

## Illicit brokering of SALW in Europe: lacunae in Eastern European arms control and verification regimes

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The EU Code of Conduct on Arms Exports was established in 1998, proclaiming the European Union as one of the world's most progressive regions in strengthening and harmonizing arms export controls. The code contains eight criteria, which all member states must consider when agreeing to an arms export licence; it also establishes a notification, consultation and reporting mechanism among EU member states. The stabilization and association process (SAP) makes this code binding on EU candidate countries: neighbouring states and other third countries may choose to align themselves with the code.<sup>1</sup> Briefly, the criteria state that arms should not be exported where there is a likely risk that they will be used to exacerbate human rights abuses or armed conflict, hamper sustainable development or promote acts of terrorism—or be re-exported to destinations where those conditions may apply. It places a duty on national licensing authorities to ensure that due diligence is applied to export licensing decisions, including a proper and meaningful assessment of the stated end-user and the specific end use of the proposed transfer. In December 2008 this code was transmuted into a legally binding EU Common Position.

But we would argue that no arms control agreement which does not recognize the need to licence and control the activities of arms brokers can ever hope to be effective. Therefore the vital interest of the EU Code of Conduct for the purposes of this article is that it is extended to cover arms brokering activities by the EU Common Position on arms brokering of June 2003.<sup>2</sup> This Common Position also establishes a system for EU member states to share information relating to arms brokers operating within the EU, and requires member states to develop adequate export controls and enforcement procedures to effectively regulate arms brokers within the EU.

Despite the accession of most Eastern European states to the European Union and the pledged collaboration of the remainder with the EU Code of Conduct on Arms Exports, there is evidence to suggest that at least four states in Eastern Europe are not fully meeting their responsibilities under the code as regards small arms and light weapons (SALW). While states appear to be attempting to follow the code as written, they are not in practice adhering to its spirit. This paper looks at six recent events: first, the recent conviction in the United States of Monzer al Kassar after a “sting” operation where he agreed to supply arms to the Fuerzas Armadas Revolucionarias de Colombia (FARC); second, the extradition hearing in Bangkok of Viktor Bout, based on an identical “sting” operation by the US Drug Enforcement Administration (DEA); and third, a recent field trip to Montenegro, where the authors met with various officials and ministers from government departments and state-owned entities. Added to

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these are our findings following visits to Bulgaria, Serbia and Ukraine in 2008 in our capacities as the Arms Expert and Arms and Aviation Consultant respectively for the UN Security Council's Group of Experts monitoring the arms embargo on the Democratic Republic of the Congo (DRC).

### *The case of Monzer al Kassar*

Monzer al Kassar was sentenced on 25 February 2009 in the US District Court for Southern New York for agreeing to supply weapons to the banned terrorist organization FARC. He was convicted after a long sting operation conducted by the DEA, in which he was paid substantial sums of money to procure weapons, including sophisticated surface-to-air missiles. The weapons were to be purchased from the Romanian state arms company, Romarm, which, as far as the written records show, did not obstruct the sale. DEA Agent William Brown states in an affidavit that:

al Kassar ultimately received more than \$400,000 for the weapons deal, in funds represented... to be FARC drug proceeds, but which in fact came from DEA undercover bank accounts ... al Kassar had repeated contact with his long-established arms suppliers in Bulgaria and Romania and he traveled to both countries to finalize arrangements to procure the weapons for the FARC.<sup>3</sup>

He continued by observing that the FARC allegedly wished to purchase the following items from al Kassar:

4,350 AKM assault rifles; 3,350 AKMS assault rifles; 200 RPK assault rifles; 50 Dragunov sniper rifles; 500 Makarov pistols; 2,000,000 rounds of 7.62mm x 39mm ammunition; 120 RPG grenade launchers; 1,650 PG-7V grenade rounds and 2,400 RGO-78 hand grenades.<sup>4</sup>

These items were notionally covered by an end-user certificate issued by the Nicaraguan government and were notionally for delivery by sea to a port in Suriname.<sup>5</sup>

