

How the UK arms and supports Israel's genocide in Gaza



Introduction

The UK is deeply complicit in supporting Israel's genocide in Gaza: through arms sales, RAF reconnaissance flights over Gaza, from which it is suspected intelligence is shared with Israel, training of Israeli soldiers, and other forms of military cooperation.

Despite the government's decision on 2 September 2024 to suspend arms export licences to Israel, which the government assessed were for use by the Israeli military in Gaza, they are still allowing the supply of crucial components for Israel's 45 F-35 combat aircraft, so long as they are supplied indirectly via the US or other countries, rather than directly to Israel. These are used to bomb Gaza, at an extraordinary level of intensity, requiring a constant supply of spare parts. Government ministers, such as Foreign Secretary David Lammy, often seek to minimise this, and even claim, falsely, that they have completely ended the supply of military equipment for use by Israel in Gaza. But, by its own admission at the time of the decision, the government accepts that these UK-supplied components may well be used by Israel to violate International Humanitarian Law (IHL) in Gaza.

The government has described Israel's actions as "intolerable" and "egregious", and as Israeli-enforced mass starvation in Gaza has deepened in recent months, ministers' language has become stronger – but their actions have remained unchanged, continuing to make an exception to allow the continuing supply of these components. This decision was challenged in the High Court, which unfortunately ruled in favour of the government in June, concluding that the questions of international law raised by the case were matters for the executive and Parliament, not the courts.

This arbitrary, ad-hoc exception to the UK's export control laws, allowing the single most important and destructive aspect of the UK's arms trade with Israel to continue, makes a mockery of the government's decision to suspend licences, their proclaimed commitment to international law, and their supposed outrage at Israel's horrific crimes in Gaza.

Meanwhile, the government has also allowed a large number of arms export licences to Israel to remain in force, and has also issued new licences. It claims these are not for use by the Israeli military in Gaza, but almost all of them nonetheless help support the Israeli war machine, and thus the genocide. Other forms of military cooperation have continued without interruption. **Indeed, the value of arms export licences to Israel surged in the last three months of 2024, after the government's partial suspension.**

Using a variety of sources, including published official export licence data and responses to Freedom of Information (FOI) requests, his briefing, which updates a previous one published in December 2024, challenges and refutes the government's false claims to have ended UK complicity in the genocide in Gaza.

Section 2 explains what the F-35 is, the UK's role in it, and why the supply of components for Israel's F-35s is so important. Section 3 discusses the types of licences that are not covered by the partial suspension of export licences, and presents information on the UK companies involved in arming Israel. Section 4 discusses other information on possible UK arms sales to Israel other than that obtained from export licensing data (and in some cases that does not appear to be consistent with known export licences), and section 5 concludes, setting out CAAT's demands for what the government must do to help end the genocide in Gaza – most critically, a complete two-way arms embargo, forbidding all military exports to and imports from Israel.

This briefing does not discuss other forms of UK military cooperation with Israel. These include training of Israeli Defence Force (IDF) personnel in the UK; surveillance flights by the UK RAF over or near Gaza, from which intelligence has been shared with Israel; and the use of the UK military base at Akrotiri, on Cyprus, to support Israel's genocide in Gaza, including its possible use for US arms deliveries, as well as the above-mentioned surveillance flights. This is discussed as part of a report by the British Palestinian Committee on UK military support for Israel, and has frequently been covered by [Declassified UK](#). Readers are encouraged to consult the above-linked sources for more on these issues. While these are not discussed in detail here, CAAT is clear that all such military cooperation with Israel must also end.



Key points

- **The F-35 is almost certainly the single largest and most important part of the UK arms trade with Israel. This makes the UK directly complicit in Israel's genocidal acts.**
- The value of UK parts in the 45 planes delivered to Israel so far since 2016 is about \$540 million, or roughly **£430m**.
- This does not include spare parts, which likely amount to around **£142m** worth since 2016, and around £98m since the start of the current Israeli war on Gaza.
- Between initial production and spares, the estimated value of UK F-35 component supplies to Israel of **£572** million represents almost half the total value of UK arms sales to Israel since 2016.
- **The figures often given in the media, based on government data for the value of UK arms exports to Israel, are vastly understated, as most or all of the F-35 exports are excluded, as they are made via non-transparent 'open licences'.**
- In 2023, the F-35 "Open General Export Licence" (OGEL) was used to deliver equipment to Israel a total of 14 times, the most of any year since it was issued in 2016. (The next highest year was 5).
- While only a small proportion of F-35s go to Israel, overall **the F-35 programme is worth billions a year to the UK arms industry**. UK arms companies have **\$7.8 billion** worth of contracts for production for the F-35, of which BAE Systems alone accounts for \$6.6 billion.
- The government claims that, apart from F-35 components that go via the US and through international pools of spare parts, it has suspended all licences for military goods to Israel for use by the Israeli military in Gaza. **However they have refused to disclose which licences were suspended, rendering proper scrutiny of the government's claim impossible.**
- This government, like previous ones, frequently claims that the UK has one of the most robust arms export licensing systems in the world. The continued arming of Israel's genocide in Gaza leaves this claim in tatters. It is now apparent that, not only do the government have huge leeway to interpret the criteria as they wish, but they can set these criteria aside completely when it suits them. If the licensing system allows arms sales to Israel now, it is hard to imagine a case where the law would actually forbid them.
- The recent ruling by the High Court that they cannot adjudicate on the matters of international law and treaties raised by the supply of F-35 components to Israel – such as the Arms Trade Treaty (ATT) and the Genocide Convention – as these have not been written into UK law, and that the issue is a matter for the government and Parliament, show that it is up to Parliament to ensure that UK arms export law enshrines adherence to international law. **Ultimately, if the government and Parliament will not act to prevent a genocide, then it is up to ordinary people to compel them to, and to take action ourselves to stop arms supplies that enable this genocide.**

Key demands on the UK government

- Implement a complete two-way arms embargo on Israel – no exports of arms to, or imports of arms from Israel, directly or indirectly, ending the F-35 exemption.
- As a minimum, severe restrictions on dual-use exports to Israel, banning all such exports that might directly or indirectly contribute to the activities of the Israeli arms industry.
- Sanctions on the Israeli arms industry, including a ban on investments, loans and financing of Israeli arms companies. Israeli arms companies with subsidiaries in the UK must be required to divest from these holdings.
- An end to all UK military cooperation with Israel, including training of Israeli military personnel, and spy flights by the RAF over Gaza from the UK military bases in Cyprus.



