



Transparent as mud

How UK arms export reporting obscures
as much as it reveals

Sam Perlo-Freeman

October 2026

About the author

Dr. Sam Perlo-Freeman is Research Coordinator at Campaign Against Arms Trade.

Campaign Against Arms Trade (CAAT) is a UK-based organisation working to end the international arms trade.

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

Tel 020 7281 0297 **Email** enquiries@caat.org.uk **Web** caat.org.uk **Twitter/X** @CAATuk

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Executive Summary

Transparency in the arms trade is crucial both for international peace and diplomacy, and for domestic scrutiny of a business that can have devastating consequences for people against whom the arms are used. Yet, such transparency is typically weak, even in countries with relatively strong democratic and institutional norms, and that proclaim transparency as a virtue.

The UK is no exception, and despite the publication of a significant volume of official information on arms exports, this information contains severe gaps and failings that mean that the true picture of the UK arms trade is obscured as much as it is revealed.

Export licences – open licences and lack of delivery data

The main type of information published on UK arms exports is data on export licences. This includes details of the number and type of licences issued to each destination, broad descriptions of the types of equipment included on each licence, and, for one type of licence, namely Single Individual Export Licences (SIELs), the value of goods authorised for export by category.

The main, and interlinked, problems with these data are:

- 1 The lack of information on actual deliveries of military equipment using these licences, which is not even collected by the government, let alone published, and;
- 2 The extensive use of very broad ‘open’ licences that allow for unlimited deliveries of specified goods to specified destinations. These often cover a very wide range of types of equipment, and a large number, often dozens, of recipient countries.

Between them, these issues mean that export licence data fails to reveal the real size and extent of UK arms exports, of how much and what types of equipment is being exported where. Even SIELs, which do carry financial values, may end up being unused, while a given open licence may represent extremely large or rather small volumes of exports to each of the different countries listed.

Other weaknesses in the export licence data

Other flaws of the export licence data include:

- A current transition of the government’s online export licence application platform to a new system has led to a serious weakening of the detail available for a large proportion of export licences – this should be rectified by the creation of a new database linked to the new online platform, but there is no indication of when this will happen.

- Where export licences authorise the export of components to one country, for incorporation into larger systems that may then be exported to one or more third countries ('incorporation licences'), in most cases the information provided does not allow one to identify the ultimate destination(s) of this equipment. This means that the real impact of such exports cannot be scrutinised.
- The descriptions of items covered by export licences are extremely broad, giving only a very limited idea of how significant such exports are.
- No information is routinely published on the companies applying for and receiving export licences. Details of these companies can sometimes be obtained through Freedom of Information requests, but these are time-consuming and are frequently met with refusal on various grounds.

Other official sources of UK arms export data

- Until recently, UK Defence and Security Exports, an export promotion unit within the Department for Business and Trade, has published annual data on the value of arms export contracts gained by UK companies. The publication of this data has now moved to the Ministry of Defence.
- This data provides a fuller picture of the overall value of UK arms exports, as it is independent of the type of export licence used for deliveries on different contracts. However, the data has virtually no detail, and does not even break down the figures by recipient country, only by region – or by categories of equipment, only very broad 'domains', land, sea, air, and other.
- Since the full-scale Russian invasion of Ukraine, the UK government has provided ad-hoc information on UK arms supplies to Ukraine as military aid through various sources, including the Annual Report on Strategic Export Controls, and periodic research reports published by the House of Commons Library. This is useful.
- The UK makes annual returns to the UN Register of Conventional Arms (UNROCA), detailing exports of certain classes of major conventional weapons, as well as of small arms and light weapons. The same report is also submitted to the Arms Trade Treaty reporting mechanism. Unfortunately, these returns tend to be riddled with errors and irrelevant information.

Recommendations

- Reporting of data on deliveries of controlled goods, at least to the level of the value of exports by destination, cross-tabulated by control categories (Military and Dual Use lists), would be the single most valuable measure the government could implement to improve transparency in UK arms export statistics. It would greatly improve the ability of both the public and Parliament to monitor, assess, and debate UK arms export policy.
- We urge the government to ensure that the Export Control Joint Unit (ECJU) has sufficient resources to ensure the swift completion and deployment of the new online searchable database.
- The government should provide details of the specific ultimate end-users for all goods licenced via incorporation licenced to each initial end-user destination.
- Item descriptions in export licensing statistics are often over-broad. Substantially more specific information on the nature of goods licensed for export could and should be provided.
- Information on which companies have been issued, or refused, export licences to all destinations should be part of the information routinely published as part of export licensing statistics.
- The DBT (or MOD) should publish the value of arms export contracts collected by UK Defence and Security Exports broken down by recipient country, and if possible also by ML category.
- The UK government should take reporting under the UN Register of Conventional Arms (UNROCA) and the ATT seriously, with officials from the MOD, FCDO, and DBT working together to ensure a comprehensive and accurate return to these global transparency instruments. The UK reports should cover actual deliveries, as requested by these mechanisms, rather than export licensing.

1 Introduction

The arms trade is, at the best of times, a murky business. At one end of the scale is the illicit trade, carried out in complete secrecy, often in violation of one or more country's laws (or UN embargoes), involving shadowy networks of brokers, traffickers, and financiers. But the officially sanctioned arms trade, carried out by businessmen in suits, authorised and often directly supported by their national governments, is also subject to very limited transparency. (Indeed, the borders between the licit and illicit trade are often blurred, as exemplified by the massive corruption in deals involving top western arms companies such as BAE Systems, Thales, or Leonardo). Governments invoke national security and commercial confidentiality to restrict the amount of information they provide on what military equipment is sold to whom, and for how much. Even western governments that proclaim the virtues of transparency in the arms trade as in other aspects of governance provide only very partial information on arms exports, that frequently hides as much as it reveals.

The UK is no exception to this pattern. In some ways, the UK is actually one of the more transparent countries in relation to arms exports, and the government reports a considerable volume of information on export licences in particular. However, a closer look reveals serious flaws in transparency, so that it is for example not even possible to know the total value of the UK arms trade in any given period, or how much is supplied to which countries, let alone being able to get a clear picture of what weapons systems UK companies are contributing to, and thus how the UK is implicated in armed conflict and repression worldwide.

Yet transparency in the international arms trade is crucial both for international peace and security, and for enabling meaningful domestic scrutiny and debate of an issue with profound, and often highly damaging, human, political, and economic impact. The question of just how the UK is contributing to the genocide in Gaza, for example, is of huge importance to millions of people, but available information only provides partial answers – and the extent to which such questions can be answered in any given situation is often a matter of happenstance, rather than consistent policy. It is likewise important for the media, civil society, and parliament to be able to scrutinise the government's arms export policies and practices, to hold them to account in relation to arms export laws and political commitments and rhetoric.

Internationally, the importance of transparency in the arms trade as a means of assessing and preventing what the UN calls “destabilizing accumulations” of arms in a country or region, potentially leading to arms races and internal and regional conflicts, has been recognised by states since the 1990s. In 1991, the UN introduced, with general consensus among member states, the UN Register of Conventional Armaments (UNROCA), whereby states are requested to report annually on their exports and imports of major conventional weapons and, optionally, small arms and light weapons. Reporting to UNROCA is patchy, and often of poor quality, underlining again how practice often fails to live up to policy commitments, but the principle that transparency in the arms trade is desirable is – at least officially – widely acknowledged in policy and diplomatic circles.