Substantial sums of money began to be sent by the undercover agents of the DEA to bank accounts controlled by al Kassar and it is clear from the US court documents that al Kassar, in turn, successfully negotiated with Romarm and others to add surface-to-air missiles, including SA-7, SA-16 and SA-18, to the order.<sup>6</sup> The Brown affidavit continues:

Al Kassar told [us] that he was in Bulgaria and traveling the following day to Romania in connection with the weapons deal. ...he would meet with the weapons manufacturers in Romania on May 11<sup>th</sup>. ...I have confirmed through airline records that al Kassar ... in fact entered Romania on May 10, 2007".<sup>7</sup>

During his journey to Romania and Bulgaria al Kassar received quotations for prices from two defence companies: Armitrans<sup>8</sup> (Bulgaria) and Romarm (Romania).<sup>9</sup> Brown makes it clear that "some of the weapons had been procured by al Kassar from Romarm, a weapons manufacturer in Bucharest, Romania".<sup>10</sup> According to Brown, at one point "al Kassar indicated that he was in Romania, and that the weapons manufacturer was upset because al Kassar had promised them ... money for the deal".<sup>11</sup> The DEA undercover agent "told al Kassar that the FARC had 3.5 million Euros in Romania to provide to the weapons manufacturer. Al Kassar indicated that the Romanian arms manufacturer would not be willing to receive the cash, so something else had to be arranged. ...because of the delay in payment, al Kassar himself had paid some of his own money to the weapons manufacturer"<sup>12</sup> and emphasized that "he did not want to hurt his reputation with the weapons manufacturer".<sup>13</sup> Al Kassar also offered to provide an additional end-user certificate for the surface-to-air missiles "at a cost of 15 to 20 per cent of the total cost of the weapons listed on the certificate".<sup>14</sup>

Presumably to mislead Romanian government officials, al Kassar used an intermediary to procure the guns and ammunition from Romarm. This was Milan Djurovich of Trawl Services Limited, a company registered in the United Kingdom, but apparently with offices in Belgrade, Serbia. Paperwork found in the possession of al Kassar indicates that Milan Djurovich also used a company named Transtrade GmbH. It is from the Transtrade fax number that al Kassar received a fax with a Trawl letterhead for a meeting on 11 May 2007 in Bucharest.<sup>15</sup> Romanian export licence C32.7515 of 16 May 2007 issued to Romarm reports Trawl Services Ltd as the broker.<sup>16</sup> A copy of a contract between Trawl Services and Romarm was also found in al Kassar's possession.<sup>17</sup> The handwritten notes on the back of the document give an indication of the profit that al Kassar was intending to make. Djurovich planned to buy a variety of assault rifles (2,000 AKM and 2,250 AKMS), machine guns (200 RPK) and sniper rifles (50 Dragunov) from Romarm for US\$ 607,000, which he would sell to Abu Munawwar (al Kassar<sup>18</sup>) for US\$ 920,000. Al Kassar would sell these weapons to the FARC for US\$ 2,005,000.<sup>19</sup>

Monzer al Kassar has been mentioned numerous times in a variety of shady arms deals.<sup>20</sup> In a 1993 report on the Iran/Contra scandal he was said to have received US\$ 500,000 for supplying weapons to the Nicaraguan Contras.<sup>21</sup> His name was also mentioned in an Argentine arms trafficking case involving the then Argentine president Carlos Menem, in which it is alleged that between 1991 and 1995 guns were sold to Croatia and Ecuador, when a United Nations arms embargo was in force against Croatia, and Ecuador was engaged in a border conflict with Peru (Buenos Aires was a guarantor for negotiating peace between the two states). Most of the Argentine culprits were sentenced in 2001: "the court called for further investigation of Syrian citizen Monser al Kassar [sic], of the money trail left by the illegal commissions paid ... investigators must track the steps of businessman Al Kassar and clarify Washington's responsibility in the events".<sup>22</sup> In 1992 Switzerland blocked US\$ 6.2 million in a Geneva bank account in the name of al Kassar after allegations of money laundering. Instead of shipping tea and coffee to Yemen, Polish weapons were shipped to Bosnia and Croatia: the proceeds of this shipment had gone through the Geneva bank account.<sup>23</sup> In 2003 the United Nations Panel of Experts on Somalia found that al Kassar had undermined the UN arms embargo against Somalia in 1992.<sup>24</sup>

EU member states are required to exercise "due diligence" when interpreting the Code of Conduct on Arms Exports. How was a notorious arms trafficker able to make deals with Bulgarian and Romanian defence companies, when these two countries had sought, and been accepted for, membership of the European Union—membership that carries as an obligation the strict observance of the EU Code?