Section 1: UK arms export licences to Israel

1.1 Single Individual Export Licences for direct export

Based on government export licence data, also reproduced in CAAT's online database, the total value of "Single Individual Export Licences" (SIELs) for UK arms sales to Israel between 2015-24 was **£633 million**. SIELs allow a company to export a fixed quantity and value of specified equipment to a specified destination country. They are the only type of export licence to which a financial value is attached.

This figure, or similar figures for other periods, is what is most often cited in the media when discussing the value of the UK arms trade to Israel. On an annual basis, the values were:

Table 1: Value of military Single Individual Export Licences (SIELs) to Israel 2015–24

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Value (£m)	20	86	221	22	27	31	24	42	18 ¹	142 ²

Between these SIELs and the estimated value of F-35 components, total UK arms exports to Israel over the 10-year period 2015-24 have been worth over £1.2 billion.

The surge in the value of licences in 2024 is notable, in particular as the great majority – £128m – was licenced in quarter 4, October – December 2024, after the government's decision to suspend licences for equipment for use by the Israeli military in Gaza, and not to issue new such licences. The majority of the value of these licences was in the category ML5, covering radars and sensors, fire control and targeting systems, and countermeasures to these. Most of this was for "components for military radars". As usual, no information is available on what type of radars these were, or what their purpose is.³

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- 1 From 2023, due to a change to a new online export licence application platform, which is not connected to the government's online database from which CAAT's database draws its data, about 15% of the value of export licences for 2023 are not included in these online databases, although they are all included in the government's overall annual and quarterly statistics. Thus, the figure in CAAT's database for 2023 is an underestimate.
 - 2 For 2024, the problem with the online database worsened, and indeed for the first three quarters of the year, even the quarterly spreadsheets were missing data. However, the spreadsheet for the 4th quarter and for the whole year were complete. This is where the figure is taken from. Due to the severe gaps in the online database, CAAT's database has not been updated to include the (partial) data for the 4th quarter of 2024.
 - 3 However, from a recently received FOI response, the company involved in the export of radars and their components, which almost certainly account for the bulk of this figure, is Thales. Around £67 million of the figure is for incorporation, while the rest is for equipment to remain in Israel. From subsequent correspondence between MPs and ministers, and between CAAT and the Export Control Joint Unit, we understand that both relate to a weapons programme ultimately destined for a NATO customer. The licence for equipment to remain in Israel is for "integration testing", according to an ECJU official.

1.2 Incorporation licences

These figures cover licences for the direct export of military equipment to Israel. However, there are also so-called “incorporation licences” (a type of SIEL), which allow the export of components to country A, typically to the arms industry in that country, to be used (‘incorporated’) in the production of weapons or weapons systems that are then exported to country B. Companies seeking to export components in this way must declare the ultimate recipients of the equipment (one or more country B), as well as the initial recipient (country A).

The UK is a major supplier of components and subsystems to the US arms industry, and since the US is Israel’s largest arms supplier by far, many arms exports from the UK to the US go into weapons that are ultimately sold to Israel.

Information on the ultimate destinations for incorporation SIELs is unfortunately highly untransparent. While published export license data reveals which SIELs are for incorporation, and which are ‘standard’ SIELs that do not allow for onward re-export, the published export licence statistics do not disclose which incorporation destinations are authorised for which individual licences.⁴

However, CAAT has received responses to FOI requests detailing all incorporation SIELs issued for export to the US from October 2021 (the latest that a licence could have been extant by October 2023), to the end of 2023, for which Israel was an approved incorporation destination, or final end-user.⁵ (Figures for 2024 have not yet been obtained).

The FOI response revealed that during this period, 26 Incorporation SIELs worth **£165.4 million** were issued for export to the US, with Israel as a final destination for the complete equipment containing the UK components. This far exceeds the value of direct SIELs to Israel over the same period. This included:

- £97.8 million for components for combat aircraft
- £42.1 million for components (and software) for military aero-engines
- £25.5 million for components for launching/handling/control equipment for missiles

Of these licences, 18, worth £52 million only listed Israel as a permitted third country final destination. This included £24.6 million for components (and software) for military aero-engines, and £24.1 million for components for launching/handling/control equipment for missiles.

These indirect exports to Israel are not included in the figures typically reported in the media for UK arms sales to Israel.

⁴ Official export licensing statistics disclose, for each recipient destination, a list of all countries that were authorised ultimate destinations for equipment licensed under one or more Incorporation SIELs during a given period (of 30 days or more), but not which ultimate destinations were associated with which licence. Nor is it possible, in general, for the algorithm used by CAAT’s online export licence database to deduce this information from what is published by the government.

⁵ This information was also received for licences to Germany with Israel as a final destination, but the amounts involved were much smaller.

1.3 Open licences

However, SIELs, whether for direct export or for incorporation, are only one type of export licence. They allow the export of a limited quantity and value of equipment to a particular destination, and are valid for 2 years. They are the only type of licence with a financial value attached. The other types of licences are:

Open Individual Export Licences (OIELs): These allow the export of an unlimited quantity of specified equipment to one or more authorised destinations, and are valid for 3 or 5 years. As the quantity is unlimited, they do not have a financial value attached. Between 2015-24, a total of 54 OIELs for export of military equipment to Israel were issued. In many cases, these covered a large number of recipient countries, so we do not know how much, if any, was actually exported to Israel using these licences, and it is not even possible to make a meaningful estimate. Some of these OIELs may have been suspended as a result of the government's decision of 2nd September. No OIELs for military equipment to Israel were issued after 2nd September.

Open General Export Licences (OGELs): These are different from other export licences. Instead of companies applying for them, the government issues them in advance and invites companies to register for them. Registered companies can, subject to certain conditions, then export unlimited quantities of equipment covered by the OGEL to the list of authorised countries (often a very long list), without the need to apply for further licences. OGELs are valid indefinitely, until withdrawn or amended. OGELs may cover specific weapons programmes, like the F-35, specific types of equipment, or limited purposes such as exporting equipment to be repaired and then returned to the UK.

Both OIELs and OGELs may allow for both direct exports to the final end-user, and for indirect exports, where equipment is sold to one of the countries listed on the licence, but may later be re-exported to another, typically after incorporation into larger systems. The F-35 OGEL is one such licence that allows for this.

Eleven OGELs for military goods included Israel as an authorised recipient. On 2 September, the government removed Israel from the list of authorised recipients for five of these licenses. However, by far the most important is the OGEL covering the F-35 programme, which is discussed at greater length below.

CAAT estimates that open licenses cover roughly half of all UK arms exports. This, combined with the fact it is impossible to know how much equipment is actually exported using these licenses, means there is a severe lack of transparency in the UK arms export system. CAAT has long argued for radical changes in this area to enable a proper, informed public debate about UK arms exports.

