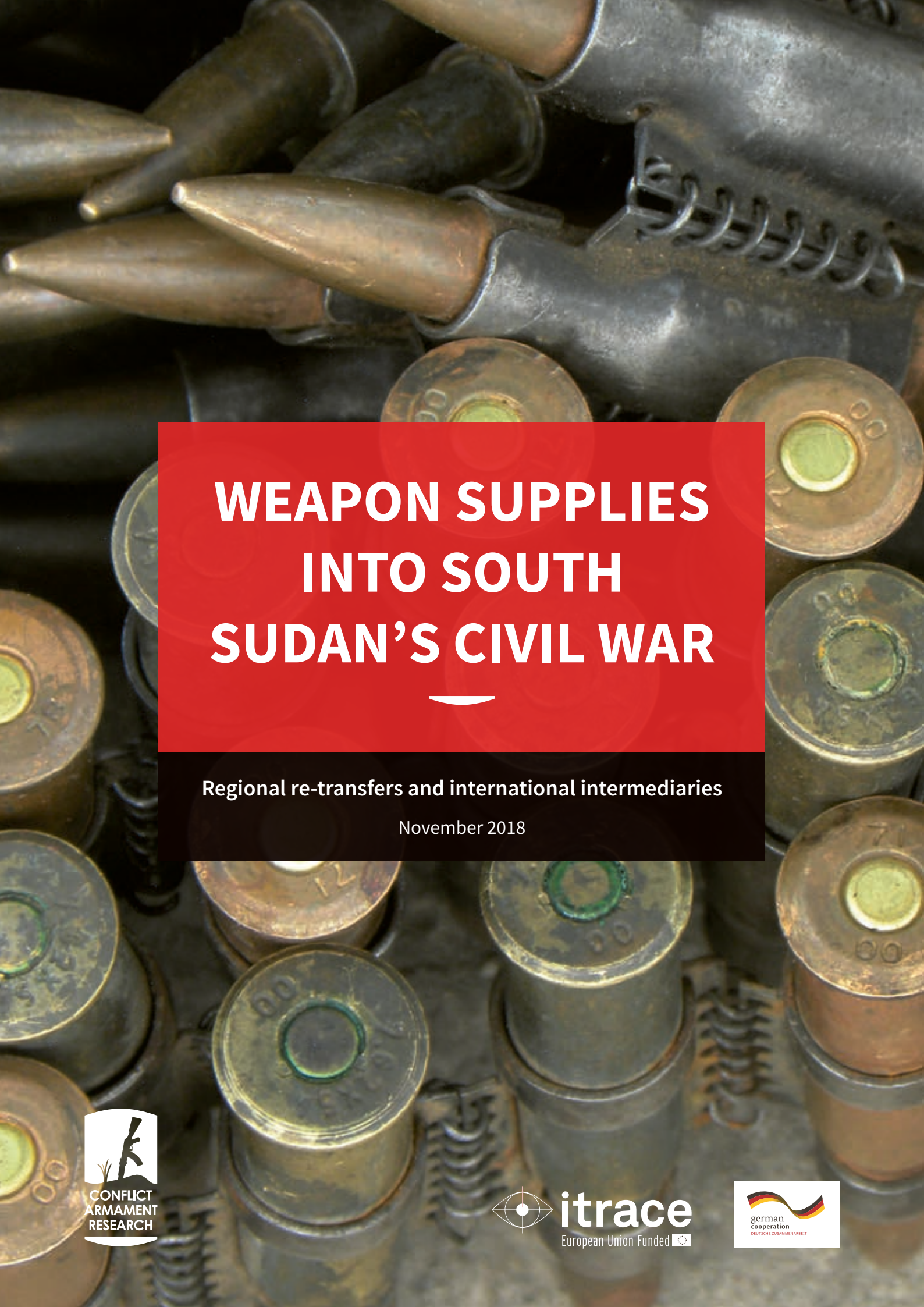




WEAPON SUPPLIES INTO SOUTH SUDAN'S CIVIL WAR

Regional re-transfers and international intermediaries

November 2018



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Front cover image: Ammunition captured from SPLA-IO forces from SPLA forces in Leer, Unity state (now Southern Liech state), South Sudan, 31 May 2014.
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Inside cover image: Graffiti reading 'SPLA Saving South Sudan' at Malakal airport, 1 October 2015. Government forces had recently recaptured the town from the SPLA-IO opposition and White Army militias after a period of intense fighting.
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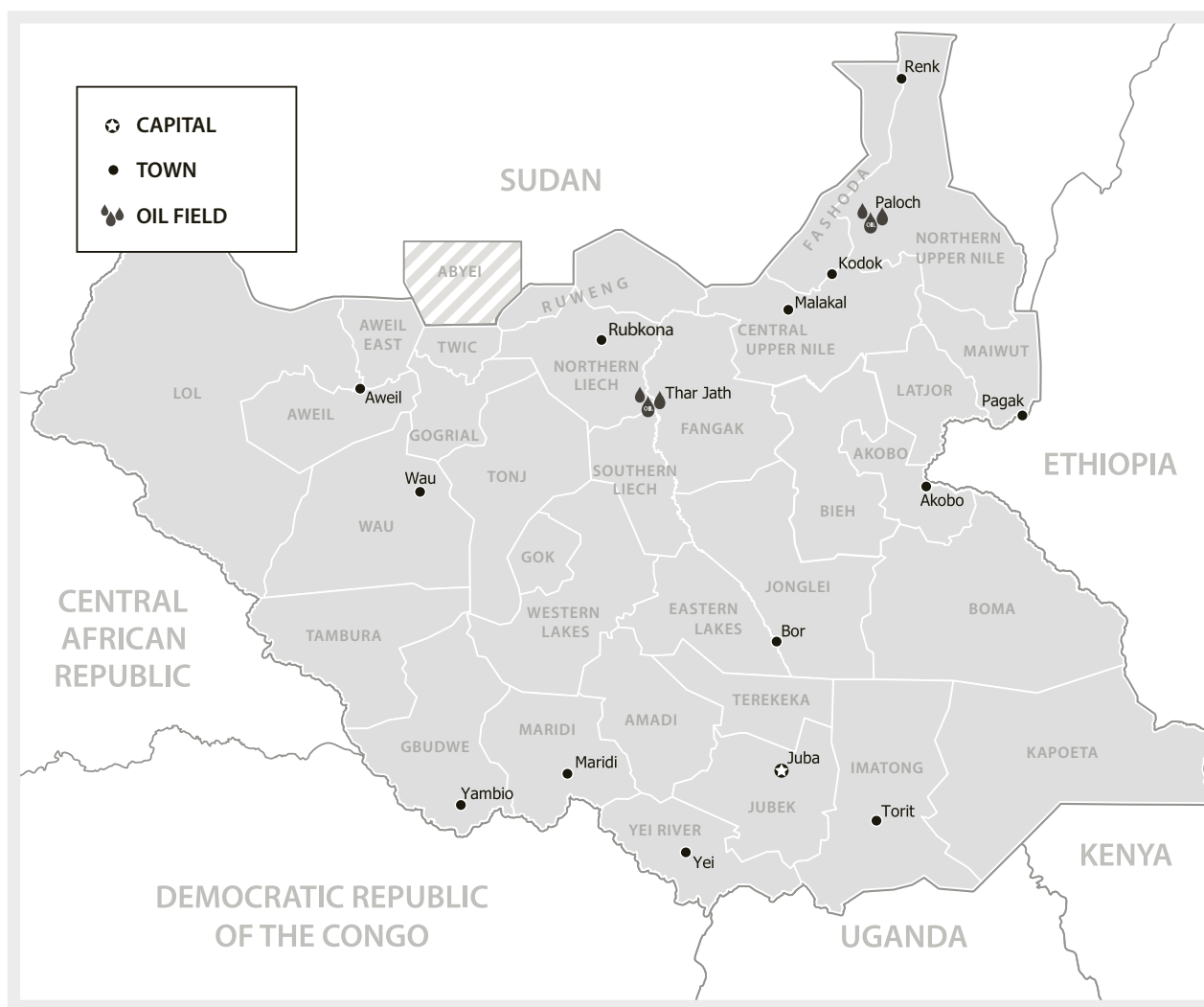
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MAP OF SOUTH SUDAN

Map 1

The 32 states of South Sudan, as established by presidential decree in January 2017



INTRODUCTION

This report presents a comprehensive survey of the sources and mechanisms of weapon transfers into South Sudan's civil war since the start of the conflict in December 2013.

It has three core findings, all of which may be relevant for the enforcement of the international arms embargo that the United Nations Security Council imposed on South Sudan on 13 July 2018.¹

First, South Sudan's immediate neighbours have been the main conduits, and sometimes sponsors, of weapon supplies to all sides in the conflict. These cross-border supplies have in some cases included weapons, ammunition, and aircraft lawfully exported to South Sudan's neighbours from China, the European Union, and the United States. There is no suggestion that the exporting countries were aware of the possible diversion of their materiel to South Sudan, or that they were complicit in the diversion. Nonetheless these retransfers may have breached end-use or non-retransfer commitments made to exporters as a prior condition of sale.

In several such cases, opaque commercial intermediaries may also have hindered the capacity of national export control authorities to make full diversion risk assessments prior to export.

Second, European and US arms transfers to South Sudan's neighbours have involved a wider international circle of European, Israeli, and US individuals and companies. In some cases, these individuals and companies have been unwitting suppliers to the South Sudan conflict. In other cases, they have liaised directly with senior representatives of South Sudan's national army, the Sudan People's Liberation Army (SPLA), and the main opposition forces, the SPLA-in-Opposition (SPLA-IO) to supply weapons and related equipment via South Sudan's neighbours. This report provides the first public evidence of direct liaison between these commercial suppliers and the parties to the conflict. Such activities may in some cases fall under European Union (EU) and US arms control mechanisms—notably the longstanding EU embargoes on Sudan and South Sudan, and extraterritorial dimensions of US arms control laws.

▼ The looted compound of the Kalibalak mosque in Bentiu, Unity State, on 26 May 2014. Some 200 civilians sheltering in the mosque and surrounding areas were killed by SPLA-IO and allied forces on 15 April 2014.

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Finally, the SPLA and SPLA-IO have each relied on air assets to deliver weapons and personnel into the conflict's major operational theatres. The SPLA, in particular, has used foreign commercial logistics providers to do so. The EU has begun to place diplomatic pressure on at least one of these logistics suppliers through the state where the company and its aircraft are registered. Under the new UN Security Council embargo, other countries may similarly be able to increase diplomatic pressure and scrutiny on logistics providers and commercial air assets operating in South Sudan.

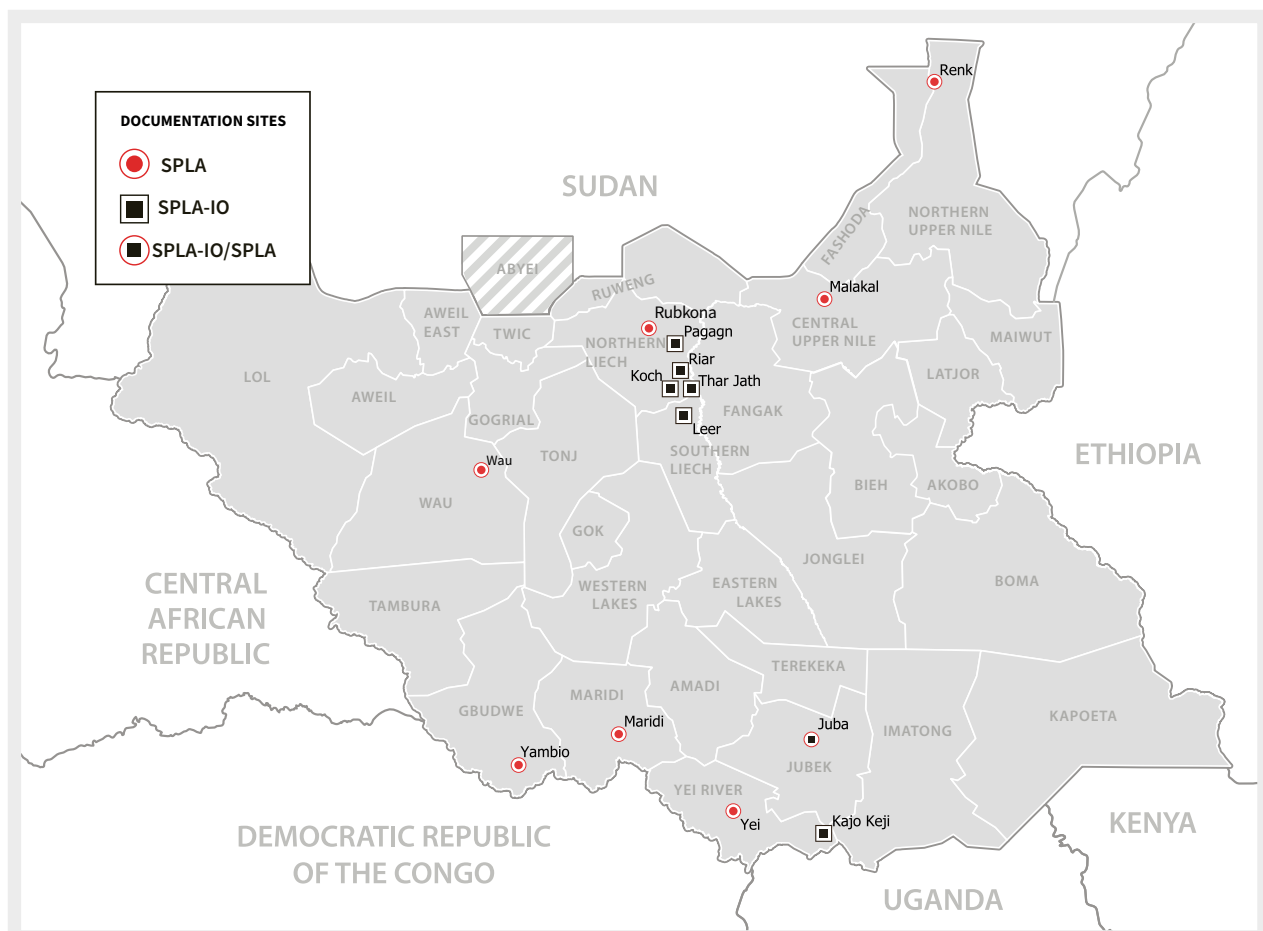
Conflict Armament Research (CAR) first deployed a field investigation team into the civil war in May 2014. This team covered South Sudan's Unity state (now Northern Liech and Southern Liech states), which was then the epicentre of the conflict, following the rapid spread of hostilities between government factions from the capital, Juba, to the greater Upper Nile

region in the country's north and east. As the SPLA split along largely ethnic lines and defecting units formed the core of the SPLA-IO, CAR's field investigation teams followed the spread of the conflict into the western and southern regions of Bahr el Ghazal and the Equatorias. CAR's teams have documented materiel in the hands of both the SPLA and SPLA-IO, as well as weapons seized from other groups drawn into the conflict, such as elements of the Sudanese rebel group the Justice and Equality Movement (JEM) operating in Northern Liech state; Shilluk Agwelek forces in Fashoda state; and two smaller Equatorian groups in Gbudwe and Maridi states, the South Sudan National Liberation Movement and the South Sudan People's Patriotic Front (see Map 2).²

CAR's most recent field deployment, in June 2017, focused on areas in Yei River state along the border with Uganda. CAR also documented materiel held by armed groups in neighbouring

Map 2

Sites of CAR weapon documentation in South Sudan, 2014–17





▲ The market in Leer, Unity state (now Southern Liech state), following fighting, looting and heavy rain, 4 June 2014.

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Central African Republic and the Democratic Republic of the Congo (DRC) in 2014 and 2015, in addition to Sudanese government weapons captured by the SPLA-North (SPLA-N) in Sudan's South Kordofan and Blue Nile states in 2016 and 2017.³ CAR has also drawn on weapon data that predates the current conflict, including weapon holdings of two Sudanese-backed rebel groups that were granted amnesty in 2012: the South Sudan Liberation Army and George Athor's South Sudan Democratic Movement/Army (SSDM/A).

This wider regional and historical data set has allowed CAR to triangulate weapons used in the South Sudan conflict with weapons used by government and non-state forces in neighbouring countries over time—and thus to test reports of possible new cross-border weapon flows into South Sudan. CAR has supplemented its field documentation of weapons with wider investigative work in South Sudan, neighbouring countries, Europe, and the Middle East.

Among the detailed findings presented in this report are:

- **Chinese-produced ammunition is by far the most prevalent ammunition used by all sides in the civil war**—both supplied lawfully to South Sudan's government under 2011 and 2013 contracts until June 2014, and retransferred clandestinely to SPLA-IO forces by elements within the Sudanese government in 2014 and 2015. All the Chinese

ammunition that CAR documented during its first field investigation deployment in mid-2014 had been produced prior to 2013. By 2017, 96 per cent of the ammunition documented by CAR in South Sudan consisted of Chinese-manufactured rounds manufactured in 2013 and 2014. Over half (55 per cent) of the ammunition for ubiquitous Kalashnikov-pattern assault rifles was a single type of ammunition produced in a Chinese factory in 2013.

- Contrary to claims by the South Sudanese opposition, **CAR's documentation sample does not show strong evidence of new supplies of Chinese weapons or ammunition to the Government of South Sudan since the mid-2014 shipments.** Nor has CAR found indications of new supplies of small arms or ammunition from Israel since the start of the conflict in December 2013. These findings are consistent with public statements made by the Israeli and Chinese governments that supplies to South Sudan ceased in 2013 and 2014, respectively.

CAR'S TEAMS HAVE DOCUMENTED MATERIEL IN THE HANDS OF BOTH THE SPLA AND SPLA-IO, AS WELL AS WEAPONS SEIZED FROM OTHER GROUPS DRAWN INTO THE CONFLICT

A NETWORK OF US AND UGANDAN COMPANIES PROCURED A MILITARY JET FROM THE US AND AN AUSTRIAN-MADE SURVEILLANCE AIRCRAFT

- In further contrast to SPLA-IO claims, **CAR's documentation provides no concrete evidence of recent Egyptian or Ethiopian supplies to the SPLA.** Without baseline samples of weapons and ammunition in service in these two countries, however, it is difficult to determine whether older items documented in South Sudan may have originated in Egyptian or Ethiopian stockpiles. Although Sudan made large-scale overland transfers to SPLA-IO forces until mid-2015, CAR's documentation does not concretely demonstrate any cross-border supplies from Sudan since then. Nor is there evidence of coordinated or state-sponsored supplies to the SPLA-IO from Ethiopia.
- **External weapon supplies to the SPLA-IO have been shrinking, following the group's failed attempts to establish more diverse international procurement networks in 2014.** These attempts included contact with a foreign adviser to the leader of the Séléka rebellion in the Central African Republic, outreach to a Lebanese arms dealer based in the Canary Islands, and overtures to a second arms dealer based in the Balearics.

As a consequence, SPLA-IO forces have increasingly relied on captured SPLA materiel to sustain fighting. Excluding two large weapon seizures that almost certainly derived from cross-border supplies from Sudan, at least 33 per cent of SPLA-IO and allied forces' ammunition documented by CAR since May 2014 matches ammunition (with identical headstamps, lot, or batch numbers) that CAR has documented in service with SPLA forces.

- **The SPLA-IO also appears unable to resupply its own forces and other allied groups that are located outside its core operational areas in the greater Upper Nile region.** SPLA-IO units that fled south from Juba following the collapse of the Agreement on the Resolution of the Conflict in the Republic of South Sudan (ARCSS)⁴ in mid-2016 have had little or no access to cross-border supplies from compatriots or sympathisers in neighbouring Uganda or the DRC, or to internal resupply from SPLA-IO forces operating elsewhere in South Sudan. CAR has not been able to substantiate published allegations that in October 2015 unnamed external parties resupplied SPLA-IO-aligned armed groups emerging in the west of the country.⁵ These groups have used materiel that is widely held by civilians in South Sudan and in the neighbouring Central African Republic: their types and calibres differ from weapons and ammunition in service with both South Sudanese government forces and the SPLA-IO.

▼ Human remains left following fighting in Leer, Unity state (now Southern Liech state), photographed on 31 May 2014.

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- **The SPLA, and non-state forces allied with the SPLA in neighbouring Sudan, have acquired small arms and ammunition that at least two EU member states—Bulgaria and the Slovak Republic—have exported to Uganda since 2014, despite longstanding EU arms embargoes on Sudan and South Sudan.** CAR's documentation provides the first physical confirmation that items exported by these European states since 2014 are currently in service with EU-embargoed forces in Sudan and South Sudan. CAR has obtained evidence that Uganda procured some of this materiel specifically on behalf of the Government of South Sudan, although there is no evidence that the Bulgarian or Slovak exporters, or their governments, were aware of this materiel's intended retransfer.
- **A network of US and Ugandan companies—controlled by British, Israeli, Ugandan, and US nationals—procured a military jet from the United States and an Austrian-made surveillance aircraft.** These aircraft entered into SPLA service during 2015 and 2016. CAR's findings suggest that neither the original supplier companies, nor the US or Austrian governments, were aware that the aircraft might be retransferred to South Sudan. However, CAR has obtained documentation indicating that at least one of the companies in the US–Ugandan network that procured the aircraft was in direct commercial contact with the South Sudanese government regarding the supply of at least one of these aircraft to the SPLA, along with training, crew, and technical support.
- **Since 2014, at least two offshore companies registered in the Seychelles have acted as brokers or intermediaries in actual or attempted arms supplies to South Sudan.** A third Seychellois company brokered the export of ammunition from Romania via the Slovak Republic to Uganda in 2015; CAR subsequently documented these rounds in the hands of non-state forces allied with the SPLA.⁶ This company is controlled by an individual whom UN investigators named in 2001 for his involvement in exports of Slovak weapons to Uganda and their subsequent diversion to Charles Taylor's regime in Liberia, in collaboration with the well-known arms transporter Victor Bout. While there is nothing inherently illegitimate about Seychellois offshore companies, export control

authorities generally lack access to information about their ownership structures. This may render the identities and past records of their owners effectively anonymous and frustrate pre-export control risk assessments.

- **Both main parties to the conflict in South Sudan have sought to exploit air logistics.** South Sudanese commercial air operators, leasing aircraft and crews from companies based in Armenia and the United Arab Emirates (UAE), have transported SPLA personnel and equipment to the key Upper Nile logistics hubs of Malakal, Paloch, and elsewhere. The SPLA itself has also procured at least one transport aircraft from Belarus. In 2014, SPLA-IO forces in Upper Nile benefitted from airdrops of ammunition and other materiel. During 2015, US individuals presented a prominent SPLA-IO official with an offer to supply and operate a large civilian turboprop aircraft via Kenyan and US companies. While the deal was not completed, it is unclear whether the US individuals involved were aware that they were negotiating with opposition officials.

This report contains five sections. The first draws on evidence from CAR's field documentation to assess allegations of arms supplies to the conflict's parties from China, Egypt, Ethiopia, Israel, and Sudan. The second examines the weapon acquisition efforts of the SPLA-IO. The third lays out evidence of retransfers to the SPLA and its allies of weapons, ammunition, and aircraft originally supplied to neighbouring Uganda from the United States and EU member states. The last two sections examine legal and logistical aspects of arms acquisitions. Section 4 examines the role of opaque commercial intermediaries that were involved in some of the transactions detailed in this report; Section 5 considers the role of commercial aircraft in deliveries and military logistics for both of the conflict's main protagonists.

SINCE 2014, AT LEAST TWO OFFSHORE COMPANIES REGISTERED IN THE SEYCHELLES HAVE ACTED AS BROKERS OR INTERMEDIARIES IN ACTUAL OR ATTEMPTED ARMS SUPPLIES TO SOUTH SUDAN

NOTES ON METHODOLOGY

At the core of this report's analysis is a data set of 128 weapons, 201,517 rounds of ammunition, and a range of other military materiel, which CAR's field investigation teams documented in South Sudan between May 2014 and June 2017.⁷ This equipment ranges from small-calibre ammunition to anti-tank guided weapons, man-portable air defence systems (MAN-PADS), and main battle tanks. CAR's field investigation teams have documented all items photographically, dated and georeferenced the documentation sites, and incorporated contextual interview data gathered from the forces in control of the items at the time of documentation.

Determining flows of weapons and associated equipment in South Sudan's multi-dimensional conflict is complicated by three factors.

First, all sides have exchanged armed personnel and materiel with each other through combat, defection, and physical displacement—with the result that opposing forces often possess identical equipment. Identifying new external weapon supplies to any one group, therefore, necessitates comparing weapon profiles of other groups and government forces in South Sudan and its neighbours, and

generating information separately on supply mechanisms and commercial networks.

Second, none of the parties to the South Sudan conflict operate fully coordinated or centralised supply chains or stockpile management systems. Not even South Sudan's national army maintains a centralised record of where materiel is distributed or stored. Military units often operate with decentralised commands and independent supply chains and use a mixture of supplied, seized, and recovered equipment. The result is an exchange of materiel between different groups in all directions. In addition, it is difficult to document large quantities of equipment in any one location. Captured or seized small arms and light weapons, in particular, are generally present in only small numbers at any given documentation site because forces reissue them to their own personnel immediately after seizure.

Third, much of the new materiel documented in South Sudan originated in states that do not respond to CAR's requests for information. CAR has sent 81 trace requests relating to items documented in South Sudan or otherwise referenced in this report, and has received only eight responses (from the Czech Republic, Germany, Romania, the Slovak Republic,

▼ The abandoned Thar Jath production site in oil concession Block 5A, Unity state (now Northern Liech state), 3 June 2014.
© CAR



Ukraine, and the United Arab Emirates).⁸ Some of these responses have proved crucial for several strands of CAR's investigations. The low response rate, however, has required CAR to use other means to obtain most of the information on the weapon transfers detailed in this report. This includes analysing physical evidence from the weapons themselves; obtaining government, commercial, transport, and other documents; and interviewing knowledgeable individuals throughout the region. All of CAR's investigations nonetheless remain rooted in the field-based documentation of weapons and associated equipment—from cartridge cases to jet aircraft. This approach provides not only indispensable primary leads for weapon transfer investigations, but also concrete proof that weapons from the transfers under investigation have reached unauthorised users in South Sudan.

CAR has provided a right of reply to all of the governments, private companies, and private individuals involved in the arms and equipment transfers described in this report. For privacy reasons, the report does not refer to private individuals by name, except in the case of well-known public officials. Other individuals are referred to by nationality and corporate affiliation.

In the interest of transparency, CAR has uploaded all items from its South Sudan data set onto the EU- and German government-funded iTrace® Global Weapon Reporting System, which is publicly available online and via the iTrace® mobile application.⁹ This report references specific items using iTrace® unique reference numbers (URNs), which users can enter into the iTrace® search box. CAR publishes this information on iTrace® to enable interested parties to browse complete records pertaining to each documented case and to facilitate further analysis by researchers and the wider public.

CAR retains all documents, interview notes, emails, recordings, photographs, and other data obtained from third parties in a secure, encrypted format. Wherever relevant, this report refers to these items as being 'on file'. To protect sources, CAR is unable to publish the precise details of the sources or circumstances of acquisition of every evidential item referenced in this report. CAR's sources have provided all such items willingly and with full

THE CORE OF THIS REPORT'S ANALYSIS IS A DATA SET OF 128 WEAPONS, 201,517 ROUNDS OF AMMUNITION, AND A RANGE OF OTHER MILITARY MATERIEL

knowledge of their use by CAR. CAR does not undertake undercover work or use other clandestine investigation methods.

This report addresses a limited number of arms transfers that also feature in reports of the UN Panel of Experts on South Sudan, a body established by the UN Security Council in 2015 in part to report on:

the supply, sale or transfer of arms and related materiel and related military or other assistance, including through illicit trafficking networks, to individuals and entities undermining political processes to reach a final peace agreement or participating in acts that violate international human rights law or international humanitarian law.¹⁰

In order to focus on original findings, however, this report only discusses such cases in detail if CAR investigators have obtained new information that substantially supplements, or provides concrete information in support of, allegations made in UN Panel reports. Accordingly, this report does not discuss five attempted or actual weapon deals addressed elsewhere. These are: unsuccessful SPLA efforts to procure armoured vehicles from an Egyptian exporter; successful SPLA procurement of UAE-produced armoured vehicles, some of which subsequently reached SPLA-IO forces through battlefield capture; unfinished SPLA negotiations to acquire ammunition production facilities via a Lebanese company; SPLA discussions on military support with North Korean officials in late 2016; and a large-scale but ultimately unsuccessful SPLA effort in 2014 to procure small arms, light weapons, and other materiel from Ukraine via a UK-registered company, sponsored by an Emirati defence manufacturer. The UN Panel, Control Arms (drawing on CAR's findings), and Amnesty International have already issued full reports on these cases, although CAR investigations have generated additional information on some of them.¹¹

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SECTION 1

EXTERNAL WEAPON SOURCES



FINDINGS BASED ON FIELD DOCUMENTATION



Published research and commentary on weapon flows into the South Sudan conflict has concentrated on a small number of international suppliers to the SPLA—particularly defence manufacturers based in China, Israel, the UAE, and Ukraine. It has also alluded to neighbouring states supplying the two main parties to the conflict.¹²

The sample of weapons and related materiel documented by CAR across South Sudan since 2014, although by no means exhaustive, helps to establish a more detailed typology and chronology of these international supplies. In contrast to allegations made since 2014 by neighbouring states, the Government of South Sudan, and representatives of the SPLA-IO, the sample reveals:

- no evidence of new supplies of Chinese weapons or ammunition since two large, well-documented shipments, which were delivered in mid-2014 and agreed in contracts made in 2011 and 2013; and
- no evidence of new supplies of small arms or ammunition from Israel since the start of the conflict in December 2013.

Although these findings do not conclusively rule out the possibility of such supplies, they

are consistent with public statements made by the Israeli and Chinese governments that supplies ceased in 2013 and 2014, respectively. Similarly, the sample provides:

- no indication of new cross-border supplies from Sudan to SPLA-IO forces since large-scale, overland transfers from Sudan in mid-2015;
- no indication of coordinated or state-sponsored supplies of weapons or ammunition from Egypt to the SPLA; and
- no indication of coordinated or state-sponsored supplies of weapons or ammunition from Ethiopia to either the SPLA or SPLA-IO.

CAR's findings also highlight the logistical isolation of SPLA-IO-aligned groups, which are stationed in different parts of the country. SPLA-IO-aligned armed groups that rebelled in the Western Equatoria region (now Gbudwe and Maridi states) during 2015 appear to have relied on old weapons and ammunition that were already in circulation among civilians in South Sudan and neighbouring states. These weapons differ in type and calibre from those commonly used by SPLA forces and by SPLA-IO forces based in the greater Upper Nile region. Consequently, CAR found no evidence that the

▲ An SPLA-IO soldier stands in front of an T-72M1 tank abandoned on the road between Riar and Koch, Unity state (now Northern Liech state), 1 June 2014.
© CAR

SPLA-IO successfully resupplied these Equatorial groups in 2015–16, despite allegations of resupply by UN and other reporting groups.¹³

Overall, the SPLA-IO's increasing reliance on weapons from SPLA defectors and from battlefield capture highlights its inability to

secure external weapon sources other than Sudan (during the first two years of the conflict). Sections 2 and 5.4 of this report provide previously unpublished details of two failed SPLA-IO procurement attempts via networks in the Central African Republic, Europe, Kenya, and the United States.

