FRONTLINE PERSPECTIVE

ILLICIT WEAPONS IN AFGHANISTAN

– ISSUE 03 –

Taliban exploitation of commercial supply lines for thermal imaging sights

February 2023

INTRODUCTION

The Taliban's ability to access and deploy night vision equipment was a significant force multiplier in the years prior to the group's takeover of Afghanistan in August 2021. Reports that the group might have night vision capabilities began to emerge between 2014 and 2017, a period during which the number of Taliban night-time attacks more than doubled (Gibbons-Neff, 2018). By 2019, UN monitors assessed that the Taliban had access to as many as one device for every 10 to 16 fighters and warned that the group's use of night vision in attacks against isolated checkpoints was a key factor in the collapse of government control, particularly in remote and rural areas (UN, 2019, paras. 10, 84).

Night vision equipment includes a range of imaging systems that enable humans to see in low- or no-light conditions. These devices include monoculars, binoculars, goggles, and weapon sights. They can

Conflict Armament Research (CAR) is an independent investigative organisation based in the UK. Established in 2011, CAR documents weapons, ammunition, and related military materiel in conflict zones, and traces chains of supply to identify points of diversion.

Between February 2019 and July 2021, CAR investigators worked in Afghanistan to document illicit weapons in the country. CAR's Afghanistan data set comprises some 1,600 small arms and light weapons, more than 1,300 rounds of ammunition, and dozens of related items, such as night vision equipment, riflescopes, and components for improvised explosive devices (IEDs). In this Frontline Perspective series, CAR explores the supply dynamics that have sustained and supported armed groups in Afghanistan over the past few years.

Left: A CAR investigator assessing captured weapons prior to documentation at an ANA storage facility in Helmand Province in March 2021.

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be handheld, fitted to a weapon or headgear, or mounted on a platform or vehicle. Night vision equipment is commonly classified as sensitive technology, although related export controls vary by country and device type.[1]

International security forces strictly controlled the provision of night vision equipment to the Afghan National Defence and Security Forces (ANDSF). This technology was largely restricted to elite Afghan forces rather than regular ANDSF units, and night vision equipment distributed in Afghanistan was generally subject to enhanced end-use monitoring.[2] In view of such strict controls, the Taliban appear to have exploited commercial supply chains to procure night vision-capable devices.

Conflict Armament Research (CAR) has been documenting and tracing illicit weapons, ammunition, and related military materiel in Afghanistan since 2019. This Frontline Perspective—the third in a series from CAR's field operations in Afghanistan—reports on two commercial supply lines through which the Taliban sought to procure thermal imaging weapon sights. These sights, manufactured in the past five years, were commercially available in the United States and the United Arab Emirates (UAE). CAR is grateful to the manufacturer of the thermal sights, Yukon Advanced Optics Worldwide, for its cooperation in the identification of these two supply chains and for providing supporting documentation.[3] CAR has documented other weapon sights and optical devices in Afghanistan and is actively investigating the provenance of these items.

THE TALIBAN APPEAR TO HAVE EXPLOITED COMMERCIAL SUPPLY CHAINS TO ACCESS NIGHT VISION EQUIPMENT.

Representatives of the former ANDSF on deployment in Maidan Wardak province, 08 April 2020.

NIGHT VISION END-USE CONTROLS IN AFGHANISTAN

The Combined Security Transition Command–Afghanistan (CSTC-A) first supplied units of the Afghan National Army (ANA) with night vision devices in July 2007. (Figure 1) Initially, these devices were issued without end-use controls; CSTC-A only began to monitor the end use of night vision devices 15 months later, in October 2008 (GAO, 2009). In June 2012, the US Department of Defense (DOD) Office of Inspector General found evidence that hundreds of serial numbers for night vision devices provided to the ANDSF were missing from inventory management databases. Its investigation assessed that the absence of adequate controls to implement existing accountability procedures was making night vision devices more vulnerable to diversion (DODIG, 2012).