The partial suspension

The government announced on 2nd September 2024 that it was suspending “about 30” licences (later clarified to be 29) for military equipment to Israel, assessed to be for use by the Israeli military in Gaza. This followed an assessment that Israel was not complying with International Humanitarian Law (IHL) – also known as the “laws of war”, and including the Geneva Conventions – in Gaza, in particular through its blocking of humanitarian aid, and its treatment of Palestinian prisoners. Astonishingly, the government said they could not come to a conclusion as to whether Israel was violating IHL in the conduct of its military operations, in spite of the horrific levels of civilian casualties and the overwhelming evidence of war crimes, such as attacking hospitals. The government’s excuse for this is that it was not able to conclude as to why Israel launched specific attacks, and therefore whether there might have been a legitimate military goal. Nonetheless, they concluded that there was a “clear risk” that UK supplied equipment might be used to commit or facilitate serious violations of IHL which, in accordance with Criterion 2c) of the government’s Strategic Exporting Licensing Criteria, meant that licences for such equipment could not be issued, while previous licences must be suspended or revoked.

The government refused, in response to a Freedom of Information request, to disclose which licences it suspended. However, in its announcement it stated that they included items such as components for combat aircraft, military aircraft, unmanned aerial vehicles, and targeting equipment. The 29 licences suspended were out of a total of 350 licences for military and dual use equipment. The types of licences that were allowed to continue – and presumably that have continued to be issued – are discussed in section 3.

However, the most egregious exception to the suspension was licences for components for the F-35 combat aircraft, despite the government’s acknowledgement that there was a “clear risk” that Israel might be using its F-35s, including the UK components, to “commit or facilitate serious violations of International Humanitarian Law”. Indeed, documents submitted by the government in the recent court case over arms supplies to Israel (see section 2.11), included an assessment by the Export Control Joint Unit (ECJU), the unit within the Department for Business and Trade responsible for assessing export licence applications, stating that **“it is uncontentious that conduct which could, in principle, satisfy the physical component of genocide continues to take place in Gaza”**.⁶

⁶ What the UK arms sales to Israel challenge actually decided | The Herald

Section 2: The F-35

2.1 What is the F-35?

The F-35 is an advanced ‘5th generation’ stealth fighter aircraft produced primarily by Lockheed Martin in the US. It is the most expensive military programme in history. While the US is the lead producer, many other countries are involved in producing parts for the F-35, including Australia, Canada, Denmark, Italy, Japan, the Netherlands, Norway, and the UK. Around 20 countries use the F-35, including all the above – and Israel.

2.2 Israel’s use of the F-35

Israel has 45 F-35s, with a further 30 on order. Israel has used these aircraft, along with its other US-made F-15 and F-16 fighters, in its genocidal assault on Gaza since 8 October, 2023. At the start of the war, it had 39 aircraft, with 6 more delivered so far in 2025. All three types of aircraft have been equipped with US-made 2000lb bombs, that Israel has used in some of its most devastating attacks. On 2 September 2024, the very day the government made its announcement, Danish NGO Danwatch revealed that an F-35 was used in July to drop three 2000lb bombs in an attack on a so-called “safe zone” on Al-Mawasi in Khan Younis, killing 90 people. The attack almost certainly violated IHL and may well have been a war crime.⁷ Israel has modified the F-35s to operate in so-called “beast mode”, carrying additional munitions on the wings as well as the interior. This suggests that, while Israel has more F-16s and F-15s than F-35s, the use of the F-35 for bombing Gaza may be disproportionate to their number.

2.3 The UK and the F-35

Of all the countries involved in the F-35 outside the US, the UK is by far the most important, and is the only “Level 1 partner”. 15% by value of every F-35 aircraft produced is made in the UK. The current unit cost of an F-35 is about \$80 million, which makes the UK share of each plane worth \$12m. This makes the value of UK parts in the 45 planes delivered to Israel since 2016 about \$540m, or roughly £430 million.⁸ This is over three times as much as the value of all the other aircraft-related licences to Israel over the same period.⁹

⁷ In general, while fragments of bombs and missiles are often found at the scene of attacks, since all the aircraft can carry the same munitions, it is rare for the aircraft responsible to be identified. In this case, Danwatch found evidence, and actually received confirmation from the Israeli military.

⁸ Based on average exchange rates in the year of aircraft delivery, which of course do not necessarily correspond to the exchange rates operating at the time of payment for components. This is a conservative estimate, as the unit cost of earlier production lots was higher, but have come down over time.

⁹ Out of single export licences to Israel, the category of equipment with the highest value since 2016 is “technology” (ML22), at £183m. Almost all of this was from a single licence in 2017 for “technology for military radars”, worth £182.4 million. We do not have any information on what sort of radar system this was for. The next largest category was aircraft and components (ML10), with £125 million. No other category had more than £44m worth of licences.



Key components and subsystems made in the UK include:

- The rear fuselage is produced by BAE Systems in Samlesbury, Lancashire
- The active interceptor system is produced by BAE Systems in Rochester, Kent
- The targeting lasers for the F-35's electro-optic targeting system, produced by Leonardo in Edinburgh
- The bomb release cables for the F-35, made by L3Harris in Brighton

At least 75 UK companies are involved in the production of the F-35. Details are shown on a [interactive map](#) designed by Campaign Against Arms Trade.¹⁰

The F-35 is almost certainly the single largest and most important part of the UK arms trade with Israel, and it makes the UK directly complicit in Israel's genocidal acts.

2.4 The F-35 Open General Export Licence

Exports of UK components for the F-35 mostly do not go via the normal licensing system. There is a special “Open General Export Licence” (OGEL) covering the F-35 programme that was first issued by the government in 2016.¹¹ Companies can register for this licence (the 75 companies referred to above are those that were registered in October 2023), and then, subject to certain administrative conditions, they can freely export any equipment for the F-35 programme without individual licences. The government does not even keep records of how much is actually exported using an OGEL, and the value of goods exported under an OGEL is not included in statistics for the value of export licences issued – in particular, they are not included in the value of SIELs presented in section 1. **This means the figures often given in the media, based on government data for the value of UK**

¹⁰ Of these, at least two, Rolls-Royce and Mission Systems Wimborne, produce significant subsystems for the F-35, but NOT for the version used by Israel. Rolls-Royce produce the “active lift system” for the F-35B, while Mission Systems Wimborne produces the air-to-air refuelling pods used by the F-35B and F-35C. Israel uses its own customised version of the F-35A, known as the F-35I Adir.

¹¹ There are many such OGELs issued by the government for a variety of purposes.

arms export licences to Israel, are vastly understated, as most of the F-35 exports are excluded. However, some F-35 exports do go via individual licences, typically ‘incorporation’ licences, as discussed in section 1.2.