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### ***The case of Viktor Bout***

Viktor Bout is facing extradition from Thailand after his arrest following a very similar DEA operation to that carried out against Monzer al Kassar, in which he was allegedly induced to supply weapons to the FARC. In this example, the full documents have yet to be produced in court, but the indictment presented to the US Magistrate Judge in Southern New York, which resulted in the grant of Bout's arrest warrant, is available. According to DEA Special Agent Robert Zachariasiewicz's affidavit, Bout's co-accused, Andrew Smulian, said that, after speaking with Bout, "Bout had 100 Igla surface-to-air missiles available immediately. ...Smulian also advised that the weapons are in Bulgaria, and it will cost \$5 million to move them".<sup>25</sup> At a subsequent meeting with DEA undercover agents, on 30 January 2008, Smulian again reiterated that "the weapons are ready in Bulgaria"; Bout and Smulian later nominated to transport the weapons using "an airline company based in Romania".<sup>26</sup> The indictment alleges that Bout believes he is able to obtain and export weapons from Bulgaria, which raises concerns about the new member state's application of the EU Code of Conduct.

### *Montenegro's export control regime*

On 20 and 21 January 2009, in the course of a series of meetings between the authors and both Montenegrin government officials and representatives of the state-owned Montenegro Defence Industry, concerns began to arise regarding Montenegro's arms export control regime. In particular, the tables of import and export licences issued during 2007<sup>27</sup> have a number of inconsistencies. For example, the import of 1,200 machine guns from Zimbabwe is shown in the table of imports as an import from Switzerland, which is only the state of residence of the company that brokered the deal, not the state of origin of the weapons. According to the table of exports, Montenegro licensed the export of 18,666 units of M72 and M73 mines to Israel under a Philippine end-user certificate. The M72 is a scatterable anti-personnel mine and the Philippines ratified the 1997 Mine Ban Treaty on 15 February 2000: the veracity of that particular end-user certificate would therefore appear questionable. Moreover, Montenegro has itself ratified the Mine Ban Treaty and undertook to dispose of its stock of anti-personnel mines by the middle of 2009.<sup>28</sup> Export, or re-export, of the mines does not follow the spirit of the treaty. Finally, in the same year, 103 sets of refurbishment kits for torpedo 53-65KE were authorized for export to Macedonia. The table of exports states that the kits were ultimately for civilian use in Kyrgyzstan—which, one may recall, is at some considerable distance from the nearest ocean.<sup>29</sup>

### *Bulgaria*

In the course of a series of meetings with competent officials in Sofia during October 2008, it became clear that the EU Code of Conduct on Arms Exports was not always being interpreted according to its underlying principles. For example, there had been a small but significant transfer of spare parts for machine guns to the Government of Rwanda.<sup>30</sup> Rwanda is bound by a different UN Security Council sanctions regime than the DRC, therefore the transfer of these parts was licit, but given the highly portable nature of the equipment, the geographical proximity of the two states and the porosity of their border, and allegations of Rwandan assistance to the Congrès national pour la défense du peuple (CNDP) rebel group operating in eastern DRC, the transfer raised concerns. Examination of the relevant documents reveals that the company brokering this particular deal was a small operation with no physical presence at the given address in the United Kingdom: the company was an off-the-shelf purchase by an unknown entity subscribing just £1 share capital; the company secretary was a Ukrainian national; and the one named company director was also Ukrainian.<sup>31</sup> A more prudent interpretation of the EU Code would have militated against an export licence being granted to that particular company. Since this case was brought to the Bulgarian authorities' attention, they have consulted their British colleagues about subsequent export licence applications by that particular company, which is a positive sign of better European cooperation and adherence to the code.

