a **law enforcement agency**.] £22,500
  - According to [HRW](#), the government has killed several hundred for allegedly supporting Islamist militias.

### Belarus

- Small arms ammo [for civilian/commercial use, £90K, 2017, 2 licences]
  - Despite the 2011 [EU embargo](#): “It is prohibited to export, sell, supply or transfer military goods and technology to Belarus.” [UK Trade Restriction on Belarus](#)
  - [UK military trained Belarusian forces](#) - Aug 2020

### Tier 3

### Ethiopia

- military communications equipment [Licence granted for accessories / spare parts. **Law enforcement agency** end use, 2016, £18,238]
  - Ethiopian police recently [arrested](#) a Reuters journalist, released [12 days later](#). Media watchdog groups reported the arrests of at least 12 other journalists in Ethiopia last year.

### Senegal (ECOWAS embargo)

- Small arms ammo [2016, £38K, NSEU]
- gun mountings [2020, £9.6K] to [Navy end user]
  - Senegalese journalist Babacar Fall told Bonjourdakar.com that the Senegalese Naval vessel deliberately rammed into a small boat carrying refugees, with at least a dozen drowning in the incident. [\[UNCONFIRMED\]](#)

### Russia

- Very few exports, as per embargo, but did approve navigation equipment for **armed forces** end use in 2016 [£178K] despite EU embargo including “dual use items for military use”.

### Pakistan

- 2020: 725 assault rifles, SITCL from Brazil, Components for sniper rifles [NSEU, £1.47m]
- 2019: 20 sniper rifles with silencers [**Navy end use**] £260K deal, small arms ammo £400K [**Navy end use**]
- 2017: 130 sniper rifles, £760K [NSEU]
- 2016: 632 sniper rifles[ for accessories / spare parts. **Armed forces end**], Military helicopters and support aircraft [End use by the Navy] £2.1m, military helicopters [Licence granted for armed forces end use.] Part of **£1.7m** deal, pistols (32) [for accessories / spare parts. **Armed forces end use.**]
  - Pakistan has conducted a ‘sustained sniping campaign’ against Indian forces in Kashmir - [Oct 2020](#)
  - Sniper attacks on Pakistani security focus, in Northwest Pashtun region, by Pakistan Taliban - [Sep 2020](#)
  - Pakistani snipers trained with Russian snipers in [Nov 2020](#)
  - [FCDO Report](#): There was increased pressure on civic space and freedom of expression, including self- and overt censorship, threats to journalists’ safety, and blasphemy allegations against academics. Two journalists were killed in Sindh, and two journalists were allegedly detained and tortured by security forces for reporting on COVID-19 quarantine facilities in Balochistan. Torture and enforced disappearances remained a concern.

## Zimbabwe

- **Military aircraft components** and infrared **imaging equipment** were approved in 17 country OIEL, 2017 - no specified end user.
  - **Council Decision 2011/101/CFSP**: embargo on the provision of arms and related material, as well as of equipment that might be used for internal repression
  - Zimbabwe [buying](#) equipment/software from Israel for state surveillance.

## Argentina

- **Five licences in 2017 & 2018**: Riot shields [law enforcement agency end use] - £23K
  - The sale itself is less egregious than other police forces but it’s noteworthy that we have an embargo against the Argentinian military, yet arm their police force.
  - 9 police officers were arrested after the killing of a man near Tuchuman in [May 2020](#)
  - Police with riot shields at Maradona’s funeral - [Nov 2020](#)
  - Officers fired tear gas during abortion demonstrations, [2018](#)
  - 100 people injured after police fire rubber bullets and tear gas at pension protesters. - [2017](#)

## Central African Republic

- Riot shields and body armour to for military end user in 2019 - £18K
  - Could be for MINUSCA UN peacekeeping force, does not specify
  - CAR are also backed by Russian military, with “several hundred soldiers and heavy weapons” sent by Russia, according to CAR government. - [Dec 2020](#)

## Jamaica

- 6 Sniper rifles **armed forces end use**. Granted for training purposes. [2016, £113K]

Note: UK and US previously rejected applications by the Jamaican Constabulary Force ([2005](#)) due to consolidated EU and national arms export licensing criteria. “Specifically, their concerns included what they deemed to be the JCF's insufficient accountability measures, weapons handling procedures, maintenance schedules, and poor human rights record. In addition, London reported that the JCF had not yet decided where the weapons would be stored, and that the exported weapons "might be diverted to an **undesirable end user**".

## Iraq

- **04/2017, SITCL from Romania**: 10,000 assault rifles and unknown number of grenade launchers with NSEU

## Afghanistan

- 9,000 assault rifles, grenades [2020, **SITCL from Bulgaria**, NSEU]

## South Sudan

- **2015 SITCL from Ghana, NSEU**: 400 assault rifles, machine guns (92), mortars and mortar bombs, projectile launches, small arms ammo, tear gas
- **2018 SITCL from Brazil, NSEU**: Hand grenades, small arms ammunition, tear gas
  - For UN peacekeeping? If so, still didn't have good end results: United Nations peacekeepers abandoned their posts when fighting erupted in South Sudan's capital in July and then used tear gas on frightened civilians who sought shelter at the center of the U.N. base, [a 2016 report claims](#).

*OIELs to multiple countries worth mentioning*

[17 countries](#), military aircraft components for **Air Force end user**, including East Timor, Zimbabwe, Turkmenistan, Albania, Armenia, Bosnia, Serbia, Moldova

[93 countries](#), 2017: combat aircraft components and software for **Armed Forces end use**, including to: **Burkina Faso, Cameroon, Dominican Republic, Ghana, Mauritania**.

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