1.1 CHINESE WEAPONS AND AMMUNITION

Chinese-manufactured weapons and ammunition constitute a significant proportion of materiel in circulation in a number of African conflicts, including the one in South Sudan. China accounts for 37 per cent of the weapons and more than 99 per cent of the ammunition documented by CAR in South Sudan since 2014.¹⁴

CAR has nonetheless found no indications of direct or indirect Chinese weapon or ammunition supplies to the SPLA since May 2014. These findings stand in contrast to SPLA-IO claims that Chinese supplies reached the SPLA more recently, via neighbouring countries, including Ethiopia.¹⁵

In May 2014, the Chinese arms manufacturer China North Industries Corporation (Norinco) dispatched two large shipments by sea to Juba, via the Kenyan port city of Mombasa. The shipments were consigned to the South Sudanese Ministry of Defence (MOD) and comprised more than 27 million rounds of small-calibre ammunition, 40,000 Type 69 40 mm rockets, 20,000 BGL2 40 mm anti-personnel spin-stabilised grenades, 2,394 40 mm under-barrel grenade launchers, 1,200 Type HJ-73D anti-tank guided missiles, 100 HJ-73D launchers, 9,574 Type 56 (AK-pattern) 7.62 × 39 mm assault rifles, 660 NP42 9 mm pistols, 319 Type 80 general-purpose machine guns, and other military equipment.¹⁶ Norinco shipped this materiel under contracts concluded in 2011 and 2013, with the respective contract numbers MOD/001/2011 and MODVA/001/2013 (see Figure 1).¹⁷ Given the absence of a UN arms embargo on South Sudan at the time, these transfers were lawful.

The sample of ammunition documented by CAR in South Sudan indicates that Chinese ammunition supplied to the country in the 2013–14 period—most probably under these 2011 and 2013 contracts—constitutes a signif-

icant proportion of the SPLA's ammunition inventory. This is especially the case for 7.62 × 39 mm (AK-pattern) ammunition. As Charts 1 and 2 indicate, during 2014 less than two per cent of ammunition documented by CAR in South Sudan was Chinese and manufactured after 2012. None of this Chinese ammunition was of 7.62 × 39 mm calibre. By 2017, over half (56 per cent) of all the AK-pattern ammunition sample documented by CAR in South Sudan consisted of a single type of Chinese-manufactured 7.62 × 39 mm ammunition bearing headstamp code 811_13, which denotes manufacture by Chinese State Factory 811 in 2013.¹⁸

The logical conclusion is that the 27 million rounds of small-calibre ammunition legally transferred to the SPLA from China in 2014 have sustained SPLA operations in the years since.¹⁹

While CAR's documentation is opportunistic and not necessarily representative, it substantiates the use of this particular lot of 7.62 × 39 mm ammunition in major attacks against civilian targets in South Sudan by both government and opposition forces (see Box 1 on page 21).

▼ Belted 12.7 × 108 mm ammunition, manufactured in China in 2013, in a vehicle-mounted machine gun seized from the government-allied Sudanese rebel group the Justice and Equality Movement in Koch, Unity state, 2 June 2014.
© CAR



Chart 1

Ammunition documented in South Sudan, by country and year of manufacture, 2014–17 (n=4,571)²⁰

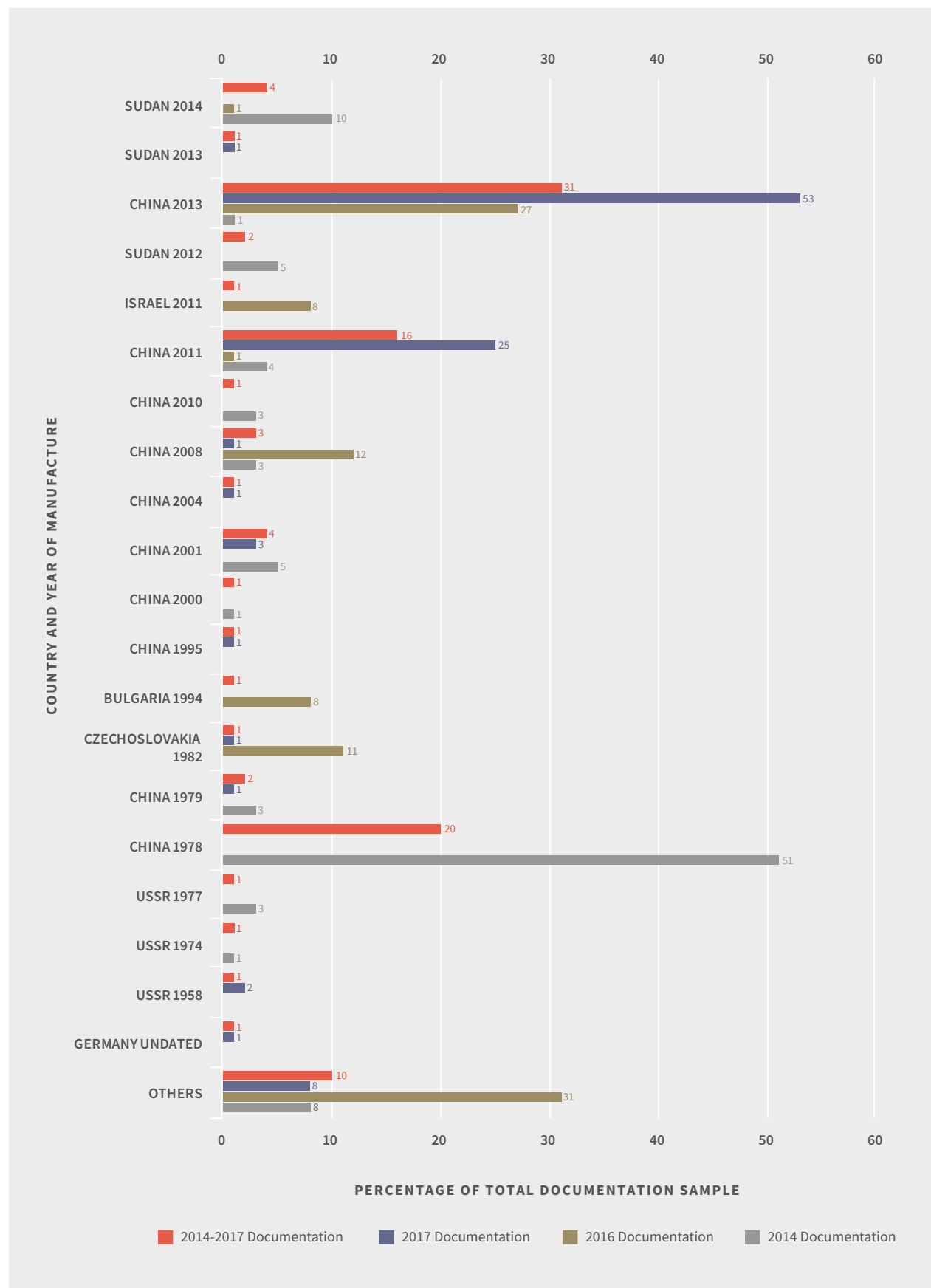


Chart 2

Chinese 7.62 × 39 mm ammunition, by date of documentation and headstamp (n=1,274) ²¹

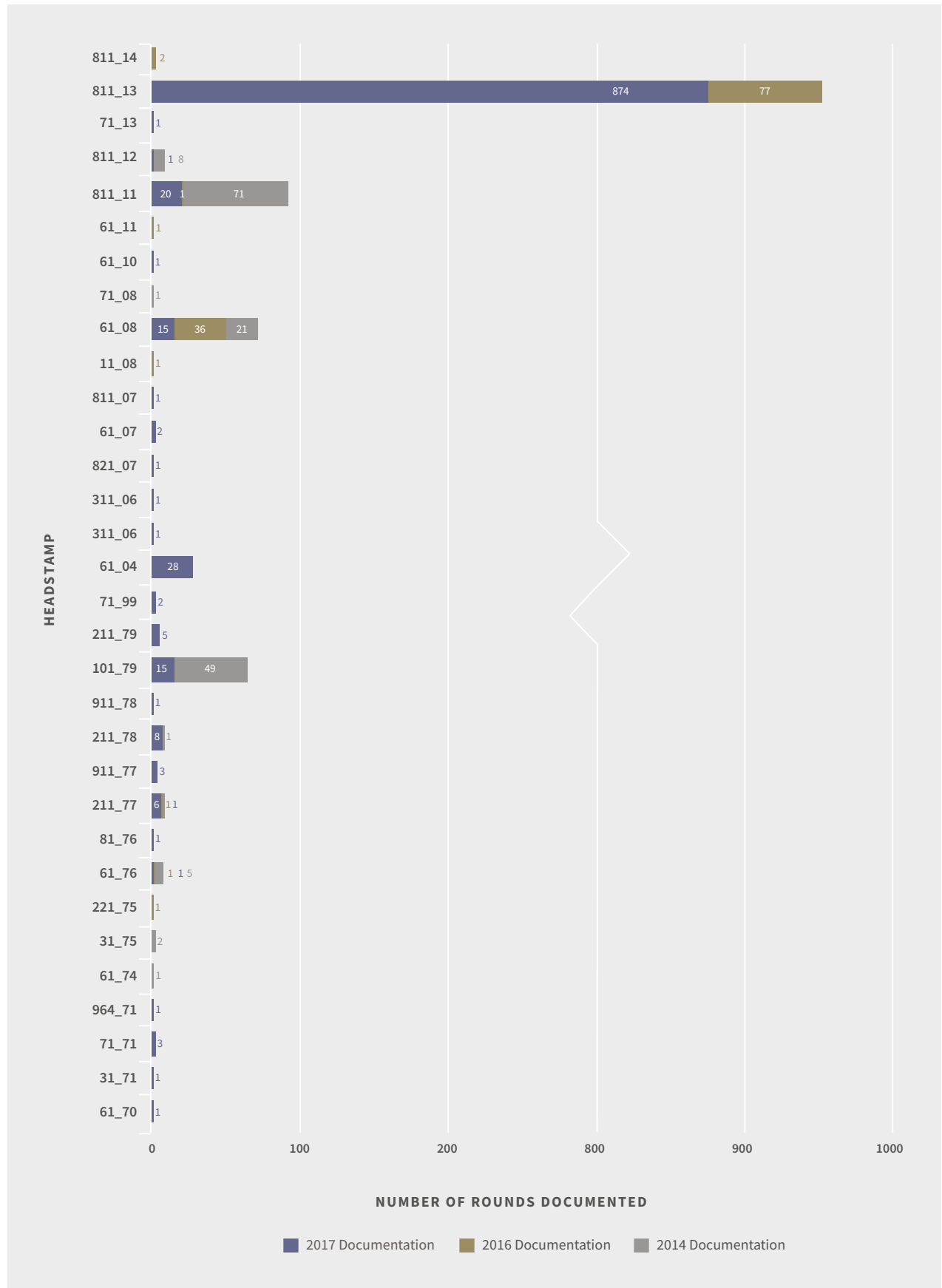


Figure 1

This crate originally contained Type 69 rocket-propelled grenades and bears the contract number MOD 001/2011. It was abandoned after fighting between SPLA and SPLA-IO forces at Thar Jath oil production facilities, Unity state (now Northern Liech state). CAR documented it on 1 June 2014.



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In September 2014, the Chinese Embassy in Juba informed journalists that China would halt arms shipments to South Sudan, including all outstanding deliveries subject to existing contracts.²² Irrespective of this decision, the outbreak of fighting may already have made such deliveries logistically difficult. Correspondence between Norinco and the SPLA deputy chief of general staff in late December 2013 indicates that a shipment of 45 Chinese-manufactured VT2 (Type 96) main battle tanks—included in contract MODVA/001/2013—

arrived in Mombasa around 28 December 2013, but remained in the port because the outbreak of hostilities prevented Norinco from identifying a logistics company willing to transport the tanks to South Sudan.²³

In South Sudan, CAR has not documented Chinese ammunition manufactured after 2014 or sighted VT2 (Type 96) main battle tanks. This appears to corroborate claims that China instituted a formal halt to arms deliveries to South Sudan in 2014.

▼ SPLA-IO fighters march to the front line near Bentiu, Unity state (now Northern Liech state), 3 June 2014.
© CAR



BOX 1 — AMMUNITION STOCKS: FINDINGS FROM ATTACK SITES

Between 2014 and 2016, CAR field investigation teams documented cartridge cases at the sites of three major attacks on civilians:

1. The 15 April 2014 attack by the SPLA-IO and allied forces on civilians sheltering in the Kalibalak mosque in Bentiu;
2. The December 2015 SPLA attack on the mainly Zande residential area of Ikpiro in Yambio; and
3. The 17-18 February 2016 attack by SPLA elements on the UN protection of civilians (POC) site in Malakal (see Figure 2).

Figure 2

Left: Kalibalak mosque, Bentiu, photographed on 24 May 2014. *Right:* Burnt houses in Ikpiro district, Yambio, photographed on 17 February 2016. *Bottom:* The UN POC site in Malakal, photographed on 27 February 2016.



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BOX 1 — AMMUNITION STOCKS: FINDINGS FROM ATTACK SITES (CONTINUED)

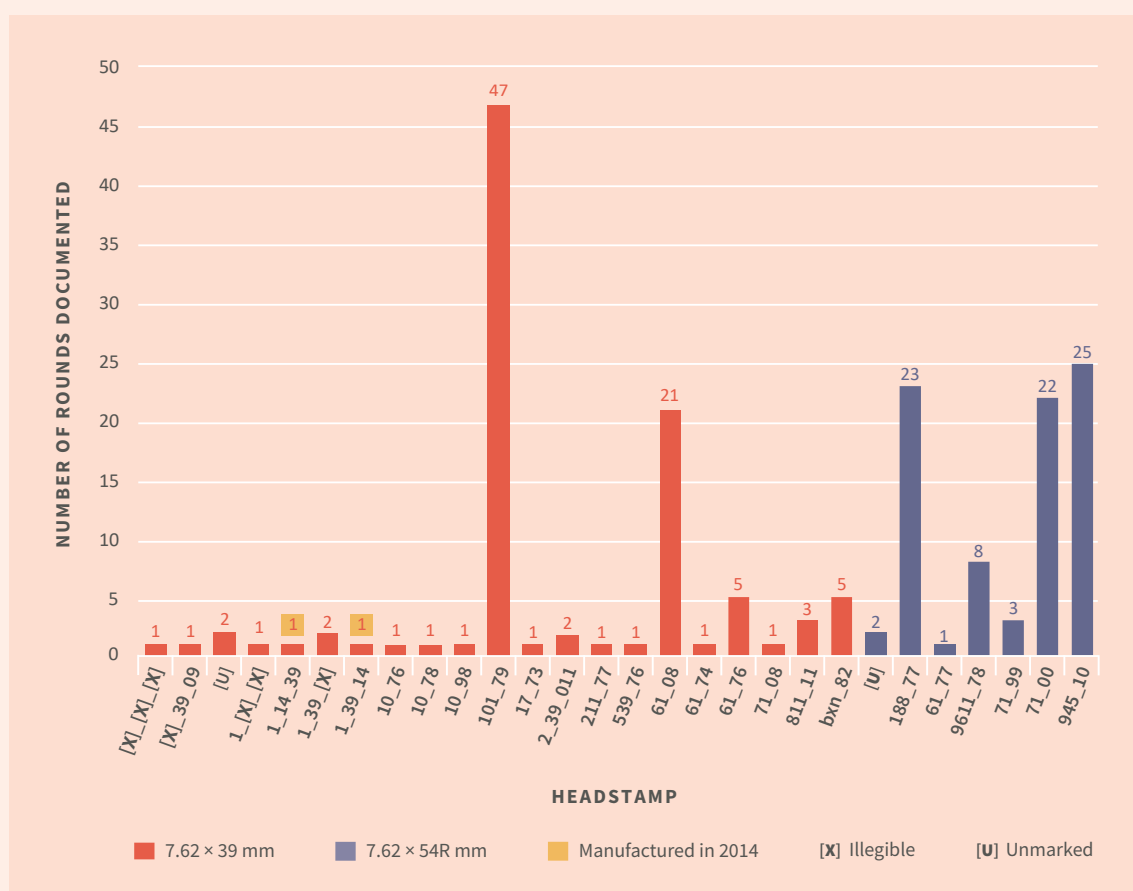
ATTACK SITE 1 – KALIBALAK MOSQUE, BENTIU

A large number of the cartridge cases recovered following the attack by SPLA-IO and allied forces on the mosque were probably in SPLA stockpiles prior to December 2013, when personnel from various SPLA divisions defected to the SPLA-IO,

taking their weapons and ammunition with them. As shown in Chart 3, this sample included only three rounds manufactured in 2013 or 2014, all of Sudanese manufacture.

Chart 3

7.62 × 39 mm and 7.62 × 54R mm ammunition recovered from the Kalibalak mosque (n=184)



Notes: The cartridge cases were recovered following the attack of 15 April 2014 and examined on 24 and 26 May 2014. Ammunition manufactured in 2014 is highlighted.

ATTACK SITE 2 – IKPIRO, YAMBIO

CAR documented only two cartridge cases from the Ikpiro attack, at the site in February 2016. One was a 7.62 × 39 mm round manufactured in Czechoslovakia in 1982, which CAR has previously recorded in service with numerous groups across Sudan and South Sudan. The other was a 7.62 ×

39 mm cartridge case, produced by Chinese State Factory 811 in 2013. CAR did not observe this type of ammunition in service with SPLA or SPLA-IO forces during its 2014 and 2015 investigations, and this was its first documentation by CAR in South Sudan.

BOX 1 — AMMUNITION STOCKS: FINDINGS FROM ATTACK SITES (CONTINUED)

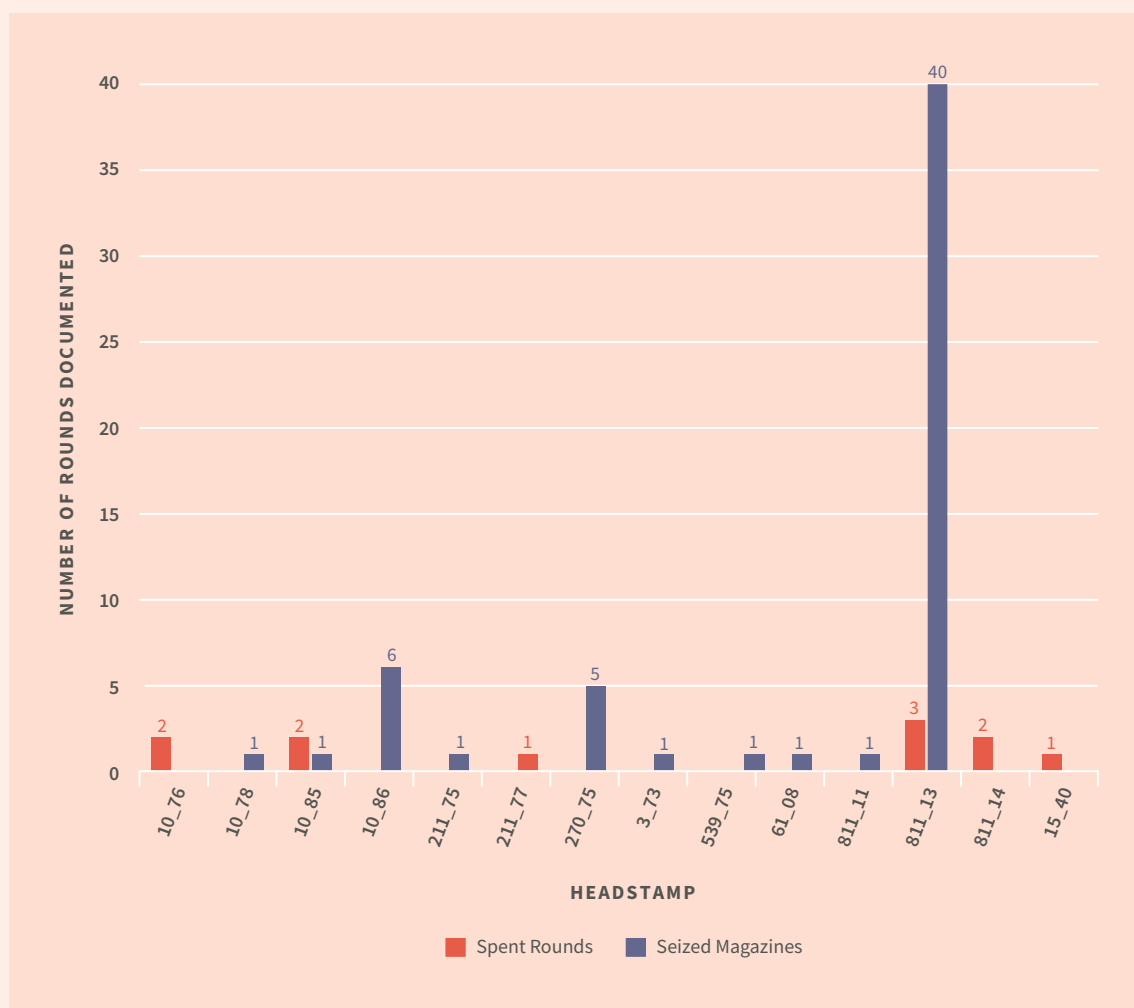
ATTACK SITE 3 – UN POC SITE IN MALAKAL

In the evening of 17 February 2016, just prior to the attack on the POC site, UN peacekeepers seized two loaded magazines from SPLA soldiers who were attempting to enter the site (see Figure 3). The magazines were predominantly loaded with ammunition produced at Chinese State Factory 811 in 2013, which were identical to the round documented by CAR at the Ikpiro attack site. These findings suggest that this ammunition was in service with SPLA Division 2 in Malakal.

Further, CAR observed identical spent cartridge cases at firing positions within the POC, in addition to ammunition manufactured by the same Chinese factory in 2014 (see Chart 4). The presence of Chinese State Factory 811 ammunition in service with SPLA forces that operated across widely separated theatres of the conflict underlines the continued predominance in SPLA stockpiles of the Chinese ammunition supplied in 2013–14.

Chart 4

7.62 × 39 mm rounds seized and observed at the UN POC site in Malakal (n=69)



Notes: UN peacekeepers seized rounds from two magazines (blue) as SPLA personnel attempted to enter the Malakal POC site at the Juliet Gate on the night of the attack; CAR observed spent cartridge cases (red) at firing positions on the POC site on 27 February 2016.

BOX 1 — AMMUNITION STOCKS: FINDINGS FROM ATTACK SITES (CONTINUED)

Figure 3

Top: Two magazines, seized by UN peacekeepers from SPLA soldiers who were attempting to enter through the Juliet Gate of the Malakal POC site on 17 February 2016. *Bottom:* A Chinese-manufactured 7.62 × 39 mm ammunition round from one of these magazines. Forty of the 58 rounds in these magazines were of this type, manufactured in State Factory 811 in 2013.²⁴



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1.2 ISRAELI WEAPONS AND AMMUNITION

Israeli arms supplies to South Sudan received significant media attention after the UN Panel of Experts reported that government-sponsored Mathiang Anyoor militia members were using (lawfully supplied) Israeli Galil ACE rifles. These weapons originated in South Sudanese National Security Service (NSS) stockpiles and were deployed by the militia during the initial fighting in Juba in December 2013. The UN Panel of Experts also reported that the NSS had acquired Micro Galil rifles from Ugandan stockpiles in 2014, after the start of hostilities. The Government of Israel had not authorised Uganda to retransfer the weapons.²⁵ In January 2016 Israeli officials informed journalists that Israel had supplied the Galil ACE rifles to the NSS during 2013, and that relevant Israeli ministries had, in early 2014, decided to suspend transfers of lethal equipment to any party in South Sudan.²⁶

The sample of weapons documented by CAR in South Sudan includes seven Israeli-made weapons (five per cent of the sample). Their markings and specifications suggest at least two supply sources. Four of the weapons had been marked prior to export with the acronyms ISB and NSS, indicating that they were intended for service with the Internal Security Bureau of the NSS.

As Table 1 shows, the NSS-marked weapons documented by CAR in 2017 have serial numbers that are sufficiently close to that of the weapon documented in 2014 (at the start of the conflict) to suggest that they were consigned to the NSS at the same time, and probably prior to the conflict. Though the sample is small and not exhaustive, it provides no indication of direct Israeli weapon supplies to South Sudan since the outbreak of the conflict.²⁷

▼ The interior of the Kalibalak mosque in Bentiu, Unity state, after removal of the bodies of some 200 civilians killed while sheltering there on 15 April 2014.

© CAR



The three Israeli weapons that are not marked for service with the NSS (dark shaded in Table 1) differ from those that are in two ways: 1) the Galil ACE 21 has a different calibre (5.56 × 45 mm), and 2) there is a large gap in the serial numbers of the Jericho pistol with NSS markings and the two without.

These findings support the hypothesis that these three weapons arrived indirectly from a third party, not necessarily authorised by the Government of Israel. CAR has requested trace information from the Government of Israel but has yet to receive a response.²⁸

Table 1

Israeli-manufactured weapons documented in South Sudan, 2014-17

Documentation date	Model	Calibre	Serial number	Circumstances	ISB/NSS-marked?	iTrace® URN
12 June 2017	Galil ACE 21 assault rifle	5.56 × 45 mm	41163285	Held by SPLA-IO forces in Kajo-Keji, Yei River state, seized from SPLA forces	No	165E21F1F00C19EA1
6 December 2016	Galil ACE 31 assault rifle	7.62 × 39 mm	41161985	Held by UN personnel in Juba, seized from SPLA-IO elements in and around the Juba POC site	Yes	165E21F1F00C102DB
1 June 2014	Galil ACE 32 assault rifle	7.62 × 39 mm	43106066	Held by SPLA-IO forces in Northern Liech state, seized from SPLA forces	Yes	165E21F1F00C147C8
12 June 2017	Galil ACE 32 assault rifle	7.62 × 39 mm	43106455	Held by SPLA-IO forces in Kajo-Keji, Yei River state, seized from SPLA forces	Yes	165E21F1F00C19EB1
12 December 2014	Jericho 941 PSL semi-auto pistol	9 × 19 mm	41307617	Collected by UN peacekeepers at UN base, Malakal, from unknown individual during 2014	No	1A9EB1F2A00C3FE
12 June 2017	Jericho 941PSL semi-auto pistol	9 × 19 mm	41310223	Held by SPLA-IO forces in Kajo-Keji, Yei River state, seized from SPLA forces	No	165E21F1F00C15B00
12 June 2017	Jericho 941PSL semi-auto pistol	9 × 19 mm	43353553	Held by SPLA-IO forces in Kajo-Keji, Yei River state, seized from SPLA forces	Yes	165E21F1F00C15AA7

 = Not marked for service with the NSS

1.3 ALLEGATIONS OF EGYPTIAN SUPPLIES TO THE SPLA

The Sudanese government and South Sudanese opposition officials have persistently alleged that Egypt has supplied military equipment to the SPLA since the fighting broke out, including by air.²⁹ CAR has documented no Egyptian-made weapons in South Sudan. Its sample of recovered Egyptian ammunition is small and comparatively old, comprising only 11 rounds that were manufactured between 1964 and 1980.

The 11 rounds are all 9 × 19 mm in calibre and were among SPLA stocks that SPLA-IO forces captured during the fighting that followed

the collapse of the ARCSS in July 2016.³⁰ The rounds constitute less than 1 per cent of the ammunition documented by CAR in South Sudan since 2014, and only 17 per cent of the 9 × 19 mm ammunition in CAR's documentation sample. This neither precludes the possibility that Egypt has supplied old, Egyptian-manufactured ammunition to the SPLA in recent transfers, nor that it has supplied ammunition manufactured by other producers. Nonetheless, CAR's sample provides no strong indications of concerted or recent supply of Egyptian-manufactured materiel to any party to the conflict.

1.4 ALLEGATIONS OF ETHIOPIAN SUPPLIES TO THE SPLA-IO

Since 2014, South Sudanese government representatives have alleged that Ethiopia has provided military and logistical assistance to the SPLA-IO.³¹ Verifying these allegations is difficult for two reasons. First, Ethiopia has historically supported the SPLA since the early 1980s. This means that the SPLA's pre-conflict stockpiles contained Ethiopian-manufactured materiel, including ammunition and GAFAT

(AK-pattern) assault rifles. This materiel is now distributed on both sides of the conflict. Second, Ethiopia's small arms ammunition plant, Homicho Ammunition Engineering Industry (HAEI), produces unmarked, brass-cased ammunition (see Figures 4 and 5). The absence of a date code on this ammunition makes it difficult to determine when it arrived in theatre.³²

Figure 4

An empty ammunition crate with labels removed and markings painted over. The construction is consistent with ammunition crates from Ethiopia's state factory, HAEI. SPLA Division 2 forces captured this crate from SPLA-IO-aligned Agwelek forces in Wadakona, Fashoda state, South Sudan, in February 2016. CAR documented the item at Division 2 headquarters in Malakal on 3 March 2016.³³



Figure 5

A crate of 7.62 × 39 mm ammunition bearing an HAEI label (location and precise date withheld, 2013).