It is likely that some companies not registered for the OGEL are also involved in F-35 production. This could include companies choosing to use individual licence applications for component exports, and lower-tier suppliers, who supply components for the F-35 to other UK companies (such as BAE Systems), that go into larger subsystems that are then exported by the larger company. Thus, the smaller supplier would not themselves be conducting exports.

2.5 Spare parts

The involvement of the UK arms industry in the F-35, including Israel’s F-35s, doesn’t stop with their initial production. Keeping an advanced combat aircraft like the F-35 flying is not a simple matter, and such aircraft are very hungry consumers of spare parts. This is even more so when they are being used in high intensity combat operations, as Israel is doing in Gaza. One report stated that Israel was using its F-35s in Gaza at more than five times the normal rate of peacetime operations. This high intensity of operations has continued; one report from March 2025 stated that Israel’s F-35 had conducted “thousands” of sorties, and flown more than 15,000 flight hours.

Shortly after the start of the current war, it was reported that the US was rushing spare parts and additional capabilities for the F-35 to Israel to assist in their operations. At a Congressional hearing in December, one official stated that they were working ‘at breakneck speed’ to deliver more spare parts for the F-35 to Israel.

The UK is very much involved in the ‘global supply chain’ for spare parts for the F-35, including for Israel. While some such parts will be delivered directly to Israel, most spares will go into common stockpiles kept in the US and other locations. From there they can be exported to any of the countries using the F-35 as needed, again including Israel.

Without the continuous supply of spare parts from the UK, as well as other producer countries, it would be impossible for Israel to keep using the F-35s to bomb Gaza.

It is hard to know the exact value of UK spare parts exported to Israel. However, based on official reports of the cost of maintaining F-35s, the number of aircraft Israel has received over the years, the heightened rate of use in wartime, and assuming that the UK provides 15% of spare parts, we estimate that the value of UK spare parts delivered to Israel since 2016 will reach **£142 million** by June 2025, of which over **£98 million** since the start of the current war.¹²

¹² A US Government Accountability Office report from 2021 gave the annual maintenance cost of an F-35A as \$7.8 million. The report also suggests (p43) that about one third of this, i.e. \$2.6m, is spare parts (the rest being labour and other costs). This would make the 15% UK share \$390,000 per aircraft per year. However, we assume that during the Gaza war, since the planes are being used at more than 5 times their usual rate, they require 5 times as many spare parts, thus \$1.95m per aircraft per year from the UK. Figures for the number of F-35s Israel received each year from the SIPRI Arms Transfers Database. Based on average exchange rates for the year/part year in question.

This brings the total value of UK components in Israel’s F-35s, including initial production and spares, to around £572 million. These figures are a ballpark estimate, and should not be taken as precise or definitive, but in the absence of concrete information, they are the best estimate available.

2.6 Use of the F-35 OGEL

While the government does not collect information on the amount or value of goods exported using OGELs, companies registered for an OGEL are required to make annual returns to the government stating *how many times* they have used the OGEL to make a shipment to each destination country. This information is only published in a highly aggregated form, showing the total number of times *all* OGELs have been used by *any* company to export to each country.

However, in 2024 CAAT obtained information through Freedom of Information (FOI) requests on the total number of times the F-35 OGEL was specifically used to deliver equipment to Israel each year since it was issued in 2016.¹³ The figures are shown in the table below. A subsequent FOI obtained figures for 2024 which, perhaps surprisingly, showed 0 usages for export direct to Israel, although 8 months of 2024 were before the suspension of direct component exports to Israel.

Table 2: Number of usages of the F-35 OGEL to export equipment to Israel per year, 2017-2024

Year	2017	2018	2019	2020	2021	2022	2023	2024
Number of uses	5	2	1	2	5	5	14	0

This only covers *direct* exports of material to Israel, not exports to the US of components to build new F-35s to go to Israel, nor exports of spares to the global stockpiles that were subsequently delivered to Israel.

The surge in the number of shipments in 2023 is noteworthy. We do not know *when* in any year deliveries occurred, or how much was delivered each time, but this jump is consistent with a greatly increased demand by Israel for spare parts since 7 October.

2.7 The F-35 exemption

As stated at the beginning of this briefing, in announcing the suspension of licences for military equipment that Israel was likely to use in Gaza, the government made a specific exception for components for the F-35. To be precise, they have amended the F-35 OGEL so that it can no longer be used to send components directly to Israel (the deliveries discussed in 2.5 above) – but it still allows components to be exported freely to Israel, provided they go via another country involved in the F-35 first.¹⁴ This includes both components that go to the US to be put into new aircraft for Israel, and spare parts going into the global stockpiles that may then go to Israel. As well as the F-35 OGEL, the government has left open four other export licences for F-35 components where Israel is a permitted final destination, according to government submissions

¹³ FOI responses by the Department for Business and Trade available from CAAT on request.

¹⁴ The section of the OGEL that has been amended is Section 4.1.

to court proceedings in a case brought against the government by Palestinian human rights group Al-Haq and the Global Legal Action Network.¹⁵

This means that the government is allowing the single most significant part of UK arms sales to Israel to continue, and is therefore choosing to remain complicit in the genocide in Gaza.

2.8 Bending the rules: why is the government exempting the F-35 from the suspension?

The government claims that it is not possible to stop UK components for the F-35 going to Israel via other partner countries without disrupting the entire global supply chain for the F-35, on which both the UK and its allies depend. It therefore argues that stopping these spare parts would harm the UK's security and defence. But there are several problems with this claim.

Firstly, the government has admitted that Israel is not committed to following IHL in its war in Gaza, and that there is a 'clear risk' that UK components for military equipment sent to Israel could be used to commit or facilitate serious violations of IHL – potentially, war crimes. **It has fully acknowledged that this risk applies to F-35 components, whether supplied directly or indirectly.**¹⁶ UK law on arms export licences requires that exports must be stopped when such a clear risk exists.

The government is making up a special exception to the rules as it goes along.

2.9 International law

Moreover, the UK has commitments under international law. This includes the Genocide Convention, which requires that all states must take whatever steps they can to prevent the crime of genocide. The International Court of Justice (ICJ) in The Hague has ruled that it is at least 'plausible' that Israel is committing crimes covered by the Genocide Convention.

The International Court of Justice (ICJ) ruling imposed provisional measures on Israel to prevent genocide against the Palestinian people in Gaza. The ICJ found that the measures were necessary "to protect the rights claimed by South Africa that the Court has found to be plausible," including "the right of the Palestinians in Gaza to be protected from acts of genocide." The UK government is at risk of failing to take action to prevent genocide.