Concerns about the possible diversion and proliferation of night vision devices in Afghanistan led international security forces to introduce tighter control measures. The CSTC-A instituted a physical security and accountability Night Vision Device Control Plan in Afghanistan and established a formal enhanced end-use monitoring programme for night vision equipment supplied to the ANDSF (USDOD, 2020). These controls were more stringent than those applied to the provision of conventional weapons and ammunition (CAR, 2021). Under enhanced end-use monitoring procedures, DOD personnel are required to assess the physical security of the facilities in which devices are being stored and to verify the serial numbers of 100 per cent of transferred devices on an annual basis.[4] Between May 2019 and April 2020, night vision devices made up 87 per cent of the 12,681 items that required enhanced end-use monitoring in Afghanistan (SIGAR, 2020, p. 6). Despite the restrictive distribution of night vision devices in Afghanistan and increased efforts to ensure their safeguarding, however, these items remained susceptible to diversion through loss or capture. In financial year 2019, for example, CSTC-A recorded 72 night vision devices captured in combat, including 19 that were subject to enhanced end-use monitoring (SIGAR, 2020, table 3).

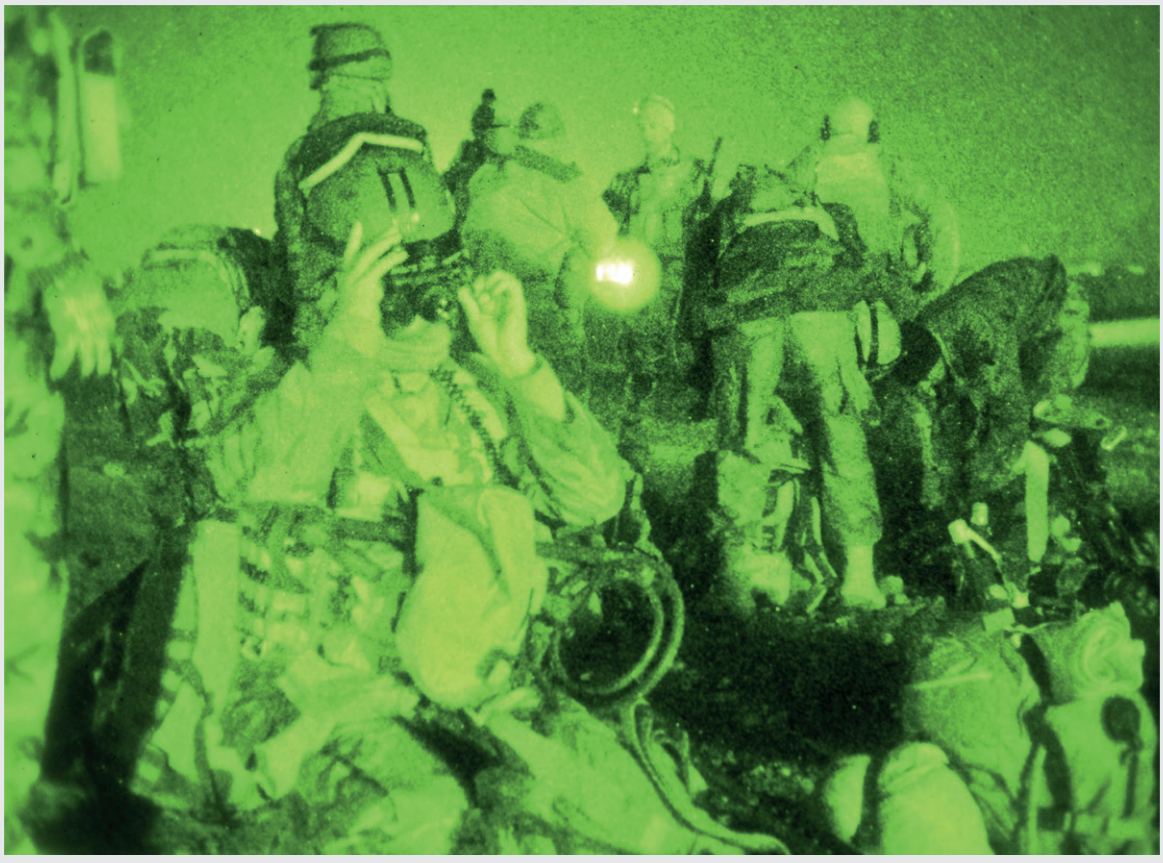


Figure 1

An Afghan Soldier with 3rd Commando Kandak makes adjustments to his mounted night vision device before conducting an operation in Kandahar province on 14 November 2010. © U.S. Army photo by Spc. Daniel P. Shook

INVESTIGATING COMMERCIAL SUPPLY CHAINS

CASE 1: SOLD ON AMAZON AND SMUGGLED INTO AFGHANISTAN

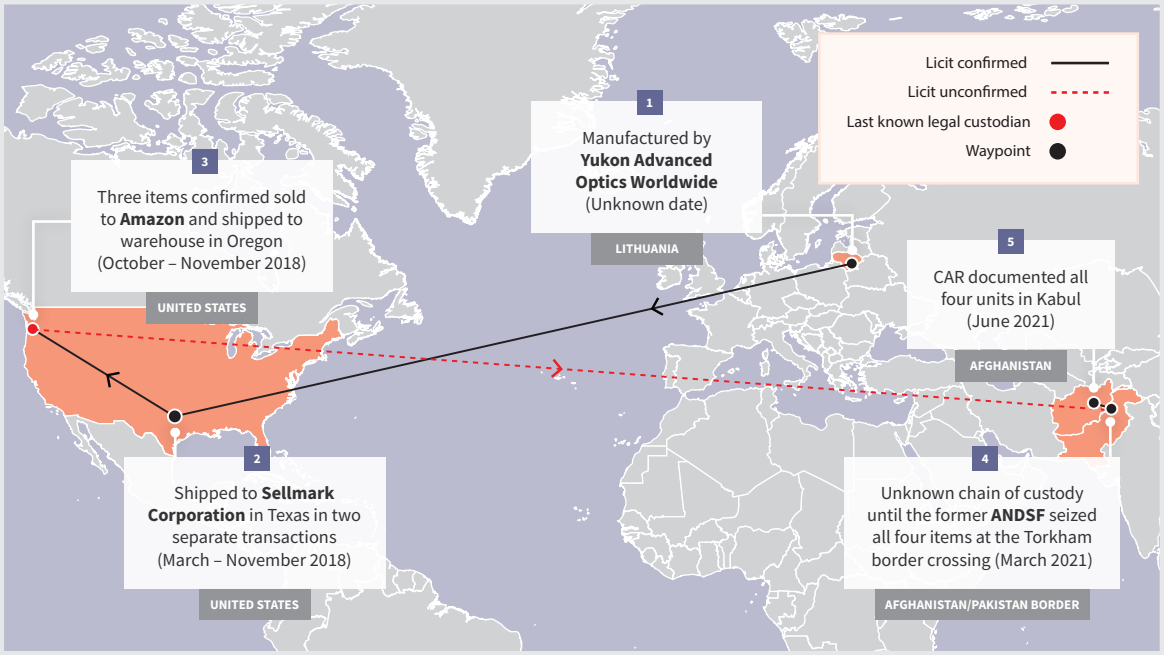
On 28 June 2021, CAR investigators documented six rifle sights that had been seized by Afghanistan's National Directorate of Security (NDS) in March of that year. The NDS reportedly recovered the sights from a truck as it made its way across the Torkham border crossing from Pakistan into Afghanistan. The seizure included four PULSAR Trail XQ50 thermal sights (see Figure 2, and Figures 4-7 (pages 7-8)). CAR is investigating the origin and supply chains of the other two rifle sights in this seizure.