This report assesses the information provided by the UK government on UK arms exports, and exposes the severe failures of transparency that become clear when one looks below the surface of what are apparently very detailed export licence statistics, and how this serves to obscure what is really going on with the UK arms trade, preventing proper public scrutiny of how this trade contributes to conflict, repression, and atrocities worldwide.

Section 2 summarises the key elements of the UK export licensing system, which authorises exports and brokerage of military and dual-use goods by UK companies, and presents the main sources of information on arms exports published by the UK government, mostly relating to export licences but also some other types of data.

Section 3 discusses the two most crucial obstacles to transparency, namely the heavy use of unlimited, non-transparent, “open” licences, and the complete lack of information on actual deliveries of military equipment. **Section 4** delves more deeply into the export licence data and the gaps therein, including issues such as so-called “incorporation” licences, the details (or lack thereof) of what precise types of equipment are licenced, and the companies receiving export licences. **Section 5** discusses some of the other, less detailed, sources of official information on UK arms exports, such as the UK Defence Export Statistics on export contracts received by UK arms companies, and UK reports to UNROCA. **Section 6** concludes and presents recommendations for improvements to transparency in arms exports, arguing that, beyond technical changes, a fundamental change in culture is needed that emphasises the right of the public to know what is being done in their name over official secrecy and corporate interests.

2 The export licensing system, and the sources of official information on UK arms exports

2.1 Export licensing

The export of *controlled goods*, i.e. military goods and dual-use goods, requires an export licence from the government to be legal. This includes equipment, software, and technology. “Military” goods refer to goods that are specifically designed or adapted for military use, while “Dual-Use” goods refer to certain categories of goods that have both military and civilian applications.

Other types of licences, called trade control licences (sometimes called brokerage licences), are required for individuals or companies based in the UK, or who are UK citizens, who wish to arrange the sale of military or dual-use goods from one country to another, without the goods ever being in the UK. This report focuses primarily on export licences rather than trade control licences.

A complete list of goods subject to strategic export controls (military and dual use) is available [here](#). They are divided into various categories, of which some of the most frequently used are:

ML1	Small arms, including rifles, handguns, sub-machine guns, and volley guns
ML2	Light weapons, including larger guns, howitzers, cannons, mortars, anti-tank weapons, projectile launchers, etc.
ML3	Ammunition and fuse-setting devices
ML4	Bombs, torpedoes, rockets, missiles, grenades etc., and countermeasures
ML5	Radars, sensors, fire control equipment, targeting equipment, and countermeasures.
ML6	Military land vehicles
ML9	Military naval vessels and naval equipment, including surface ships and submarines
ML10	Military aircraft, including fixed-wing aircraft, helicopters, and UAVs
ML11	Military electronic equipment, and spacecraft
ML13	Armoured or protective goods and constructions for military use (e.g. armoured plate)
ML21	Software for military use
ML22	Technology for military goods
PL5001	Security and paramilitary goods, e.g. riot shields, other riot-control equipment and vehicles

Each category also includes components and related equipment for the main items in the category.

There are three main types of export licence:

- 1) Single Individual Export Licences (SIELs). These authorise the transfer of a fixed quantity of specified equipment to an end-user in a particular country, up to a maximum value. Usually valid for 2 years. These are the only type of export licence to which a financial value is attached.
- 2) Open Individual Export Licences (OIELs). These authorise the transfer of unlimited quantities of specified goods to end-users in one or more destination countries, with no limit on value. Generally valid for 3 or 5 years.
- 3) Open General Export Licences (OGELs). These are pre-issued licences, covering one or more destinations and a specified list of goods or categories of goods. Companies may register for these OGELs, after which, subject to certain conditions, they can export unlimited quantities and values of goods covered by the licence to the listed destinations.

Some OGELs relate to specific programmes (e.g. Eurofighter Typhoon or the F-35 combat aircraft). Others relate to specific, limited purposes, such as for display at an exhibition. Others cover a wide range of equipment to a long list of countries. A full list of valid OGELs can be found [here](#).

For more information, see e.g. the government's Annual Report on Strategic Export Controls, or past CAAT annual reports.

2.2 Official information on UK arms exports

The UK government provides information and statistics on exports of military and dual-use equipment through a number of channels.

- 1) [Annual](#) and [quarterly](#) data from the Export Control Joint Unit on export licence applications and decisions for military and dual use goods, and goods covered by the torture regulation. This includes information on the number and type of licences issued, refused, revoked etc. to each destination, the control codes (military list and dual use list categories), summary item descriptions (e.g. “components for combat aircraft”, “sniper rifles”, “military aero engines”, etc.), and – in the case of Single Individual Export Licences (SIELs) the value of licences to each destination broken down by control category. The data also includes information on processing times and other administrative statistics.

Since 2023, as the Export Control Joint Unit has begun to roll out a new online export licence application platform, LITE, to replace the legacy SPIRE system, there have been gaps in the coverage of data provided in the annual and quarterly reports, although this has been improving. In particular, export licences applied for via LITE were not included at all, except in highly summarised form, in the quarterly data for 2024 Q1, Q2, and Q3, although they were included in the annual data for 2024. More recent data has included most information on LITE licences, but not processing times.

- 2) More detailed export licence data, covering broadly the same categories of information, but allowing for more precise time-bound searches, on the ECJU [online searchable database](#). This allows for search periods of 30 days or more, filtered by destination and other criteria.

Unfortunately, the database only connects to the SPIRE system, so that it does not cover licence applications made through LITE at all. This is discussed further below.

CAAT's online UK export licence browser draws its data from these two sources, presenting them in a far more detailed and user-friendly fashion, with more useful summary statistics and options for filtered searches. Originally, the browser drew all its data from the government's online database, using an algorithm using overlapping 30-day searches to identify licences down to the day they were issued (or refused). More recently, as an ever higher proportion of licences have gone through the new LITE system, and are thus only included in the annual and quarterly reports rather than the online database, the browser algorithm now combines the two sources, showing the licences that are in the online database in full detail, and the LITE licences in quarterly blocks, based on the government's quarterly reports.

3) Information on Open General Export Licences (OGELs). Unlike other export and trade control licences, OGELs are not applied for by individual companies and assessed by ECJU, but are pre-issued by the government (though subject to assessment under the Strategic Export Licensing Criteria as for other licences), after which companies may register for them. Once registered, companies can carry out unlimited exports within the coverage of the OGEL, subject to certain conditions and administrative requirements, without the need for individual licensing. OGELs are therefore not included in the annual and quarterly licensing statistics, or the online searchable database, but are listed individually at the above link.

OGELs may relate to specific countries (e.g. one for the US-UK Defence Cooperation treaty, and one covering the UK-Saudi government-government arms deals), specific weapons programmes (e.g. the Eurofighter Typhoon or the F-35), broad classes of equipment allowing exports to 'safe' countries (e.g. an OGEL covering certain classes of components), or specific purposes (e.g. export for repair or replacement under warranty, export after repair or replacement under warranty, etc.). Some cover very large numbers of countries, sometimes defined by a shorter list of countries not covered, and/or very wide classes of equipment.