Under both relevant international and domestic law, the UK is required to prevent the transfer of military equipment and technology, including parts and components, where there is a clear or overriding risk that such equipment and technology might be used to commit or facilitate a serious violation of international humanitarian law or international human rights law. These binding obligations are contained within Articles 6 and 7 of the International Arms Trade Treaty (ATT) as well as criteria one and two of the UK's Strategic

¹⁵ Government OPEN summary grounds of defence, 18 November 2024, available on request.

¹⁶ Government submission to court proceedings, as above.

Export Licensing Criteria (SELC). These obligations are even more clear in the light of the arrest warrants issued by the International Criminal Court (ICC) for Israeli Prime Minister Binyamin Netanyahu and former Defence Minister Yoav Gallant. **It means the UK is supplying indicted war criminals with arms to commit the very crimes for which they have been indicted.**

The UK is prioritising the supply chain for one particular weapon system above upholding international law, and above avoiding complicity in war crimes and even genocide.

2.10 Impossible... or inconvenient?

Finally, the government's claim that it is impossible to stop the indirect supply of F-35 components to Israel without disrupting the supply chain for all countries involved is highly questionable. Legally, there is nothing to stop the government from simply removing Israel completely from the list of authorised recipient countries on the OGEL. Logistically, while it might add complications to ensure that no component from the UK sent to one of the other F-35 partners ends up in Israel, given modern electronic stockpile management systems that allow for the tracing of every single item, it is hard to believe it is impossible. Rather, as information revealed in the recent court judgment shows, it is a matter of the political agreement signed between the UK, the US, and other F-35 partners that effectively cedes the UK's control over where its components go. But that does not stop the UK – perhaps along with other partners concerned about Israel's actions – from refusing to supply components unless it is guaranteed they will not go to Israel.

Arguably, the real reason the government is refusing to stop the supply of F-35 parts to Israel is that this would damage relations with the US, and might lead to the US reducing the UK's role in the F-35 programme in the future. While only a small proportion of F-35s go to Israel, overall, **the F-35 programme is worth billions a year to the UK arms industry.** UK arms companies have **\$7.8 billion** worth of open contracts for production for the F-35, of which BAE Systems alone accounts for \$6.6 billion.

The reality is that the UK is placing its relations with the US and the profits of the arms industry above international law and the lives of Palestinian people.

2.11 The legal challenge to the F-35

In December 2023, Palestinian human rights organisation Al Haq, represented by human rights law organisation Global Legal Action Network (GLAN), brought a legal challenge against the government's decision to continue allowing the export of arms to Israel, filing a request for a Judicial Review of the decision. The new government's suspension of some licences in September 2024 changed the nature of the case, and following a hearing in October, the court decided it would hear an amended case challenging the government's "carve-out" for the F-35. A hearing took place at the High Court of Justice in May 2025.



On 30 June, the High Court rejected Al-Haq's claim,¹⁷ and ruled that the government's decision to continue to allow the supply of F-35 components to Israel to continue, provided they were supplied indirectly, was one they were legally entitled to take.

A key part of the Al-Haq/GLAN case was that the government's F35 exemption violated international law in numerous respects – including treaties which the UK has signed and ratified, and which are therefore binding on the UK government – and should therefore be ruled illegal under UK law. These include the Arms Trade Treaty, the Geneva Conventions, and the obligations this places on states, and the Genocide Convention, which places an obligation on all states to take measures to prevent a potential genocide.

However, the court accepted the government's argument that, since these treaties are not written into UK domestic law, and since, according to the judges, measures like the export control criteria do not give a sufficient "domestic foothold" on which to make a ruling in UK law, it is not a matter for the courts to rule on how these treaties and aspects of international law are interpreted. Instead, this is a matter for the government, and for parliament.

Essentially, since the UK's legal obligations under these treaties, including the duty to prevent genocide, is not explicitly written into UK law when it comes to arms exports, the courts will not hold the government accountable for its violations of international law.

The courts will not hold the government accountable for its violations of international law

¹⁷ In fact, the Court refused permission for judicial review; unusually, the permission hearing, where a claimant seeks to have their case heard in a full hearing, and the substantive hearing, were rolled up into a single hearing. The Court's decision meant that they ruled that the case didn't reach the threshold that would normally be needed to proceed to a full hearing.

The Court accepted that the government was allowed to make an exception, or ‘carve-out’, to the Strategic Export Licensing Criteria (the Criteria), which normally should have required the government to stop the export of the F-35 components to Israel. The Criteria are part of official Guidance issued by the government on how export licence applications should be assessed and decided.¹⁸

The Criteria include factors such as the UK’s international legal obligations, human rights and international humanitarian law, peace and security in the recipient country and its region, the security of the UK and its allies, the recipient’s adherence to international law, the risk of diversion of weapons to unauthorised users or uses, and the impact on development in the recipient country. Crucially, Criterion 2c) states that the government “shall not issue a licence if there is a clear risk that the goods might be used to commit or facilitate a serious violation of International Humanitarian Law”. It was on the basis of this criterion that the government stopped other export licences to Israel for use in Gaza.

However, the current Guidance, issued in December 2021 by the previous Tory government, included a line stating “The application of these Criteria will be without prejudice to the application to specific cases of specific measures as may be announced to Parliament from time to time.” **In other words, the government is allowed to make exceptions to the Criteria when it wishes to.** The Court accepted that the government had not acted “irrationally” in making such an exception in this case.

An important issue throughout the hearing and the judgment was the government’s claim that it is impossible to prevent supplying Israel with UK components when they are exported via the US or through the global F-35 programme’s pool of spare parts. From the case, it is clear that the obstacle is not a *practical* or *logistical* one, but rather a *political* one. The judgment stated that the Memorandum of Understanding between the F-35 partner countries, including the US, the UK, and others, does not allow partner nations¹⁹ to unilaterally decide that components it supplies should not go to certain recipient countries – and that therefore, the choice facing the government was whether to continue to participate in the F-35 programme at all, including supplies to Israel, or to temporarily or permanently withdraw.

This means that, by signing the MOU governing the F-35 programme, the UK government essentially ceded its export control decision-making to the US when it comes to the F-35.

The court heard from the government that officials had had “informal” discussions with partners about the issue, but had not taken things any further. The court found that the government was not legally required to make any more serious attempts to convince partners to stop supplies to Israel.

¹⁸ This Guidance is not part of the law on arms exports, but is something that the Export Control Act of 2002 requires the Government to present to Parliament, and to then follow when making export licensing decisions.

¹⁹ Other than, presumably, the US, which decides on export contracts for the F-35, such as with Israel, and which has previously made a unilateral decision to expel Turkey from the programme.