The PULSAR Trail XQ50 is a thermal imaging sight advertised by the manufacturer for use in hunting. It is equipped with a built-in video recorder and a highly sensitive thermal imaging sensor that can detect heat signatures up to 1.8 km away (PULSAR, n.d.c). Thermal imaging sights differ from traditional night vision technology in that they do not require any light to function. Instead, thermal imaging devices 'use heat-detection technology to enhance the visibility of heat-emitting objects in the dark' (USDC CACD, 2021, para. 6). Reporting suggests that the ANDSF were not using PULSAR thermal optics (Vining and Richter, 2018).

Figure 2

Four Pulsar Trail XQ50 thermal sights, seized in March 2021 by the former ANDSF at the Torkham border crossing on entrance into Afghanistan.

Documented by CAR in Kabul on 28 June 2021.



Map 1

Supply of PULSAR Trail XQ50 thermal sights via the United States to Pakistan.

Since 2009, PULSAR has been a registered trademark for products developed by Yukon Advanced Optics Worldwide, a company headquartered in Lithuania. On 10 July 2021, the company responded to CAR's trace requests regarding all four PULSAR units that the NDS intercepted crossing the Torkham border into Afghanistan. Yukon's response states that it sold the units to a US distributor called Sellmark Corporation. The sights were shipped in separate transactions: two on 30 March 2018, one on 5 October 2018, and the final one on 19 November 2018.[5]

Sellmark Corporation, based in Mansfield, Texas, specialises in the marketing and sale of a variety of night vision optics, laser sights, and tactical and thermal scopes, as well as first-aid and camping gear (Sellmark, n.d.). Yukon's tracing response to CAR notes that Sellmark sold three of the units to Amazon on 15 October 2018 and 19 November 2018, and that Sellmark shipped them to Amazon's warehouse in Troutdale, Oregon. Yukon was not able to provide CAR with information on the onward transfer of the fourth item after its initial shipment to Sellmark on 30 March 2018.

Amazon has not responded to a trace request from CAR for information about the onward sale of the three units sold by Sellmark.[6] Night vision devices are widely available for sale online. Amazon permits the sale of night vision rifle scopes on its US platform but notes that these are 'subject to geographical sales restrictions' (Figure 3) (Amazon Seller Central, n.d.). An advertisement for a PULSAR Trail LRF thermal sight listed on the platform warns: 'This product is controlled for export and in-country transfers under the authority of the International Traffic in Arms Regulations (ITAR). Diversion contrary to U.S. law prohibited' (Amazon, n.d.b). Without Amazon's assistance, CAR is not able to determine the identity or number of purchasers for the three PULSAR Trail XQ50 thermal sights that Sellmark Corporation sold to Amazon, nor whether the consignee or consignees were based in the United States.[7]

AMAZON PERMITS THE SALE OF NIGHT VISION RIFLE SCOPES ON ITS US PLATFORM BUT NOTES THAT THESE ARE 'SUBJECT TO GEOGRAPHICAL SALES RESTRICTIONS'.

Yukon's own restriction policy, available online, specifies that the company 'does not develop solutions and/or products for the military industry,