### *Bosnia and Herzegovina*

Until October 2006, the NATO-led Implementation Force (IFOR) and its successors (Stabilization Force, or SFOR, and then EUFOR) were effectively controlling all the exports and imports of military equipment from and to Bosnia and Herzegovina (BiH).<sup>32</sup> All parties involved claimed to adhere to the EU Code of Conduct, regional arms control protocols, and "regional balance of power regimes".<sup>33</sup> The movement of military equipment was controlled through an administrative procedure involving Forms 5 and 6. Form 5 was submitted by the BiH authorities to the multinational force 15 days in advance, detailing the contents, the timing of proposed movements and the final destination. Upon

approval, the BiH authorities could issue an export/import licence and prepare a Form 6, which is a transport request form. Again the form had to be authenticated through the relevant ministry. It was then submitted to the multinational force 5 days prior to shipment. Form 6 also provided details of the contents, proposed timings and final destination: all data in Form 6 had to match the data in Form 5. If Form 6 was not correctly completed no export (or import) was allowed.

The BiH Ministry of Defence told the authors in 2006 that the majority of its surplus weapons and ammunition had been earmarked for destruction, but this never happened.<sup>34</sup> Instead, a large quantity of weapons and ammunition were exported: almost 332,000 SALW were sold compared with 85,000 destroyed, and almost 65 million rounds of ammunition were sold compared with 3 million rounds destroyed.<sup>35</sup> Many of these weapons and ammunition were shipped to Iraq. The US military was in need of weapons for its security sector reform operations in Iraq, and the Stabilization Force, led by NATO, had control over the export of arms from BiH, which had an abundance of weapons. The shipments of arms from BiH to Iraq became so important that the entry into force of BiH's moratorium on the export of surplus SALW, issued on 22 July 2004, was delayed by a year.<sup>36</sup>

The procedure for many of these shipments does not always appear to have adhered to the regional protocols as claimed.<sup>37</sup> All of the shipments to Iraq involved a combination of Croat, Swiss, UK and US arms brokers. Many appear to flout the spirit of the EU Code of Conduct as well as some of the detail. EUFOR file number 50627/04<sup>38</sup> is a typical example.<sup>39</sup> It involves a transfer of approximately 35 million rounds of SALW ammunition and approximately 10,000 Kalashnikov assault rifles to Iraq from Tuzla airport.<sup>40</sup> The three Forms 5 that were used identified the buyer and end-user as Marius Joray Waffen A.G. from Switzerland, represented by Ivan Peranec. On various occasions, Marius Joray has denied any involvement in these transfers, and claimed that his name had been used incorrectly in all these transactions.<sup>41</sup> Copies of the export licences were shown to the authors by the Bosnian arms company Unis Promex in October 2006. All clearly stated Marius Joray Waffen A.G. as the buyer.<sup>42</sup> Marius Joray Waffen A.G. is a small weapons shop in the town of Laufen; Ivan Peranec runs Scout d.o.o., allegedly a travel agency<sup>43</sup> in Zagreb, but operating in BiH as arms broker.<sup>44</sup> Of the 26 Forms 6 that coincide with these exports between 8 December 2004 and 23 June 2005 only three had Marius Joray Waffen A.G. in Switzerland as the final destination. The final destinations on the other Forms 6 were Coalition Provisional Authority (Baghdad), Marius Joray Waffen A.G./Coalition Provisional Authority (Iraq), Marius Joray Waffen/Republic of Iraq (Gen. Saad Saleh Khafagi).<sup>45</sup> As the names on Form 6 do not match those on the Forms 5, the procedure has not been adhered to.