However, it clearly is possible for the UK government to demand a halt to the supply of F-35 components to Israel as a condition of continuing its involvement in the F-35. The outcome of such a demand could not be predicted, but it is important to note that many other F-35 partners, including Australia, Canada, Italy, the Netherlands, and Norway have stopped or restricted direct arms supplies to Israel, while continuing to allow indirect component supplies. all such partner nations demanded a halt, they would have considerable leverage.

Ultimately, the problem in preventing F-35 component supplies to Israel is one of political will, not logistical impossibility.

Moreover, even if the US did not agree to such a move, the government is choosing to prioritise continuing producing a fighter aircraft over preventing a genocide. **The court ruled this is a choice that the government can legally make – but it is still a choice.**

Section 3: Other UK arms sales to Israel

In its announcement of 2 September 2024, the government said it was suspending around 30 export licences for arms to Israel;²⁰ a small proportion of the 350 licences that were valid at the time. What of the other 320 licences? This section discusses the categories of export licence that were not suspended, and indeed which have continued to be issued since the government's decision. Following this, information is presented on the companies that have received arms export licences to Israel that could have been valid since 7 October 2023.

3.1 Dual use

Firstly, export licences are required for the export of both military and 'dual use' goods – that is goods that can have military or civilian uses. Typically, the great majority of dual use licences are for civilian applications, e.g. for (civil) industrial purposes. We don't know how many of these 350 licences were military or dual-use, but from 2019-2023, a little over half of all export licences to Israel were dual-use.

Does that mean there isn't a problem with these licences and that Israel is not using them in its genocide and occupation? Not necessarily. Some dual use equipment, such as 'information security equipment', may well be used as part of Israel's system of surveillance and repression of the Palestinian people. Other equipment and materials for industrial use may be for companies that, while not arms companies themselves, do supply the Israeli arms industry, along with other civil customers. Without knowing more about the type of goods covered by these licences, and their end-users within Israel, it is not possible to be certain whether some of the goods exported might ultimately contribute to Israel's war machine. This is not information the government makes available, making it impossible to hold them to account on this.

3.2 Military licences – who is the end user?

This still leaves a large number of military licences that were not suspended. How big a problem this is depends on what the equipment is, and who it is for.

Some military equipment, such as armoured vehicles or body armour, is licenced for export for use by the UN, NGOs, or diplomatic missions operating in Israel and the Occupied Palestinian Territories. Several such licences were issued in the last quarter of 2023, for example. These are not a problem, and

²⁰ Our understanding is that this figure includes both licences for direct export to Israel, and incorporation licences for export to other countries, where Israel is a permitted final destination (see section 1.2), and that both direct and incorporation licences were considered in the suspension process.

CAAT would accept that such licences could be exempted from any arms embargo against Israel. The value of licences of this nature that could have been valid at the time of the government's decision amounted to just £1.9 million.

3.3 Incorporation licences for onward export

Incorporation licences were discussed in section 1.2 above, in particular licences for the export of military equipment to the USA for incorporation into weapons systems that may then be sold on to Israel. However, the reverse also happens: indeed, as Israel is itself a major arms producer and exporter, there are many such incorporation licences allowing UK companies to export components to Israel for incorporation into equipment then sold to other countries. India, for example, is a major importer of Israeli arms, and is a regular final destination for incorporation licences to Israel. In the last quarter of 2024, when there was a major surge in arms export licences to Israel, a little over half (£67m) of the value was for incorporation.

These licences were not suspended, as the government says that they are ultimately going to a third country, and therefore Israel will not use them in Gaza. But there are two big problems with this:

1) There is no guarantee that all the components exported to Israel under incorporation licences end up being re-exported. The exporting company must declare any possible third country recipients they know about – but it is still possible that, while some of the components go into weapons that are re-exported, others go into weapons for Israel's own use. **The government does not even track what happens to such components after they are exported from the UK.**

2) The Israeli arms industry is large, highly advanced, and growing. Like the UK arms industry, it exports arms to repressive regimes and fuels conflicts around the world. It is also a crucial supplier to the Israeli military – for example almost all of Israel's UAVs (drones) are domestically produced. As Israel is a relatively small country, this industry depends crucially on exports to remain viable. **UK exports that help the Israeli arms industry produce weapons for export therefore help sustain and strengthen that industry, and therefore support Israel's brutal repression of the Palestinian people.**

3.4 Other licences for the Israeli military

Some of the roughly 320 licences not suspended are nonetheless for the Israeli military, the Israel Defence Forces (IDF). The government states this is for equipment it considered Israel would not use in Gaza. As examples, the government's statement cited components for trainer aircraft and some naval equipment.

But while Israel may not use trainer aircraft directly to bomb Gaza or the West Bank, they are obviously essential for training the pilots that do carry out these bombings. Even if – as we certainly hope – the current Gaza war ends before any current trainee pilots are in action, so long as Israel's illegal Occupation of the Palestinian territories continues, all arms exports for the Israeli military risk complicity with the occupation.

As for naval equipment, Israel has used warships, specifically German Saar-class corvettes, to shell Gaza, as recently as July 2024. In 2009, the then-Labour government admitted these ships contained UK components. Moreover, the Israeli navy has maintained a crushing naval blockade of Gaza since 2007, preventing all trade by sea, and severely restricting fishing by Gazans (indeed, Israel recently banned Gazans from using the sea altogether). The licences in question may be for other types of warship (published export licence information is never specific), but in general, even if Israel is not using certain weapons now, there is no guarantee it will not do so in the future.

During October – December 2024, over £60m worth of licences not for incorporation – i.e. for ultimate Israeli end use – were issued, mostly for components for military radars and targeting equipment. The government has subsequently clarified that these were for “integration testing” for a project linked to a NATO customer, and not for Israel’s own use. However, no information is available on exactly what type of radars these are, what systems they are for, etc., and this additional information was only obtained following questioning by MPs. Once again, the transparency of the export licensing system is seen to be severely lacking.

3.5 The UK companies arming Israel

Regularly published export licence data does not include information on the companies that received each licence. However, it is sometimes possible to obtain this information through Freedom of Information (FOI) requests to the Department for Business and Trade (DBT), the department responsible for administering the export licensing system and issuing licences.²¹ Especially since October 7 2023, considerable information has been obtained through such FOI requests on companies with export licences to Israel.

In particular, we and others have obtained:

1) A list of the companies registered for the Open General Export Licence (OGEL) covering the F-35 programme. There are currently 75. While registration for the OGEL does not automatically mean that every company is actively engaged in production for the F-35, they would not have registered for the OGEL if they were not expecting to use it on a regular basis. Other companies may be involved in F-35 production, either obtaining individual export licences, or acting as suppliers of sub-components to companies on the list, and therefore not themselves carrying out exports.