4) The government's Annual Report on Strategic Export Controls. This does not include the content of export licensing statistics, but does include data on the numbers of licences, outcomes, processing times, etc., as well as information on export licensing enforcement. The only data it provides on the content of arms exports is a) military equipment gifted by HMG to overseas governments and other actors; b) Disposals (by sale) of surplus equipment by the MOD, and c) exports conducted under government-to-government contracts such as those with Saudi Arabia. The latter have increasingly become perfunctory, referring back to export licensing statistics. The Annual Reports for 2023 and 2024 have included the most definitive list of equipment donated to Ukraine.

5) Annual information on the value of contracts for arms and security exports, provided by UK Defence & Security Exports. This is made in two releases, one for Defence exports, and one for Security. Some of the latter may include equipment covered by either the military or the dual-use list. The Defence Exports statistics are based on a survey of companies. They break down the value of contracts only by region (Africa, Asia Pacific, Middle East, North America, South America, unknown/mixed), and 'domain' (Aerospace, Marine, Land, other), not by country or by any more detailed categories of equipment.

6) The UK's annual returns to the UN Register of Conventional Armaments (UNROCA), which is also used as the UK's annual return to the Arms Trade Treaty reporting mechanism. This covers exports of major conventional weapons in seven categories as defined by UNROCA, and of small arms and light weapons (SALW). It also provides information on imports of such weapons, and of UK military holdings in these categories

Of these sources, the first two, relating to export licensing statistics, are by far the most important and comprehensive, and addressing the gaps in these would represent the most valuable improvements to transparency. A discussion of these will therefore form the bulk of the remainder of this report, although issues with the other sources will also be considered.



Image: Jill Gibbon, sketch from DSEI 2023

3 How the export licence data obscures the reality of the arms trade

The export licence data published by the government – and reproduced in a far more usable form by CAAT – is in many ways quite detailed, and gives an appearance of transparency. However, there are two fundamental, and related flaws that severely undermine transparency in UK arms exports.

First, The UK government does not publish data on the value or content of actual arms deliveries, and for the most part does not collect such data. This means that neither the public nor even the government itself know how much of what types of arms are exported to what countries. Such data is provided by most EU countries, and used to be provided by the USA until 2017, indicating that there are no fundamental technical or security reasons for not doing so.

Second, a high proportion of UK arms exports are conducted using highly non-transparent ‘open licences’, that allow for unlimited deliveries of a wide range of goods, frequently to numerous countries. These include Open Individual Export Licences (OIELs), which are applied for by individual companies, and allow for unlimited deliveries of the goods covered by the licence to the destinations covered for a period of either 3 to 5 years,¹ and Open General Export Licences (OGELs), pre-issued licences for which many companies can register, as discussed above.

Both OIELs and OGELs can cover a very wide range of both destinations and types of equipment.² With OGELs, they may be used by a very large number of companies – for example, an FOI response from DBT revealed that 75 companies are registered for the F-35 OGEL. While companies applying for an OIEL need to provide a ‘business need’ for an open licence, with one justification being that they have received five relevant SIELs in a year, although there are various ways of demonstrating this.³ Where licences cover dozens of destinations, some of which are very small countries or territories, and long lists of item descriptions, it is implausible that the companies have contracts for all such equipment to all listed destinations, let alone five relevant SIELs in each case.

1 See Open individual export licence (OIEL) – <https://www.gov.uk/guidance/open-individual-export-licence-oiel>
OIELs are limited to three years for exports from Northern Ireland to an EU member state.

2 For example, an OIEL issued on 20 May 2025 included 67 destinations and 83 separate item descriptions.

3 See Open individual export licence (OIEL) – <https://www.gov.uk/guidance/open-individual-export-licence-oiel>

It is possible that in some cases the long list of destinations includes one initial recipient (not known from the licence information), which will include the exported equipment in larger systems to be re-exported to some or all of the other countries on the list.⁴

While an OIEL or OGEL may be used for very large volumes of exports – the permission is unlimited – it is likely that in some cases an individual OIEL, or the use of an OGEL by an individual registered company, may involve only relatively modest levels of exports. Where companies receiving OIELs have been identified through FOI responses, in some cases these are fairly small companies that do not have large revenues from the recipient countries or regions in question.

Thus, while an OIEL, and even more so an OGEL, represents unlimited levels of potential exports, possibly very large in some cases, there is absolutely no way of knowing whether an individual OIEL or OGEL will lead to mere thousands of pounds worth of exports, or billions, or anything in between.

These two issues would be problems on their own. Together, they leave claims of transparency in the UK arms trade in tatters.

The very broad nature of open licences is a problem on its own, and even if some delivery data were published, would serve to obscure the details of the arms trade. We might know how much is delivered to each country in different broad categories, but not the details of what types of equipment have been exported. The significance of individual licences would remain unknown. This is especially true of some of the very wide-ranging OGELs – for example, there is one covering the US-UK Defence Cooperation agreement, which permits the export to the US of the great majority of military equipment – excepting complete weapons systems such as missiles or aircraft, which the UK doesn't sell to the US anyway. How much this is used, and what types of equipment actually get exported using this OGEL is completely hidden.

The use of open licences is not unique to the UK, but comparison of data with other European countries suggests that open licences are used far more sparingly by other countries. Germany, for example, appears to use open licences – going by the rather classically Germanic name of *sammelausfuhrgenehmigungen* – primarily for exports to partner nations for collaborative projects with EU and NATO members.

Lack of delivery data and SIELs – the case of the undelivered Paveway IV bombs to Saudi Arabia

While the lack of delivery data is greatly exacerbated by the wide use of open licences, the problem can also apply to SIELs, as individual SIELs may be only partially used, or indeed end up being unused. An example of the latter can be where a company is unable to deliver major equipment during the 2-year validity period of a SIEL, and ends up applying for another, identical licence when they are in a position to deliver.

One case where we know this has happened relates to the delivery of precision-guided bombs to Saudi Arabia for use in the Yemen war, which raged from 2015–2022. This was one of the most controversial and harmful aspects of the UK arms trade in recent years. The case highlights a rare campaigning success in stopping some of the worst arms sales, but also illustrates how misleading export licence data can be without corresponding data on deliveries.

⁴ In the case of SIELs, these would be listed as 'incorporation licences', as discussed below, but no such distinction is reported for OIELs

In June 2019, the Court of Appeal ruled that the UK government's policy on allowing continued arms sales to Saudi Arabia for use in Yemen was "irrational and unlawful", and required the government to retake all its previous decisions on such sales on a lawful basis. As a result, the government halted the issuing of new licences for Saudi Arabia for equipment that could be used in Yemen, although existing licences were not suspended.⁵

In July 2020, the government announced that they had completed their review and retaken the decisions, and concluded, based on their new process, that there was no "clear risk" that UK equipment might be used by Saudi Arabia to violate International Humanitarian Law (IHL) in Yemen, and thus resumed issuing licences. (This new decision was also challenged in court by CAAT, but unfortunately was ruled lawful).⁶

One of the first licences that was issued was for £698m worth of "components for bombs" for Saudi Arabia, issued in August 2020.⁷ This related to the guidance systems for Paveway IV precision-guided bombs, produced by Raytheon Systems Ltd., a UK subsidiary of the US arms giant RTX, in Glenrothes, Scotland.⁸ This huge volume of munitions was no doubt to replenish Saudi stockpiles in the wake of their intense, and then ongoing, bombardment of Yemen.