In July 2005 approximately 78,000 assault rifles and light machine guns were exported to the United Kingdom on a UK import licence for three UK arms dealers.<sup>46</sup> These assault rifles are prohibited in the United Kingdom, and it is not clear what the dealers were going to do with the rifles upon receipt. Nonetheless, the MV *Sloman Traveller* sailed from the Croatian port of Ploče to Immingham, United Kingdom on 12 July 2005. It had taken several weeks to transport the guns to Ploče<sup>47</sup> from arsenals scattered around BiH—all allegedly under police escort.<sup>48</sup> According to a shipper's discrepancy note that was discovered in the records of the Port Authority some weapons had disappeared in transit between the Bosnian frontier post and Ploče: when the truck was unloaded at the quayside on 1 July 2005 six pallets of assault rifles were missing.<sup>49</sup> This represents potentially 720 assault rifles. The note describes the lack of physical security: "693 pallets said to contain 7,389 cases of surplus weapons. Pallets control: steel stripe bands loosened ... Cases are not sealed. Carrier shall not be liable for the number and content of cases" (emphasis added).<sup>50</sup> During various interviews the Bosnian authorities and EUFOR assured the authors that the cases had been unsealed for inspection prior to transport, and thereafter resealed.<sup>51</sup> There was no action taken to establish the whereabouts of the missing weaponry.

## Ukraine

The Ukrainian government provided information regarding all exports of arms and ammunition to states in the Great Lakes region of Africa between 2004 and 2008 to aid the authors' work for the United Nations Security Council Group of Experts on the DRC. The amounts of ammunition exported were prodigious, but there was little further information. It was stated that it was impossible to note the head markings on any of the ammunition exported to the region, as it came from surplus stocks inherited from the Soviet Union. In fact, these ammunition rounds still carry headstamps and the boxes would have been marked with lot numbers. It would have been possible to record these lot numbers at the time of export licensing, which would have facilitated future tracing of the consignments. The EU Code of Conduct has a User's Guide that describes best practice for the application of each criterion of the code. Although the User's Guide does not specify best practice for the recording of information on export licences, it seems reasonable that best practice demands the recording of more, not minimal, information on not only export licences but also accompanying cargo manifests, airway bills and the like: a more robust interpretation of the exporting state's responsibilities would be to the humanitarian and developmental advantage of the receiving state.

## Conclusion

Arms brokers have for too long been the elephants in the room when establishing arms control agreements. Regulation of the activities of arms brokers is paramount to the effectiveness of arms

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control agreements. For as long as states recognize the role, and the undoubted usefulness to some, of arms brokers, they must also recognize the opportunities available for individual brokers to ply their trade for both good and ill in an increasingly global marketplace.

The EU Code of Conduct and the Common Position on brokering do appear to recognize this. What is needed now is to ensure that the reasons and principles behind the code are better appreciated by all those who are affected by it.

One can argue that the cases referred to here demonstrate that states are struggling to adapt to this more challenging arms export control and verification regime. Perhaps a more coherent approach from the Council of the European Union would ensure that current efforts, which often rely on bilateral projects and can appear piecemeal,<sup>52</sup> evolve into a more focused and effective assistance programme to inculcate the principles of the EU Code of Conduct on Arms Exports more firmly into the political culture of new and potential member states.

One practical way to heighten awareness of state responsibilities vis-à-vis the Code of Conduct is to broaden the base of those who receive sensitization to the code. Rather than providing purely for officials of the relevant ministries, politicians and the media should also be sensitized: these groups need to know what questions to ask of governments, not just when an annual report is presented to parliament, but on a continual basis. This process, which implies a series of small seminars in several locations, given the large geographical area involved (and also issues of language, etc.), would help markedly to provide another series of internal checks and balances on arms exports and, by inciting a dialogue, would help to ensure the Code of Conduct is honoured more effectively both within affected states and within the European Union as a whole.