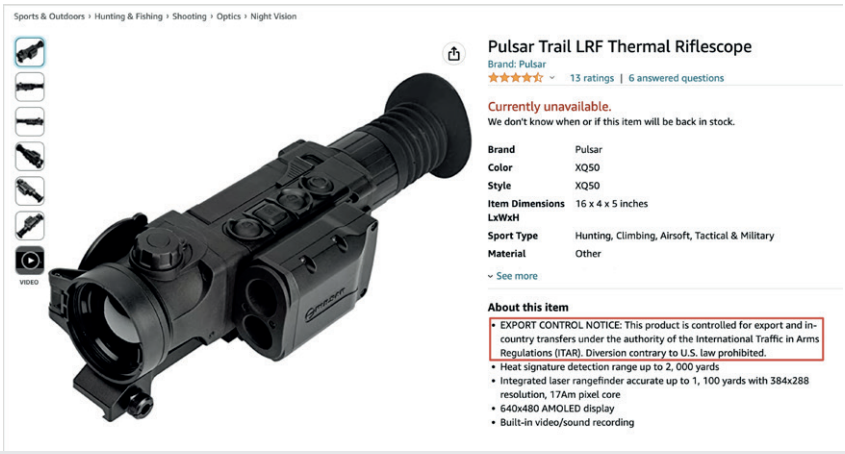


Figure 3

A Pulsar sight advertised for sale on Amazon.com. Note the Export Control Notice clearly indicated, advising that this is a controlled product and that diversion is prohibited.

Accessed by CAR on 6 June 2022.

does not provide them for military applications, and none of the Company's products meet military standards'. It also specifies that most of the digital and thermal devices produced by the company require a special export control licence for transfer, including within the European Union (PULSAR, n.d.a). A previous version of the company's website referred to the performance of its second- and third-generation night vision riflescopes as 'on the same level of devices used by the military' (PULSAR, n.d.b).

The United States requires licences for exports of most night-vision equipment. These devices and components are controlled items, falling either under the ITAR US Munitions List or the Commerce Control List, depending on the item's technical specifications, its intended destination, and its intended end user or end use.[8] With very few exceptions, items not covered by the ITAR are subject to the Export Administration Regulations and would require a licence through the Bureau of Industry and Security at the US Department of Commerce (USDOS, 2016). On 20 July 2017 the Directorate of Defense Trade Controls issued a determination that designated a number of weapon sights as defence articles. This included Trail XQ50 sights with the part number PL 76503Q.[9]

The US Department of State amended the ITAR in 2016 as part of efforts to clarify which items warranted inclusion in the US Munitions List. Category XII of the revised list – which entered into force on 31 December 2016 – introduces a new concept, explicitly controlling items that are specially designed for a military end user.[10] In introducing this definition for certain types of night vision equipment, the Department of State acknowledged that controls based on the intent of the designer are more difficult to implement than those based on technical parameters, and that 'the Department cannot yet articulate objective technical criteria that would establish a bright line between military and commercial and civil systems' (USDOS, 2016).[11]

A caché of weapons recovered by the former ANDSF in Logar province, 25 June 2019.

Figure 4

A PULSAR Trail XQ50 thermal sight with the serial number 9025621, sold to Amazon on 15 October 2018 and seized by NDS at the Torkham border crossing with Pakistan in March 2021

Figure 5

A PULSAR Trail XQ50 thermal sight with the serial number 9025451, sold to Amazon on 15 October 2018 and seized by NDS at the Torkham border crossing with Pakistan in March 2021.

Figure 6

A PULSAR Trail XQ50 thermal sight with the serial number 9032474, sold to Amazon on 19 November 2018 and seized by NDS at the Torkham border crossing with Pakistan in March 2021.

Figure 7

A PULSAR Trail XQ50 thermal sight with the serial number 9012188, sold to Sellmark Corporation on 30 March 2018 and seized by NDS at the Torkham border crossing with Pakistan in March 2021.

CASE 2: SOLD BY A COMMERCIAL RETAILER

In January 2020, Afghan National Army forces seized a PULSAR Trail XQ50 thermal sight from the Taliban in Ghazni province, Afghanistan. The ANA shared photographs of the item with CAR for tracing purposes on 18 January 2020 (see Figure 8).

Figure 8

A PULSAR Trail XQ50 thermal sight with the serial number 9013831, seized by the ANA from the Taliban in Ghazni province in January 2020

In December 2020, ANA forces seized a second PULSAR Trail XQ50 thermal sight from the Taliban in Pashtun Kot, Faryab province, Afghanistan. The ANA shared photographs of the item with CAR as well, on 8 April 2021 (Figure 9).