Similar licences, for almost identical values of just over £698m, were issued in June 2022 and August 2024. This suggests that the UK sold almost £2.1 billion worth of these key bomb components to Saudi Arabia during this period – in addition to other smaller licences!

However, a note in Raytheon Systems Ltd. annual report for 2021 revealed that all was not quite as it seemed.⁹ The report stated that the company had incurred a one-off cost of sales of £328.8 million, due to being unable to fulfil a contract for the sale of precision-guided munitions to a "certain Middle-Eastern customer" – clearly Saudi Arabia, known to be a user of the Paveway IV produced by Raytheon UK. This was because in January 2021, the incoming Biden administration in the US halted the sale of US precision-guided munitions to Saudi Arabia, on account of their use against civilians in Yemen – something that the UK government signally failed to do.¹⁰

The Paveway IV is based on the US-made Paveway II, produced by both Raytheon and Boeing. The US maintains tight control over the export of arms containing US technology and components by other countries, thus preventing the sale of the Paveway IVs to Saudi Arabia, despite the fact that the sales were from the UK rather than the US.

Thus, Raytheon were never able to use the 2020 licence, which would have expired in August 2022. The 2022 licence was perhaps applied for on the expectation that, with a ceasefire in Yemen coming into effect in April 2022, the US might lift the restrictions, but in fact the Biden administration maintained a (justifiably) cautious approach, and did not lift them until August 2024. Thus, the 2022 licence likewise went unused, a fact confirmed by Raytheon Systems Ltd.'s very limited revenue from the Middle East in 2022–2024.

5 <https://caat.org.uk/data/countries/saudi-arabia/caats-legal-challenge/>

6 <https://caat.org.uk/data/countries/saudi-arabia/caats-legal-challenge/>

7 Details of the export licences discussed here can be found in CAAT's online browser, <https://caat.org.uk/data/exports-uk/>

8 The warheads are made in Italy. In the past, export licences were issued for the export of complete bombs to Saudi Arabia. Presumably the assembly of the warhead with the guidance system now takes place in Saudi Arabia itself.

9 See <https://find-and-update.company-information.service.gov.uk/company/00406809/filing-history> for Raytheon Systems Ltd. Annual reports and accounts.

10 <https://www.aljazeera.com/news/2021/1/27/us-reviewing-billions-in-arms-sales-to-saudi-arabia-uae>

The third similar licence was issued in August 2024, presumably also to Raytheon Systems Ltd., and it is likely that this one will, or has been, used to export Paveway IVs to Saudi Arabia, four years later than planned.

But what this means is that figures based on the value of Single Individual Export Licences for UK sales of these weapons to Saudi Arabia are exaggerated by nearly £1.4 billion. This emphasises the need for actual delivery data to understand what is actually happening in the UK arms trade.

Collecting delivery data would not be hard

At one point the Coalition government of 2010–15 was consulting on introducing reporting of deliveries, along with other transparency measures, but abandoned the plans for unknown reasons. These were not understood to be based on objections from industry.¹¹

The feasibility of collecting delivery data is underscored by the fact that companies *do* provide the government with some, limited information on their usage of export licences. In particular, they make annual returns of their usage of each open licence they have received or registered for, broken down by destination and end-user type (government, commercial, individual, other). Such returns report the number of times they have used such licences, but not the quantity or value exported. Broad aggregate data on the number of annual usages of *all* open licences of each type (OIEL, OGEL, and Open Individual Trade Control Licence (OITCL)) to each destination and end-user type can be downloaded from the ECJU's online searchable database. In some cases, figures for usage of specific open licences to different destinations have been supplied in response to FOI requests. (For example, I have received an FOI response reporting the number of times the F-35 OGEL was used to make deliveries to Israel each year. A subsequent FOI response disclosed the number of usages to each of the F-35 partner nations).

In the case of SIELs, it appears that companies also make some reporting of usage of licences. Various successful or partially successful FOI requests have asked for lists of licences received by specific companies to specific destinations, and have received as part of this information on the *status* of individual licences at the time of the response – which can include extant, expired, and exhausted – the latter implying that the licence has been fully used.¹² Other responses have disclosed whether individual licences have been used *at least once* by the licensee. Both types of response imply reporting of licence usage – though not quantities, except where licences are reported as exhausted – by companies.

This is further evidence that there is no fundamental obstacle to the collection and publishing of data on deliveries of controlled goods. Companies are *already* required to keep records of their use of licences, and make at least partial reports of their usage. The burden of expanding such usage reports to include the value of deliveries by categories, which of course companies would in any case have to record for customs purposes, would likely be minimal. It is clear that this is done successfully by the majority of EU member states.

11 See House of Commons Hansard Ministerial Statements for 07 Feb 2012 (pt 0001), Transparency in Export Licensing: Government Response.

12 Examples of such FOI responses available on request.

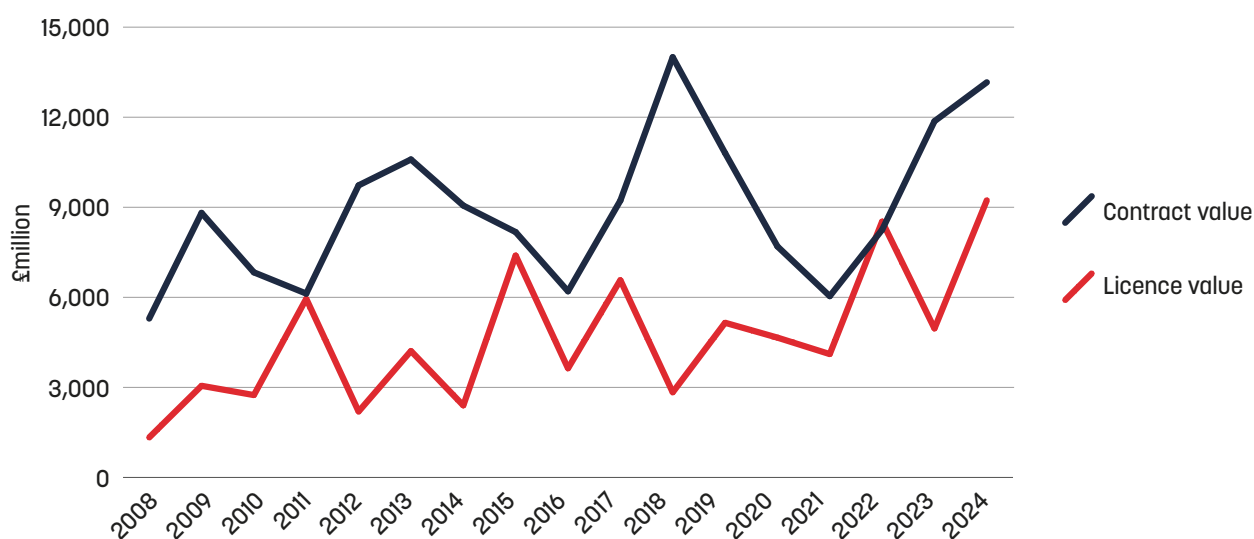
In short, reporting of data on deliveries of controlled goods, at least to the level of the value of exports by destination, cross-tabulated by control categories (ML and DU list), would be the single most valuable measure the government could implement to improve transparency in UK arms export statistics. It would greatly improve the ability of both the public and Parliament to monitor, assess, and debate UK arms export policy.