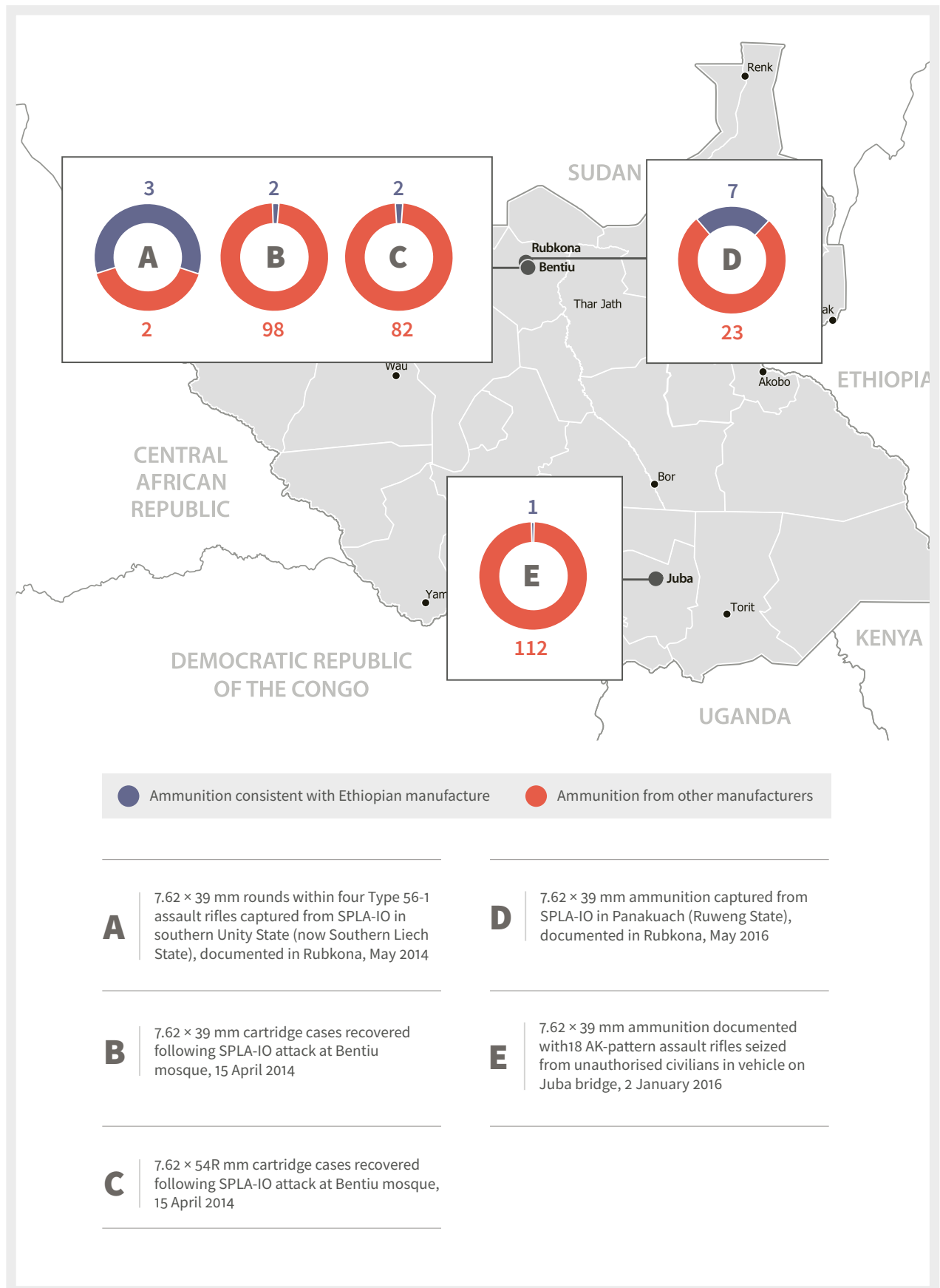
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CAR documented loose, unmarked brass-cased 7.62 × 39 mm and 7.62 × 54R mm ammunition on four occasions between May 2014 and May 2016 (see Map 3). This ammunition, which the SPLA seized from SPLA-IO forces and armed civilians, is physically consistent with Ethiopian HAEI manufacture.³⁴ The seizures did not include any ammunition crates that bear date stamps, which makes establishing when they entered the country problematic. However, relatively low recovery volumes and the fact that Ethiopian ammunition does not appear predominant at any single recovery site are factors that challenge allegations of concerted or state-backed supply from Ethiopia.

Likewise, CAR field investigation teams documented only four Ethiopian-made GAFAT assault rifles during the 2014–17 period. CAR has also documented GAFAT weapons with South Sudanese civilians in areas that had, at the time, not yet been affected by the current conflict.³⁵ While not conclusive, these findings suggest that Ethiopian materiel in service with SPLA-IO forces probably derives from a range of informal sources, including piecemeal acquisition from long-standing SPLA stockpiles, small-scale ‘ant trade’ within South Sudan, and possibly small-scale cross-border movements of weapons and people across the South Sudan–Ethiopia border.

Map 3

Ethiopian ammunition at CAR documentation sites in South Sudan, 2014–16³⁶ (n=15)



1.5 SUDANESE SUPPLIES TO THE SPLA-IO

Cartridge cases recovered following the April 2014 attack by SPLA-IO and allied forces on the Kalibalak mosque in Bentiu (see Box 1) provided the first indications that Sudanese 7.62 × 39 mm ammunition manufactured in 2014 had entered service with the SPLA-IO. Importantly, this ammunition was manufactured after December 2013, when various SPLA divisions split to form the core of the SPLA-IO. It thus could not have come from existing SPLA stocks.³⁷

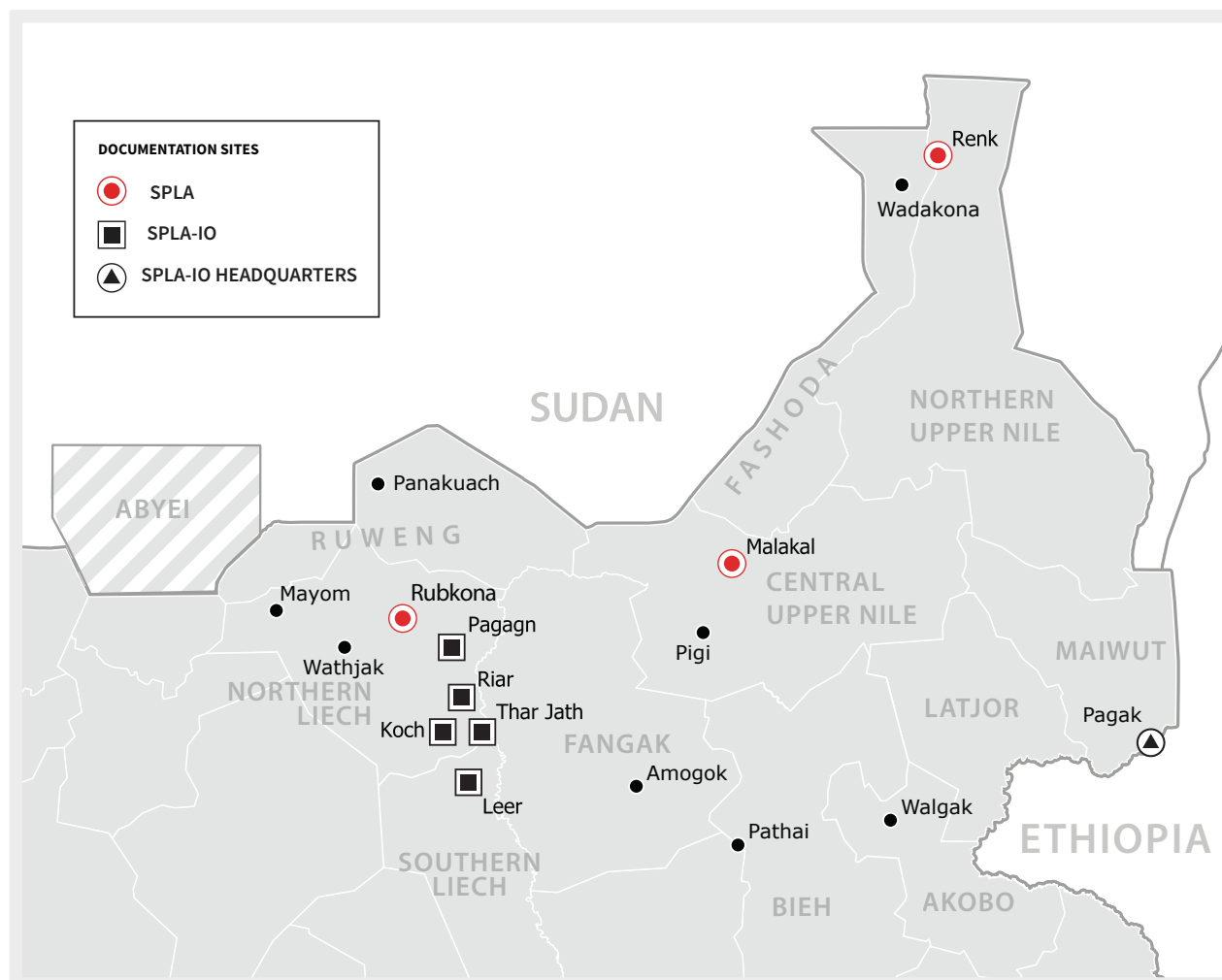
In December 2014, a CAR field investigation team examined far larger quantities of air-dropped ammunition following its capture by the SPLA from SPLA-IO forces in Pigi county, Jonglei state (now Central Upper Nile state), in September 2014 (see Map 4). The materiel

included ammunition of three calibres: 7.62 × 39 mm, 7.62 × 54R mm, and 12.7 × 108 mm. More than 70 per cent of this ammunition was of Sudanese manufacture and 44.6 per cent was manufactured in 2014, with the remainder produced in China and Sudan between 2008 and 2013.³⁸ Most of this ammunition had suffered lateral impact damage, which is consistent with airdrop delivery.

In May 2016, CAR documented a much more substantial captured consignment—consisting of 1,438 ammunition crates—in Rubkona, Northern Liech state. The SPLA reportedly captured the consignment from SPLA-IO forces in Panakuach in Ruweng state in mid-2015, allegedly the day after its delivery to SPLA-IO forces by land from West Kordofan in Sudan.

Map 4

The greater Upper Nile region



SPLA personnel claimed that the 1,438 boxes presented to the CAR field investigation team comprised approximately one-quarter of the full consignment captured that day (SPLA commanders stated that they had immediately redistributed the remaining materiel to their forces in Panakuach, Jaw, and Leer).³⁹ CAR was unable to confirm this claim.

The boxed consignment comprised 196,786 rounds of ammunition of 7.62 × 39 mm, 7.62 × 54R mm, 12.7 × 108 mm, 14.5 × 114 mm, and 23 × 152B mm calibres, 99.9 per cent of which were manufactured in China and almost all of which were produced in 2013 or 2014. It also contained 160 60 mm mortar projectiles manufactured in Sudan in 2014.

Black paint had been applied to conceal factory marks on the crates of 14.5 × 114 mm, 12.7 × 108 mm, and 7.62 × 54R mm ammunition, which strongly suggests clandestine supply (see Figure 6). Markings on some of the Chinese-manufactured 12.7 × 108 mm armour-piercing incendiary (API) ammunition crates within the shipment indicate that they were originally consigned to Sudan's National Intelligence and Security Service via Port Sudan (see Figure 7).⁴¹

CAR has been unable to verify whether SPLA-IO forces have received any further materiel from or via Sudan since this mid-2015 consignment; Box 2 in Section 2 presents details of an alleged

2017 delivery whose circumstances CAR was unable to verify. The quantity of post-2014 Sudanese-manufactured materiel in CAR's sample is insignificant. During 2016 and 2017 CAR field investigation teams documented only 18 rounds of loose 7.62 × 39 mm copper-clad steel ammunition with the headstamp code 15_40. The headstamp typeface corresponds to that of Sudanese-manufactured ammunition from previous production years and the date code '15' suggests manufacture in 2015.⁴³

CAR documented the ammunition at the site of an SPLA attack on the Malakal POC in February 2016; following recovery from SPLA-IO forces in and around the Juba POC in December 2016; and with SPLA-IO forces after its capture from SPLA forces in Kajo-Keji, Yei River state, in June 2017 (see Figure 8).⁴⁴ Even if this ammunition can be confirmed as Sudanese-produced, CAR has not documented sufficiently large, or crated, quantities to support allegations of concerted or state-sponsored supply.

Materiel supplied from, or via, Sudan has also reached combatants in the current conflict through routes other than direct supply. For example, a number of older rebel groups in the greater Upper Nile region received arms and ammunition from Sudan prior to the onset of the current conflict.⁴⁵ These groups were granted amnesty by the Government of South Sudan in 2012 and have since fought alongside

Figure 6

Sealed crates of 14.5 × 114 mm ammunition with black paint applied to conceal shipping and consignee information, documented in Rubkona, Northern Liech state, on 17 May 2016.⁴⁰



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Figure 7

Shipping information visible on a sealed crate of Chinese-manufactured 12.7 × 108 mm API ammunition.⁴²



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Figure 8

These headstamps suggest that Sudanese ammunition marking practices may have changed between 2014 and 2015. *Left:* A Sudanese-manufactured 7.62 × 39 mm round with the headstamp 1_14_39 held by SPLA-IO forces in Kajo-Keji, Yei River state, after capture from SPLA forces. A CAR field investigation team documented it on 12 June 2017.⁴⁵ *Right:* A 7.62 × 39 mm round with the headstamp 15_40, documented at the same location.⁴⁶



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both the SPLA and SPLA-IO. Groups with historic Sudanese weapon holdings include the South Sudan Liberation Army (SSLA), under the command of Gen. Matthew Puljang and Gen. Baphiny Monytuil; and Shilluk Agwelek fighters now under the command of Gen. Johnson Olony who may previously have fought with Gen. George Athor's SSDM/A.⁴⁸

The Sudanese-backed SSLA, for example, held materiel prior to the outbreak of the current conflict that included more than 100 Chinese-manufactured CQ 5.56 × 45 mm assault rifles, whose factory marks had been removed by milling and then painted black, a practice suggestive of clandestine supply. CAR field investigation teams consistently documented these weapons alongside Chinese 5.56 × 45 mm ammunition manufactured by the Harbin Longjiang Special Equipment Company (HLSEC) in 2008. Similarly, Sudanese-supplied rebel forces under Gen. George Athor and the former Murle rebel leader Gen. David Yau Yau also possessed CQ rifles with identically obliterated markings, which were likewise always recovered with HLSEC ammunition manufactured in 2008.⁴⁹ The co-occurrence of CQ rifles with obliterated markings and HLSEC ammunition manufac-

tured in 2008 thus appears to be an indicator of clandestine Sudanese supply (see Figure 9).

In 2014, in then Unity state, the SPLA-IO seized CQ rifles from SPLA and SSLA forces. The rifles bore identically obliterated markings and were likewise loaded with HLSEC ammunition manufactured in 2008. They thus corresponded closely to the materiel supplied by Sudan to the SSLA and allied groups prior to the current conflict.⁵⁰

Similarly, combatants in the South Sudanese civil war appear to have obtained small numbers of non-military weapons that originally circulated on Sudan's civilian markets. How these weapons entered South Sudan is unclear, but plausible mechanisms include personal migration and cross-border 'ant trade', rather than any government-orchestrated supply. For example, UN peacekeepers collected a P22 Walther .22 LR pistol from armed elements in the Malakal POC site in late 2014. The producer had legally exported it to a Sudanese company in 2006; seven years later, a change in German law brought such weapons within the scope of German export licensing requirements and the EU embargo.⁵³ ■

SSLA
South Sudan
Liberation Army – an
armed group operating
in the Upper Nile
region of South Sudan
from 2011.

Figure 9

CQ 5.56 × 45 mm rifles with obliterated factory markings, accompanied by 5.56 × 45 mm ammunition manufactured in 2008 by the Harbin Longjiang Special Equipment Company. *Top:* A rifle held by SSLA combatants in Mayom, Unity state (now Northern Liech state), documented on 9 May 2013.⁵¹ *Bottom:* A rifle held by SPLA-IO combatants in Pagagn, Unity state (now Northern Liech state), captured from SPLA and allied forces and documented on 2 June 2014.⁵²



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SECTION 2

**SPLA-IO ACQUISITION
EFFORTS SINCE 2014**



Despite allegations made by the SPLA during 2017, CAR has found little indication of external resupply to the SPLA-IO since mid-2015 (see Box 2).⁵⁴

This would suggest that the SPLA-IO enjoyed limited sources of external support early in the conflict. Its efforts to diversify external weapon sources support this conclusion.

2.1 FAILED INTERNATIONAL PROCUREMENT EFFORTS

During the first half of 2014, representatives of SPLA-IO leader Riek Machar entered into discussions with a West African businessman, previously resident in Canada, to procure arms and ammunition for the SPLA-IO. During 2013, the businessman had been based in Bangui, Central African Republic, where he acted as an adviser to the leader of the Séléka rebellion, Michel Djotodia.⁵⁵ The businessman confirmed to CAR that he had worked with a number of African political and military groups, including that of Riek Machar, although he did not specify the nature of these contacts.⁵⁶

According to documents from a diplomatic source, the businessman discussed with representatives of Riek Machar the acquisition and air delivery of a large 'shopping list' of arms and ammunition during meetings in January and March 2014. This 'shopping list' included 43 million rounds of small-calibre ammunition; 23 × 152B mm and 37 × 240 mm cannon ammunition; 82 mm and 120 mm mortar projectiles (high-explosive and smoke); 15,000 PG-7 rockets; 960,000 rockets for BM-21 122 mm rocket launchers; 50,000 AK-pattern assault rifles; 20,000 sniper rifles; 5,000 PKM-pattern general-purpose machine guns; 300 anti-tank guided weapons (of unspecified type); 100 SA-7 MANPADS; 10,000 grenades; and communications equipment.⁵⁷

The West African businessman was reportedly in contact with a Lebanese arms dealer based in the Canary Islands. The South Sudanese intermediary between the businessman and Riek Machar was also in contact with an arms dealer based in the Balearics regarding parts of the 'shopping list'.⁵⁸

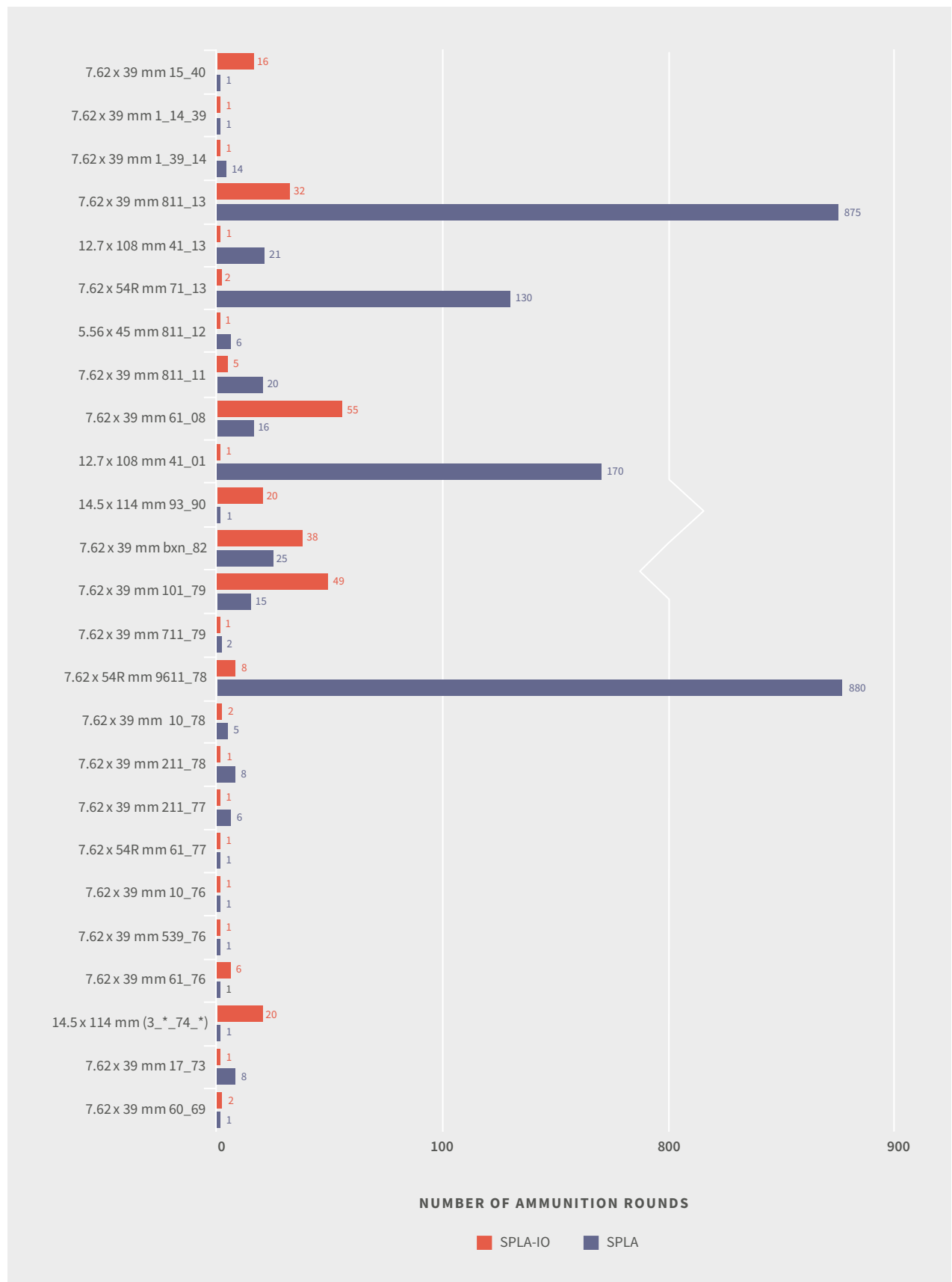
There is no suggestion that these businessmen and dealers acted unlawfully, and it is not clear that any of these procurement efforts ever bore fruit. Although CAR's field investigation teams documented SPLA-IO materiel from 2014 to 2017 and across all SPLA-IO operational areas, they did not identify systematic external resupply beyond the Sudanese deliveries of 2014 and 2015 (see Section 1.5).

The SPLA-IO's isolation appears to have made the group heavily dependent on battlefield capture and on defection of armed SPLA personnel as sources of resupply. At least 33 per cent of SPLA-IO and allied forces' ammunition documented by CAR since May 2014 matches materiel that CAR has also documented in service with SPLA forces (see Chart 5).⁵⁹ This percentage is almost certainly an underestimate, given CAR's limited oversight of SPLA stockpiles.

▲ SPLA-IO commanders and officers at a camp near Pagagn, Unity state (now Northern Liech state), 2 June 2014.
© CAR

Chart 5

Number of ammunition rounds of types common to SPLA and SPLA-IO stocks, by ammunition lot, batch, and headstamp number in the SPLA-IO sample, 2014–17⁶⁰ (n=2,467)



BOX 2 — ALLEGED SPLA-IO CROSS-BORDER RESUPPLY: MATERIEL PURPORTEDLY CAPTURED IN KUEK, MARCH 2017

In March 2017, a CAR field investigation team in Renk, Eastern Nile state, documented a sample of ammunition that the SPLA claimed was part of a much larger seizure that it had made earlier in the month from SPLA-IO and Agwelek forces. The SPLA reported that they had seized the materiel in Kuek, Fashoda state, which lies near the border with Sudan on the west bank of the Nile River.

Notably, the sample included three Soviet-manufactured 9M14M (AT-3 Sagger) anti-tank guided missiles (see Figure 10), though CAR did not document corresponding launchers which would have been required to operate them. CAR's field investigation teams had not previously documented 9M14M anti-tank guided missiles in service with either the SPLA or SPLA-IO. The SPLA claimed that it had captured 137 such missiles from the SPLA-IO in Kuek and had transported the full seizure to Renk. The SPLA declined CAR's request to access the weapon depot to substantiate the claim.⁶¹

While the missiles were a new find, nearly 70 per cent of the Kuek sample was consistent with ammunition lots and headstamps CAR had previously documented in South Sudan (see Table 2). Black paint had been applied to the crates of the 9M14M missiles, ostensibly to conceal shipping details. In the absence of additional sources of information, CAR was unable to confirm when the items may have been acquired by the SPLA-IO and Agwelek forces in Kuek, and thus cannot independently verify whether the seizure is evidence of cross-border support since 2015, as the SPLA claims. Nor was CAR able to trace the 9M14M missiles to their original manufacturer or consignee. The Russian Federation did not respond to a request for information regarding these missiles. The government of Ukraine confirmed that it did not export these 9M14M missiles, and exported a different model of anti-tank missile to Sudan.⁶²



Figure 10

Anti-tank guided weapons in South Sudan.
Below: A 9M14M anti-tank guided missile, which SPLA forces allegedly captured from SPLA-IO forces in Kuek, Fashoda state; documented by a CAR field investigation team in Renk, Eastern Nile state, on 15 March 2017. *Left:* A misfired 9M115 anti-tank guided missile reportedly left at Rubkona SPLA Division 4 headquarters after the departure of SPLA-IO forces; documented on site by a CAR field investigation team on 24 May 2014.

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BOX 2 — ALLEGED SPLA-IO CROSS-BORDER RESUPPLY: MATERIEL PURPORTEDLY CAPTURED IN KUEK, MARCH 2017 (CONTINUED)

Table 2
Materiel allegedly seized from SPLA-IO and Agwelek forces in Kuek, March 2017

Calibre/designation	Headstamp/ lot number	Quantity	Year of manufacture	Country of manufacture	Documented previously in South Sudan?	iTrace® URN
12.7 × 108 mm API ammunition manufactured in 2008 and 2013, packaged together in black plastic bags and crates marked '2014', consistent with Sudanese repackaging ⁶³	Headstamps: 41_08, 41_13; lot: 1 (2014)	2	2008/2013	China/Sudan	2014, 2016	165E21F1F00917E47, 165E21F1F00917E3A
14.5 × 114 mm API ammunition	01-13-11	282 (3 crates)	2013	China	2016, transferred in mid- 2015 ⁶⁴	165E21F1F00917E25
23 × 152B mm API-T ammunition	6-606-77-0	1	1977	Soviet Union	No	165E21F1F00917E18
23 × 152B mm HE-I ammunition	03-14-11	2	2014	China	No	165E21F1F00917DF1
23 × 152B mm ammunition	I_14_11	5	2014	China	No	165E21F1F00917DFB
UBR-167 37 × 250R mm AP-T ammunition	40-58-67	60 (3 crates)	1958	Soviet Union	No	165E21F1F00917DE2
D-821 60 mm mortar projectiles	04-13	30	2013	Sudan	No, but close lot number previously documented ⁶⁵	165E21F1F00917E7B

BOX 2 — ALLEGED SPLA-IO CROSS-BORDER RESUPPLY: MATERIEL PURPORTEDLY CAPTURED IN KUEK, MARCH 2017 (CONTINUED)

Table 2 (continued)

Calibre/designation	Headstamp/ lot number	Quantity	Year of manufacture	Country of manufacture	Documented previously in South Sudan?	iTrace® URN
81 mm mortar round	01-08	18	2008	Unknown; factory marking (116) Sudanese production but colour and packaging not characteristic of Sudanese production	No	165E21F1F00917E55
82 mm mortar round	18-5-14	1	2014	Unknown; colour characteristic of Sudanese production, but without characteristic Sudanese black-painted markings and with fin construction not typical of previously documented Sudanese mortar production	No	165E21F1F00917E68
9M14M wire-guided anti-tank guided weapon	04-80, 05- 80, 07-80	3	1980	Soviet Union	No	165E21F1F00917DD2, 165E21F1F00917DB9, 165E21F1F00917DA7
GLD215 anti-tank landmine	05-03	6	2003	China	No, but close lot number previously documented ⁶⁶	165E21F1F00917EAA, 165E21F1F00917EA1, 165E21F1F00917E8D

2.2 THE GREATER EQUATORIA REGION: ISOLATION AND WEAK DOMESTIC RESUPPLY

Logistical isolation appears to be particularly acute for SPLA-IO and allied forces that convened in the southern part of South Sudan following the collapse of the ARCSS in July 2016 (see Map 5). In contrast to SPLA-IO forces operating in the greater Upper Nile region, whose arsenals included Sudanese-supplied materiel, weapons deployed by these southern-based forces overwhelmingly match those in service with the SPLA. This suggests that these Equatoria-based SPLA-IO forces lack external sources of weapons, and that they have been largely unable to acquire new military supplies from compatriots or other armed actors in neighbouring Uganda or the DRC. They have instead relied on SPLA defections or piecemeal battlefield seizures from the SPLA and other government forces.

On 12 and 13 June 2017, CAR inspected weapons and ammunition held by two separate units of the SPLA-IO in Kajo-Keji in Yei River state (formerly Central Equatoria state). One unit, under the Equatorian commander Maj. Gen. Moses Lokujo, originated in the immediate area. The other unit, commanded by Lt. Gen. John Jok

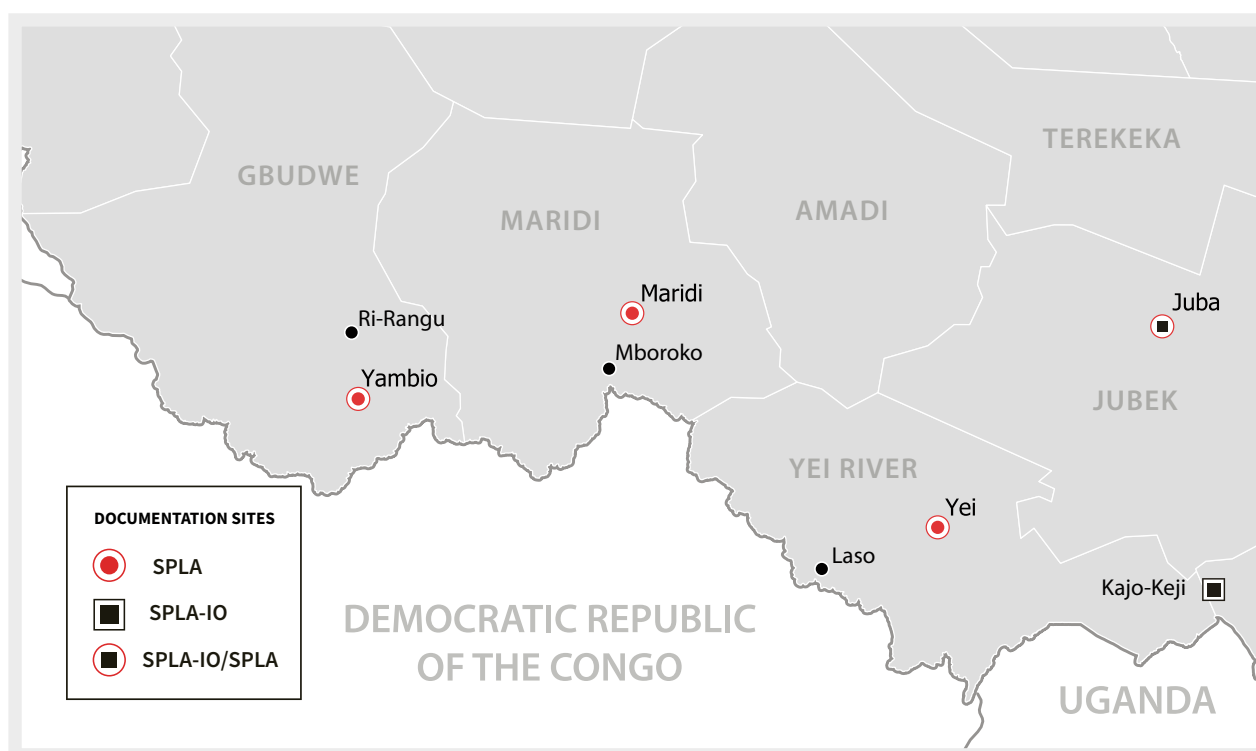
Gai, comprised ethnic Nuer fighters and had recently redeployed from Laso, Yei River state, on the border with the DRC.

Some of the weapons documented in the possession of these forces bore government user marks for the South Sudan Police Service ('SSPS'),⁶⁷ the South Sudan Customs Service ('SSCS'),⁶⁸ and the South Sudan Fire Brigade ('SSFB'),⁶⁹ indicating that they were previously part of pre-conflict government stockpiles. The weapons had been marked prior to the conflict with support from the Regional Centre on Small Arms (RECSA).