Figure 9

A PULSAR Trail XQ50 thermal sight with the serial number 9007698, seized by the ANA from the Taliban in Pashtun Kot, Faryab province, in December 2020.

Polaris Vision Systems EU Ltd, a UK-based division of Yukon Advanced Optics Worldwide, manufactured both of the PULSAR Trail XQ50 sights that CAR traced on behalf of the ANA. Polaris responded promptly to CAR's trace requests for these two sights and confirmed that it had sold both in 2018, as a part of a larger order for 20 units, to LightSpeed General Trading LLC, a company based in Dubai, United Arab Emirates.[12] Polaris provided CAR with documentation relating to this transfer, including the relevant export licence and an invoice for the sale.

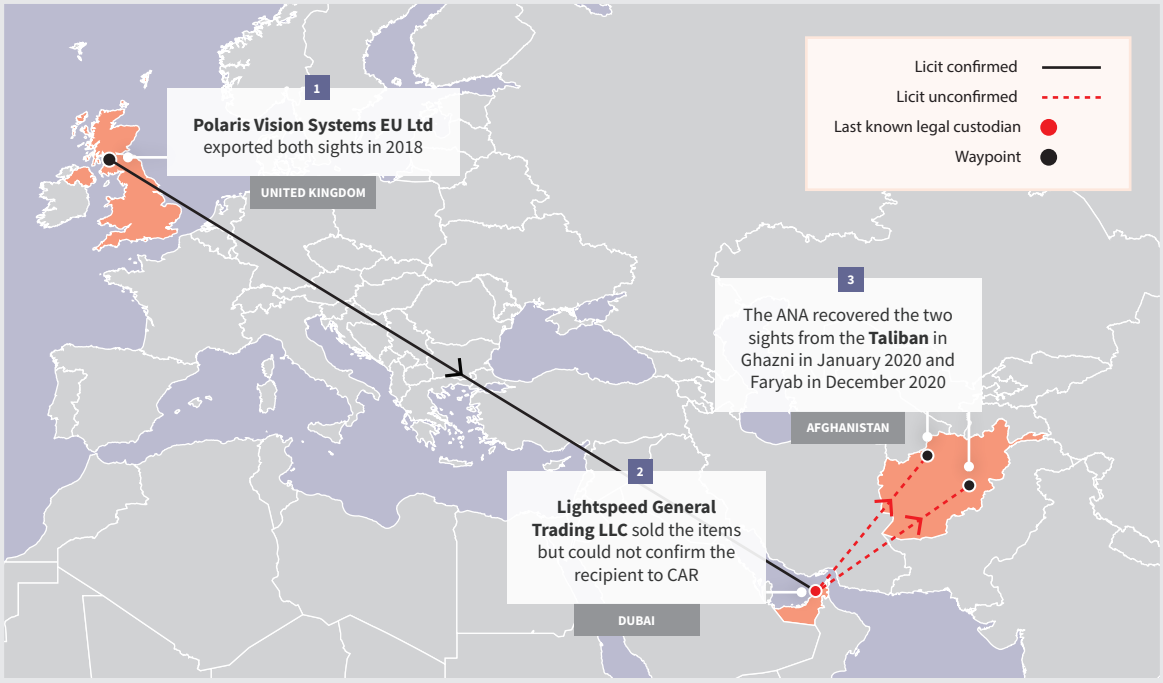
Polaris exported these sights under a standard individual export licence issued in November 2017 by the UK Department for International Trade (Map 2).[13] This licence permitted Polaris Vision Systems EU Ltd to export 75 PULSAR Trail XQ50 rifle sights to LightSpeed, as well as 24 riflescopes of other models, 25 other thermal imaging scopes, and 15 thermal imaging binoculars.[14] UK records released to CAR show that Polaris received four other export licences during 2017 for exports of products to the UAE. The records do not show which specific items, or which purchasers, were covered under these licences.[15]

The export licence and invoice for the two PULSAR Trail XQ50 sights classified the devices as 'Military List' items falling under category ML1d.