NB: since this report was written, the government has indicated that they intend to start reporting on deliveries from open licences starting with data for 2027 quarter 1. This is very welcome news, although the scope and detail of such reporting remains to be seen.

How much of UK arms exports use open licences?

Due to the lack of data on deliveries, it is naturally impossible to know what proportion of UK arms exports are conducted using open licences, as opposed to Single Individual Export Licences (SIELs), which have a maximum value and quantity attached (with the value publicly reported, and the quantity in the case of complete small arms). However, a very rough estimate can be made by comparison with the UK Defence & Security Exports data on the value of arms export contracts, discussed briefly above.¹³ As these are based on a survey of companies and the contracts they have obtained each year, which does not depend on what type of export licence might eventually be used to conduct the exports, they give a more comprehensive picture of the total value of UK arms exports. UKD&SE have at various times estimated that their surveys capture over 90% of such exports. The value of contracts reported by UKD&SE is consistently higher, usually very substantially, than the value of single licences (see figure 1).

Figure 1 Value of UK arms export contacts vs single licences 2008–2024

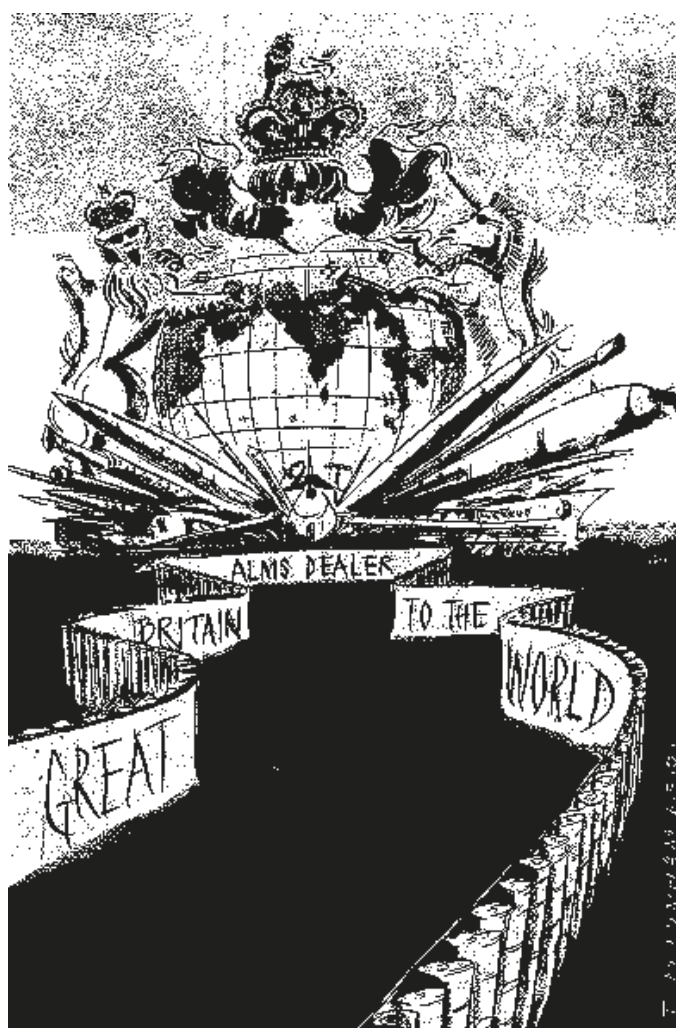


Source: Export licensing statistics and Defence Export Statistics

¹³ The most recent edition of UK Defence Export Statistics, covering 2024, was published by the MOD instead of by UKD&SE, although the company survey was still conducted by the latter. See <https://www.gov.uk/government/statistics/uk-defence-export-statistics-2024/uk-defence-export-statistics-2024>.

Annual comparisons of the figures for SIELs and for contracts as reported by UKD&SE are of limited value, as typically (though not necessarily always) export licences will be issued after contracts are signed, in some cases years after for weapons with long lead times. However, a comparison of the average over a longer period, say 10 years, may allow for a more reasonable estimate. Based on the most recent 10-year period, using the UK Defence Exports Statistics for 2024, compared with the corresponding period of licence data (2015–24), the value of contracts was about 65% higher than the value of licences. **This suggests that, on average, roughly 40% of the value of all UK arms exports are conducted using open licences.**¹⁴

This estimate does not allow one to make a meaningful estimate of total exports in a single year, nor of exports to individual countries over a short or long period, as UKD&SE do not break down figures by individual countries. However, the regional breakdown of UKD&SE figures, compared with corresponding regional totals for SIELs, suggests that open licence usage is much higher for the Middle East and North America (i.e. the US and Canada), and that a large majority of arms exports to these regions goes via open licences. This is unsurprising, given the existence of major OGELs covering these regions; for the US, the OGELs for the US-UK Defence Cooperation Treaty and the one covering the F-35; and for the Middle East, the one covering the Eurofighter Typhoon (as most such exports are to Middle East recipients), and that covering the UK-Saudi Defence Cooperation agreement and the Al-Salam programme.



¹⁴ Previous CAAT publications have estimated around 50% of exports using open licences. However, the most recent UK Defence Exports Statistics revised down the contract figures for previous years quite significantly.

4

Other issues with export licence data

Aside from these key, interrelated issues of lack of delivery data and the heavy use of non-transparent open licences, there are several other limitations to export licence data that restrict their usefulness and limit transparency. One is – hopefully – a temporary one, the others are ongoing.

4.1 The transition of the online export license applications platform from SPIRE to LITE

Since 2023, the ECJU has been rolling out a new online export licence application platform, LITE, to replace the legacy SPIRE system. This process accelerated in 2024, and since the beginning of 2025, a clear majority of both the number and value of SIELs are applied for via LITE. At present, OIELs are still applied for via SPIRE.

As discussed above, the ECJU's online searchable database only collects data from SPIRE. Before 2023, the small number of licences applied for using LITE during the initial trials were added manually to the database. From 2023 onwards, the number of such applications has made this impractical. This means that licence applications made through LITE are not included in the online database, only in the quarterly and annual spreadsheets. Moreover, the quarterly spreadsheets for 2024Q1 to Q3 did not include the LITE data, so that LITE licences during this period are only covered in the annual spreadsheet for 2024.¹⁵

The ECJU database allows for searches for a minimum period of 30 days. However, by using an algorithm conducting multiple overlapping searches, Campaign Against Arms Trade's online export licence browser is able to identify what has been licenced down to the individual day, and in most cases to identify individual licences. This, together with the additional filtering features on the CAAT online browser, allows for a much more fine-grained and user-friendly picture of UK export licences.

¹⁵ For official commentary on the transition to LITE and the impact on export licensing statistics, see <https://www.gov.uk/government/statistics/strategic-export-controls-licensing-statistics-1-april-to-30-june-2025/strategic-export-controls-commentary-1-april-to-30-june-2025>.

CAAT's online browser has now been adapted to include data from the LITE licences, using the quarterly and annual spreadsheets, but of course this information cannot be presented in the same fine-grained fashion; items licenced and their value can only be allocated to the quarter or, for January-September 2024, to that 9-month period.