The remaining new-condition weapons deployed with these Equatorian forces included Type 56-1 7.62 × 39 mm assault rifles, Galil ACE 21 5.56 × 45 mm and Galil ACE 32 7.62 × 39 mm assault rifles, CQ 5.56 × 45 mm assault rifles, and Jericho 9 × 19 mm pistols (see Figures 11–13 and Table 3). These bore serial numbers close to those of weapons documented by CAR during the early stages of the conflict, in 2014, in the hands of SPLA-IO fighters in the greater Upper Nile region. These SPLA-IO fighters had

Map 5

The Equatoria regions



FOR SOME OF THESE GROUPS, SECURING ACCESS TO SPLA-IO RESUPPLY MAY HAVE BEEN A MOTIVATING FACTOR BEHIND THEIR ALIGNMENT WITH THE MAIN OPPOSITION FACTION

recently defected from the SPLA with their weapons, or had seized weapons from SPLA or allied forces on the battlefield. It thus appears likely that the Equatoria-based SPLA-IO forces acquired most of their weapons from the SPLA through similar means.⁷⁰

Moreover, none of the 2,103 rounds of small-calibre ammunition in service with these SPLA-IO forces had been produced more recently than 2015. 43 per cent of this sample consisted of a single type of Chinese-manufactured 7.62 × 39 mm cartridge (with the headstamp 811_13). This type is prevalent in SPLA stockpiles and was probably supplied by China to the SPLA, under

2011 and 2013 contracts, before mid-2014 (see Section 1.1).⁷¹

Significantly, the ammunition sample included only two Ugandan-manufactured cartridges (produced in 2002 and 2006), reinforcing the view that SPLA-IO forces in the area enjoy little cross-border support from their ethnic compatriots in northern Uganda.⁷²

Rebel groups that had emerged in 2015 from community defence units in the western Equatorial region around Yambio and Maridi, prior to the collapse of the ARCSS in July 2016, appear to have been even more logistically isolated. For some of these groups, securing access to SPLA-IO resupply may have been a motivating factor behind their alignment with the main opposition faction. As the UN Panel of Experts has noted, journalists and the Intergovernmental Authority on Development monitoring mechanism reported that these groups received resupply from an unknown external source in October 2015.⁷⁶ Weapon evidence seen by CAR does not bear out this allegation.

Figure 11

Chinese Type 56-1 assault rifles manufactured in 2013 and documented while in service with SPLA-IO units in Kajo-Keji, Yei River state, on 12 June 2017 (left) and in Pagagn, now Northern Liech state, on 2 June 2014 (right).⁷³



Figure 12

Israeli-manufactured Galil ACE 32 assault rifles documented while in service with SPLA-IO units in Kajo-Keji, Yei River state, on 12 June 2017 (left) and in Riar, now Southern Liech state, on 1 June 2014 (right).⁷⁴



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Figure 13

Israeli-manufactured Jericho 941PSL 9 × 19 mm semi-automatic pistol, documented while in service with SPLA-IO units in Kajo-Keji, Yei River state, on 12 June 2017 (left). In late 2014, UN peacekeepers took a similar pistol from armed elements in Malakal, now Eastern Nile state, where CAR documented it on 12 December 2014 (right).⁷⁵



© Conflict Armament Research



**SPLA-IO FORCES
HAVE RELIED UPON
SPLA DEFECTIONS
OR PIECEMEAL
BATTLEFIELD CAPTURE**

Table 3

CQ 5.56 × 45 mm assault rifles documented while in service with SPLA-IO units, 2014 and 2017

Serial number	iTrace® URN	Location of documentation
[erased]	165E21F1F00C15F38	Pagagn
07001051	165E21F1F00C15EB4	Leer
24001808	165E21F1F00C15AF5	Kajo-Keji
24002119	165E21F1F00C1EE67	Leer
24002683	165E21F1F00C19E95	Kajo-Keji
24004404	165E21F1F00C15E97	Leer
24004693	165E21F1F00C1EE75	Leer
25006007	165E21F1F00C19F19	Kajo-Keji
24006182	165E21F1F00C15EA5	Leer

Notes: Documentation took place on 31 May 2014 in Leer (now Southern Liech state), on 2 June 2014 in Pagagn (now Northern Liech state), and on 12 June 2017 in Kajo-Keji (now Yei River state).

In January 2016, SPLA Division 6 captured small samples of weapons and ammunition from two of these groups—the South Sudan National Liberation Movement (SSNLM) and the South Sudan People's Patriotic Front (SSPPF)—during clashes in Ri-rangu (Gbudwe state) and Mboroko (Maridi state). This equipment, which CAR examined, revealed no evidence to substantiate claims of external resupply or even recent battlefield capture from the SPLA. Rather, the equipment was consistent with antiquated weapons and ammunition circulating regionally in the civilian market. Of the 15 captured weapons, 8 were old 7.62 × 51 mm G3-pattern rifles, manufactured between 1963 and 1991. Their types, manufacturers, and manufacturing years closely matched those of G3-pattern weapons that the South Sudan Wildlife Service (SSWS) in Maridi state had previously seized from poachers in the region.⁷⁷ The remaining weapons were break-action shotguns, all but one of artisanal manufacture. The sample included no AK-pattern weapons, which are the most prevalent weapons employed by armed forces in South Sudan.

◀ 7.62 × 54R mm ammunition captured by SPLA-IO forces from SPLA forces in Leer, Unity state (now Southern Liech state), 31 May 2014.
© CAR

CAR also documented 12 rounds of 7.62 × 51 mm ammunition that had been loaded into the magazines of the G3-pattern rifles. Manufactured between 1960 and 2007, the ammunition included seven rounds that had been manufactured in Iran and Sudan between 1981 and 1996. They are consistent with ammunition repeatedly documented in circulation among civilians, armed groups, and poachers in Sudan and South Sudan over the past decade.⁷⁸ More than 50 per cent of the ammunition sample showed signs of reloading, which is a strong indicator of ammunition shortages. Undated 12-gauge shotgun rounds, manufactured in the Republic of Congo, were also present in the sample. These match cartridges that CAR documented in service with anti-balaka and ex-Séléka groups in the Central African Republic in 2014–15, which suggests that ammunition of this type is in common regional non-state circulation.⁷⁹

Findings based on this small, opportunistically collected sample do not rule out that SPLA-IO-aligned western Equatorial groups may have held newer or more sophisticated weapons elsewhere. Nonetheless, the weapons and ammunition were wholly consistent with matériel held by civilians throughout South Sudan and neighbouring countries. The local origins of the SSPPF and the SSNLM also support these findings: both groups drew personnel from long-standing local 'Arrow Boy' militias organised by communities against the LRA since the first decade of the 2000s. Despite new political affiliations with the SPLA-IO, these new opposition groups thus appear to have drawn both arms and personnel primarily from existing community self-defence groups. CAR found little indication of material support from the SPLA-IO or external parties until SPLA-IO units from the greater Upper Nile region physically moved into the Equatorias from late 2016 onwards.⁸⁰ ■

THESE NEW OPPOSITION GROUPS APPEAR TO HAVE DRAWN BOTH ARMS AND PERSONNEL PRIMARILY FROM EXISTING COMMUNITY SELF-DEFENCE GROUPS



SECTION 3

WEAPON SUPPLIES TO THE SPLA VIA UGANDA

EUROPEAN AND US EXPORTERS AND INTERMEDIARIES



The findings presented in Section 1 of this report suggest that external material support to the SPLA from China and Israel dropped away in the early stages of the war, while external support to the SPLA-IO from Sudan likewise appears to have declined after mid-2015.

In contrast, evidence presented in this section indicates that Uganda has continued to be a conduit for materiel flowing to the SPLA and allied forces. This materiel includes small arms ammunition, but also larger items, such as military and surveillance aircraft.

During the period covered by this report, there were no international prohibitions governing Uganda's provision of weapons or direct military assistance to the Government of South Sudan. The Ugandan government has openly provided both arms and troops to assist the SPLA's military efforts since the start of the conflict in December 2013. During the first weeks of the conflict, the Uganda People's Defence Forces (UPDF) deployed two infantry battalions and Mi-24 attack helicopters to South Sudan.⁸¹ In October 2014, South Sudan's defence minister announced a new military cooperation agreement with Uganda.⁸² Uganda has also served

as the transit country for at least three Mi-24V attack helicopters procured (lawfully) by the Government of South Sudan, which Ukraine exported by air in disassembled form between April and July 2015 for reassembly in Entebbe (given the absence of appropriate technical facilities in Juba).⁸³

Although there was no UN arms embargo during this period, some of the military materiel retransferred from Uganda to South Sudan—in potential violation of non-retransfer and end-use restrictions—was exported to Uganda by states, including EU member states, that had already imposed regional or unilateral prohibitions on arms supplies to South Sudan. CAR's weapon documentation indicates that the SPLA

THE UGANDAN GOVERNMENT HAS OPENLY PROVIDED BOTH ARMS AND TROOPS TO ASSIST THE SPLA'S MILITARY EFFORTS SINCE THE START OF THE CONFLICT IN DECEMBER 2013.

▲ World Food Programme airdrop of sorghum in Leer, now Southern Liech state, 4 June 2014
© CAR

in South Sudan and non-state forces allied with the SPLA in neighbouring Sudan have acquired small arms and ammunition exported from at least three EU member states—Bulgaria, Romania and the Slovak Republic—to Uganda since the start of the current South Sudan conflict.⁸⁴

The cases presented below also demonstrate how a network of jointly owned Ugandan and US companies—controlled by British, Israeli, Ugandan, and US nationals—procured a military jet from the United States and an Austrian-made surveillance aircraft, which one of these companies delivered into service with the SPLA in 2015 and 2016, respectively (see Map 6). There is no reason to suspect that the original supplier companies or the governments that granted export licences were

SOME OF THE MILITARY MATERIEL RETRANSFERRED TO SOUTH SUDAN WAS EXPORTED BY STATES THAT HAD ALREADY IMPOSED PROHIBITIONS ON ARMS SUPPLIES

aware that the aircraft might be retransferred to South Sudan, or that they otherwise acted unlawfully. However, CAR has obtained documents that indicate that one of these companies, Yamasec Ltd, liaised directly with the South Sudanese government to supply the surveillance aircraft along with training and technical support.

3.1 BULGARIAN SMALL ARMS AND AMMUNITION EXPORTS

Bulgarian government reports to the UN and the Council of the European Union indicate that during 2014, Bulgaria exported small arms and small-calibre ammunition to Uganda then valued at some EUR 2.7 million (USD 3.1 million; see Table 4).⁸⁵ CAR has obtained commercial documentation that shows that these 2014 exports constituted a single March 2014 deal in which a Bulgarian arms exporter, Bulgarian Industrial

Engineering and Management (BIEM) JSC, contracted to supply 10,000 AK-pattern assault rifles and at least 2.94 million rounds of 7.62 × 39 mm ammunition to a Ugandan company, Bosasy Logistics (U) Ltd. This transfer was ostensibly for the end use of the Ugandan MOD.⁸⁶ According to these documents and entries in a Ugandan business register, Moldovan and Ugandan citizens own Bosasy Logistics.⁸⁷

Table 4

Exports of small arms and ammunition from Bulgaria to Uganda, 2014–15

Year of export	Category	Value (EUR) ⁸⁸	Quantity
2014	Small arms	1,240,876	10,000 AK-pattern assault rifles consigned in two shipments of 4,000 and 6,000 rifles ⁸⁹
	Ammunition for small arms	1,452,627	At least 2,940,000 rounds of 7.62 × 39 mm ammunition for AK-pattern assault rifles (first shipment) ⁹⁰
2015	Small arms	2,372,021	Not known
	Light weapons	1,154,900	Not known
	Ammunition for small arms and light weapons	14,641,620	Not known

Table 5

The two 2014 flights operated by AirBridgeCargo Airlines LLC from Burgas, Bulgaria, to Entebbe, Uganda

Date	14 July 2014	5 August 2014
Departure airport and time	Burgas (LBBG) 07:06	Burgas (LBBG) 06:59
Destination airport and arrival time	Entebbe (HUEN) 12:38	Entebbe (HUEN) 12:24
Flight number	ABW 9638	ABW 9652
Aircraft	B-747 registration VQ-BJB	B-747 registration VQ-BHE
Air operator	AirBridgeCargo Airlines LLC	AirBridgeCargo Airlines LLC
Consignor	Bulgarian Industrial Engineering and Management (BIEM) JSC	Unconfirmed
Consignee	Bosasy Logistics (U) Ltd for Ugandan MOD	Unconfirmed
Cargo	4,000 assault rifles; 2,940,000 rounds of 7.62 × 39 mm ammunition	Unconfirmed

Note: All times are given in 'Zulu' time (Coordinated Universal Time).

Sources: 14 July 2014: airway bill no. 580-0314 0351 and packing lists, from a confidential source, on file; flight records from a confidential source, on file; 5 August 2014: flight records from a confidential source, on file

The first of at least two shipments under this contract⁹¹ comprised 4,000 AK-pattern assault rifles and 2.94 million rounds of 7.62 × 39 mm ammunition. CAR has confirmed that a Bermudan-registered Boeing 747 aircraft, operated by the Russian air cargo carrier AirBridgeCargo Airlines LLC, transported this shipment from Burgas (Bulgaria) to Entebbe (Uganda) on 14 July 2014 (see Table 5).⁹²

A July 2014 letter from BIEM to Bosasy Logistics mentions a second consignment of weapons and proposes that BIEM transfer this second consignment to a warehouse in Burgas, for onward shipment, five days after the first cargo flight.⁹³ CAR has not been able to obtain cargo or transport records for this second consignment; however, flight records indicate that AirBridgeCargo Airlines operated a second cargo flight from Burgas to Entebbe on 5 August 2014 (see Table 5), the second of only two such cargo flights on that route during 2014.

Contemporaneous South Sudanese government correspondence, which CAR has obtained from a senior South Sudanese military official with direct knowledge of this deal, indicates that the Government of South Sudan sought to procure weapons from Uganda that match the

weapon quantities, types, and consignee of the Bulgaria–Uganda shipments.⁹⁴

- A letter dated 18 March 2014, from the then chief of general staff of the SPLA, Gen. James Hoth Mai, addressed to the then chief of Defence Forces of the UPDF, Gen. Katumba Wamala, requests that the UPDF provide an end-user certificate (EUC) for the delivery by air of 10,000 AK-47 rifles and 5 million rounds of ammunition to 'Bosasy Company'—the same company that contracted with BIEM to ship weapons from Burgas to Entebbe in 2014 for the ostensible end use of the Ugandan armed forces (see Figure 14).⁹⁵
- A second letter, also dated 18 March 2014, from the South Sudanese minister of defence, Kuol Manyang Juuk, to the permanent secretary of the Ugandan defence ministry, similarly requests 10,000 AKM rifles and 5 million rounds of ammunition (see Figure 15).

Significantly, the date of these two letters from the Government of South Sudan (18 March 2014) matches the date of the contract between BIEM and Bosasy Logistics, under which BIEM subsequently shipped weapons and ammunition from Burgas to Entebbe.

Figure 14

Letter dated 18 March 2014 from Gen. James Hoth Mai (SPLA) to Gen. Katumba Wamala (UPDF).



Source: Confidential

Figure 15

Letter dated 18 March 2014 from South Sudanese Minister of Defence Kuol Manyang Juuk to the permanent secretary of the MOD, Uganda.



Source: Confidential

3.1.1 2015 EXPORTS

Bulgaria reported much larger exports of small arms and ammunition to Uganda during 2015. On export, these were valued at nearly EUR 18.2 million (USD 21.1 million). The exporters, consignees, and transporters involved in these transactions are unconfirmed, and CAR has been unable to determine whether they were consigned to Bosasy Logistics or formed part of the 2014 contractual arrangements detailed above.

However, CAR has obtained a draft request for aircraft landing permissions in Entebbe for six prospective flights in May 2015 from Burgas to be made by AirBridgeCargo Airlines LLC

(the carrier of the July 2014 weapon shipment detailed above) and a Slovak air operator, Air Cargo Global s.r.o. The metadata for this document shows that it was created in April 2015 by a senior South Sudanese military official who was then resident in Uganda.⁹⁶ Flight records indicate that AirBridgeCargo Airlines and Air Cargo Global operated 17 cargo flights from Burgas to Entebbe between February and October 2015. These include two flights whose dates, aircraft registrations, and flight numbers precisely match the flights listed on the draft request for landing permissions issued by the South Sudanese military official (see Table 6).⁹⁷

Table 6

Flights from Burgas to Entebbe that match those detailed on a draft request for landing permissions issued by a South Sudanese military official

Date	6 May 2015	12 May 2015
Departure airport and time	Burgas (LBBG) 06:45	Burgas (LBBG) 12:39
Destination airport and arrival time	Entebbe (HUEN) 12:24	Entebbe (HUEN) 20:42
Flight number	ABW 9850	CCC 4521
Aircraft	B-747 registration VPBIK	B-747 registration OM-ACA
Air operator	AirBridgeCargo Airlines LLC	Air Cargo Global
Consignor	Unconfirmed	Unconfirmed
Consignee	Unconfirmed	Unconfirmed
Cargo	Unconfirmed	Airway bill No. 159-99004765

Note: All times are given in 'Zulu' time (Coordinated Universal Time).

Source: Flight records from a confidential aviation source, on file; draft landing request from a confidential source, on file.

3.1.2 AMMUNITION EXPORTED FROM BULGARIA DOCUMENTED IN SOUTH SUDAN AND SUDAN

CAR has not obtained any information to suggest that either BIEM, AirBridgeCargo Airlines LLC, or Air Cargo Global s.r.o. was aware of the possibility that materiel they exported or shipped to Uganda was intended for use by South Sudanese forces, or that any of these companies otherwise acted unlawfully. Nor does the documentation outlined above provide direct evidence that Bosasy Logistics was aware that the weapons and ammunition it procured from BIEM were destined for South Sudan in violation of the EU embargo on South Sudan—although the correspondence from the SPLA to the UPDF names the company directly and Bosasy Logistics has a record of other direct contracts with the South Sudanese government for weapon supplies.⁹⁸

CAR has been unable to obtain the precise serial numbers, lot numbers, and batch numbers of the arms and ammunition exported by BIEM to Uganda.⁹⁹ Nonetheless, CAR has confirmed that rebel forces allied with the SPLA in Sudan's Blue Nile state are in possession of ammunition exported by BIEM since 2013. CAR has likewise confirmed that SPLA-IO forces operating in South Sudan's Equatoria region captured iden-

tical ammunition from the SPLA; the rounds bear a close lot number and were packed for export in 2015.

In March 2018, CAR obtained photographs of a crate of 12.7 × 108 mm ammunition in service with elements of the SPLA-N faction loyal to Malik Agar in Blue Nile state, Sudan (see Figure 16). The SPLA-N/Agar claims that it captured the ammunition on 17 February 2018 in Tanpona, Kurmuk county, Blue Nile state, from forces fighting under Lt. Gen. Joseph Tuka Ali, a commander of the SPLA-N faction loyal to Gen. Abdel-Aziz Adam al Hilu.¹⁰⁰ The crate's markings indicate that it contained armour-piercing, steel-cased ammunition manufactured in the Soviet Union in 1956, and that it was shipped by the Bulgarian company BIEM JSC under a 2013 contract.¹⁰¹

Meanwhile, on 13 June 2017 in Kajo-Keji in South Sudan's Yei River state, a CAR field investigation team photographed the lid of a similar crate. The crate also originally contained 12.7 × 108 mm armour-piercing, steel-cased ammunition produced in 1956 by the same Soviet manufacturer, with a lot number only four



Figure 16

A crate of 12.7 × 108 mm ammunition bearing BIEM JSC shipper information, captured by a faction of the SPLA-N loyal to Malik Agar in Blue Nile state, Sudan, March 2018.

Source: Confidential

digits from that of the ammunition exported by BIEM observed in Blue Nile state (see Figure 17).¹⁰² Markings indicate that the crate was packed in February 2015.

The SPLA-IO forces in possession of the packaging claimed that they had seized it from SPLA forces during fighting in March 2017 in the Equatorias, following the breakdown of the ARCSS in July 2016.¹⁰³

The sample of weapons and ammunition documented by CAR in South Sudan since 2014 does not include recently produced

Bulgarian small arms or ammunition in any significant quantities. This absence initially undermined confidence in claims made by the UN Panel of Experts and Bulgarian journalists regarding the ultimate destination of BIEM's exports.¹⁰⁴ However, information affixed to these ammunition crates—one shipped under a 2013 contract and the other packed for export in 2015—explains why recently manufactured Bulgarian materiel may not be circulating in South Sudan: it appears that materiel recently exported by BIEM included much older, Soviet-produced materiel.

Figure 17

The lid of a crate of 12.7 × 108 mm ammunition in service with SPLA-IO forces in Kajo-Keji, Yei River state, South Sudan, June 2017.



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3.2 DIVERSION OF OTHER EU-ORIGIN WEAPONS AND AMMUNITION PURCHASED BY UGANDA

Materiel exported by other EU member states to Uganda during 2015 has also reached non-state actors allied with the SPLA. In contrast to the previous example of materiel exported from Bulgaria, however, CAR has not determined the means of diversion, whether deliberate or not.

In 2014, the Ugandan MOD engaged EBS Investments Corporation, a company registered in the Seychelles, to procure several thousand small arms and light weapons, and several million rounds of ammunition.¹⁰⁵

EBS Investments Corporation contracted S.M.S. spol. s.r.o., an arms exporter in the Slovak Republic, to obtain this materiel. In turn, S.M.S. sourced at least some of the materiel from other companies and countries (see Figure 18). Information provided to CAR by the

Romanian and Slovak governments indicates that S.M.S. obtained 5 million rounds of 7.62 × 54R mm ammunition from Romania and that the consignment was exported to the Slovak Republic for re-export to Uganda. According to a delivery verification certificate (DVC) issued by the Ugandan MOD, the ammunition arrived in Kampala on 16 March 2015.¹⁰⁶

There is nothing to suggest that the Romanian or Slovak governments, or the companies involved in the transactions, were aware that the materiel supplied to Uganda might be diverted, or that they otherwise acted unlawfully.

In June 2016, a CAR field investigation team documented the Romanian-manufactured 7.62 × 54R mm ammunition that formed part of this

Figure 19

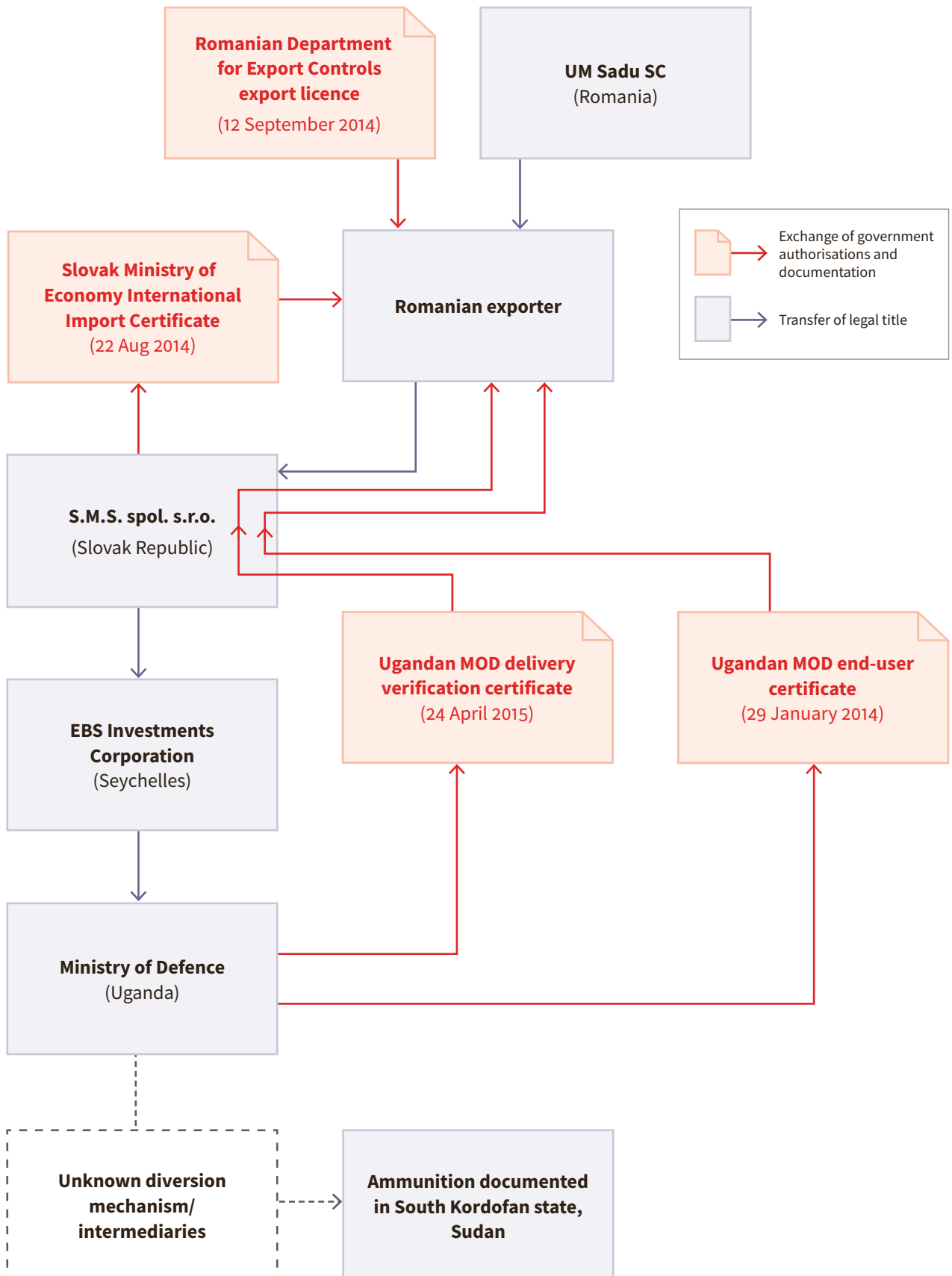
A tin of Romanian-manufactured 7.62 × 54R mm ammunition in Mandi, South Kordofan, Sudan, documented on 14 June 2016.



© Conflict Armament Research

Figure 18

Supply chain of Romanian 7.62 × 54R mm ammunition transferred to Uganda in 2014–15



shipment in three different locations in South Kordofan state, Sudan, with the SPLA-N. CAR documented one 400-round tin containing 200 rounds of ammunition in Mandi (see Figure 19), which it traced with the manufacturer.¹⁰⁷ CAR also documented a nearly-full 400-round tin in Dabbi; 25 belt-loaded rounds in a PK-pattern machine gun in Mandi; and 14 belt-loaded rounds in a PK-pattern machine gun documented in Um Serdiba. This loose and belted ammunition was identical to the rounds in the traced tin, but could not be traced due to the absence of lot numbers.¹⁰⁸

The Ugandan EUC for this materiel identifies the company EBS Investments Corporation as the purchaser of the Romanian ammunition on behalf of the Ugandan MOD, but it provides no information about the company's country of incorporation, or the identity of its owners or directors. Documents obtained independently by CAR indicate that the company was incorporated as an international business corporation in the Seychelles on 12 September 2001 (see Figure 20).¹⁰⁹

Company documents filed in Uganda indicate that EBS Investments Corporation's directors were—at least from 2004 to 2010—an Egyptian national and a second individual of unknown nationality. Notably, both directors stated on company documents in 2004 that they were residents of the European Union, and both

provided the same (partial) residential address in Vienna (see Figure 21).¹¹⁰ Since at least March 2004, EBS Investments Corporation has had a taxable presence in Uganda, where it has operated bank accounts in Ugandan shillings, US dollars, and euros.¹¹¹

CAR holds no information to suggest that EBS Investments Corporation or its officers were aware or intended that the weapons they purchased for the Ugandan government would be diverted elsewhere. However, the absence of supporting information about EBS Investments Corporation's officers, owners, and country of incorporation—whether listed in documentation submitted to European export control authorities or recorded at the company registry of the Seychelles—may have impeded the exercise of pre-export due diligence by European export licensing authorities.

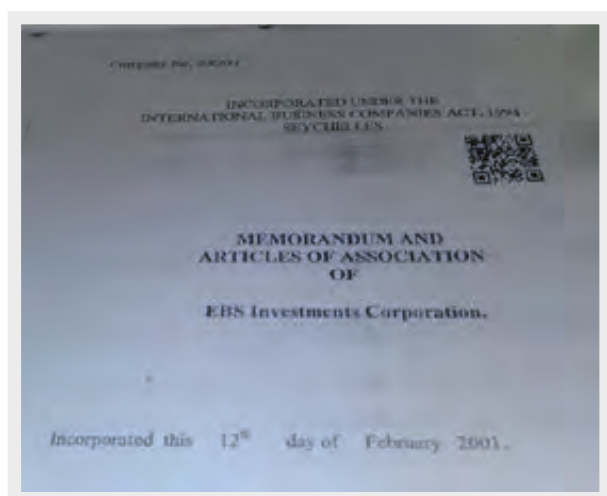
As Section 4 of this report discusses in more detail, the absence of this information is significant because EBS Investments Corporation's Egyptian director, as well as a second Seychellois company directed by EBS's other director (see Figure 21), have previously appeared in public UN Security Council reporting in relation to earlier diversions of weapons procured in the Slovak Republic, shipped to Uganda, and then diverted to Charles Taylor's regime in Liberia in contravention of the then UN arms embargo on Liberia.¹¹³

End User Certificate

A document used in international arms transfers to certify that the buyer is authorised to purchase the materiel, and identifying its final recipient.

Figure 20

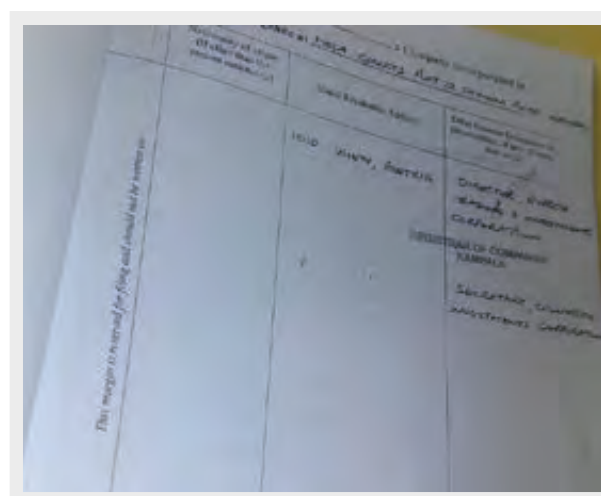
Articles of association of EBS Investments Corporation, Seychelles.



Source: Documents filed with Uganda Registration Services Bureau

Figure 21

Directors' addresses and other directorships, EBS Investments Corporation, 4 March 2004.¹¹²



Source: Documents filed with Uganda Registration Services Bureau

3.3 MILITARY AND PARAMILITARY AIRCRAFT DIVERTED FROM EUROPE AND THE UNITED STATES

The SPLA acquired a Diamond DA42 surveillance aircraft around July 2015, and at least one L-39 jet trainer/ground attack aircraft in July 2016.¹¹⁴ These aircraft were regularly visible at Juba International Airport during 2016 and early 2017. The SPLA also deployed them in the greater Upper Nile region soon after acquisition.¹¹⁵ Neither aircraft carried a visible registration number, and the UN Panel's reports have not established their provenance or supply routes.