2) Details of the companies receiving or applying for export licences to Israel (Single or Open Individual Export Licences, SIELs or OIELs) between October 2021 and December 2024. Details of the companies associated with particular licences can be found in most cases on CAAT’s online export licence browser. (The link shows licences to Israel since October 2021).

²¹ Specifically, the Export Control Joint Unit, ECJU, which sits within the DBT but also has staff seconded from the Ministry of Defence (MOD) and the Foreign, Commonwealth and Development Office (FCDO), who take part in the assessment of licence applications against the export licensing criteria.

The top ten companies with export licences to Israel in this period were:

- 1 Teledyne UK Ltd.:** 30 Single Individual Export Licences (SIELs) issued, with 3 applications pending as of the end of 2024. 2 licence applications were refused. Teledyne are also registered for the F-35 OGEL (see above).
- 2 Phoenix Optical Technologies Ltd.:** 13 SIELs issued, 5 applications pending, 1 refused, and 1 application withdrawn by the company or stopped by the Export Control Joint Unit (ECJU).²²
- 3 Qioptiq Ltd.:** 13 SIELs issued, 4 pending. Also registered for the F-35 OGEL.
- 4 Gooch & Housego (UK) Ltd.:** 11 SIELs issued, 8 pending.
- 5 Instro Precision Ltd.:** 11 SIELs issued, 4 pending, 1 refused, 1 stopped. 1 Open Individual Export Licence (OIEL) also issued.
- 6 Martin-Baker Aircraft Company Ltd.:** 8 SIELs issued, 3 pending. 2 OIELs also issued. Also registered for the F-35 OGEL.
- 7 Leonardo UK Ltd.:** 6 SIELs issued, 1 pending, 1 withdrawn or stopped. 1 OIEL also issued. Also registered for the F-35 OGEL.
- 8 UAV Tactical Systems Ltd.:** 6 SIEs issued, 2 withdrawn/stopped. 1 OIEL also issued.
- 9 Stop-Choc Ltd.:** 6 SIEs issued.
- 10 CAV Ice Ltd.:** 6 SIELs issued.

Since this list was produced, Phoenix Optical Technologies was acquired by Gooch and Housego, making the latter the single largest applicant for individual export licences to Israel.

Both sets of companies – those registered for the F-35 OGEL and those with individual export licences to Israel – are displayed on an [interactive map](#) on the CAAT website.

²² The process of assessing an application for an export licence may in certain cases be stopped by the ECJU, without coming to a decision, for example due to a failure by the company to supply additional information on request. This is different from a decision to refuse an export licence, which is always on the grounds of a specific criterion.

Section 4: other information on UK arms exports and military support to Israel

Export licensing data is one of the main sources of information on the UK arms trade, and generally the most detailed, but it is not the only one, and it has serious limitations. It provides no information on actual arms deliveries. Due to the major use of open licences, which allow unlimited exports and do not have a financial value attached, it is very hard or impossible to know the true level of UK arms exports to any individual country. Finally, it does not cover all aspects of the UK role in facilitating arms transfers, in particular through UK military bases.

4.1 Israeli customs data

In May 2025, the Palestine Youth Movement (PYM), Workers for a Free Palestine, and Progressive International, published a report on UK arms transfers to Israel based on Israeli customs data covering imports of military equipment. This provided evidence of the transfer of 8,630 individual munitions from the UK to Israel since October 2023, as well as a shipment of 150,000 bullets.

In general, international customs data (which gives figures for the value of imports to and exports from countries broken down into various categories and sub-categories) is of limited value in measuring the extent of the arms trade, as most military equipment is not separately distinguished in the customs codes. In particular, military aircraft and their components fall under the same customs codes as civil aircraft, and similarly for ships and military electronic equipment. However, actual weapons and ammunition, such as guns, artillery, missiles, bombs, bullets, etc., as well as tanks and armoured vehicles and their components, do have their own customs codes. Even so, guns and ammunition for military use are not distinguished from those for civilian use.

Israeli imports data revealed the following shipments of such equipment received from the UK:

- 6 shipments of “Tanks and other armoured fighting vehicles, motorised..., and parts of such vehicles”, between January 2024 – January 2025, containing 299 items, to a total value of £135,782
- 2 shipments of “Rocket launchers; flame-throwers; grenade launchers; torpedo tubes and similar projectors”, in December 2023 and April 2024, containing 150 items, worth £86,544

- 1 shipment of “Bombs, Grenades, Torpedoes, Mines, Missiles And Similar Munitions Of War And Parts Thereof – Bullets”, in October 2023, 150,000 items, £94,728
- 5 shipments of “Bombs, Grenades, Torpedoes, Mines, Missiles And Similar Munitions Of War And Parts Thereof – Other”, November 2023 – February 2025, 9,631 items, £204,666

This provides significantly more information on some of these transfers than the export licence data, which does not provide any information on the number of items transferred. Moreover, this confirms actual delivery of equipment.

The data also raises questions as to whether the export licence data is telling the whole story of UK arms exports to Israel, or whether there are exports not covered by the licence data. To assess this, we compared the customs data with data on export licences in the categories ML3 (ammunition), ML4 (bombs, missiles, grenades etc. and their components), and ML6 (military vehicles and their components). A list of such licences issued since October 2021 can be found [here](#).²³

For some of these shipments, corresponding export licences that could explain them can be identified. For example, the shipment of 150,000 bullets could relate to a licence issued in May 2023, worth £118,000, for “training small arms ammunition”.²⁴

The shipments of military vehicles and components could relate to a number of licences. In particular, an Open Individual Export Licence (OIEL), issued in May 2022, and valid for three years, covered (among other things) “military support vehicles”, and “components for military support vehicles”, with Israel and Romania as the recipients. **However if so, the question remains as to why the licence was not suspended in September 2024, as there were four shipments after this.** Another relevant licence was issued in December 2023, covering “all-wheel drive vehicles with ballistic protection”, worth £160,000, intended for a diplomatic mission.

The “munitions – other” category is the hardest to explain. Some shipments could be covered by existing licences for “training artillery ammunition” in May 2023 (which, as it was intended for training, would not have been suspended), and “components for surface-to-air missiles” in November 2024 (which would also not have been suspended, as Israel has no need to use surface-to-air missiles in Gaza – although it uses them against rockets fired *from* Gaza).

The biggest mystery relates to a shipment in September 2024, worth £97,436, and containing 528 items, for which there does not appear to be any export licence that would permit such a delivery.

²³ Standard licences are valid for 2 years, so licences before October 2021 could not still be valid by 7 October 2023. Open Individual Export Licences (OIELs) are valid longer, but there were no older OIELs that were relevant.