We understand that ECJU is working on a new online searchable database that will connect to LITE, and indeed the development team reached out to CAAT to solicit our views on what such a new system should include, but we are not aware of any timeline for completion of this new database. In the meantime, as the proportion of licence applications made via LITE increases, the online searchable database has become increasingly unhelpful as a transparency tool.

The impact of this transition is a serious reduction in the transparency and usefulness of export licensing data. For licences using the LITE system, it is no longer possible to identify individual licences, or identify the date when licences were issued more finely than to the 3-month period. It is likewise not possible to identify the value of specific items licenced to given destinations – for example, we might know that there has been £100 million worth of ML10 licences to a given destination during the quarter, but have no way of knowing how much of this is for (say) “components for combat aircraft”, “components for military support aircraft”, “military aero-engines”, etc.

We therefore urge the government to ensure that the ECJU has sufficient resources to ensure the swift completion and deployment of the new online searchable database.

4.2 Incorporation licences

When applying for export licences, exporters must specify both the initial end-user for the goods, that is the person or entity (corporate, governmental or otherwise) that will initially receive and either use or process the goods, and all *ultimate* end-users, who will eventually receive and make use of the goods or any larger system containing the goods. In other words, if the exports are components for a weapons system, then both the company receiving the components, and anyone they plan to sell the systems containing those components to, must be listed.¹⁶

In the case of SIELs, if one or more of the ultimate end-users are in a third country or territory, outside that of the initial end-user, then the licence is reported in the published export licensing statistics as an ‘incorporation’ SIEL. Otherwise, it is reported as a ‘standard’ SIEL. While a small percentage of OIELs are also classified as being for incorporation, OIELs by their nature allow for multiple destinations, so that all of the initial and ultimate end-users could be included in the list of approved destinations, potentially allowing any OIEL to involve incorporation.

Unfortunately, the reporting of ultimate end-user destinations for incorporation SIELs is very limited. The quarterly spreadsheets only report, for each initial end-user destination, which ultimate end-user destinations have been approved for *at least one* incorporation SIEL during the quarter.

¹⁶ If the initial recipient is a stockist, who takes delivery of and stores the goods until they are delivered to a user, then they are not considered an ‘end-user’, and there is a slightly different form for declaring the stockist and the potential actual end-users.

For example, during 2025Q2, it is reported that incorporation SIELs (military and dual-use) issued to Belgium included the following ultimate end-user destinations for at least one such licence: Australia, Hungary, India, Sweden, Switzerland, and the United Kingdom. However, there is no information on which licences, or which items, were associated with which ultimate end-user destinations, or for how many licences each of these ultimate end-user destinations occurred.

In the online searchable database (for SPIRE licences), the same reporting applies for whatever search period – minimum 30 days – is entered. **This means that it is not possible to deduce, even with the help of CAAT's online browser algorithm, the specific incorporation destinations associated with most individual licences or items licenced, due to the fact that the report only states which ultimate destinations occurred at least once.**¹⁷

This is a particular problem where there are a large number of incorporation SIELs issued to a particular destination – for example the USA, due to the very substantial supply chain trade between the UK and US arms industries. In such cases, there are also a large number of ultimate end-user destinations in any given period, due to the fact that the US sells arms to so many countries. This means there is a serious lack of transparency, as all we can know is that there is a long list of equipment exported to the US for incorporation, and a long list of countries that are the final recipients of the arms containing the UK components; but all we know is that at least *some* of the equipment is destined for each of the final destination countries, but we have no idea what, or how much.

Thus, the ultimate destinations for military components exported from the UK through incorporation SIELs is obscured by the current reporting system, creating a severe gap in transparency.

In assessing the impact of UK arms exports, and the government's compliance with and interpretation of its export licensing criteria, as well as international instruments such as the Arms Trade Treaty, it is just as important to know where systems containing UK components will be sold, as to know where equipment is sold directly.

There is no obvious reason of national security, commercial confidentiality, or any other, that would appear to justify obscuring this information in this way. Indeed, in response to FOI requests, the DBT has on occasion provided lists of licences for particular ultimate end-user destinations.¹⁸

To correct this gap, **The government should provide details of the specific ultimate end-users for all goods licenced via incorporation SIELs to each initial end-user destination.** For example, quarterly reports could list, under each ultimate end-user destination corresponding to a given initial end-user, the values by ML category and the item descriptions of the goods licenced.

17 For example, if we know that 3 incorporation SIELs were issued for export to Belgium, with India as the ultimate end-user, during the period 1 – 30 November, but that there were 4 such licences during the period 1 November – 1 December, then we could deduce that an incorporation SIEL to Belgium with India as ultimate end-user was issued on 1 December. However, if all we know is that India appeared at least once on incorporation SIELs to Belgium for both periods, then we are none the wiser. Paradoxically, this means that the more often country B appears as an ultimate end-user destination for incorporation SIELs issued to country A, the harder it is to know when such licences were issued, or which ones.

18 Specifically, we made requests for licences where the initial end-user destination was Germany, Italy, or the USA, and where Israel was one of the final end-user destinations. The requested information was provided by the Department for Business and Trade without objection.

4.3 Overly broad item descriptions

Published export licensing statistics provide item descriptions for goods authorised for export. These may be extremely broad, providing only very limited information as to the types of goods to be exported. For example, “components for combat aircraft” may refer to anything from fairly small electronic components, to the wings or other major subsystems. This means these descriptions are hard to interpret in terms of their importance and impact.

While precise technical details are not necessary for effective transparency, we would argue that substantially more specific information on the nature of goods licensed for export could and should be provided, even if company details were also disclosed (as per section 4.4 below). The precise level of detail would necessarily be a matter for consultation between Parliament, industry, and civil society.