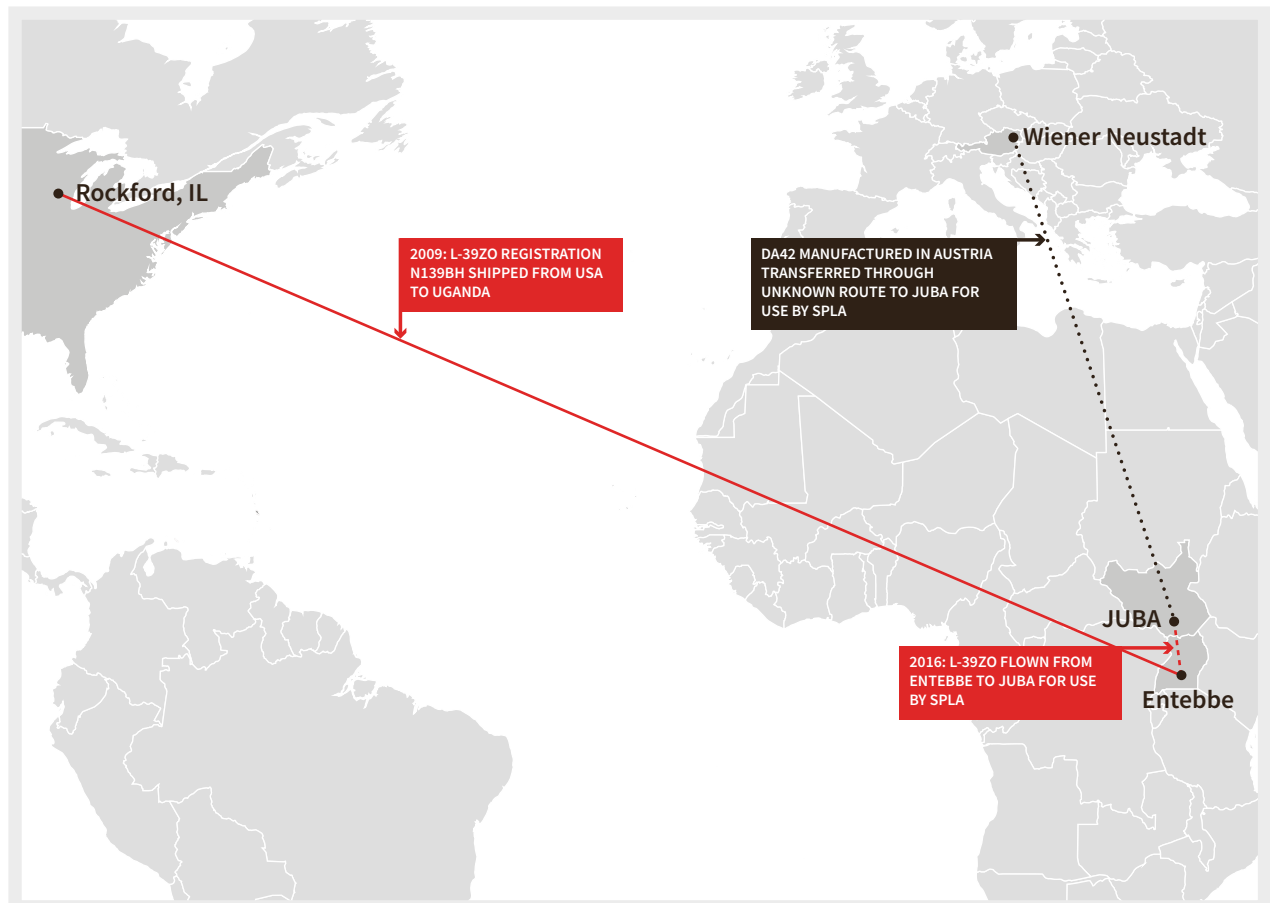
CAR has obtained commercial documents and conducted interviews with individuals directly involved in the transfer of the aircraft. These show that a group of related companies owned and operated by Israeli, Ugandan, UK, and US citizens based in Uganda acquired the L-39 and the DA42 and transferred them to Uganda.¹¹⁶ One of these companies, Yamasec, then sup-

plied these aircraft to the SPLA, together with training and crew (CAR has not determined whether all of the individuals who own and operate these companies were involved in the aircraft's retransfer to South Sudan).

CAR has not observed either of these aircraft engaged in transporting weapons or related materiel. Two aviation sources with direct knowledge of the transfer indicate that the L-39's weapon systems were not functionally connected to controls at the time of export or deployment.¹¹⁷ Nonetheless photographs and commercial documents obtained by CAR confirm that the L-39 jet is a 'ZO' variant, which is equipped with underwing hard points suitable for attaching bomb racks, missile launchers, or rocket pods.¹¹⁸ According to US licensing officials, the aircraft is export-licensable under US defence trade laws.¹¹⁹

Map 6

Supply chains of L-39 military jet and DA42 surveillance aircraft to South Sudan



3.3.1 L-39ZO TRAINER/GROUND ATTACK AIRCRAFT

CAR has established that the SPLA's L-39ZO aircraft was shipped from the United States to Uganda in 2009, after which a private company then operated it for the UPDF Air Wing.

In addition to testimonies of those involved, a chain of photographic evidence clearly illustrates the transfer history of this L-39ZO jet: from Rockford, Illinois, to Entebbe, Uganda, and then to South Sudan's greater Upper Nile region in 2016. Photographs of the (unmarked) L-39 on the military apron at Juba International Airport, taken in early 2017, show the aircraft fitted with a cockpit cover on which the aircraft's previous registration (AF751) is visible (see Figure 22).¹²⁰ AF7XX is the registration format employed by the UPDF Air Wing for its fleet of L-39 jet trainers.¹²¹ An undated photograph, published online by the UPDF Air Wing in late 2016, shows a member of the UPDF posing next to an L-39 aircraft with the registration AF751, which is painted in a 'digital' camouflage livery that precisely matches the digital camouflage

livery of the L-39 in Juba (see Figure 23).¹²² A second photograph from Malakal airport in South Sudan confirms that the L-39 retained the registration number '751' on its nose for some time after its arrival in South Sudan, but that SPLA insignia were applied to its tail and forward of the rear jet engine (see Figure 24).¹²³

Finally, CAR has obtained in-cockpit photographs from this aircraft during its deployment around Malakal in September 2016. These photographs indicate that the aircraft was previously registered in the United States under the registration number N139BH (see Figure 25).

The distinctive configuration of antennas under the body of the aircraft and an additional GPS antenna on its tail, visible in the aircraft's US sale prospectus, match those of the aircraft operating in Juba in 2016–17 (see Figure 26). These features provide further confirmation of its identity.¹²⁴

L-39ZO

Developed by Czech aircraft company Aero Vodochody, the L-39ZO was the training/light combat model of the L-39 series – it performed its first flight in 1975.

Figure 22

The L-39 on the military apron, Juba International Airport, early February 2017.



Source: Confidential

Figure 23

The L-39 carrying registration AF751. Photograph distributed online by the UPDF Air Wing, no date.



Source: UPDF Air Wing

Figure 24

The L-39 jet at Malakal airport, South Sudan, in September 2016. Note the SPLA insignia on the tail and forward of the rear jet engine.



Source: Confidential

Figure 25

The L-39 cockpit. Note the previous registration (N139BH) affixed to the airspeed gauge, and the aircraft's position to the north of Juba displayed on the GPS screen. The bearing and distance shown on the Garmin unit places the aircraft at approximately 8.610 Lat, 31.636 Lon, between Malakal and Ayod.



Source: Confidential

Figure 26

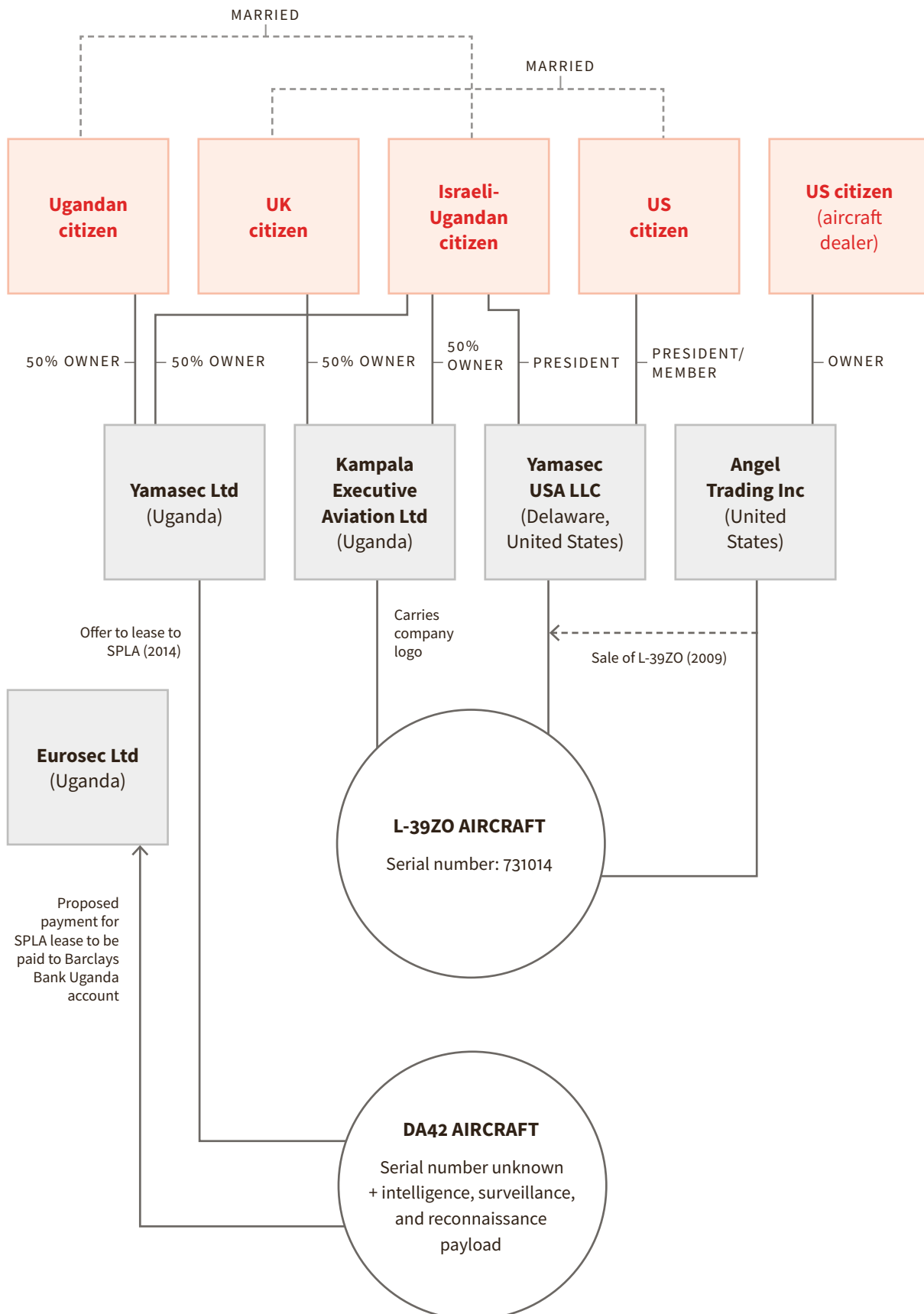
Left: Antenna configurations on N139BH prior to its sale in the United States in 2009. *Right:* Antennas on the aircraft in Juba in 2017.¹²⁵



Sources: Confidential/aircraft sale brochure

Figure 27

Companies involved in the purchase and transfer of L-39 and DA42 aircraft



A company registered in the US state of Delaware, Angel Trading Inc, brokered the sale of N139BH from a private US owner to a second Delaware company, Yamasec USA LLC, in February 2009.¹²⁶ The US aircraft broker who controls Angel Trading Inc informed CAR that the Israeli-Ugandan citizen who owns Yamasec Ltd personally approached his company in early 2009 to acquire the aircraft. The aircraft broker claimed that the Israeli-Ugandan individual then formed a Delaware corporation at the same address as his own company out of convenience, in order to take legal title of the aircraft in the United States.¹²⁷ Although Delaware does not record the ownership of corporations registered in the state, a US citizen who described herself as Yamasec USA LLC's 'President/Member' signed the aircraft's US re-registration application (see Figure 29). The aircraft's airworthiness application papers also include a note signed by the Israeli-Ugandan citizen, who also describes himself as the 'President' of Yamasec USA LLC.¹²⁸

The US aircraft broker confirmed that, during 2009, his company disassembled the L-39 for export to Uganda in a shipping container. He subsequently travelled to Entebbe to help reassemble the aircraft, in addition to

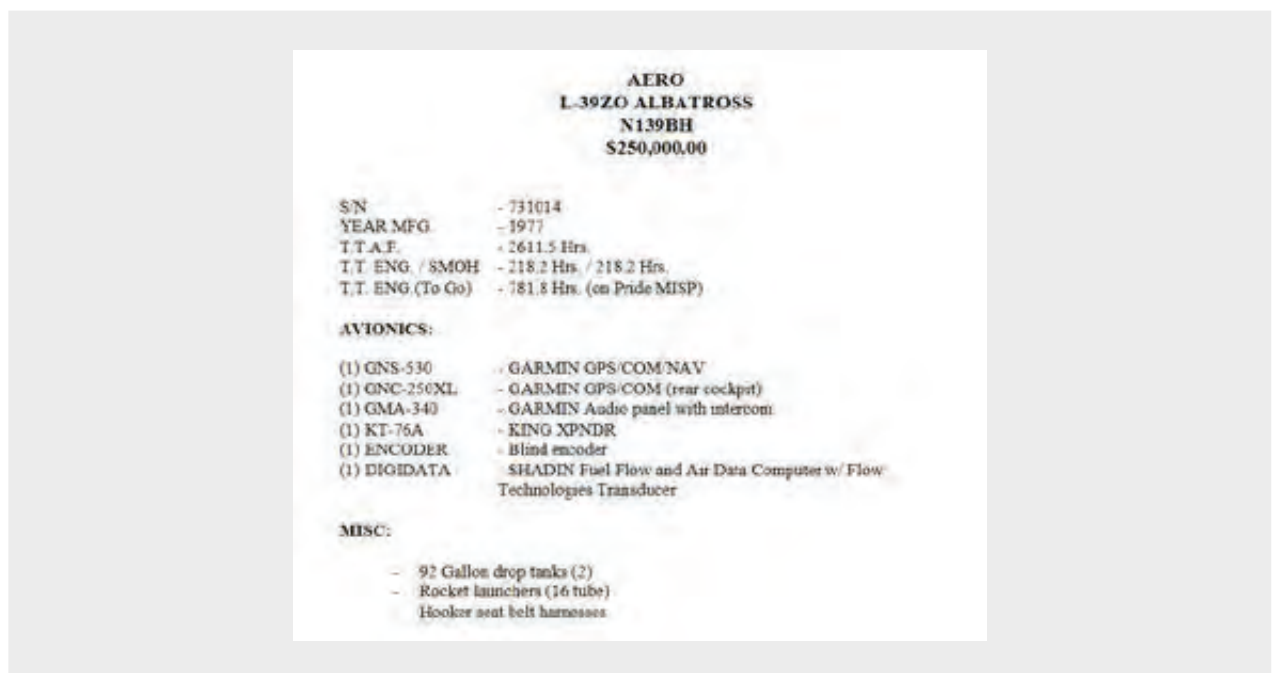
AIRCRAFT N139BH CONSTITUTES A DEFENCE ITEM, FOR WHICH A MILITARY EXPORT LICENCE WOULD HAVE BEEN REQUIRED

producing new decals bearing UPDF insignia.¹²⁹

The aircraft broker further informed CAR that Yamasec USA LLC took responsibility for obtaining a US Department of Commerce dual-use export licence, which he noted was required for the aircraft's export.¹³⁰ The Department of Commerce, however, has stated that it issued no such licence and that aircraft N139BH constitutes a defence item, for which a military export licence issued by the US State Department would have been required for export.¹³¹ CAR has been unable to confirm whether the US State Department issued such a licence.¹³² US arms export reports in 2008 and 2009 list no licences issued for the export of complete military aircraft to Uganda. The 2009 report lists licences for 2,002 aircraft 'parts and components' worth USD 6 million, but no licences for complete aircraft. The reports do not state what model of aircraft each licence covers.¹³³

Figure 28

Extract from the US sale prospectus for the L-39 aircraft.



Source: Aircraft sale brochure.

The US Federal Aviation Administration (FAA) has no record of any request to cancel the registration of the aircraft due to its export from the United States.¹³⁵ It appears that Yamasec USA LLC simply ceased to respond to correspondence from the FAA, which was returned from Yamasec USA LLC's registered address unopened and stamped 'No Longer At This Address'. Accordingly, the aircraft's US registration expired in August 2011.¹³⁶ The aircraft is visible flying with other L-39s of the UPDF Air Wing in air show film footage and photographs from Entebbe, Uganda, taken on 11 May 2011. In these images the aircraft still bears its former US registration number, N139BH.¹³⁷

The 'Z' in L-39ZO
The 'Z' in the L-39ZO's name is derived from the Czech word for 'weapons'.

During its time in South Sudan the L-39 jet also carried the partially erased logo of a second Ugandan company, Kampala Executive Aviation Ltd, which has operated the aircraft in Uganda.¹³⁸ Company records indicate that Kampala Executive Aviation is co-owned and directed by the same Ugandan-Israeli citizen who controls Yamasec USA LLC. Its second co-owner is a UK citizen who is married to the US citizen who signed the aircraft's US registration papers on behalf of Yamasec USA LLC (see Figure 27).¹³⁹ The interrelation of the companies is further confirmed by the fact that the Ugandan-registered company, Yamasec Ltd, served as guarantor for USD 5.6 million in loans to Kampala Executive Aviation from Barclays Bank Uganda between 2011 and 2014.¹⁴⁰ CAR has not obtained evidence that the UK or the US citizen were involved in the aircraft's eventual retransfer to South Sudan.

From 2009 to 2011, Yamasec Ltd provided training to UPDF Air Wing trainees in Entebbe using the L-39 aircraft.¹⁴¹ Yamasec Ltd employed a ground crew and a European training pilot for these purposes.

In late August 2016, after a brief period piloting surveillance flights for the joint UPDF-AFRI-COM operation against the Lord's Resistance Army in the Central African Republic in 2014, this pilot and a Belarusian technician travelled to South Sudan. A commercial source with direct knowledge of the aircraft's transfer and use within South Sudan claimed that the owner of Yamasec Ltd paid for this crew's deployment.¹⁴²

According to this commercial source and photographs obtained by CAR, a South Sudanese pilot accompanied this crew on three or four missions in September 2016. During these missions, and under the instructions of an SPLA colonel, the aircraft flew from Juba to Malakal and to areas west of Malakal. The L-39 did not deploy weapons but created smoke and overflew SPLA-IO targets, while accompanied by Mi-24 attack helicopters and an Antonov-26 transport aircraft.¹⁴³ During one mission close to the Sudanese border, small-arms fire damaged the aircraft's port wingtip, after which the aircraft returned temporarily to Entebbe for repair.¹⁴⁴ The commercial source alleges that delayed SPLA payments led to the foreign crew's redeployment back to Uganda at the end of September 2016, after which the South Sudanese pilot flew the L-39 and the above-mentioned DA42 aircraft unaided.¹⁴⁵

The transfer of an L-39 aircraft from Uganda to South Sudan was not unlawful at that time, as no UN embargo was in effect. Since this L-39 was originally exported from the United States to Uganda, however, its re-export to South Sudan may have violated non-retransfer conditions under US arms export controls—assuming that it did indeed receive a US licence for its export to Uganda.¹⁴⁶

3.3.2 DA42 SURVEILLANCE AIRCRAFT

Investigations by CAR have also established the direct role of Yamasec Ltd in procuring the SPLA's Austrian-manufactured Diamond DA42 surveillance aircraft. CAR has obtained a copy of a commercial proposal from Yamasec Ltd, made to a senior SPLA general and dated 24 March 2014.¹⁴⁷ This document proposes the supply of a DA42MPP aircraft equipped with an integrated airborne intelligence, surveillance, and reconnaissance (AISR) system and associ-

ated technical support; ground equipment; and training in Juba for pilots, mechanics, and AISR operators. A first quotation proposes the sale of the aircraft to the SPLA for USD 2,850,000 and a training package valued at USD 255,000. A second quotation offers the monthly rental of the aircraft, including a three-person crew, at a cost of USD 201,000 per month. The document notes that the contract is contingent on obtaining an 'Israel MOD marketing and export

Figure 29

The aircraft re-registration application submitted to the US Federal Aviation Administration by Yamasec USA LLC for the L-39 aircraft.¹³⁴

FORM APPROVED:
OMB No. 2120-0042

Accepted NAW APR/22/2009

UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION-WILCOX AERONAUTICAL CENTER
AIRCRAFT REGISTRATION APPLICATION

CERT. ISSUE DATE

UNITED STATES
REGISTRATION NUMBER **N 139BH**

AIRCRAFT MANUFACTURER & MODEL
AERO L-39ZO AERO VedeckHody

AIRCRAFT SERIAL No.
731014

FOR FAA USE ONLY

TYPE OF REGISTRATION (Check one box)
☐ 1. Individual ☐ 2. Partnership ☒ 3. Corporation ☐ 4. Co-owner ☐ 5. Gov't ☐ 6. Non-Citizen Corporation

NAME OF APPLICANT (Person(s) shown on evidence of ownership. If individual, give last name, first name, and middle initial)
Yamasec USA, LLC

TELEPHONE NUMBER: **815, 969-7743**

ADDRESS (Permanent mailing address for first applicant listed; if P.O. BOX is used, physical address must also be shown)
Number and street: **4001 Kennett Pike, Suite 134-502**

Rural Route: _____ P.O. Box: _____

CITY: **Greenville** STATE: **Delaware** ZIP CODE: **19807-2000**

☐ CHECK HERE IF YOU ARE ONLY REPORTING A CHANGE OF ADDRESS
ATTENTION! Read the following statement before signing this application.
This portion MUST be completed.
A false or dishonest answer to any question in this application may be grounds for punishment by fine and/or imprisonment (U.S. Code, Title 18, Sec. 1001).

CERTIFICATION

I/WE CERTIFY

(1) That the above aircraft is owned by the undersigned applicant, who is a citizen (including corporations) of the United States.
(For voting trust, give name of trustee: _____) An
CHECK ONE AS APPROPRIATE:
a. ☐ A resident alien, with alien registration (Form 1-15) or Form 1-55R) No _____
b. ☐ A non-citizen corporation organized and doing business under the laws of (state) _____ and said aircraft is based and primarily used in the United States. Records or flight hours are available for inspection at _____

(2) That this aircraft is not registered under the laws of any foreign country; and
(3) That legal evidence of ownership is attached or has been filed with the Federal Aviation Administration.

NOTE: If executed for co-ownership all applicants must sign. Use reverse side if necessary.

TYPE: _____

EACH PART OF THIS APPLICATION MUST BE SIGNED IN INK.

SIGNATURE: _____ TITLE: **President / MEMBER** DATE: **2/5/09**

NOTE: Pending receipt of the Certificate of Aircraft Registration, the aircraft may be operated for a period not in excess of 90 days, during which time the FAA's copy of this application must be carried in the aircraft.

AC Form 8050-1 (5/03) (0052-00-826-9007)

Source: US Federal Aviation Administration

licence', which suggests that at least some of the equipment, and possibly the aircraft itself, was sourced from Israel.

The document further proposes that the AISR system would be integrated into the aircraft during field acceptance tests (FAT) at the facilities of Diamond Aircraft, the DA42's manufacturer, based in Wiener Neustadt, Austria. The aircraft would then be ferried to Juba. The document proposes that, 'subject to security clearance', representatives of the 'Customer' [the SPLA] will 'participate in such FAT at Diamond's premises or designated area in Austria.'

Diamond Aircraft states that SPLA personnel did not in fact visit Diamond's facilities in Austria to observe such tests, and CAR has no evidence that Diamond Aircraft was aware of the aircraft's transfer to the SPLA. Diamond Aircraft further states that Yamasec Ltd has purchased only one DA42 aircraft from them,

which was exported to Uganda in May 2018 for the end use of the UPDF, after UPDF officials visited the company in Austria that month. A second contract for the integration of a camera system and in-country training in Uganda is outstanding. The DA42 operating in South Sudan as of 2015 must thus be a different aircraft, possibly procured from a third party.¹⁴⁸

The SPLA appears to have moved quickly to accept the offer of 24 March 2014. Three days later, the senior SPLA general liaising with Yamasec Ltd wrote to the then SPLA chief of general staff, Gen. James Hoth Mai, requesting permission to acquire the system 'for both day and night airborne surveillance much needed in our current situation of conflict with rebels' (see Figure 30).¹⁴⁹ This letter recommends that the SPLA select the leasing contract option, in addition to hiring Yamasec Ltd to train SPLA fixed-wing pilots, 'prior to considering purchasing the plane'. Military Intelligence personnel,

Figure 30

Letter to Gen. James Hoth Mai, SPLA chief of general staff, 27 March 2014.



Source: Confidential

Figure 31

Letter from Lt. Gen. Bior Ajang Duor, undersecretary of the South Sudanese MOD, to the five-person contract committee, 1 April 2014.



Source: Confidential

Figure 32

The Diamond DA42 surveillance aircraft in Juba, February 2017.



Source: Confidential

the letter states, would undertake the imaging (airborne surveillance).¹⁵⁰ Five days later, on 1 April 2014, the undersecretary of the South Sudanese MOD, Lt. Gen. Bior Ajang Duor, wrote to five SPLA officers to form a 'committee for drafting a contract on behalf of the Ministry of Defence, Republic of South Sudan and YAMASEC Limited – Kampala Uganda' (see Figure 31).¹⁵¹

CAR has not obtained a copy of the final contract for this deal, and it is unclear in the 24 March 2014 proposal from Yamasec Ltd which of the Yamasec companies ultimately served as the contract vehicle for the deal. The offer lists the Kampala address of Yamasec Ltd and the Delaware address of Yamasec USA LLC. It also notes that payment should be made to a Barclays Bank of Uganda account belonging to another company, Eurosec Ltd. In addition, the letter to the SPLA chief of general staff refers to 'Yamasec AISR System', an 'Israeli Company' (see Figure 30).¹⁵²

The Diamond DA42 aircraft, which carries no registration number, has been visibly operating from Juba International Airport since July 2015 (see Figure 32). The aircraft was also present in Malakal in September 2016.¹⁵³ A commercial source familiar with the aircraft's operations informed CAR that the aircraft was used for aerial reconnaissance and carried two intelligence officers, whose laptops were connected to the airborne surveillance camera.¹⁵⁴

Figure 33

The DA42 MPP (Multi Purpose Platform) aircraft during a ferry flight from South Sudan back to Entebbe, September 2016.



Source: Confidential

SECTION 4

**OPAQUE CORPORATE
INTERMEDIARIES**

FRUSTRATING EXPORT CONTROL DUE DILIGENCE



Several of the suppliers, intermediaries, and transporters involved in the arms transfers described in this report have used corporate entities registered in jurisdictions where corporate ownership is either not on public record, or is not recorded by official company registries at all. There may be many legitimate reasons—whether fiscal, commercial, or political—for the use of such legal or corporate entities, and their use is not in itself an indication of any wrongdoing. Nonetheless, the use of such entities has, whether deliberately or not, hindered export control due diligence.

As described in Section 3.2, during 2014 and 2015, a Seychellois company, EBS Investments Corporation, procured several thousand small arms and light weapons and several million rounds of ammunition for the Ugandan MOD from EU defence manufacturers via a Slovak exporter. This purchase included 5 million rounds of ammunition from a Romanian manufacturer, some of which subsequently reached Sudanese rebels allied with the SPLA.

CAR has not obtained evidence that EBS Investments Corporation or its directors were responsible for this materiel's diversion from Uganda, or that they were aware that the materiel might be diverted. Nonetheless, EBS Investments Corporation's directors, and their

associated companies, have been subject to previous UN accusations of diverting Slovak weapons originally supplied to Uganda. In 2001, a UN sanctions investigation named the Egyptian co-owner of EBS Investments Corporation in relation to a consignment of small arms exported from the Slovak Republic to Uganda. The published report of the UN investigation asserted that during 2000 this individual purchased the weapons from the Slovak Republic and imported them into Uganda, acting via Culworth Investments Corporation, another Seychellois company directed by EBS Investments Corporation's co-owner. An aircraft controlled by the well-known arms transporter Victor Bout subsequently transported the weapons from Entebbe, Uganda, to Liberia for use by the embargoed regime of Charles Taylor. The UN investigation alleges that the Egyptian individual had resold the weapons to a Guinean company, and that he provided Ugandan authorities with a Guinean EUC which both the Guinean authorities and the Guinean company named on the EUC claimed was forged.¹⁵⁵

Best practices set out in the EU User's Guide on arms export controls suggest that authorities should consider UN sanctions committee reports of this kind when gauging diversion risks prior to granting arms export licences.¹⁵⁶ Public UN allegations linking the owner of EBS Investments Corporation to the diversion of

▲ Documenting small arms ammunition captured from SPLA-IO forces in Pigi county, Jonglei state, in October 2014.
© CAR

EBS INVESTMENTS CORPORATION, PROCURED SEVERAL THOUSAND SMALL ARMS AND LIGHT WEAPONS AND SEVERAL MILLION ROUNDS OF AMMUNITION FOR THE UGANDAN MOD FROM EU DEFENCE MANUFACTURERS VIA A SLOVAK EXPORTER

Slovak weapons from Uganda might therefore have raised red flags for Slovak and Romanian control authorities when, in 2014, they considered applications to export Slovak and Romanian weapons to Uganda once again via a company owned by this individual.¹⁵⁷

However, the Ugandan EUC provided for this transaction did not list any information about the individuals who control or direct EBS Investments Corporation.¹⁵⁸ Nor would those export control authorities necessarily have been able to request such information from the authorities in the Seychelles, where the company is registered. Under Seychellois company law, the company registry does not record the beneficial owners or shareholders of Seychellois offshore companies. Instead, each company's resident company service provider must keep a register of shareholders in case of official enquiries.¹⁵⁹ Other countries' law enforcement authorities may ask the Seychellois authorities to obtain the ownership information of a Seychellois offshore company from the company service provider, particularly in the case of judicial or tax-enforcement investigations or in response to a Seychellois court order. Information on an offshore company's owners and directors may not, however, be available for administrative processes such as export licence assessments.¹⁶⁰ As a result, the owners of Seychellois offshore entities may be effectively anonymous to export control authorities, and their ownership records unobtainable, hampering pre-export risk assessment.

In addition, the Romanian government informed CAR that the copy of the documentation received by the Romanian licensing authorities from the Slovak exporter through the Romanian export licence applicant was partly redacted.¹⁶¹ By comparing the document with an unredacted version of the EUC obtained from a different source, CAR was able to confirm that the name of the broker ('Messrs. EBS Investments Corporation') had been redacted on the EUC. This redaction prevented the Romanian government from conducting any pre-licensing checks on EBS Investments Corporation.