## Notes

1. Ukraine agrees to “take due account of the content and principles of the EU Code of Conduct on Arms Exports” in its Action Plan with the EU (adopted February 2005), and has received help from EU member states in its efforts to do so. Bosnia and Herzegovina committed itself to following the EU Code of Conduct in 2002, as part of the Stabilization and Association Process; Montenegro has also officially aligned itself with the code (as noted in the Annual Reports According to Operative Provision 8 of the European Union Code of Conduct on Arms Exports, available from <[www.consilium.europa.eu/showPage.aspx?id=1484&lang=en](http://www.consilium.europa.eu/showPage.aspx?id=1484&lang=en)>).
  2. EU Common Position 2003/468/CFSP of 23 June 2003 on the control of arms brokering.
  3. *US v. Monzer al Kassar*, Affidavit in Support of Request for Extradition, 17 July 2007, court document 56-2, case 1:07-cr-00354, paragraphs 9–10.
  4. *Ibid.*, paragraph 25.
  5. On 2 May 2007 al Kassar and a DEA agent met with the owner and the captain of the cargo vessel to discuss the transportation of the weapons. During the meeting it was made clear that the vessel would make a stop in Suriname for technical reasons, where the cargo would be discharged. (*US v. Monzer al Kassar*, Government’s Memorandum in Connection with the Sentencing of Monzer al Kassar, court document 108, case 1:07-cr-00354, pp. 15–17.)
  6. *US v. Monzer al Kassar*, Affidavit in Support of Request for Extradition, 17 July 2007, court document 56-2, case 1:07-cr-00354, paragraph 41; See also Trial Transcript 10 November 2008, 8BAAKASF; Trial Transcript 18 November 2008, 8BIFKASF; Trial Transcript 19 November 2008, 8BJGKASF.
  7. *US v. Monzer al Kassar*, Affidavit in Support of Request for Extradition, 24 July 2007, case 1:07-cr-00354, paragraphs 64 and 67.
  8. Letter Armitrans to Policia Nacional Nicaragua, 10 May 2007, ref. no. 114-En/10.05.2007.
  9. *US v. Monzer al Kassar*, Government’s Memorandum in Connection with the Sentencing of Monzer al Kassar, op. cit., p. 17.
  10. *US v. Monzer al Kassar*, Affidavit, 24 July 2007, op. cit., paragraph 70.
  11. *Ibid.*, paragraph 73.
  12. *Ibid.*, paragraphs 73–74.
  13. *Ibid.*, paragraph 74.
  14. *Ibid.*, paragraph 69.
  15. Fax from Trawl Services, 27 April 2007, on file with author.
  16. Export Licence C32.7515, 16 May 2007, on file with author.
  17. Contract no. 004/07-nlc, annex no. 1, 13 April 2007.
  18. *US v. Monzer al Kassar*, Trial transcript 6 November 2008.
  19. Contract no. 004/07-nlc, annex no. 1, 13 April 2007.
  20. See Brian Wood and Johan Peleman, 1999, *The Arms Fixers*, BASIC, NISAT and PRIO, p. 9.
  21. L.E. Walsh, *Final Report of the Independent Counsel for Iran/Contra Matters, Volume I: Investigations and Prosecutions*, 4 August 1993, Washington, DC, Government Printing Office, chapter 8, at <[fedbbs.access.gpo.gov/library/iran\\_rpt/](http://fedbbs.access.gpo.gov/library/iran_rpt/)>.
  22. “Illicit Arms Case Broadens in Scope”, *IPS-Inter Press Service*, 9 April 2001.
  23. “Victoire à l’arraché d’un trafiquant d’armes”, *Swissinfo.ch*, 13 March 2003.
  24. Report of the Panel of Experts on Somalia pursuant to Security Council resolution 1425 (2002), in UN document S/2003/223, 25 March 2003, paragraphs 41–48.
  25. *US v. Viktor Bout and Andrew Smulian*, “Indictment”, case 1:08-cr-00365-SAS, court document 5.
  26. *Ibid.*, paragraphs 17d and 20.
  27. Ministry of Economic Development of Montenegro, 2008, *Annual Report on Foreign Trade in Controlled Goods in 2007*.
  28. Montenegro’s stockpile destruction programme was in fact completed in 16 May 2007 (International Campaign to Ban Landmines, “Ceremony in Belgrade Marks End of Stockpile Destruction in Both Serbia and Montenegro”).
  29. It is also difficult to imagine a civilian use for a torpedo.
  30. Rwandan end-user certificate, 16 January 2007, reference 033/DEF/318/F/007/08.
  31. This information was obtained from Companies House, at <[www.companieshouse.gov.uk](http://www.companieshouse.gov.uk)>.
  32. The multinational force based itself upon Annex 1A, Article VI of the Dayton Peace Agreement, which allowed them to regulate the military traffic throughout BiH. However, documentation obtained by the authors showed that the force went beyond “the control and regulation of surface military traffic throughout Bosnia and Herzegovina” (see Peter Danssaert, Jan Cappelle and Brian Johnson-Thomas, 2007, *Recent Arms Deliveries from the Successor States of the Former Yugoslavia*, Antwerp, International Peace Information Service). This was denied by Nick Williams, Chief Political Advisor of EUFOR, in an email to the authors, 26 November 2006.
- Since 2006, Bosnia and Herzegovina’s Law on Import and Export of Arms and Military Equipment and Control of Import and Export of Dual-Use Items charge four state-level ministries with control of the trade in arms and military