²⁴ This is more than the value of the delivery, but licences give a maximum value for exports, so companies may well request a value at the top end of likely deliveries. Exchange rate fluctuations may also have an impact.

This category in the customs data – bombs, grenades, etc. other than bullets – could only be covered by the ML3 (ammunition) and ML4 (bombs, missiles, grenades etc.) categories of export licence. No licence or combination of such licences from the list above that remained valid in September 2024 was worth close to the £97,436 value of the shipment.

This raises the question: were these arms shipped illegally? (Unlikely). Were they a gift from the UK government to Israel, that would be subject to a “Crown exemption” from export licensing requirements? If so, this should be reported in the government’s next Annual Report on Strategic Export Controls for 2024, due to be published some time in 2025.

Another possible explanation is that they could have been US equipment delivered from the UK sovereign military base in Akrotiri, Cyprus, from which numerous flights to Israel have been documented; but misclassified in the customs data as coming from the UK itself.²⁵ This would not have required any UK export licence, but would certainly represent direct involvement by the UK Ministry of Defence in facilitating US arms transfers to Israel.

We are seeking to find further clarification on this matter. But whether this shipment came from the UK itself, or from the UK military base on Cyprus, it raises some serious questions.

4.2 Subcontract data for the F-35

In January 2025, Ploughshares Canada published a report, “Global production of the Israeli F-35I Joint Strike Fighter”, providing information on the countries and companies involved in producing F-35s for Israel around the world. The information was compiled from US Department of Defense (DOD) data on subawards, i.e. subcontracts, related to the F-35, issued to the companies concerned, who act as subcontractors to Lockheed Martin, the Prime Contractor for the F-35.

The report details subawards relating to “production lots” – separate main awards for the production of large numbers of F-35s for multiple users – from which Israel has, or will, receive some aircraft. From each lot, Israel has received or will receive only a handful of aircraft, with most going to the US and others going to the roughly 20 countries buying the F-35.

The report shows the value of subcontracts received by companies in each country (up to November 2024), and by each individual company in each country.²⁶ Moreover, data tables attached to the report provide more details on the individual subawards for each company, including information on the type of equipment produced.²⁷

²⁵ The UK Sovereign Base Area of Akrotiri on Cyprus is owned by the UK, and governed by a UK military governor. However, like other UK Overseas Territories, it is not formally part of the UK. It is not subject to UK export control laws, and any activities by the MOD based there in facilitating arms transfers would be covered by a Crown exemption from all licensing regulations.

²⁶ Some companies, e.g. BAE Systems and Leonardo, produce components for the F-35 from multiple countries – BAE in both the UK and US, Leonardo in both Italy, the UK, and the US – the value of these contracts are listed separately for each company’s subsidiaries in different countries.

²⁷ The full data tables can be obtained by emailing report author Kelsey Gallagher, kgallagher@ploughshares.ca.

The total value of subcontracts for the production lots that include Israel by country are shown below:

Table 3: value of F-35 subcontracts by producer country

USA	\$28.4 billion
UK	\$6.7b
Italy	\$3.4b
Netherlands	\$890 million
Israel	\$700m
Canada	\$590m
Norway	\$499m
Denmark	\$138
Japan	\$78.3m
Australia	\$64.5m
Turkey	\$17.7m
Luxembourg	\$3.8m
Belgium	\$411,000
Germany	\$132,000

Source: Project Ploughshares, “Global production of the F-35I Joint Strike Fighter”

Of the UK companies, BAE Systems dominates the subcontracts data. The figures by company are as follows:

Table 4: F-35 subcontracts awarded to UK companies

BAE Systems²⁸	\$5,773 million
Smiths Aerospace Group	\$343m
Martin-Baker Aircraft Company	\$303m
GE Aviation Systems Ltd.	\$227m
Ultra PCS Ltd.	\$72.5m
Goodrich Actuation Systems Ltd.	\$23.7m
L3Harris Release & Integrated Solutions Ltd.	\$2.0m
Icon Aerospace Technology Ltd.	\$1.9m
Leonardo UK Ltd.	\$291,000
Druck Ltd.	\$200,000

Source: Project Ploughshares, as above.

The small number of companies listed may be surprising, given that we know 75 companies are registered for the F-35 Open General Export Licence (OGEL), and that certain companies not listed above are known to produce specific components for the F-35. The low value attached to some companies may also be surprising. However, it is important to point out that the data relate only to the *first level* of subawards below the Prime Contractor, and not to companies lower down the supply chain, who may have sub-sub-contracts at various levels.

²⁸ Including BAE Systems (Operations) Ltd. and BAE Systems Plc.

Section 5: Conclusion – so what should the government do?

CAAT has, for a long time, called for a complete two-way arms embargo on Israel – no arms exports, and no arms imports, as the latter support Israel's deadly arms industry.

No exceptions for F-35s, and no exceptions based on exactly what weapons Israel might or might not use in its genocidal campaign and illegal occupation and apartheid regime right now. The only exceptions should be, as noted, for equipment for use by the UN, humanitarian organisations, diplomatic missions, etc. In view of the extreme nature of Israel's crimes in Gaza, this should arguably be extended to a complete ban on dual-use exports as well – at the very least, there needs to be much closer scrutiny of what dual-use goods are being exported and to whom, and whether such exports could directly or indirectly support the Israeli war machine.

Beyond an arms embargo, the UK should place sanctions on the Israeli arms industry – as it has done with the Russian industry – banning UK individuals and companies from investing in the industry, providing loans and financing, or otherwise dealing with Israeli arms companies. This would include requiring Israeli arms companies with subsidiaries in the UK, specifically Elbit Systems and Rafael, to divest from these holdings. In addition, the UK should completely end to all military cooperation with Israel, including the training, spy flights, and use by the US of the Akrotiri base on Cyprus.

When Russia annexed Crimea and invaded eastern Ukraine in 2014, the EU (including the UK) imposed an arms embargo, which was further tightened after Russia's full invasion in 2022. There was no quibbling about exactly what weapons Russia was using in Ukraine, or whether certain components were for export to other countries. The same should apply to Israel. Its military has killed over 56,000 Palestinians in Gaza, and it continues to kill dozens more every day, including gunning down civilians desperately seeking aid. It is engaging in a policy of deliberate starvation of the population, and has reduced the entire Gaza Strip to a virtually uninhabitable wasteland.

**This is genocide. It is no time
for excuses or half-measures.**



Campaign Against Arms Trade,
Unit 1.9, The Green House,
244–254 Cambridge Heath Road,
London E2 9DA

 020 7281 0297

 enquiries@caat.org.uk

 caat.org.uk