This case illustrates three problems: first, the very limited details on the brokering company provided in export documentation; second, the use of a company registered in a jurisdiction whose corporate regulators do not record corporate ownership information; and third, the provision of redacted documentation to export licensing authorities. These three factors may have obscured the link between EBS Investments Corporation and individuals previously named in public UN allegations of weapon diversion—even though the exporting and end-user countries were the same as in the previous case of diversion.

At least two other offshore companies registered in the Seychelles have acted as brokers or intermediaries in actual or attempted arms supplies to South Sudan since the start of the current conflict.

▼ Graffiti left by SPLA-allied forces after their capture of Leer, Unity state (now Southern Liech state), in early 2014.

© CAR



A photograph of an oil well valve assembly. The valve is primarily blue and red. A circular pressure gauge is mounted on the right side. A metal plate with handwritten text is attached to the front of the valve. The background shows a grassy field, a utility pole, and a small building under an overcast sky.

Well Name TJ-25
Spud in 2007.11.6
TD 1450 M
Complete Date 2007.11.17

**AN INTERNATIONAL OIL
COMPANY TRANSPORTED
CARGO FOR SPLA MILITARY
UNITS IN ITS AREA OF
OPERATIONS**

◀ Well head in the Thar Jath oil field, shut down after fighting started in December 2013.

© CAR

First, in April 2014, the Seychellois company Engineering Master Group Ltd contracted with the Ukrainian state arms export company, Ukrspecexport, to purchase 830 PKM-pattern general-purpose machine guns for end use by the Government of South Sudan.¹⁶² (At the time of transfer, there was no international prohibition on the export of weapons from Ukraine to South Sudan).¹⁶³ CAR documented one of these machine guns in Malakal on 3 March 2016, following its seizure by the SPLA in Wadakona, Fashoda state, from Agwelek forces under the command of Johnson Olony, which had previously fought briefly alongside the government (see Figure 34).¹⁶⁴ CAR has been unable to establish the ownership of Engineering Master Group Ltd, and has thus been unable to establish either its past export control record, or the regulatory regimes under which its owners may fall.

Second, on 14 June 2014 in Dubai, two South Sudanese individuals ostensibly representing

South Sudan's NSS signed a contract with an Armenian national representing another Seychellois company, Mosston Engineering Ltd.¹⁶⁶ The contract was for weapons and ammunition worth USD 264.75 million, including 20 million rounds of 7.62 × 39 mm ammunition, 40 BTR-70 armoured personnel carriers, and 40 T-55 main battle tanks. Payment was to be in US dollars, to be made from an account held at the Juba branch of a Kenyan bank to Mosston Engineering Ltd's account at an Armenian bank. CAR has corroborated the identity of the two South Sudanese signatories, one of whom was subsequently appointed a state governor.¹⁶⁷ Nonetheless, it is unclear whether the two genuinely had authorisation to procure such a huge quantity of equipment on behalf of the South Sudanese government. The Armenian national confirmed to CAR that the contract was concluded and signed, but added that the contract was never implemented due to the failure of the South Sudanese individuals to produce an EUC.¹⁶⁸

Figure 34

A KM-7.62 general-purpose machine gun captured from Agwelek forces in Wadakona, Fashoda state, in January 2016, documented by CAR at SPLA Division 2 headquarters in Malakal on 3 March 2016.¹⁶⁵



© Conflict Armament Research



SECTION 5

DOMESTIC LOGISTICS



Both the SPLA and the SPLA-IO have relied on air assets to deliver weapons, equipment and personnel to the epicentres of the South Sudan conflict, and particularly to the greater Upper Nile region.

Since the outbreak of the conflict, commercially operated transport aircraft have moved SPLA personnel and equipment to key Upper Nile logistics hubs, including Malakal and Paloch.¹⁶⁹ SPLA-IO forces in northern Jonglei state (now Central Upper Nile state) have benefitted from airdrops of ammunition and other materiel, at least during 2014. In 2015, a prominent SPLA-IO official engaged in negotiations with US individuals for them to supply and operate a large civilian turboprop aircraft via a Kenyan company (there is no evidence that this official

indicated to the prospective suppliers that the aircraft would be used in a military role).

The role of commercial logistics providers in delivering fighters and equipment into key conflict theatres points to an arms control mechanism that the EU, for one, has begun to exploit (see Section 5.1). The EU embargo on South Sudan prohibits the involvement of EU nationals, companies, and EU-flagged aircraft in the supply or transfer of arms or related materiel to embargoed entities in South Sudan.¹⁷⁰ The European External Action Service has used diplomatic channels to dissuade air operators from allowing aircraft that are registered in countries formally aligned with the EU embargo to transport weapons and fighters within South Sudan.

5.1 ARMENIAN-REGISTERED AIRCRAFT

Since 2011, Armenia has been formally aligned with the EU arms embargo on South Sudan.¹⁷¹ A group of Armenian-flagged aircraft nevertheless began transporting SPLA personnel and equipment within South Sudan in 2014.

In January 2016 the UN Panel of Experts on South Sudan identified two of these aircraft as SPLA logistics providers.¹⁷² CAR has established the actual operators of these aircraft, and further details of their activities (see Table 7);

it has also confirmed that at least one other Armenian-registered aircraft has also transported cargo for the SPLA.¹⁷³

Following the presentation of evidence by CAR and the UN Panel about the activities of these aircraft, the European External Action Service engaged with the Government of Armenia, which led the Armenian General Department of Civil Aviation to withdraw Skiva Air's operating licence at the end of March 2017.¹⁷⁴

▲ SPLA-IO fighters examine a Toyota vehicle captured from the government-allied Justice and Equality Movement in Koch, now Northern Liech state, 2 June 2014
© CAR

Table 7

Examples of SPLA logistics movements undertaken by Armenian-registered aircraft, July 2014–February 2017

Date of transport	24 November 2014	18 June 2015	3 February 2017
Aircraft registration	EK-72928	EK-72928	EK-74052
Aircraft type	Antonov-72-100	Antonov-72-100	Antonov-74
Reported details	Unloaded weapon-mounted vehicles at Rubkona airstrip (see Figure 35)	Unloaded SPLA personnel at Rubkona airstrip (see Figure 36)	Transported 758 kg of cargo listed on manifest as 'spare parts' for delivery to SPLA Division 6 in Paloch, Eastern Nile state (see Figure 37)
Registered owner at date of transport	Maritime Air Ltd (British Virgin Islands)	Maritime Air Ltd (British Virgin Islands)	Geleon Trade Avia Ltd (British Virgin Islands)
Registered operator at date of transport	Air Armenia CJSC (Armenia)	Reliable Unique Services Aviation LLC (Armenia)	Skiva Air LLC (Armenia)
Actual owner/operator at date of transport	N/A (Between November 2014 and June 2015, aircraft acquired the livery of the South Sudanese air operator Golden Wings Aviation)	N/A (Between November 2014 and June 2015, aircraft acquired the livery of the South Sudanese air operator Golden Wings Aviation)	Eagle Enterprise Ltd (South Sudan)

Notes: There is no suggestion that the owners of these aircraft were in control of their respective aircraft at the time of these flights, or that they contracted directly with the South Sudanese government to provide services to them. Insofar as CAR has been able to identify further operators or sub-lessees beyond those registered with the Armenian aircraft registry, these are indicated in the 'Actual owner/operator' row.

Sources: Observer reports from three separate confidential sources within intergovernmental organisations, precise dates withheld, 2014–15, on file; email correspondence from the Armenian General Department of Civil Aviation, 16 January 2017, 7 February 2017, 15 February 2017, and 2 July 2018

**Figure 35**

The Antonov 72-100 aircraft registered as EK-72928 unloading weapon-mounted vehicles at Rubkona airstrip, 24 November 2014.

Source: Confidential

Figure 36

The Antonov-72-100 aircraft registered as EK-72928 unloading SPLA personnel at Rubkona airstrip, 18 June 2015.



Source: Confidential

The role of these aircraft also highlights the interrelation of private and SPLA logistics in South Sudan. For example, an Armenian-registered Antonov-74 aircraft, EK-74052, has for more than two years flown regularly to Paloch in Eastern Nile state, a major logistical hub for both the oil industry and the government's war effort. The aircraft's registered operator, Skiva Air LLC, provided the aircraft and crew to a South Sudanese company, Eagle Enterprise Ltd.¹⁷⁵ Eagle Enterprise was contracted to transport food and equipment for the Dar Petroleum Operating Company (DPOC), an international consortium of Chinese, Egyptian, Malaysian, and South Sudanese oil companies

that operates oil fields in the Melut basin in and around Paloch.¹⁷⁶ Eagle Enterprise states that it only carries civilian cargo for companies and non-governmental organisations (NGOs).¹⁷⁷ Nonetheless, according to documentation provided by the aircraft's owner and Eagle Enterprise Ltd, on 3 February 2017 the cargo transported for DPOC included 758 kg of 'spare parts' for Division 6 of the SPLA, which Eagle Enterprise states comprised vehicle parts and spares (see Figure 37).¹⁷⁸ While this cargo may not have comprised weapons, it indicates clearly that an international oil company transported cargo for SPLA military units in its area of operations.¹⁷⁹

Dar Petroleum Operating Company
 Designer Hotel, UNMIS Road,
 Juba, Republic of South Sudan
 Email: dpo@darpetroleum.com

Delivery Notes

From: Juba To: Paloch
 Sender: Eagle Enterprise Air Cargo Date: 3/2/2017

S/N	DESCRIPTION	QTY	UOM	UNIT'S	PG NO	S/L - AWR	Weight	REMARKS
1	Foodstuffs	116	boxes	ES-CD-08			8200KG	
2	Spare parts	5	Items	SPLA Div 6			758	
3	Light installation	12	cls	DPOC SECURITY			179KG	

Prepared by: [Signature] Received by: [Signature]
 Signature/Date: [Signature/Date] Signature/Date: [Signature/Date]
 Title: [Title] Title: [Title]

DPOC Procurement Manager Approval

Figure 37

Delivery note for a cargo flight on EK-74052 from Juba to Paloch, 3 February 2017.

Source: Eagle Enterprise Ltd

5.2 SPLA TRANSPORT AIRCRAFT ACQUISITION

The SPLA has also acquired at least two larger Ilyushin-76 transport aircraft, which have operated in South Sudan either without registration numbers, or with partial registrations that do not correspond to any national aircraft registry (see Figure 38).

The second of these aircraft arrived in Juba on 17 March 2016.¹⁸⁰ Formerly registered in Belarus as EW466TH, and operated by the Belarusian state-owned company Transaviaexport, this aircraft's registration expired on 12 August 2016. Its

manufacturer-authorised airworthiness certification expired on 17 January 2017.¹⁸¹ The aircraft nonetheless continued to operate in South Sudan during 2017, using a Transaviaexport call sign (TXC5641)—although CAR has no indication that Transaviaexport personnel have in fact continued to operate the aircraft or acted in any way unlawfully—and with its Belarusian registration number partially painted over.¹⁸² On 21 January 2017, for example it transported around 400 individuals from Juba to Paloch in Eastern Nile state.¹⁸³

Figure 38

An Ilyushin-76 aircraft carrying a partial registration number that does not correspond to any official aircraft registry, Juba, February 2017.



Source: Confidential

5.3 OTHER SPLA LOGISTICS PROVIDERS

Another Belarusian-registered Ilyushin-76 aircraft—this one operated by a second Belarusian air company, Ruby Star Airways—undertook the (lawful) 28 August 2014 delivery of small arms and light weapons from Ukraine to South Sudan brokered by Engineering Master Group Ltd (see Section 4).

Notably, this aircraft, and another one also operated by Ruby Star, undertook several further deliveries of ammunition crates to Juba

between 11 and 20 December 2014 (see Table 8). During this period these two Ilyushin-76 aircraft undertook at least two rotations from Minsk to Juba, via Istanbul and Djibouti, returning to Minsk via Khartoum.¹⁸⁴ CAR has established that during these rotations, the aircraft offloaded ammunition crates in Juba on 17 and 19 December 2014 (see Figures 39 and 40).¹⁸⁵ CAR has been unable to confirm whether the aircraft transported this ammunition from within or outside South Sudan.

Table 8

Rotations of the Ilyushin-76 aircraft registered as EW430TH and EW78836 between Minsk and Juba, 11–20 December 2014

Departure date and time (local)	Arrival date and time (local)	Departure airport	Arrival airport	Call sign/flight number	Aircraft registration
11 December, 18:55	11 December, 21:36	Minsk	Istanbul	RSB7681	EW430TH
11 December, 22:56	12 December, 04:31	Istanbul	Djibouti	RSB7681	EW430TH
11–13 December, times not known	Not known	Not known	Not known	Not known	Not known
13 December, 08:15	13 December, 14:34	Khartoum	Minsk	RSB7682	EW430TH
16 December, 20:53	16 December, 23:47	Minsk	Istanbul	RSB7681	EW430TH
17 December, 00:58	17 December, 05:52	Istanbul	Djibouti	RSB7681	EW430TH
17 December, time not known	17 December, c. 14:00	Djibouti	Juba	Not known	EW430TH
18 December, c. 08:00	18 December, time not known	Juba	Khartoum	Not known	EW430TH
18 December, 09:06	18 December, 15:19	Khartoum	Minsk	RSB7682	EW430TH
18 December, 19:50	18 December, 22:12	Minsk	Istanbul	RSB7681	EW78836
18 December, 23:14	19 December, 04:20	Istanbul	Djibouti	RSB7681	EW78836
19 December, time not known	19 December, c. 12:00	Djibouti	Juba	Not known	EW78836
20 December, c. 10:00	20 December, time not known	Juba	Khartoum	Not known	EW78836
20 December, 10:36	20 December, 16:33	Khartoum	Minsk	RSB7682	EW78836

Notes: The Djibouti–Juba leg is not visible in the flight data obtained by CAR, but photographic evidence confirms the aircrafts' arrivals, departures, and operations in Juba between 17 and 20 December.

Sources: Photographs of deliveries, from a confidential source; flight data from a confidential source, on file

Figure 39

The Ilyushin-76 aircraft registered as EW430TH offloading ammunition crates at Juba International Airport, 17 December 2014.



Source: Confidential

Figure 40

The Ilyushin-76 aircraft registered as EW78836 offloading ammunition crates at Juba International Airport, 19 December 2014.



Source: Confidential

5.4 SPLA-IO ATTEMPTED AIRCRAFT ACQUISITION

CAR has also established that SPLA-IO officials have sought to obtain their own aviation capability. In late 2015 and early 2016, a senior SPLA-IO politician and adviser to the opposition leader Riek Machar entered into negotiations with a US lawyer and a Somali-US citizen to purchase a second-hand Fokker F27 Mk 50 aircraft (see Figure 41).¹⁸⁶

F27 aircraft are not suitable for airdropping cargo but are widely used in East and Central Africa for transporting cargo and personnel.

Kenyan-registered F27 and F50 aircraft are particularly prevalent among private Somali air operators.¹⁸⁷

A draft sale/purchase agreement and draft aircraft operation agreement, both drawn up by the US lawyer and Somali-US citizen and dated October 2015, list the aircraft's seller as Brighton Freedom Air Ltd (see Figure 42). This company was newly registered in Kenya in August 2015 as a subsidiary of Brighton Ventures LLC, a company based in the US state of Maryland.¹⁸⁸

The draft aircraft operation agreement lists Brighton Ventures LLC as the proposed operator of the aircraft on behalf of the ‘Republic of South Sudan’.¹⁸⁹ The US lawyer directly involved in the negotiations is a co-director of Brighton Freedom Air alongside another partner at his US law firm; he is also the resident agent of Brighton Ventures LLC.¹⁹⁰ However, the two draft agreements list the Somali-US citizen as the director and authorised representative of both Brighton Freedom Air Ltd and Brighton Ventures LLC.¹⁹¹

The draft contract documents, which leave the registration number of the aircraft blank, provide for the sale of the aircraft for USD 4 million. They also provide for Brighton Freedom Air Ltd to continue to operate the aircraft for the client from 1 March 2016 onwards, at a block hour rate of USD 1,400 per hour, and for a minimum of 100 block hours per month. These sums were to be paid in advance in US dollars via wire transfer.¹⁹²

CAR HAS ALSO ESTABLISHED THAT SPLA-IO OFFICIALS HAVE SOUGHT TO OBTAIN THEIR OWN AVIATION CAPABILITY

Surprisingly, the documents list the purchaser as ‘Sudd Petroleum Operating Company’ (SPOC), which is a South Sudanese oil company that is partly owned by the state-owned oil company Nilepet.¹⁹³ CAR has seen no indication of the involvement of SPOC officials in the negotiations. Nor is there any clear indication in the documents or correspondence seen by CAR that Brighton Freedom Air Ltd, Brighton Ventures LLC, or their representatives were aware that they were negotiating with SPLA-IO officials, and not with representatives of SPOC or the Government of South Sudan. However, the adviser to Riek Machar who conducted

Figure 41

A Fokker 27 Mk 50 aircraft.



Note: This photograph is for illustrative purposes only; it does not show the aircraft that was the subject of negotiations described in this section.

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Figure 42

Cover page of the draft contract for the sale of a Fokker 27 Mk 50 aircraft from Brighton Freedom Air Ltd to SPOC.



Source: Confidential¹⁹⁵

THIS ATTEMPT TO PROCURE AN AIRCRAFT WAS NOT THE FIRST TIME THAT SPLA-IO FIGURES HAD REACHED OUT TO WIDER INTERNATIONAL PROCUREMENT NETWORKS

the negotiations under his real name, is an internationally prominent figure whose affiliation with the SPLA-IO was, at the time, widely publicised. The aircraft negotiations took place prior to the April 2016 formation of a unity government, which incorporated SPLA-IO ministers and staff. In that context, the SPLA-IO officials involved could not legitimately, or credibly, have presented themselves as South Sudanese government or SPOC representatives. Documents indicate that the adviser to Riek Machar suggested that SPOC should be the vehicle for the aircraft contract, and that Brighton's representatives pointed out that the party could be changed. The correspondence that CAR reviewed does not indicate that Brighton's representatives were party to any deception, nor is there necessarily anything unusual about changing one of the parties to a sale and purchase agreement at a later stage in a negotiation.¹⁹⁴

CAR has seen no indication that the SPLA-IO representatives indicated to the buyers that they intended to use the aircraft to transport military materiel. Nor is there any indication

that supplying the aircraft would have been unlawful on the part of the companies involved if they had not known that the SPLA-IO was ultimately acquiring it. At the time, the US government had not yet placed SPOC on the US Department of Commerce sanctions list. Nor have the SPLA-IO officials who were involved in the negotiations featured on EU, UN, or US sanctions lists.¹⁹⁶

As Section 2 shows, this attempt to procure an aircraft was not the first time that SPLA-IO figures had reached out to wider international procurement networks. The episode is indicative of the range of international actors from which the SPLA-IO has attempted, largely unsuccessfully, to acquire both military equipment and dual-use items such as aircraft.

The US lawyer and US-Somali citizen representing Brighton Freedom Air Ltd had previously been subject to allegations involving illicit activities in other East African conflict-affected states. In October 2014, a widely reported investigation by the UN Monitoring Group on Somalia alleged their involvement in 'conspiring to take private control of recovered overseas assets' belonging to the Somali government via an asset recovery contract. The Monitoring Group also alleged that the Somali-US citizen had been involved in a 2013 arms transfer to an al-Shabaab commander.¹⁹⁷ Each individual denied the charges and there is no indication from the documents in CAR's possession that the SPLA-IO officials were aware of these allegations. ■

▼ Bentiu town, deserted following fighting, 26 May 2014.
© CAR



CONCLUSION

At the time of writing, the South Sudanese government and SPLA-IO have signed a new peace agreement, though sporadic fighting involving a number of armed groups continues in several parts of the country. This report covers the period prior to the imposition of a UN embargo on South Sudan, yet the modalities of weapon transfers it details may inform future arms embargo enforcement efforts. These weapon transfers may also fall within the jurisdiction of existing legal and diplomatic enforcement mechanisms in three ways.

First, the retransfer to South Sudan of weapons, ammunition, military aircraft, and other licensable items that EU and US companies have exported to South Sudan's neighbours—particularly Uganda—may contravene non-retransfer clauses contained within end-user agreements with original exporters. Such 'counter-diversion' clauses can only be enforced with rigorous end-use monitoring, which the iTrace® initiative is intended to support, but not replace. Importantly, exporting states cannot simply rely upon verifying EUCs and DVCs from legitimate government recipients when elements within those governments are actively involved in diverting weapons and ammunition to unauthorised end users, as is the case in several retransfers presented in this

report. Successful counter-diversion measures also require meaningful consequences for consignees and end users that violate non-retransfer and other end-use agreements—including future export licence denials.

Second, states and regional organisations may seek to enforce existing unilateral or multilateral arms embargoes on South Sudan, such as those of the EU and the United States; they may also apply extraterritorial controls on the involvement of their nationals and companies in arms transfers to sensitive or embargoed destinations, such as those imposed by the United Kingdom and the United States. By enforcing these controls on their nationals and companies, EU, UK, and US agencies may increase the risks and transaction costs involved, thereby reducing the number of brokers and intermediaries available to facilitate these deals. Such enforcement requires detecting the involvement of these nationals and companies in transfers to destinations such as South Sudan—whether through the kind of investigative work presented here, or through enhanced export control due diligence on commercial intermediaries with opaque ownership or control. Incorporating arms embargo risk assessment criteria into suspicious activity reporting of large banking transactions might also facilitate such detection, particularly in

▼ Bentiu hospital, attacked in April 2014 and subsequently looted and abandoned.
© CAR





the case of transactions from accounts known to be connected to politically exposed South Sudanese persons or security institutions (such as the accounts at the Kenyan bank associated with the attempted NSS procurement detailed in Section 4 of this report). Notably, several of the commercial contracts for the supply of weapons and associated equipment to the SPLA proposed receiving payment into euro or US dollar accounts at large international banks, with correspondent banking arrangements via major New York or Frankfurt banks.

Finally, South Sudan's international and domestic military supply chains have frequently relied on logistics providers that are based in countries with arms restrictions on South Sudan, or that use aircraft flagged in those countries. The pool of commercial logistics providers willing to provide such services in a conflict setting like South Sudan, and the pool of aircraft (particularly ex-Soviet Antonov and Ilyushin aircraft) suitable for such logistics, are each limited. The EU's 2017 démarche to Armenia, which Section 5 of this report details, demonstrates how jurisdiction over such logistics providers may be used to curtail weapon movements to and within South Sudan.

The growing isolation of the SPLA-IO over the course of the conflict, and the cessation of some of the SPLA's external supply sources, also beg the question of where weapon

▲ SPLA-IO soldiers examine a Cougar armoured personnel carrier damaged and abandoned near Gwit (now Northern Liech state), 2 June 2014.

© CAR

supplies will come from next if full-scale fighting resumes. While Sudanese support to the SPLA-IO appears to have abated since mid-2015, the SPLA has continued to benefit from its close relationship with Uganda. Throughout South Sudan's conflict areas, the predominance of Chinese ammunition that was lawfully delivered to the country in 2013–14 shows that a small number of large deliveries can sustain low-technology hostilities for some time. Consumables such as ammunition must nonetheless be resupplied eventually.

Answers to some of this report's outstanding questions—including the ultimate fate of some of the large 'wish list' SPLA and SPLA-IO contracts detailed in Sections 2.1 and 4, or the source of the large ammunition deliveries by Belarusian aircraft in December 2014, detailed in Section 5.3—may well identify as yet unknown suppliers to military actors in South Sudan.

SOUTH SUDAN'S INTERNATIONAL AND DOMESTIC MILITARY SUPPLY CHAINS HAVE FREQUENTLY RELIED ON LOGISTICS PROVIDERS THAT ARE BASED IN COUNTRIES WITH ARMS RESTRICTIONS ON SOUTH SUDAN

ENDNOTES

- 1 UNSC (2018b).
- 2 CAR has not had the opportunity to document equipment held by some of the groups that have formed around more recent SPLA defections, such as the National Salvation Front under Gen. Thomas Cirillo Swaka or, around Aweil, forces that are loyal to former SPLA chief of general staff Gen. Paul Malong Awan (sometimes labelled the South Sudan United Front). Nor has CAR documented weapons in service with forces loyal to long-term SPLA-IO figure Costello Garang Riiny Lual or former presidential adviser Abdelbagi Ayii Akol (sometimes labelled the South Sudan Patriotic Army) in Aweil East state and surrounding areas. In August 2017 the South Sudanese government formally changed the name of the SPLA to the South Sudan People's Defence Forces. This report nonetheless uses the name SPLA, which was current during the period of documentation covered by this report, and remains in widespread usage.
- 3 CAR (2017a; 2017b).
- 4 See IGAD (2015).
- 5 UNSC (2016a, para. 91).
- 6 This report uses the term 'offshore companies' to refer to types of businesses that are registered in a jurisdiction but operate only outside that jurisdiction and are often forbidden under that jurisdiction's company law from operating domestically. In the case of the Seychelles, these are called 'international business companies'.
- 7 This data set is supplemented by a baseline of a further 109 weapons and 1,870 rounds of ammunition documented by CAR researchers in-country prior to the outbreak of the conflict, from February 2011 to May 2013, partly in collaboration with the Small Arms Survey.
- 8 CAR has also written to governments and companies named in this report to request comment on its findings. Responses to these requests are reflected in the main sections and notes.
- 9 Visit www.itrace.com or download the iTrace® mobile application from the Apple® (iOS) or Google Play® (Android) app stores.
- 10 UNSC (2015, para. 18(c)).
- 11 AI (2017); CA and CAR (2015); UNSC (2016a, para. 85 ; 2017, paras. 113–15, 119–21).
- 12 AI (2017); UNSC (2016a, paras. 65–87; 2017, paras. 109–28; 2018a, paras. 69–82).
- 13 UNSC (2016a, para. 91).
- 14 Of the 201,517 rounds of ammunition that CAR has documented in South Sudan, 200,420 are of Chinese manufacture. The vast majority of this Chinese ammunition (196,775 rounds) formed part of a single clandestine delivery to the SPLA-IO that the SPLA captured in mid-2015. The shipment, which CAR documented in Rubkona, Unity state (now Northern Liech state), on 17 May 2016 and analysed in detail in CAR (2017a), constitutes the single largest instance of clandestine supply from Sudan to SPLA-IO forces documented to date.
- 15 Sudan Tribune (2015); CAR interviews with SPLA-IO representatives, precise date and location withheld, 2017.
- 16 Bills of lading, packing lists, and commercial invoices from a confidential source, on file. For summaries, see CA and CAR (2015, p. 3) and Gridneff (2014a).
- 17 Commercial invoices from a confidential source, on file.
- 18 This analysis omits the seizure mentioned in Note 14 (see above), documented on 17 May 2016 in Rubkona with the SPLA.

- 19 As Section 1.5 of this report details, elements within the Sudanese government also supplied SPLA-IO forces with large quantities of Chinese ammunition manufactured between 1976 and 2014. There is no evidence that the Chinese government authorised, or was aware of, these retransfers by Sudan.
- 20 This analysis excludes one seizure of 1,438 crates of ammunition documented in Rubkona on 17 May 2016, as its large volume would skew the analysis. The shipment was apparently delivered by road from Sudan in mid-2015. The seized crates contained 196,946 rounds of ammunition, 196,775 (99.9 per cent) of which were of Chinese manufacture. See Section 1.5 of this report.
- 21 This analysis excludes one seizure of 1,438 crates of ammunition documented in Rubkona on 17 May 2016, as its large volume would skew the analysis. The shipment was apparently delivered by road from Sudan in mid-2015. The seized crates contained 196,946 rounds of ammunition, 196,775 (99.9 per cent) of which were of Chinese manufacture. See Section 1.5 of this report.
- 22 Gridneff (2014b).
- 23 Letter from the Norinco vice-chairman to the SPLA deputy chief of general staff, 27 December 2013, from a confidential source, on file.
- 24 iTrace® URN 165E21F1F0091EAC2.
- 25 AFP (2016); UNSC (2016a, paras. 71, 81).
- 26 Ravid (2016).
- 27 In 2015, a Ugandan company supplied the SPLA with an airborne intelligence, surveillance, and reconnaissance system that reportedly required export approval from the Israeli MOD (see Section 3.3.2).
- 28 CAR sent trace requests to the Government of Israel for these weapons on 4 August 2015 (for iTrace® URNs 165E21F1F00C147C8 and 1A9EB1F2A00C3FE), a follow-up on 24 June 2016, and another request on 14 May 2018 (for iTrace® URNs 165E21F1F00C19EA1, 165E21F1F00C102DB, 165E21F1F00C19EB1, 165E21F1F00C15B00, and 165E21F1F00C15AA7).
- 29 CAR interview with a former SPLA military official, Addis Ababa, June 2017; UNSC (2017, para. 115).
- 30 iTrace® URNs 165E21F1F0091EF30, 165E21F1F0091EF20, 165E21F1F0091EF28, 165E21F1F0091EF18, and 165E21F1F0091EAD8.
- 31 In November 2014, the South Sudanese government circulated a PowerPoint presentation to diplomats in Juba alleging weapons deliveries in four Ilyushin-76 aircraft from Gambella in Ethiopia to four locations in what was then Jonglei state (Amogok, Pathai, Walgak, and Wathjak). Until 2017, SPLA-IO figures were able to move relatively freely between Ethiopia's Gambella region and the SPLA-IO headquarters at Pagak in Upper Nile state. The SPLA retook Pagak in August 2017, and Ethiopia arrested some SPLA-IO officers (from the faction loyal to Vice President Taban Deng Gai) in Gambella in October 2017 (Sudan Tribune, 2018).
- 32 CAR has identified HAEI-produced ammunition through physical comparison (cartridge case, bullet construction, and propellant) with ammunition rounds taken from distinctive crates carrying HAEI labels documented elsewhere in East Africa.
- 33 iTrace® URN 165E21F1F009202B0.
- 34 This ammunition matches the materials, dimensions, bullet shape, and primer annulus colour of known HAEI-manufactured ammunition.
- 35 iTrace® URNs 165E21F1F00C1F411, 165E21F1F00C1E874, 165E21F1F00C1E70F, and 165E21F1F00C15E5C. The last item indicates that GAFAT rifles circulate among civilians outside main conflict areas. CAR documented the item in November 2014 in Yei, which was then peaceful and outside the primary conflict theatre. Documentation took place on 12 November 2014, when local South Sudan Police Service personnel collected the item from a private garden, where an unidentified individual had reportedly abandoned it the previous night.
- 36 In addition to these items, CAR also documented an empty ammunition crate in Malakal on 28 February 2016. The crate's construction is consistent with that of HAEI ammunition crates. See Figure 5.
- 37 CAR and Small Arms Survey (2014).