- equipment in Bosnia and Herzegovina (BiH), of which three have veto power: the Ministry of Foreign Trade and Economic Relations is responsible for issuing licences to import, export or transit; the Ministry of Foreign Affairs and the Ministry of Security must give their consent before a licence can be issued; and finally the Ministry of Defence can voice an opinion. Until March 2008 EUFOR was still responsible for granting transport permits within and from Bosnian territory. It is not yet clear how this has changed the situation with regard to illicit arms brokering.
33. E-mail between SFOR Joint Military Affairs Current Operations and SFOR Legal Advisor, 2 May 2003.
  34. Interviews with BiH Ministry of Defence representatives, 20 and 25 October 2006
  35. End 2006 more than 200 million rounds remained in the surplus stockpiles (Interviews with BiH Ministry of Defence representatives, 20 and 25 October 2006).
  36. Danssaert et al., op. cit., pp. 25–26.
  37. For a detailed analysis of the Iraqi shipments see Amnesty International and TransArms, 2006, *Dead on Time: Arms Transportation, Brokering and the Threat to Human Rights*.
  38. Reference 10-03-39-223-80/04 “Unis Promex to Swiss”.
  39. EUFOR began its mission in BiH in December 2004, and the Stabilization Force left in December 2005.
  40. Danssaert et al., op. cit., pp. 20–21, 27–30.
  41. “Anfrage Banga Boris. Schweizer Waffenschiebereien nach Irak und Afghanistan?” (06.1056), *Amtliches Bulletin der Bundesversammlung*, Beilagen – Nationalrat, Wintersession 2006, Zwölfte Sitzung, 20 December 2006.
  42. Visit by IPIS to Unis Promex, 19 October 2006.
  43. The agency used to have an Internet presence at <[www.cursor.hr/pa.nsf/Pages/scout-zg](http://www.cursor.hr/pa.nsf/Pages/scout-zg)> (visited 21 April 2006).
  44. Various SFOR/EUFOR Forms 5 and 6; interview with BiH Ministry of Defence representatives, 20 October 2006. For additional information on the activities of Scout d.o.o. with the American arms broker Taos Industries, see H. Griffiths, 2007, “The Case of Taos Industries, Speedex and Scout” in UNIDIR, Small Arms Survey and UN Department for Disarmament Affairs, *Developing a Mechanism to Prevent Illicit Brokering in Small Arms and Light Weapons: Scope and Implications*, Geneva, UNIDIR, pp. 23–24; Amnesty International and TransArms, op. cit., pp. 111–113.
  45. SFOR/EUFOR, file 50627/04. (See Danssaert et al., op. cit., pp. 27–30.)
  46. Danssaert et al., op. cit., pp. 23.
  47. Interview with Port Authority Ploče, 16 October 2006.
  48. Interview with BiH Ministry of Defence representatives, 20 October 2006.
  49. Brian Johnson-Thomas’s visits to Port Authority Ploče, 16–17 October and 15–16 November 2006; Danssaert et al., op. cit., Annex 5.
  50. Reproduced in Danssaert et al., op. cit., Annex 4.
  51. Interviews with BiH Ministry of Defence representatives, 20 and 25 October 2006.
  52. See, for example, Council Joint Action 2008/230/CFSP of 17 March 2008 on support for EU activities in order to promote the control of arms exports and principles and criteria of the EU Code of Conduct on Arms Exports among third countries.