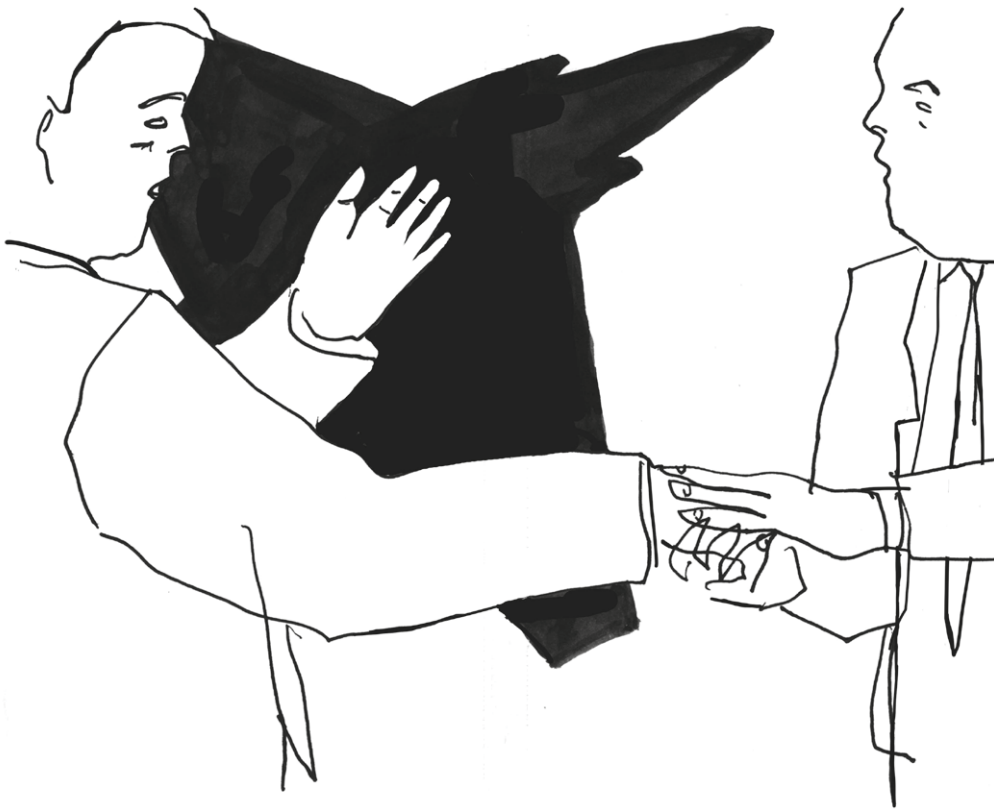


Image: Jill Gibbon, sketch from DSEI 2023

4.4 Information on companies receiving export licences

Information on which companies have applied for or received export licences is not published as part of the government's export licensing statistics. Some such information is provided by some European countries, for example Germany and Italy.¹⁹ At various times, the DBT has, in response to FOI requests,²⁰ disclosed information, to varying degrees of detail, on companies applying for and receiving export licences to different destinations, while at other times it has withheld, or partially withheld, such information, usually based on the exemptions under section 41 of the Freedom of Information Act (information provided in confidence), and/or section 43 (commercial interests), usually in tandem. The application of such exemptions is not uniform, as it is based on a public interest test.²¹

In practice, many such FOI requests receive fairly full disclosure, especially where the destination in question is one of considerable public interest and debate – such as Israel, but also recently the UAE.²² However, there have at times been refusals, or partial withholding of information, for reasons that are not entirely clear in comparison with other cases where disclosure has been approved. One particularly concerning example is a refusal to disclose which licences for export of military equipment (directly or indirectly) to Israel were suspended as a result of the government's decision of 1 September 2024; this was at least partly on the grounds that a *previous* FOI disclosure of which companies had received export licences to Israel meant that this new information would allow one to deduce which companies had had licences suspended. Thus, a matter of major public interest and concern, and of crucial importance for holding the government to account over arms sales to Israel, is now considered secret.

There is certainly a strong public interest in knowing which companies are exporting military equipment to which countries. While governments hold the primary responsibility for issuing or refusing export licences, under the UN Guiding Principles for Business and Human Rights, businesses have their own responsibilities to conduct due diligence as to the human rights impact of their business activities, which should certainly include the potential use to which lethal weapons and their components and associated systems are put. Knowledge of companies' arms trade activities and customers may be relevant for individuals and institutions in relation to investment decisions, employment choices, sponsorship decisions, etc. Shareholders may also wish to hold their companies to account over the choices they make in relation to arms exports.

19 Italy, for example, provides quite detailed information on what equipment has been licenced for export by company, although this is not cross-tabulated with the recipients.

20 Some made by myself or others affiliated with CAAT, others by various private individuals.

21 Section 43 is a qualified exemption, and is automatically subject to a public interest test. Section 41, preventing disclosure of information that would represent an 'actionable breach of confidence' is an absolute exemption; however, the question of what would constitute an actionable breach of confidence itself depends on a public interest test.

22 For example, recent requests for lists of export licences received by companies for export to Israel and the UAE have received fairly comprehensive responses from DBT.

It is accepted that exporters need some aspects of export licence applications to remain confidential – for example, the precise technical details of the goods to be exported, or exact unit values. However, CAAT would argue that, given the potentially devastating impact of arms exports on armed conflict and human rights, the broad details of what military equipment companies are exporting to which countries, such as are provided in current export licensing statistics, are matters of legitimate public interest that do not compromise such core commercial confidentiality concerns, and that exporters should not thus have an expectation of confidentiality.

We therefore call for information on which companies have been issued, or refused, export licences to all destinations to be part of the information routinely published as part of export licensing statistics.

5 Other official sources of arms trade data

While the export licensing data is the most detailed source of reporting on UK arms exports by the government, it is not the only one. This section briefly discusses other sources.

5.1 Data on arms export contracts from UK Defence Export Statistics

The UK Defence Exports Statistics (previously UK Defence & Security Exports Statistics) provide annual data on the value of arms export contracts gained by UK companies. Up to 2023, this data was published by UK Defence & Security Exports (UKDSE), an arms export promotion unit within the DBT, formerly known as the Defence Services Organisation (DSO). For 2024, the data was published by the MOD, although the survey to collect the data was carried out by UKDSE.²³

The data is based on an annual survey of companies, who are asked to report on their arms export contracts signed during the previous year. The data is typically published towards the end of the year after the year covered, sometimes later – the data for 2024 was not published until March 2026.

Where there are long-running government-to-government arms sales contracts, in particular those between the UK and Saudi Arabia, under which BAE Systems not only provides aircraft and other equipment, but supports and maintains the Saudi Air Force on an ongoing basis, the statistics count the value of work invoiced under the umbrella contract each year.

As mentioned in section 2, the main problem with this data is the almost complete lack of detail, with no breakdown by destination, only by region, or by military list category, only very broad ‘domain’. On at least one occasion, an FOI request for the value of contracts to a specific destination (Saudi Arabia) has been refused on the grounds of damaging relations with another state. Given that such information is routinely published by other major exporters (e.g. the US and France), without any apparent damage to their relations with the recipients, this claim seems, on the face of it, absurd.

²³ See <https://www.gov.uk/government/collections/uk-defence-and-security-exports-statistics> for data up to 2023, <https://www.gov.uk/government/statistics/uk-defence-export-statistics-2024/uk-defence-export-statistics-2024> for 2024.

Despite the lack of detail, the Defence Exports Statistics provides a better picture of the total value of UK arms exports each year than the export licensing data, as it does not depend on what sort of licence the arms sold might eventually be exported under. In other words, it covers the value of goods exported on open licences as well as single licences.

In many ways, this information would be less important if information on the value of deliveries by recipient were published, as per section 3) above. Nonetheless, the value of contracts is an important forward looking indicator of arms exports.

The DBT (or MOD) should publish the value of arms export contracts collected by UKD&SE broken down by recipient country, and if possible also by ML category.

5.2 Ad-hoc information on arms supplies and military aid to Ukraine.

The House of Commons Library publishes periodic reports on UK military aid, including financial support and direct arms donations, to Ukraine. The most recent report was published in July 2025.²⁴ As well as providing information on the value of military aid each year, these reports provide considerable detail on what equipment has been donated or pledged to Ukraine by the UK government.

A complementary source for such data is the government's Annual Report on Strategic Export Controls,²⁵ an annual summary of government policy and practice in the area. The report does not provide the details of export licences, which are provided separately (see section 2 above), but does include overall information on the number of licences, and administrative details such as licence application processing times etc.