- 38 CAR (2015). On the same occasion, CAR documented 82 mm recoilless rifle rounds that also showed lateral impact damage. These rounds were manufactured in the Soviet Union in 1958, 1959, and 1983. CAR also documented 57 mm recoilless rifle rounds manufactured in the United States in 1953. For the full documentation from this site, see iTrace® URNs 165E21F1F0091163, 1A9ED1132009128D, 1A9ED113200912A7, 165E21F1F0091166, 165E21F1F009116A, 1A9ED113200912EC, 1A9ED11320091317, 1A9ED1132009130D, 1A9ED1132009131B, 1A9ED11320091322, 1A9ED113200912CA, 1A9ED113200912CF, 1A9ED11320091757, 1A9ED11320091756, 1A9ED11320091755, 1A9ED11320091754, 1A9ED11320091753, 1A9ED11320091872, 1A9ED11320091747, and 1A9ED1132009171B.
- 39 CAR interview with SPLA personnel, Rubkona, South Sudan, 17 May 2016. For more detail on this consignment, see CAR (2017b, pp. 49–52).
- 40 iTrace® URN 165E21F1F0091EF75.
- 41 On 26 April 2018 CAR sent a formal trace request to the Government of Sudan asking for further information on this ammunition, but at the time of writing, has not received a reply.
- 42 iTrace® URN 165E21F1F0091EF55.
- 43 On 26 April 2018 CAR sent a formal trace request to the Government of Sudan asking for further information on this ammunition, but at the time of writing, has not yet received a reply.
- 44 iTrace® URNs 165E21F1F0091ED42 and 165E21F1F009202D9. CAR documented identical rounds in 2016 in South Kordofan state, Sudan, with the Sudanese rebel group the SPLA-N. CAR has also reviewed documentation of identical rounds of loose ammunition seized from armed civilians moving through eastern Central African Republic in March 2017. Correspondence, photographs, and an incident report from a confidential source, Central African Republic, 30 March 2017; CAR (2017b, p. 56).
- 45 Small Arms Survey (2013).
- 46 iTrace® URN 165E21F1F0091AFDB.
- 47 iTrace® URN 165E21F1F0091ED42.
- 48 At the time of writing, Olony's Shilluk Agwelek forces were aligned with the SPLA-IO, while Puljang was one of the main Bul Nuer commanders leading SPLA operations in former Unity state.
- 49 Small Arms Survey (2013).
- 50 The recovered sample also included HLSEC 5.56 × 45 mm ammunition manufactured in 2013 (iTrace® URNs 165E21F1F0091EE12 and 165E21F1F0091EE1B). On 15 May 2018 CAR sent a formal trace request to the Government of China asking for information about all the CQ rifles it has documented in South Sudan, except those without any visible intact markings. CAR has not yet received a response.
- 51 iTrace® URN 1D5E1292300C8D7.
- 52 iTrace® URN 165E21F1F00C15F38.
- 53 iTrace® URN 165E21F1F00C12CC1. On 2 July 2015, the Government of Germany responded to a formal tracing request issued by CAR on 4 February 2015. This response confirms that the Carl Walther Model P22 pistol with the serial number G029301, the object of CAR's tracing request, was sold from the producer to a company in Sudan in 2006. The Government of Germany further stated that at the time of the sale, German law required no export licence, although since 2013 such transfers have required export licences under the German Weapons Law.
- 54 CAR interviews with an SPLA commander, Juba, South Sudan, March 2017.
- 55 Business card of the businessman listing his role in the Séléka administration, provided to CAR by a senior Séléka leader, on file; CAR interviews with three senior Séléka leaders, Bangui, Central African Republic, 25 August 2014, 4 September 2014, and 5 September 2014; CAR telephone interview with the businessman, 14 September 2015.
- 56 Notes of researcher interview with the businessman, 14 September 2015.
- 57 Document from a diplomatic source, obtained in May 2014 (precise date and location withheld), on file.

- 58 The South Sudanese intermediary involved has since defected from the SPLA-IO's Machar faction to the faction aligned with Vice President Taban Deng Gai.
- 59 Matches refer to the presence of identical headstamps, lot numbers, or batch numbers. Calculations are based on the iTrace® data set. These figures exclude ammunition airdropped in Pigi county, Jonglei state (now Central Upper Nile state), documented on 11 December 2014, and ammunition recovered in bulk in Panakuach, Unity state (now Northern Liech state), documented on 17 May 2016. CAR can tie the materiel documented on both occasions to external resupply to the SPLA-IO.
- 60 This sample excludes SPLA seizures of SPLA-IO materiel in Pigi county, Jonglei state (now Central Upper Nile state), in October 2014, and near Panakuach, Ruweng state, in mid-2015. In these cases the physical condition, presence of newly produced Sudanese ammunition, and efforts to obscure the Sudanese delivery markings of the materiel provided credible supporting evidence of their cross-border provenance.
- 61 iTrace® URNs 165E21F1F00917DA7, 165E21F1F00917DB9, and 165E21F1F00917DD2.
- 62 CAR sent requests for trace information for these 9M14M missiles to the governments of the Russian Federation (15 May 2018) and Ukraine (13 July 2018). CAR has not yet received a response from the Russian Federation. On 17 August 2018, the Government of Ukraine responded to a formal trace request issued by CAR on 13 July 2018. This response confirms that: 1) between 1962 and 1984, the former Soviet Union manufactured the "Malyutka" anti-tank guided weapon (ATGW) of which the 9M14M anti-tank missile is part; 2) Poland, the former Czechoslovakia, Bulgaria, China, Iran and Taiwan manufactured licenced variants of the 9M14M ATGW; 3) the "Malyutka" was in service with the national armies of more than 40 countries including the Sudanese Army; 4) Ukroboronprom, the state-owned export/import company of Ukraine, has not exported any 9M14M missiles to any African states including the Republic of Sudan; 5) in 2011, SpetsTechnoExport, the State Foreign Trade Enterprise, delivered 42 9P135M launch units (which are part of the "Fagot" ATGW) and 9M113 anti-tank missiles to the Republic of Sudan.
- Although CAR had not previously documented 9M14M missiles in South Sudan, they are not the first anti-tank missiles it has documented in the country. A CAR field investigation team observed a misfired Soviet-made 9M115 (Metis) anti-tank missile at SPLA Division 4 headquarters in Rubkona, Unity state (now Northern Liech state), on 24 May 2014 (see Figure 10), but could not examine it thoroughly for safety reasons (iTrace® URN 165E21F1F0091ED20). SPLA Division 4 personnel claimed that this missile did not form part of SPLA stocks and that it had been left by SPLA-IO forces that had occupied the headquarters earlier in 2014. On 15 May 2018 CAR sent a formal trace request to the Government of the Russian Federation to request further information about the export of this 9M115 missile; at the time of writing, CAR has not received a reply.
- 63 For evidence of Sudanese repackaging practices, see CAR (2017a, pp. 44–52).
- 64 The headstamps of this ammunition matched those documented in 2016 (see footnote 14). It is not known whether the lot numbers of the ammunition documented in 2016 matched those documented here, since their crate markings were deliberately obliterated.
- 65 Similar D-821 60 mm mortar projectiles carrying lot number 03-14 were present in large quantities in the mid-2015 cross-border transfer documented in 2016: see footnote 14 and iTrace® URN 165E21F1F0091EF93.
- 66 GLD215 anti-tank landmines with lot number 07-03 were documented amongst materiel captured from SSDM/A forces in 2011. See iTrace® URN 165E21F1F00961C8.
- 67 iTrace® URN 165E21F1F00C15A84.
- 68 iTrace® URN 165E21F1F00C15AE2.
- 69 iTrace® URN 165E21F1F00C19F03.
- 70 Some of these SPLA-IO units also received weapons from the government in Juba in 2015–16, under the terms of the peace agreement.
- 71 iTrace® URN 165E21F1F0091B075.
- 72 iTrace® URNs 165E21F1F0091ECB0 and 165E21F1F0091B09A. Several ethnic groups present in Equatorial SPLA-IO forces extend across borders and have strong community relations, particularly Kakwa communities in southwest South Sudan and northwest Uganda.
- 73 iTrace® URNs 165E21F1F00C15AB4 (left) and 165E21F1F00C1EEAC (right).

- 74 iTrace® URNs 165E21F1F00C19EB1 (left) and 165E21F1F00C147C8 (right). CAR wrote to the Government of Israel on 14 May 2018 requesting trace information for these weapons but has not yet received a response.
- 75 iTrace® URNs 165E21F1F00C15B00 (left) and 1A9EB1F2A00C3FE (right). CAR wrote to the Government of Israel on 4 August 2015 and 14 May 2018 requesting trace information for these weapons but has not yet received responses.
- 76 UNSC (2016a, para. 91).
- 77 iTrace® URNs 165E21F1F00C1E8FD, 165E21F1F00C1F3ED, 165E21F1F00C1E859, 165E21F1F00C1E84A, 165E21F1F00C1E839, 165E21F1F00C1E828, 165E21F1F00C1E818, 165E21F1F00C1E80A, 165E21F1F00C1E7F9 and 165E21F1F00C1E7E6. A CAR field investigation team examined old SSWS weapon seizures at the SSWS post in Maridi town on 22 February 2016; the relevant iTrace® URNs are 165E21F1F00C1E8EF, 165E21F1F00C1E8D7, and 165E21F1F00C1E8E3.
- 78 iTrace® data set; Observations by CAR personnel, Darfur, Sudan, 2011, and Unity state, South Sudan, 2012.
- 79 iTrace® URN 165E21F1F0091E90C.
- 80 See Section 2.1 and CTSAMM (2018).
- 81 CAR observations, Juba, South Sudan, May 2014; Barigaba (2013).
- 82 Sudan Tribune (2014).
- 83 Letter dated 10 July 2015 from the chief of Defence Forces, UPDF, to the Ministry of Foreign Affairs of Ukraine, from a confidential source, on file; summaries of Ukrainian customs declarations 100250005\2015\532255, 100250005\2015\532513, and 100250005\2015\532804, on file; South Sudanese MOD, delivery confirmation certificate (n.d. 2015), from a confidential source, on file; South Sudanese MOD, delivery confirmation certificate (19 May 2015), from a confidential source, on file; photographs of Ilyushin-76TD aircraft making a delivery at Entebbe on 17 July 2015, from a confidential source, on file; UNSC (2016a, paras. 75–77). There is some uncertainty about how many Mi-24s Ukraine exported to South Sudan under various different contracts. The annual arms exports report from Ukraine's State Service of Export Control lists two Mi-24 attack helicopters and a further three Mi-24-MSB helicopters supplied to South Sudan during calendar year 2015; see DSECU (n.d.). An end-user certificate issued by the South Sudanese MOD on 11 September 2014 lists four Mi-24 attack helicopters to be supplied from Ukraine under contract number 30.3-30-K, and in a letter dated 10 July 2015 to the Ministry of Foreign Affairs of Ukraine the chief of Defence Forces of the UPDF 'confirm[s] that the 04 (four) helicopters Mi-24V [...] will be forwarded to South Sudan to the Ministry of Defence and Veteran Affairs'. However, Ukrainian customs records indicate that the exports of three Mi-24V helicopters to Entebbe under this contract took place on 6 April 2015, 26 May 2015, and 15 July 2015. Confusingly, the customs declarations for 26 May and 15 July list the same (unique) helicopter serial number. According to customs records, the Ukrainian company Motor Sich exported a further three Mi-24-MSB helicopters directly to the MOD of South Sudan on 6 January 2015, 6 March 2015, and 29 May 2015 (extracts of Ukrainian customs declarations 112010002\2015\23, 112010002\2015\431, and 112010002\2015\1029, on file). Given the absence of a UN arms embargo on South Sudan at the time of transfer, these transfers of Mi-24 attack helicopters were entirely lawful.
- 84 The UN Panel of Experts on South Sudan reported in November 2016 that Bosasy Logistics, one of the three groups of brokers and military service providers covered in this section, had procured 4,000 rifles and small arms ammunition from the Bulgarian company BIEM JSC that 'were subsequently transferred to South Sudan' (UNSC, 2016b, para. 53). At the time, the UN Panel was unable to provide physical evidence for these weapon transfers. Evidence obtained by CAR and presented here confirms for the first time that ammunition exported by this Bulgarian company had indeed been retransferred to armed actors in South Sudan (and Sudan); shows that the transfers involved a larger number of weapons than those detailed by the UN Panel; details the supply routes of the materiel; and demonstrates that Uganda procured at least some of this materiel on behalf of the Government of South Sudan.
- 85 Council of the EU (2016; 2017); UNGA (2015, p.51).
- 86 UNGA (2015, p. 51). Packing list for a shipment dated 14 July 2014, from a confidential source, on file; airway bill 580-0314-0351 dated 14 July 2014, from a confidential source, on file; letter dated 3 July 2014 from BIEM to Bosasy Logistics, from a confidential a source, on file.

- 87 PPDA (n.d.); copy of a contract dated 20 August 2014, certified by the South Sudan Ministry of Justice Directorate of Contracts, from a confidential source, on file.
- 88 Export values taken from Council of the EU (2016; 2017).
- 89 Packing list for a shipment dated 14 July 2014, from a confidential source, on file; letter dated 3 July 2014 from BIEM to Bosasy Logistics, from a confidential source, on file.
- 90 Packing list for a shipment dated 14 July 2014, from a confidential source, on file. The total of 10,000 rifles comes from Bulgaria's 2014 declaration to the UN Register of Conventional Arms, which indicates exports of 10,000 assault rifles to Uganda in 2014. According to Bulgaria's submissions to the EU report on arms exports under Council Common Position 2008/944/CFSP (Council of the EU, 2016), the Bulgarian government issued only one licence for small arms exports from Bulgaria to Uganda during 2014; the 14 July 2014 shipment of 4,000 rifles must thus form part of a single deal under which a total of 10,000 rifles (those notified to the UN Register) were exported. Likewise, correspondence from BIEM to Bosasy Logistics related to the deal indicates that the 4,000 rifles constitute the first of two shipments. It is not possible to determine the number or types of small arms exported from Bulgaria to Uganda in 2015 because Bulgaria did not submit a 2015 report to the UN Register, and because only the value of weapon types exported, rather than their quantity, is recorded in Bulgaria's national arms export reports and its submissions to the EU report on arms exports under Council Common Position 2008/944/CFSP (Council of the EU, 2017).
- 91 Contract number 16/17 dated 18 March 2014 (letter dated 3 July 2014 from BIEM to Bosasy Logistics, from a confidential source, on file).
- 92 AirBridgeCargo Airlines LLC is a subsidiary of the Russian air cargo carrier Volga-Dnepr Group.
- 93 Letter dated 3 July 2014 from BIEM to Bosasy Logistics, from a confidential source, on file.
- 94 National reports to the UN Register of Conventional Arms do not include ammunition, so it is not possible to determine the precise quantity of ammunition exported from Bulgaria to Uganda during 2014, only its value, based on EU reporting.
- 95 CAR has received no response from the Government of South Sudan regarding the authenticity of the documents in Figures 14 and 15; however, their format, stamps, signatures, and contact details match documents issued by SPLA general headquarters and the South Sudanese MOD relating to another prospective contract for arms exports from Ukraine to South Sudan, obtained from a separate source in Ukraine (2014–15 defence procurement documents, on file).
- 96 Draft request for landing permissions in Entebbe, from a confidential source, on file.
- 97 Flight records, from a confidential aviation source, on file. It is possible that later flights by Air Cargo Global from Burgas to Entebbe correspond with the other four landing requests in the landing request document, since it is not unusual for the dates of prospective charter cargo flights to change according to the availability of crews, aircraft, and contract payments.
- 98 Bosasy Logistics contracted directly with the South Sudanese government to supply three Mi-24V attack helicopters from Ukraine to South Sudan via Uganda in 2015, in accordance with a contract signed between Bosasy and the South Sudanese MOD on 20 August 2014 (copy of the contract, certified by the South Sudan Ministry of Justice Directorate of Contracts, from a confidential source, on file).
- 99 In December 2014, CAR verified that a C-130 cargo aircraft (registration 5X-UCF) operated by Uganda's state-owned air cargo company, was present from 15 to 19 December 2014 on the military apron at Juba International Airport, where military cargo is offloaded (photographic evidence and flight records from a confidential source, on file). CAR has as yet been unable to verify the cargo that this Ugandan C-130 aircraft delivered.
- 100 Photographs from an SPLA-N source in Blue Nile state, precise location withheld, 28 March 2018. In mid-2017 the SPLA-N split into two factions, one loyal to the Nuban military leader Gen. al Hilu, and one to Malik Agar, the former head of the SPLA-N's Blue Nile wing and chair of the Sudanese rebel coalition the Sudanese Revolutionary Front.

- 101 CAR wrote to the Government of Bulgaria on 10 May 2018 and to BIEM on 13 July 2018 asking whether they could confirm to which country and consignee this crate was originally exported. At the time of writing, CAR had not received any responses to these communications. On 9 October 2018, the Government of Bulgaria responded promptly to a request for information issued by CAR on 10 September 2018. This response stated that: 1) the Government of Bulgaria does not grant licences for exports of defence products to areas under embargo and; 2) no embargo was imposed on Uganda. Both South Sudan and Uganda have historically supported the SPLA-N, although evidence of substantial direct weapon supplies to the SPLA-N from either country remains limited. See CAR (2017a); Gramizzi (2013); Gramizzi and Tubiana (2013).
- 102 iTrace® URN 165E21F1F0091ECCD.
- 103 CAR wrote to the Government of Bulgaria on 10 May 2018 and to BIEM on 13 July 2018 asking whether they could confirm to which country and consignee this crate was originally exported. At the time of writing, CAR had not received any responses to these communications.
- 104 Bivol (2017); UNSC (2016b).
- 105 EUC issued by the Ugandan MOD, 29 January 2014.
- 106 DVC issued by the Ugandan MOD, 24 April 2015.
- 107 iTrace® URN 165E21F1F009142C6. On 28 September 2016, the Government of Romania responded to a formal trace request issued by CAR on 5 September 2016. The Government of Romania provided further information in a response on 17 September 2018. These responses confirm that: 1) UM Sadu SC manufactured the 7.62 × 54R mm FMJ ammunition, subject to CAR's trace request; 2) Romanian authorities authorised the export of this ammunition to a Slovak Republic-based importer, in December 2014, for onward export to the declared end-user, the Ministry of Defence (MoD) of Uganda; 3) a Romanian company exported the ammunition to the Slovak importer, under an export licence dated 12 September 2014, and a commercial contract; 4) The Romanian exporter included in its license application to the Romanian authorities the original international import certificate (IIC) issued by the relevant Slovak authorities, and a copy of the end-user certificate (EUC) issued by the MoD of Uganda; and 5) the MoD of Uganda issued a delivery verification certificate (DVC) to the Romanian authorities dated 24 April 2015. The Government of Romania included copies of the IIC, EUC and DVC in its response to CAR.

In addition, the Romanian government confirmed that the copy of the documentation received by the Romanian licensing authorities from the Slovak exporter through the Romanian export licence applicant was partly redacted. From comparison with an un-redacted version of the EUC obtained from a different source, CAR has confirmed that this redaction included the name of the broker (Messrs. EBS Investments Corporation) listed on the EUC. This prevented the Romanian government from conducting any pre-licensing checks on EBS Investments Corporation.

On 9 December 2016, the Government of the Slovak Republic responded promptly to a formal trace request issued by CAR on 10 November 2016. This response confirms that: 1) the Slovak company S.M.S. s.r.o exported the Romanian-manufactured ammunition with lot number 14/11, subject to CAR's trace request, to the declared end-user, the Ministry of Defence of the Republic of Uganda, via the broker EBS Investments Corporation (end user certificate dated 29 January 2014); 2) the Ministry of Defence of the Republic of Uganda issued a delivery verification certificate confirming receipt of the consignment on 16 March 2015. The Slovak authorities included copies of the EUC and DVC in their response to CAR.

On 5 October 2018, S.M.S. spol. s.r.o. responded promptly to requests for information issued by CAR on 10 September 2018 and 1 October 2018. This response stated that: 1) applications for export licences in the Slovak Republic require submission of documents proving the applicant's relationship with the producer and the consignee; 2) Slovak export licences are granted following approval by the Ministry of Economy, the Ministry of Defence, the Ministry of Interior, the Ministry of Foreign and European Affairs, the National Security Authority and the Slovak Information Service; 3) the end-user certificate (EUC) is verified by the Slovak Ministry of Foreign Affairs and the relevant Slovak embassy; 4) the Romanian licence for export to Uganda was granted on the basis of the International Import Certificate (IIC) granted by the Slovak Republic; 5) the Slovak Republic and the European Union consider Uganda to be a reliable peacekeeping partner in Africa, and there is no current embargo for the export of weapons and ammunition to this country; 6) the Delivery Verification Certificate (DVC) issued by the Ugandan Ministry of Defence confirmed that the exported products would be used for the declared

purposes; 7) EBS Investments Corporation is not only a broker but S.M.S. spol. s.r.o.'s business partner and an esteemed long-term partner of the Ugandan Ministry of Defence; 8) S.M.S. spol. s.r.o. cannot comment on the activities of EBS Investments Corporation before 2010; 9) the blackening-out of information on the EUC provided to the Romanian exporter was performed to protect commercially confidential and sensitive information from potential competitors, such as additional items ordered from alternative manufacturers and to simplify the document for the Romanian authorities; 10) this blackening-out was not intended to inhibit pre-licensing checking of the EUC or preventing Romanian authorities from undertaking such checks; 11) the IIC is the most important document for the Romanian authorities, since Slovak authorities had already undertaken pre-licensing checks. S.M.S. spol. s.r.o. additionally stated that it is not uncommon practice to simplify paperwork while keeping all the prescribed rules.

- 108 iTrace® URNs 165E21F1F009199BB, 165E21F1F00924637 and 165E21F1F00919A69.
- 109 Memorandum of association, 5 March 2004, on file. The company number is 006691 and its registered address is Oliaji Business Centre No. 12, Victoria, Seychelles, an address shared by hundreds of other international business corporations registered in the Seychelles but operating elsewhere.
- 110 EBS Investments Corporation, particulars of directors, 4 March 2004, on file. On 10 September 2018, CAR wrote to the Austrian government to request information about whether either of EBS Investments Corporation's directors currently resided in Austria, and whether they were subject to Austrian controls on arms brokering. CAR has not received a response to date. CAR also contacted the directors of EBS Investments Corporation on 12 September 2018 to request information about this arms deal, their companies, and their residency. CAR has not received a response to date.
- 111 EBS Investments Corporation, resolution dated 6 December 2007, on file; EBS Investments Corporation, resolution dated 21 October 2010, on file. Perhaps significantly, the company closed the dollar and shilling accounts, held by a Ugandan bank, in 2007, shortly after the Ugandan bank was taken over by a large bank with headquarters in the UK. The company subsequently opened a euro account with a smaller, Kenya-based bank.
- 112 It is unclear whether either individual is a resident or regularly present in Uganda. Significantly, the two directors of the company appear to have provided identical specimen signatures to open a Ugandan bank account in 2010 (company resolution to open a euro bank account, 21 October 2010, on file).
- 113 UNSC (2001).
- 114 UNSC (2016a, para. 78; 2016b, paras. 26–28). The UN Panel of Experts on South Sudan reported that the SPLA had acquired two L-39 jets, but a commercial source directly involved in the transfer told CAR that the SPLA acquired only one L-39 jet. CAR has documented only one in South Sudan.
- 115 CAR observations, Juba, February 2016 and February 2017; UNSC (2016b, para. 26, annex IV); statement of Lul Ruai Koang, SPLA spokesperson, 6 July 2016 (Nyamilepedia, 2016).
- 116 The interrelated companies referred to here are Yamasec Ltd (registered in Uganda), Yamasec (USA) LLC (registered in Delaware, United States), and KE Aviation Ltd (registered in Uganda). Angel Trading Inc, included in Figure 27 and registered at the same address as Yamasec (USA) LLC, sold the L-39ZO aircraft to Yamasec (USA) LLC but has a separate owner and does not form part of the 'jointly owned' companies referenced here.
- 117 CAR telephone interview with a US aircraft broker, 26 January 2018; CAR interview with a commercial source familiar with the aircraft's transfer, precise date and location withheld, 2018.
- 118 Comparison of photographs obtained in Juba, February 2017; video footage of N139BH/151 operating in Entebbe, May 2011; and sale photographs of N139BH in Rockford, Illinois, United States, January 2011, on file.
- 119 Correspondence from the US Department of Commerce, 6 February 2018.
- 120 Photographs on file, date withheld.
- 121 Photographs of UPDF Air Wing L-39s taken by aircraft spotters in Uganda, various dates, on file. 'X' here indicates a digit from 0 to 9.
- 122 Photographs of UPDF Air Wing L-39 aircraft distributed by UPDF online, various dates, on file.
- 123 Undated photograph from Juba International Airport, on file.

- 124 Comparison of photographs of the L-39ZO in Juba, February 2017, from a confidential source, on file; video footage of N139BH/151 operating in Entebbe (Sirovy, 2011); sale photographs of N139BH in Rockford, Illinois, January 2011, on file.
- 125 Sale photographs of N139BH in Rockford, Illinois, January 2011, on file; photograph of the L-39 in Juba, February 2017, from a confidential source; photograph of the L-39 carrying registration AF751, distributed online by UPDF Air Wing.
- 126 US aircraft registration documentation and US Federal Aviation Administration correspondence with Yamasec USA LLC, obtained via the US Freedom of Information Act, on file; CAR telephone interview with the US aircraft broker, 26 January 2018. Under Delaware corporate law, the owners of Delaware LLCs are not recorded with the Delaware company registry.
- 127 CAR telephone interview with the US aircraft broker, 26 January 2018. Yamasec USA LLC was formed in Delaware on 4 February 2009, the day before it purchased the aircraft.
- 128 US aircraft sale documentation, obtained via the US Freedom of Information Act; social media records for the US citizen.
- 129 CAR telephone interview with the US aircraft broker, 26 January 2018. The broker told CAR on this occasion that on export the aircraft had underwing hardpoints that were 'capable of dropping bombs'. On 12 September 2018, this aircraft broker responded to a written request for information on 10 September 2018. This response stated that: 1) the German Air Force demilitarised this L-39ZO aircraft prior to its original importation into the USA by removing the gunsight equipment and wiring, and completely removing all wiring from behind the armament panel on the left side of the front cockpit instrument panel; 2) during a pre-buy inspection for a local buyer during the 1990s, the broker's company verified that all armament wiring to the outboard pylons had been removed, as well as the PUS-36-DM rocket sequencing devices and all attendant wiring for each wing; 3) the UB-16-57 rocket pods with which the broker offered the aircraft for sale in 2009 were for display use, having been cut, re-welded, the tubes blocked internally and welded closed; and 4) the broker never provided any type of sale warranty nor provided any periodic maintenance or certification after the export of the item to Uganda.
- 130 CAR telephone interview with the US aircraft broker, 26 January 2018.
- 131 Correspondence from the US Department of Commerce, 6 February 2018.
- 132 CAR requested this information from the US State Department's Directorate of Defense Trade Controls on 8 February 2018, but has not yet received a response.
- 133 USDOS (2008, p. 299; 2009, p. 385). Aircraft parts and components fall under category XIII(h), complete aircraft under category XIII(a).
- 134 Obtained via the US Freedom of Information Act.
- 135 N139BH 'airworthiness', 'registration', and 'suspense' files obtained via the US Freedom of Information Act, on file. In April 2009, Yamasec USA LLC obtained a special airworthiness certificate from the FAA, which allowed it to operate only from an airport in Rockford, Illinois, for the purpose of 'exhibition' (signed application for US airworthiness certificate, 30 April 2009, obtained from the FAA via the US Freedom of Information Act). On 29 January 2018, in response to a request from CAR, the FAA wrote: 'Our office has not received or granted any request to export this aircraft to any foreign country. It is not unlawful to grant that we notify a foreign country for export that the registration is cancelled. We may accept a written request from the last US owner of record to notify a foreign country that registration is cancelled for export, Yamasec USA LLC or if a request is received from the foreign owner requesting export, the request must be accompanied by an ink signed bill of sale from the last US registered owner to the requestor' (email correspondence from the FAA to CAR, 29 January 2018).
- 136 US aircraft registration documentation and FAA correspondence with Yamasec USA LLC, obtained via the US Freedom of Information Act, on file.
- 137 Sirovy (2011).
- 138 Photographs from a confidential source, on file; company registration records for Yamasec Ltd, on file. Corporate filings for Yamasec Ltd and Kampala Executive Aviation Ltd prior to 2011 list the 50-per-cent owner's nationality as 'Israeli'; after this date, he is listed as 'Ugandan'. See also L-39 publicity at KEA (n.d.). The Kampala Executive Aviation logo was no longer visible on the aircraft by February 2017, when white-coloured repairs to the location

of a bullet hole were visible on the aircraft's left-hand wing (see Figure 33). A commercial source directly familiar with the aircraft's transfer and deployment indicated that the aircraft was hit by small-arms fire in a deployment north of Malakal close to the Sudanese border in September 2016, and that it returned temporarily to Entebbe via Gulu for repair by Ukrainian technicians (interview with a commercial source, precise date and location withheld, 2018).

- 139 Company registration records for Kampala Executive Aviation Ltd, on file.
 - 140 Yamasec Ltd board resolution dated 22 March 2014, on file. On 23 September 2018, Barclays Plc responded to a request for information issued by CAR on 10 September 2018. This response stated that; 1) Barclays' relationship with clients in the defence sector is mandated by Barclays Defence Policy; 2) under this policy, Barclays does not enter into a relationship with any company that is involved in the manufacture of or trade in cluster munitions, and will not finance the manufacture or trade in nuclear, chemical and biological weapons, landmines and other weapons covered by international conventions and; 3) Barclays complies with all laws in the jurisdictions in which it does business and has strict processes in place to ensure compliance. Barclays additionally informed CAR that in 2017 Barclays sold its controlling stake in Barclays Africa Group to ABSA Group Limited.
 - 141 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018; company registration documents for Yamasec Ltd, on file.
 - 142 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018.
 - 143 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018; photographs of two crew members and a South Sudanese pilot, from a confidential source, on file. The commercial source stated that the crew members were paid in cash and told that, if asked, they should say that they were employed by the UPDF, not by Yamasec Ltd.
 - 144 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018; photographs of wingtip damage, from a confidential source, on file.
 - 145 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018.
 - 146 See US (n.d., s. 127.1).
 - 147 Copy of the commercial proposal and quotations, from a confidential source, on file.
 - 148 On 26 September 2018 Diamond Aircraft Industries (DAI) responded promptly to a request for information issued by CAR on 10 September 2018. This reply stated that: 1) DAI has no record of their aircraft being operated by the South Sudanese military, and has not sold any aircraft to South Sudanese customers; 2) the DA42 is built as a civilian aircraft and only requires an export licence from the Austrian authorities if military goods are integrated into the aircraft; or if the aircraft is destined for military use in an embargoed destination; 3) DAI sold a DA42 aircraft to Yamasec Ltd in a contract dated 11 May 2017, for the end-use of the Ugandan People's Defence Forces; 4) this aircraft (serial number 42.MN040, registration AF-156) was ferried to Uganda in May 2018; 5) DAI signed an additional agreement for the integration and testing of a camera system for this aircraft (without camera system onboard); 6) Yamasec have requested a further contract from DAI for the integration of the camera system and training on the aircraft in Uganda; 7) this further contract is not yet signed, and would require an export licence from the Austrian government. DAI additionally informed CAR that no South Sudanese government or military officials have ever visited DAI facilities in Wiener Neustadt or elsewhere; however some visitors from the Ugandan Air Force visited DAI in Austria in May 2018.
- On 3 October 2018 the Government of Austria responded to a request for information issued by CAR on 10 September 2018. The Government of Austria confirmed that the export of the Diamond Aircraft DA 42, subject to CAR's investigation, does not require a licence from the Austrian export control authorities.
- 149 Copy of the letter to Gen. James Hoth Mai, 27 March 2014, from a confidential source, on file.
 - 150 Copy of the letter to Gen. James Hoth Mai, 27 March 2014, from a confidential source, on file.
 - 151 Copy of the letter from Lt. Gen. Bior Ajang Duor to the five-person contract committee, 1 April 2014, from a confidential source, on file. This letter is dated 1 April 2014 but stamped 1 March 2014. This is likely an error arising from failing to change the month of the official date stamp, the month having changed that day.

- 152 Copy of the letter to Gen. James Hoth Mai, 27 March 2014, from a confidential source, on file.
- 153 CAR field investigation team observations, Juba, various dates, 2015; photograph of DA42 aircraft in Malakal, September 2016, from a confidential source, on file.
- 154 CAR interview with a commercial source directly familiar with the aircraft's transfer, precise date and location withheld, 2018.
- 155 The 2001 report of UN Panel of Experts on Liberia claimed that an Egyptian individual (who co-owns EBS Investments Corporation) supplied more than 2,000 Vz.58 assault rifles from the Slovak Republic to Uganda. (The UN Panel does not identify these weapons as Vz.58s but refers to them as 'She-Guns' due to the 'she' markings on the rear sight blocks of Vz.58 rifles). According to the UN Panel report, the Ugandan government found that these rifles did not correspond to the contract specifications, and the Egyptian individual agreed with the Ugandan authorities to return the rifles to the Slovak Republic, but in fact arranged for Culworth Investments Corporation to resell them to a Guinean company called Pecos Compagnie s.à.r.l. The UN Panel asserts that the embargoed Government of Liberia under Charles Taylor used Pecos, a company established by a Slovak national, for a range of illicit weapon purchases. The UN Panel further alleges that on 22 November 2000 the Egyptian individual dispatched 1,000 of these Slovak rifles on an Ilyushin-18 cargo aircraft from Entebbe, where a representative of Culworth Investments Corporation signed the loading confirmation. From Entebbe, the Ilyushin-18 transported the rifles not to Guinea, but directly to Monrovia in Liberia. According to the UN Panel, the Ilyushin-18 was owned by the well-known arms transporter Victor Bout and chartered by another of Bout's companies, Centrafrican Airlines. Ugandan authorities reportedly stopped a second shipment of the rifles and impounded the weapons after an examination of the flight plan suggested it too was destined for Liberia. When questioned by the UN Panel, the Egyptian individual reportedly produced a Guinean EUC dated five months prior to the date on which the Ugandan government rejected the rifles. Guinean authorities and former representatives of Pecos subsequently told the UN Panel that this EUC was a forgery (UNSC, 2001, paras. 174–88, 253–75).
- 156 Council of the EU (2009, p. 84).
- 157 EBS Investments Corporation was registered in the Seychelles on 12 September 2001, shortly after the UN Panel's investigation into Culworth Investments Corporation (see Figure 20).
- 158 EUC provided by the Government of Romania, 28 September 2016.
- 159 OECD (2015, pp. 19–27). In 2015 the Financial Services Authority of the Seychelles conducted a check on the availability of company ownership information for international business companies. It found that the company service providers of 4.5 per cent of the inspected international business companies did not keep the legally required information.
- 160 Seychelles (2013, pt. IV); letter from Financial Services Authority of the Seychelles to CAR, 13 October 2016. This letter and accompanying information lists the 'information specified by the [Financial Services Authority] Act in regards to what can be given through an official search which the [Financial Services] Authority provided to the Ministry [of Foreign Affairs]'. The information listed in this letter includes a given company's number, date of incorporation, the dollar value of its authorised share capital, the due date of its annual registration fees, its current standing with the registry, and the name and address of its registered agent. It does not include any information on the company's directors, shareholders, or beneficial owners.
- 161 Correspondence from the Government of Romania, 20 September 2018.
- 162 On 21 June 2016, the Government of Ukraine responded promptly to a formal trace request issued by CAR on 22 April 2016. In its response the Government of Ukraine confirmed: 1) the Ukrainian company PJSC "Plant "Mayak" manufactured the KM-7.62 machine gun with serial number KM-1232-12, which was the subject of CAR's request; 2) the State Service of Export Control of Ukraine issued the state company Ukrspecexport, acting under the foreign trade contract No. USE-20.4-47-K/KE-14, with a one time license (No. 28256700) to export military goods (a quantity of 1,000 items) including KM-7.62 machine guns, to the Ministry of Defence and Veterans' Affairs of the Republic of South Sudan; 3) Ukrspecexport exported 830 KM-7.62 machine guns to the Ministry of Defence and Veterans' Affairs of the Republic of South Sudan, via the broker Engineering Master Group, Ltd., Republic of Seychelles, on 27 August 2014; and 4) the Ministry of Defence and Veterans' Affairs of South Sudan presented an end-user certificate (No. RSS/MOD&VA/J/US/44/4-()) to Ukrspecexport, dated 14 January 2014.

- 163 Flight records indicate that the weapons were shipped from Gostomel, Ukraine, to Juba by air on a Belarusian-registered Ilyushin-76 aircraft on 28 August 2014 (flight records, from a confidential source, on file). On 16 June 2016, Ukrspelexport exported a second shipment of 170 KM-7.62 machine guns manufactured between 2010 and 2016, as well as 88 DShKM 12.7 × 108 mm heavy machine guns manufactured between 1946 and 1968, to the South Sudanese MOD using the same delivery route—from Gostomel Airport to Juba International Airport (summary of Ukrainian customs declaration no. 100250007\2016\27369, on file). CAR wrote to the Government of Ukraine on 2 February 2018 to ask whether the same Seychellois intermediary was involved in this shipment but has not yet received a response. On 28 September 2017 the chair of Ukraine's National Security and Defence Council announced that Ukrainian state-owned defence companies would not supply weapons to South Sudan 'until the situation was normalized' (UNIAN, 2017).
- 164 Olony's forces fought alongside the SPLA during 2014 and 2015, before defecting to the SPLA-IO, and may therefore have acquired the weapon either directly from the SPLA or through subsequent battlefield capture.
- 165 iTrace® URN 165E21F1F00C11B93.
- 166 Copy of a contract dated 14 June 2014, from a confidential source, on file. Mosston Engineering Ltd has since redomiciled in the Marshall Islands (correspondence with Mosston Engineering Ltd, 4 October 2018).
- 167 CAR interview with a senior South Sudanese security official, date and precise location withheld.
- 168 On 4 October 2018, Mosston Engineering Ltd responded promptly to a request for information issued by CAR on 28 September 2018. This response stated that: 1) Mosston Engineering Ltd signed the contract with the National Security Service (NSS) of South Sudan on 14 July 2014, in Dubai; 2) the contract was concluded for a total of USD 274,75 million for various types of weapons and ammunition; 3) dollar payment was to be made into Mosston Engineering Ltd's Armenian bank account; 4) according to the contract terms, NSS was obliged to provide an end-user certificate (EUC) signed and certified by the Ministry of Foreign Affairs of South Sudan to Mosston Engineering Ltd within 10 days from the date of signing the contract in order for Mosston Engineering Ltd to obtain an export licence; 5) Mosston Engineering Ltd warned the representatives of the NSS that for deliveries from EU countries, all necessary documents would need to be provided to the EU countries, and that for deliveries from former USSR countries, they would have to inform and obtain permission from the United Nations; 6) due to the EUC not being signed within 10 days of signing of the contract, Mosston Engineering Ltd cancelled the contract and did not meet with NSS representatives again.
- 169 The SPLA also obtained Mi-17 transport helicopters prior to the start of the current civil war.
- 170 Council of the EU (2011).
- 171 EU (2011).
- 172 UNSC (2016a, paras. 85–86). The identified aircraft were EK-26310 and EK-72928.
- 173 In addition to the aircraft listed in Table 7, CAR obtained multiple written reports from intergovernmental observers of SPLA weapon deliveries during 2014 to Kuajok (Warrap state, now Gogrial state) and Malakal (Upper Nile state, now Eastern Nile state) by two further Armenian-registered aircraft. As CAR has been unable to obtain photographic or documentary evidence of these deliveries, they are not listed in this report.
- 174 Council of the EU (2018, p. 21).
- 175 CAR contacted the head of the board of management of Skiva Air LLC on 10 October 2018 to request further information regarding these aircraft and flights, but has not received a response at the time of writing. On 1 October 2018 and 21 October 2018, the manager of Skiva Air Ltd and South Airlines Co responded promptly to requests for information issued by CAR on 18 September 2018 and 5 October 2018. These responses stated that: 1) Skiva Air LLC and South Airlines LLC are separate companies registered in Armenia; 2) South Airlines Co and Skiva Air LTD are separate companies co-located in the Sharjah International Airport Free Zone and share common management; 3) South Airlines Co is registered in the Sharjah International Airport Free Zone and in the Seychelles; 4) the manager of Skiva Air Ltd and South Airlines Co additionally founded Skiva Air LLC and remains as one of its shareholders; 5) this individual insists that he was never involved in the management or operation of Skiva Air LLC, or in the operation or commercial loading of aircraft registered as being operated by Skiva Air LLC (including An-32 EK-32109, An-26 EK-26310 and An-74 EK-74052); 6) contrary to the allegations of UN Security Council investigators, Armenian aircraft operated by South Airlines Co and predecessor

company V-Berd Avia never delivered weapons, personnel and other military equipment in violation of any UN arms embargoes, including those on Somalia, Darfur and Libya; and 7) during UN inspections relating to these allegations, this individual provided UN investigators with all necessary evidence regarding the cargo transported at that time.

- 176 On 17 September 2018, Geleon Trade Avia, responded promptly to a request for information issued by CAR on 10 September 2018. This response confirmed that Eagle Enterprise Ltd operates the aircraft EK-74052 on a wet lease contract. Geleon Trade Avia included a copy of the cargo documentation, detailing requests for air cargo security clearance, delivery orders and delivery notes, prepared by Dar Petroleum Operating Company for three flights from Juba to Paloch on 3, 7 and 10 February 2017 in its response to CAR. CAR attempted to contact DPOC, but none of the contact details listed online, or on the documentation provided by Geleon Trade Avia and Eagle Enterprise Ltd, were operational.
- 177 On 21 September 2018, Eagle Enterprise Ltd responded promptly to a request for information from CAR on 20 September 2018. This response stated that; 1) Eagle Enterprise Ltd is a cargo company that has worked in South Sudan for five years; 2) Eagle Enterprise Ltd works with Dar Petroleum Operating Company (DPOC), which contracts Eagle to transport foodstuffs and light equipment to Paloch twice-weekly; 3) on 3 February 2017, the flight to Paloch also carried 758kg of spare parts, comprising batteries, tyres, shock absorbers and diesel filters loaded by DPOC; 4) at the time, Eagle Enterprise Ltd was not aware that this equipment was for the military; 5) Eagle Enterprise Ltd never carries weapons, ammunition or military personnel; 6) Eagle Enterprise Ltd has never been party to the conflict, and works with UN agencies and NGOs. Eagle Enterprise Ltd included a copy of the cargo documentation, detailing requests for air cargo security clearance, delivery orders and delivery notes, prepared by Dar Petroleum Operating Company for three flights from Juba to Paloch on 3, 7 and 10 February 2017 in its response to CAR.
- 178 Delivery note for a cargo flight on 3 February 2017, prepared by DPOC, on file.
- 179 On 20 September 2018, CAR wrote to DPOC requesting further information about this flight. CAR has not received any response to date. The US government placed DPOC on the Bureau of Industry and Security's 'Entity List' on 22 March 2018 for allegedly being 'involved in activities that are contrary to the foreign policy interests of the United States'. This listing imposes a licensing requirement for US entities or individuals to supply items subject to the Export Administration Regulations with a 'presumption of denial' (USDOC BIS, 2018, p. 12475).
- 180 Flight records from a confidential aviation source, on file.
- 181 Ilyushin (n.d.).
- 182 Photographs from a confidential source, on file; CAR observations of aircraft; communications with air traffic control, from a confidential source, on file. The aircraft also carried a small 'Rescue Air' logo near its nose. CAR has been unable to identify this entity or company.
- 183 Summary of communications with air traffic control, from a confidential source, on file. The aircraft departed Juba at 11:32 using call sign TXC5641, and declared 'about 400' persons on board.
- 184 Ruby Star is headquartered in Minsk and may therefore have stopped there for crew change or maintenance, rather than necessarily to load cargo.
- 185 Photographic evidence and reports from a confidential source, Juba, December 2014.
- 186 Email correspondence between the negotiators, January 2016 (precise date withheld), on file.
- 187 CAR observations, Somalia, 2015–17; Kenya Civil Aviation Authority aircraft register, 2013, on file.
- 188 Articles of association for Brighton Ventures LLC, from Maryland company registry, on file. Brighton Ventures LLC's stated purpose in its articles of association is to 'lease, own, hold, operate, manage, maintain, improve, repair, sell, sublease, finance and refinance commercial aircraft'.
- 189 Draft aircraft operation agreement, from a confidential source, on file.
- 190 Kenyan company registration document for Brighton Freedom Air Ltd, on file; articles of association for Brighton Ventures LLC, from the Maryland company registry (Maryland Business Express, n.d.).
- 191 Draft aircraft sale and purchase agreement, from a confidential source, on file.

- 192 The documents CAR has obtained do not list bank account details of the parties.
- 193 SPOC operates oil Block 5A (Thar Jath) in central Unity state. The area has changed hands several times between SPLA-IO and government forces during the current conflict.
- 194 Email correspondence between negotiators, January 2016 (precise date withheld), on file.
- 195 Full document from a confidential source, on file.
- 196 The US government placed SPOC on the Bureau of Industry and Security's 'Entity List' on 22 March 2018 for allegedly being 'involved in activities that are contrary to the foreign policy interests of the United States'. This listing imposes a licensing requirement for US entities or individuals to supply items subject to the Export Administration Regulations, which include various kinds of aircraft, with a 'presumption of denial' (USDOC BIS, 2018, p. 12475).
- 197 Reuters (2014a ; 2014b); UNSC (2014b, para. 68, annexes 5.2, 6.4).

REFERENCES

- AFP (Agence France-Presse). 2016. 'Israeli Arms "Helping to Fuel South Sudan War", Says UN.' 20 October. <<https://www.timesofisrael.com/israeli-arms-helping-to-fuel-south-sudan-war-says-un/>>
- AI (Amnesty International). 2017. *From London to Juba: A UK-Registered Company's Role in One of the Largest Arms Deals to South Sudan*. ACT 30/7115/2017 of 25 September. <<https://www.amnesty.org/en/documents/act30/7115/2017/en/>>
- Barigaba, Julius. 2013. 'Uganda Now Steps In, Sends Troops to South Sudan.' *East African*. 21 December. <<https://reliefweb.int/report/south-sudan-republic/uganda-now-steps-sends-troops-south-sudan>>
- Bivol. 2017. 'Risky Shipment of Bulgarian Weapons for Uganda Might Reach South Sudan'. 26 August. <<https://bivol.bg/en/risky-shipment-of-bulgarian-weapons-for-uganda-might-reach-south-sudan.html>>
- CA and CAR (Control Arms and Conflict Armament Research). 2015. *ATT Monitor: Arms Transfers to South Sudan—Case Study 1*. August. <https://armstreatymonitor.org/fr/wp-content/uploads/2015/08/ATT_ENGLISH_South-Sudan-Case-Study.pdf>
- CAR (Conflict Armament Research). 2015. *Weapons and Ammunition Airdropped to SPLA-IO Forces in South Sudan*. June. <http://www.conflictarm.com/wp-content/uploads/2015/06/Weapons_and_ammunition_airdropped_to_SPLA-IO_forces_in_South_Sudan.pdf>
- . 2017a. *Sudanese Stockpiles and Regional Weapon Diversions*. May. <http://www.conflictarm.com/download-file/?report_id=2520&file_id=2526>
- . 2017b. *New Sudanese Weapons in Blue Nile State*. April. <<http://www.conflictarm.com/dispatches/new-sudanese-weapons-in-blue-nile-state/>>
- and Small Arms Survey. 2014. *Small Arms Ammunition Documented at Bentiu Mosque, May 2014*. 24 July. <<http://www.smallarmssurveysudan.org/fileadmin/docs/facts-figures/arms-ammunition-tracing-desk/HSBA-Tracing-Desk-Bentiu-July-2014.pdf>>
- Council of the EU (European Union). 2009. *User's Guide to Council Common Position 2008/944/CFSP Defining Common Rules Governing the Control of Exports of Military Technology and Equipment*. April. <<http://register.consilium.europa.eu/doc/srv?l=EN&f=ST%209241%202009%20INIT>>
- . 2011. Council Decision 2011/423/CFSP of 18 July 2011 Concerning Restrictive Measures against Sudan and South Sudan and Repealing Common Position 2005/411/CFSP. *Official Journal of the European Union*, L 188/20. 19 July. <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0423>>
- . 2016. *Seventeenth Annual Report according to Article 8(2) of Council Common Position 2008/944/CFSP Defining Common Rules Governing Control of Exports of Military Technology and Equipment*. *Official Journal of the European Union*, 2016/C 163/01. 4 May. <http://publications.europa.eu/resource/cellar/25534a47-11bf-11e6-ba9a-01aa75ed71a1.0006.03/DOC_1>
- . 2017. *Eighteenth Annual Report according to Article 8(2) of Council Common Position 2008/944/CFSP Defining Common Rules Governing the Control of Exports of Military Technology and Equipment*. *Official Journal of the European Union*, 2017/C 153/01. 16 May. <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52017XG0516%2801%29>>

- . 2018. *Working Party on Public International Law (COJUR) Report on the EU Guidelines on Promoting Compliance with International Humanitarian Law, July 2016–June 2017*. April. <<http://www.consilium.europa.eu/media/34129/ihl-report-april-2018.pdf>>
- Craze, Joshua and Jérôme Tubiana. 2016. *A State of Disunity: Conflict Dynamics in Unity State, South Sudan, 2013–15*. HSBA Working Paper No. 42. Geneva: Small Arms Survey. December.
- CTSamm (Ceasefire and Transitional Security Arrangements Monitoring Mechanism). 2018. *CTSamm Report 2018/29: Violations in Western Equatoria State*. 26 July. <http://jmecsouthsudan.org/index.php/reports/ctsamm-violation-reports/106-ctsamm-report-2018-29-violations-in-western-equatoria-state/file>
- DSECU (State Service of Export Control of Ukraine). n.d. *Інформація про обсяги міжнародних передач окремих категорій озброєнь, здійснених Україною у 2015 році*. <http://www.dsecu.gov.ua/control/uk/publish/article?jsessionid=E898F1542910A71CD1A66398EECAA35?art_id=49055&cat_id=49054>
- EU (European Union). 2011. 'Declaration by the High Representative on Behalf of the European Union on the Alignment of Certain Third Countries with the Council Decision 2011/423/CFSP Concerning Restrictive Measures against Sudan and South Sudan and Repealing Common Position 2005/411/CFSP' 11 August. https://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/cfsp/124233.pdf
- Gramizzi, Claudio. 2013. *At an Impasse: The Conflict in Blue Nile*. HSBA Working Paper No. 31. Geneva: Small Arms Survey. December. <<http://www.smallarmssurveysudan.org/fileadmin/docs/working-papers/HSBA-WP31-Blue-Nile.pdf>>
- , Michael Lewis, and Jérôme Tubiana. 2012. 'Letter Dated 24 January 2012 from Former Members of the Panel of Experts on the Sudan Established Pursuant to Resolution 1591 (2005) and Renewed Pursuant to Resolution 1954 (2010) Addressed to the Chairman of the Security Council Committee Established Pursuant to Resolution 1591 (2005) Concerning the Sudan.' 24 January. <https://www.icc-cpi.int/RelatedRecords/CR2012_07641.PDF>
- Gramizzi, Claudio and Jérôme Tubiana. 2013. *New War, Old Enemies: Conflict Dynamics in South Kordofan*. HSBA Working Paper No. 29. Geneva: Small Arms Survey. March. <<http://www.smallarmssurveysudan.org/fileadmin/docs/working-papers/HSBA-WP29-S.Kordofan.pdf>>
- Gridneff, Ilya. 2014a. 'China Sells South Sudan Arms as Its Government Talks Peace.' Bloomberg Business. 9 July. <<https://www.bloomberg.com/news/articles/2014-07-08/norinco-sells-south-sudan-arms-as-chinese-government-talks-peace>>
- . 2014b. 'China Halts Arms Sales to South Sudan after Norinco Shipment.' Bloomberg Business. 30 September. <<https://www.bloomberg.com/news/articles/2014-09-29/china-halts-weapons-sales-to-south-sudan-after-norinco-shipment>>
- ICIJ (International Consortium of Investigative Journalists). n.d. Offshore Leaks Database. Accessed 26 June 2018. <<https://offshoreleaks.ijc.org/nodes/12190550>>
- IGAD (Intergovernmental Authority on Development). 2015. Agreement on the Resolution of the Conflict in the Republic of South Sudan. <<http://jmecsouthsudan.org/index.php/arcss-2015/full-agreement/59-arcss-signed-text/file>>
- Ilyushin. n.d. 'For Operators: Airworthiness.' Accessed 26 June 2018. <www.ilyushin.org/en/airworthiness/>
- KEA (Kampala Executive Aviation). n.d. 'Fleet.' <<http://flykea.com/#fleet>>
- Maryland Business Express. n.d. 'Business Entity Search.' Accessed 25 September 2018. <<https://egov.maryland.gov/businessexpress/entitysearch>>

Nyamilepedia. 2016. 'Breaking: Fighting in South Sudan Capital.' 6 July. <www.nyamile.com/2016/07/07/breaking-fighting-in-south-sudan-capital/>

OECD (Organisation for Economic Co-operation and Development). 2015. *Supplementary Peer Review Report—Phase 2: Implementation of the Standard in Practice, Seychelles*. Paris: OECD. October. <<https://www.oecd.org/tax/transparency/seychelles-supplementary.pdf>>

PPDA (Public Procurement and Disposal of Public Assets Authority). n.d. 'Organisation Details: Bosasy Logistics Ltd.' Accessed 4 June 2018. <<https://www.ppdaproviders.ug/index.php?page=yprov&sl=4&tgt=5&aph=B&sn=allproviders&sp=allsectors&st=&tp=v&id=10566>>

Ravid, Barak. 2016. 'Israel Told UN It Was Not Selling Lethal Weapons to South Sudan.' Haaretz. 14 January. <<https://www.haaretz.com/israel-news/.premium-israel-told-un-it-was-not-selling-lethal-weapons-to-south-sudan-1.5390399>>

Reuters. 2014a. 'Exclusive: U.N. Monitors Allege "Conspiracy" to Divert Somali Assets.' 16 July.

—. 2014b. 'Adviser to Somalia's President Linked to Arms Trafficking to al-Shabaab Terror Group.' 14 October.

Seychelles. 2013. Financial Services Authority Act, 2013. <[https://seylli.org/sc/sc/legislation/Act 19 of 2013 Financial Services Authority Act%20 2013.pdf](https://seylli.org/sc/sc/legislation/Act%2013.pdf)>

Sirovy, Jiri. 2011. 'L-39 UGANDA.wmv.' 11 May. Posted on YouTube 10 June 2011. Accessed 11 June 2018. <<https://www.youtube.com/watch?v=TtgqEGFWauk>>

Small Arms Survey. 2013. *Weapons and Ammunition of Returning SSLA Forces, Mayom, Unity State, May 2013*. May. <<http://www.smallarmssurveysudan.org/fileadmin/docs/facts-figures/arms-ammunition-tracing-desk/HSBA-Tracing-Desk-SSLA-July-2013.pdf>>

Sudan Tribune. 2014. 'South Sudan and Uganda Sign Military Cooperation Deal.' 15 October. <http://www.sudantribune.com/spip.php?iframe&page=imprimable&id_article=52727>

—. 2015. 'Claims China Shipping Lethal Weapons to Juba via Ethiopia.' 29 March. <<https://sudantribune.com/spip.php?article54439>>

—. 2018. 'Ethiopia Releases Detained General from SPLA-IO—Taban Gai.' 27 January. <<http://www.sudantribune.com/spip.php?article64585>>

UNGA (United Nations General Assembly). 2015. *United Nations Register of Conventional Arms: Report of the Secretary-General*. A/70/168 of 22 July. <<http://undocs.org/A/70/168>>

UNIAN (Ukrainian Independent Information Agency of News). 2017. 'Турчинов відреагував на повідомлення про нібито про постачання зброї з України до Південного Судану.' 28 September. <<https://www.unian.ua/politics/2159659-turchinov-vidreaguvav-na-povidomlennya-pro-nibito-pro-postachannya-zbroji-z-ukrajini-do-pivdennogo-sudanu.html>>

UNSC (United Nations Security Council). 2001. *Report of the Panel of Experts Pursuant to Security Council Resolution 1343 (2001), Paragraph 19, Concerning Liberia*. S/2001/1015 of 26 October. <<http://undocs.org/en/S/2001/1015>>

—. 2011. *Report of the Monitoring Group on Somalia and Eritrea Pursuant to Security Council Resolution 1916 (2010)*. S/2011/433 of 20 June. <<https://undocs.org/S/2011/433>>

—. 2013. *Final Report of the Panel of Experts Established Pursuant to Resolution 1973 (2011) Concerning Libya*. S/2013/99 of 15 February. <<https://undocs.org/S/2013/99>>

- . 2014a. *Final Report of the Panel of Experts Established Pursuant to Resolution 1973 (2011) Concerning Libya*. S/2014/106 of 15 February. <<https://undocs.org/S/2014/106>>
- . 2014b. *Report of the Monitoring Group on Somalia and Eritrea Pursuant to Security Council Resolution 2111 (2013): Somalia*. S/2014/726 of 19 September. <<https://undocs.org/S/2014/726>>
- . 2015. Resolution 2206 (2015). S/RES/2206 (2015) of 3 March. <[www.un.org/ga/search/view_doc.asp?symbol=S/RES/2206 \(2015\)](http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2206(2015))>
- . 2016a. *Final Report of the Panel of Experts on South Sudan Established Pursuant to Security Council Resolution 2206 (2015)*. S/2016/70 of 22 January. <<https://undocs.org/S/2016/70>>
- . 2016b. *Interim Report of the Panel of Experts on South Sudan Established Pursuant to Security Council Resolution 2206 (2015)*. S/2016/963 of 15 November. <<https://undocs.org/S/2016/963>>
- . 2017. *Final Report of the Panel of Experts on South Sudan*. S/2017/326 of 13 April. <<https://undocs.org/S/2017/326>>
- . 2018a. *Final Report of the Panel of Experts on South Sudan*. S/2018/292 of 12 April. <<https://undocs.org/S/2018/292>>
- . 2018b. Resolution 2428 (2018). S/RES/2428 of 13 July. <[http://undocs.org/S/RES/2428\(2018\)](http://undocs.org/S/RES/2428(2018))>
- URSB (Uganda Registration Services Bureau). n.d. 'Business Registration System: Name Search.' Accessed 25 September 2018. <<https://brs.ursb.go.ug/brs/pro/brn/searchname>>
- US (United States). n.d. Code of Federal Regulations, Title 22. <<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=70e390c181ea17f847fa696c47e3140a&mc=true&r=PART&n=pt22.1.127>>
- USDOC BIS (United States Department of Commerce Bureau of Industry and Security). 2018. Addition of Certain Persons to the Entity List and Removal of Certain Persons from the Entity List. Federal Register, Vol. 83, No. 56. 22 March. <<https://www.bis.doc.gov/index.php/documents/regulations-docs/federal-register-notice/federal-register-2018/2201-83-fr-12475/file>>
- USDOS (United States Department of State). 2008. *Report by the Department of State Pursuant to Section 655 of the Foreign Assistance Act of 1961, as Amended: Direct Commercial Sales Authorizations for Fiscal Year 2008*. <https://www.sipri.org/sites/default/files/research/armaments/transfers/transparency/national_reports/united_states/US_655_FY2008.pdf>
- . 2009. *Report by the Department of State Pursuant to Section 655 of the Foreign Assistance Act of 1961, as Amended: Direct Commercial Sales Authorizations for Fiscal Year 2009*. <https://www.sipri.org/sites/default/files/research/armaments/transfers/transparency/national_reports/united_states/US_655_FY2009.pdf>

ABBREVIATIONS

AFRICOM	United States Africa Command	JSC	Joint stock company
AISR	Airborne intelligence, surveillance, and reconnaissance	LLC	Limited liability company
AK	Avtomat Kalashnikova [Kalashnikov automatic rifle]	Ltd	Limited
API	Armour-piercing incendiary	MANPADS	Man-portable air defence system
API-T	Armour-piercing incendiary tracer	MOD	Ministry of Defence
AP-T	Armour-piercing tracer	MODVA	Ministry of Defence and Veterans' Affairs
ARCSS	Agreement on the Resolution of the Conflict in the Republic of South Sudan	NGO	Non-governmental organisation
AT	Anti-tank	Norinco	China North Industries Corporation
ATGW	Anti-tank guided weapon	NSS	National Security Service
BIEM	Bulgarian Industrial Engineering and Management	PKM	Pulemyot Kalashnikova Modernizirovanniy [modernised Kalashnikov machine-gun]
BM	Boyevaya mashina [combat vehicle]	POC	Protection of civilians
CAR	Conflict Armament Research	S.A.	Sociedad anónima [anonymous company]
DAI	Diamond Aircraft Industries	s.à.r.l.	Société à responsabilité limitée [limited liability company]
DPOC	Dar Petroleum Operating Company	SPLA	Sudan People's Liberation Army
DRC	Democratic Republic of the Congo	SPLA-IO	Sudan People's Liberation Army-in-Opposition
DSHKM	Degtyaryova-Shpagina Krupnokaliberny Modernizirovanniy [large-calibre modernised Degtyaryov-Shpagin]	SPLA-N	Sudan People's Liberation Army-North
DVC	Delivery verification certificate	SPOC	Sudd Petroleum Operating Company
EU	European Union	Spol. s.r.o.	Spoločnosť s ručením obmedzeným [limited liability company]
EUC	End-user certificate	SSDM/A	South Sudan Democratic Movement/Army
FAA	Federal Aviation Administration	SSLA	South Sudan Liberation Army
FAT	Field acceptance tests	SSNLM	South Sudan National Liberation Movement
GPS	Global Positioning System	SSPPF	South Sudan People's Patriotic Front
HAEI	Homicho Ammunition Engineering Industry	SSWS	South Sudan Wildlife Service
HE-I	High-explosive incendiary	UAE	United Arab Emirates
HLSEC	Harbin Longjiang Special Equipment Company	UK	United Kingdom
IIC	International import certificate	UN	United Nations
Inc	Incorporated	UPDF	Uganda People's Defence Forces
ISB	Internal Security Bureau	URN	Unique reference number
ISR	Intelligence, surveillance, and reconnaissance	US	United States
JEM	Justice and Equality Movement	USD	United States dollar

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