The one type of substantive information on UK arms exports the reports provide is details of equipment gifted by the UK as military aid, as well as disposals of surplus equipment by the MOD. In most years this consists of fairly minor, low-value equipment, but since the Russian invasion of Ukraine, there has of course been a large quantity of arms gifted to Ukraine, which the reports cover. This complements the HoC Library reports, as while these tend to look forward – pledges of arms supplies and aid – the Annual Report looks backwards at actual donations.

This provides a valuable addition to available information on arms supplies to a country that has become one of the UK's largest arms recipients since the start of the war.

²⁴ <https://commonslibrary.parliament.uk/research-briefings/cbp-9914/>

²⁵ <https://www.gov.uk/government/collections/united-kingdom-strategic-export-controls-annual-report>

5.3 Poor quality of reporting to the UN Register of Conventional Arms (UNROCA)

UNROCA is the only official, universal international instrument for reporting major conventional arms transfers. It is limited to seven categories of “major conventional armaments” that are fairly restrictive – for example, it only covers combat aircraft and helicopters, not other types of military aircraft such as transport, refuelling, or reconnaissance aircraft. However it also covers (as an optional addition) small arms and light weapons. All UN member states are requested annually to submit a report on their exports and imports of major conventional weapons, but unfortunately the response rate is fairly poor.

Since the coming into force of the Arms Trade Treaty (ATT) in 2013, this instrument has a similar reporting mechanism, covering the same categories of weapons. Annual reporting of imports and exports is a requirement of the ATT, although not all states parties fulfil this. States are permitted to submit private reports, only to be viewed by representatives of other states parties, which some do, although most make their reports public. The ATT Monitor, a civil society initiative which supports the implementation of the ATT and monitors its effectiveness, is the best source of information on national reporting under the ATT mechanism.

Many states, including the UK, submit identical reports to the ATT reporting mechanism and UNROCA. The UK is one of a relatively small number of states that has submitted reports to UNROCA every year since its commencement in the 1990s, and likewise to the ATT since its coming into force.

Unfortunately, the UK’s submissions to UNROCA and the ATT reporting mechanism tend to be of poor quality, containing significant errors, omissions, and material that should not be included and in some cases represents misleading information.²⁶

A first issue with UK reporting is that it is based on export licences issued during the year, not deliveries, since (as discussed), the UK does not collect information on deliveries. The exception in recent years has been military equipment gifted to Ukraine, where actual deliveries are reported. One consequence of this is that exports conducted under open licences are not reported at all, as these do not have numerical values attached. While most major conventional weapons under the UNROCA classification are rarely exported under open licences, there are some cases where this does occur, leading to significant omissions in reporting. Small arms and light weapons are also sometimes the subject of open licences.

Other examples of the types of flaws in UK reports to UNROCA include:

- Simple omissions, where export licences for the type of equipment that should be reported can be clearly identified in export licensing statistics, but where the items have not been included in UNROCA/ATT reports.
- Misclassifications, where components or related equipment have been reported in categories for major weapons – sometimes with the correct description, but sometimes reported as if they were the actual complete weapons. (In the former, less serious, category, there are a number of entries in the 2024 report for “launching/handling/control” systems for missiles, in the section on exports of actual missiles.)

26 Some of these issues are discussed in CAAT’s annual reports on UK arms exports, for 2023 and 2022.

- Especially in the armoured vehicles and artillery sections, a very large number of entries are for the export of vintage vehicles for private collections and museums. This is not the purpose of UNROCA, which is intended to monitor actual transfers of military capability. While these pointless entries do not actually mislead, they mean that genuinely relevant information is buried.
- In some cases, it appears that exports of e.g. aircraft have been recorded that appear to be return of equipment after refurbishment, for or after exhibition, or other purposes that once again do not correspond to actual transfers of new military capability. In many cases it can be very hard to work out for certain what particular entries actually mean – they have most likely simply been copied directly from the corresponding export licence.

There have been a number of cases where CAAT has written to the relevant officials in the FCDO for clarification on some of these issues, and have sometimes received responses confirming errors in the reports, or clarifying the nature of certain entries, but there has been no sign of improvement in reporting.

The only conclusion to be drawn is that the FCDO does not take the exercise of reporting to UNROCA and the ATT seriously, but rather as a check-box exercise to be carried out with minimal effort and research.

The UK government should take reporting under UNROCA and the ATT seriously, with officials from the MOD, FCDO, and DBT working together to ensure a comprehensive and accurate return to these global transparency instruments. The UK reports should cover actual deliveries, as requested by these mechanisms, rather than export licensing.

6 Conclusions and recommendations

The lack of transparency in UK arms exports is a choice, one that has been maintained by both Labour and Conservative governments since the current reporting system – which was a substantial improvement over what went before – was introduced in the early 2000s.

The heavy use of open licences is probably less designed to obstruct transparency as to facilitate arms exports themselves, removing the need for companies to apply repeatedly for individual licences for a wide range of exports. However, the effect on transparency is major and negative, especially combined with the absence of information on actual deliveries. The latter is something that could easily be rectified if the government so chose, is practiced by many other major exporters, and indeed was under serious consideration by a previous UK government at one point. There is no obstacle in terms of capacity to collect data, nor even of industry objections – it can only be seen as a policy choice to avoid greater levels of transparency.

Beyond this issue, aspects of the way export licence data is reported represent very clear choices to limit the information provided: vague item descriptions, and inadequate reporting of incorporation destinations. Meanwhile the refusal to break down the contract data from the UK Defence Exports Statistics by recipient country, when other major exporters do so, even while displaying less transparency in other areas, is a clear choice to restrict the public's access to information on the arms trade.

The philosophy appears to be one of providing the minimal information possible to comply with previous legislation. More information is sometimes provided in response to FOIs, albeit frequently reluctantly, after delays, or with major redactions. The attitude is one of a basic stinginess with information, to be disclosed to the public only when no excuses remain.

We argue that the arms trade is an issue of such importance, and that causes such harm around the world, that it should be regarded as an area where the public fundamentally have the right to know what the government is doing in their name, with information limited only where essential (whether for reasons of security or of overriding issues of commercial confidentiality), or where collecting the data would be impractical. This would enable a far more robust public debate on the arms trade, and enable far stronger Parliamentary scrutiny.

Specifically, we make the following recommendations:

- Reporting of data on deliveries of controlled goods, at least to the level of the value of exports by destination, cross-tabulated by control categories (ML and DU list), would be the single most valuable measure the government could implement to improve transparency in UK arms export statistics. It would greatly improve the ability of both the public and Parliament to monitor, assess, and debate UK arms export policy.
- We urge the government to ensure that the ECJU has sufficient resources to ensure the swift completion and deployment of the new online searchable database.
- The government should provide details of the specific ultimate end-users for all goods licenced via incorporation SIELs to each initial end-user destination.
- Item descriptions in export licensing statistics are often over-broad. Substantially more specific information on the nature of goods licensed for export could and should be provided.
- Information on which companies have been issued, or refused, export licences to all destinations should be part of the information routinely published as part of export licensing statistics.
- The DBT (or MOD) should publish the value of arms export contracts collected by UKD&SE broken down by recipient country, and if possible also by ML category.
- The UK government should take reporting under UNROCA and the ATT seriously, with officials from the MOD, FCDO, and DBT working together to ensure a comprehensive and accurate return to these global transparency instruments. The UK reports should cover actual deliveries, as requested by these mechanisms, rather than export licensing.