This category includes 'optical weapons sights with electronic image processing' designed for military-list small arms, and 'optical weapons sights specially designed for military use'.[16] The licence does not list the serial numbers of the sights to be exported.

LightSpeed is a retailer of telescopes, optical devices, electronics, and cell phone accessories. The export licence that Polaris provided to CAR lists 'LightSpeed General Trading Co., LLC' as both the consignee—the first recipient of the goods—and as the end user of the items. CAR has observed this practice of identifying commercial retailers or distributors as both consignee and end user in relation to transfers of items that were subsequently diverted (CAR, 2019). Yukon Advanced Optics Worldwide informed CAR that it requires its customers to obtain export licences from relevant authorities in the countries in which they are located prior to any re-export of this type of material. Yukon provided CAR with a caution notice that LightSpeed issued to its customers to inform them that purchases of some PULSAR-branded goods might require export licences.

CAR interviews with LightSpeed employees indicate that the company typically does not keep large quantities of night vision devices in stock and that it specially orders these items on request.[17]



Map 2

Supply of PULSAR Trail XQ50 thermal sights from the UK via the UAE

LightSpeed was unable to confirm any further details on the onward sale of these items, however. The company informed CAR that it does not keep records of items sold by serial number and that purchasers typically pay for these items in cash.[18]

CAR submitted a trace request to UAE authorities to determine whether these sights had been exported under licence and, if so, whether authorities had records of this particular sale. At the time of writing, CAR had not received a response.[19]

Polaris reported that in view of CAR's investigations, it had suspended further shipments of night vision devices to LightSpeed and had notified the UK Department for International Trade regarding the seizure of the two thermal sights from the Taliban in Afghanistan.[20]

The fact that the ANA recovered two sights that formed part of the same initial sale suggests that the items may have been diverted by the same purchaser. Without records to confirm the onward sale from LightSpeed, however, CAR is unable to determine at which point the items were diverted.

CONCLUSION

CAR's investigations demonstrate that the Taliban were able to exploit the widespread commercial availability of night vision equipment to procure sensitive thermal imaging sights. In each case detailed in this Frontline Perspective, diversion of these devices occurred within a relatively short time frame following initial production and export. Sights exported from Lithuania in 2018 were recovered at the Afghan border with Pakistan in June 2021. Separately, two sights that the ANA recovered from Taliban fighters in January and December 2020 were originally shipped from the UK in November 2017.

Night vision devices and components that meet military standards are classified as among the most sensitive types of military equipment and require special control measures when transferred from government to government. However, night vision devices that fall short of this threshold, although they provide similar capabilities, are widely available including for purchase online or through commercial retailers. As the Taliban demonstrated, these devices can be a battlefield game changer, eroding the comparative military advantage that national and international security forces in Afghanistan sought to maintain (UNSC, 2019). Despite enhanced monitoring efforts, a small amount of the night vision equipment that US forces supplied to the ANDSF was diverted. A key factor that allowed the Taliban access to night vision devices, however, was the group's ability to exploit available commercial supply chains.

POLARIS REPORTED THAT, IN VIEW OF CAR'S INVESTIGATIONS, IT HAD SUSPENDED FURTHER SHIPMENTS OF NIGHT VISION DEVICES TO LIGHTSPEED AND HAD NOTIFIED AUTHORITIES IN THE UK.

Seized weapons laid out for documentation at a former ANSDF facility in Kabul, 25 September 2019.

Illicit weapons and accessories recovered by the former ANDSF, 20 April 2019.

CAR's investigation into two different cases in which the Taliban acquired, or sought to acquire, thermal imaging sights point to similar issues regarding the safeguarding of such sensitive items. In each supply chain, manufacturers and retailers reportedly advertised or acknowledged that the sights available for sale would require an export licence. In both cases, and in the absence of further responses to trace requests, CAR has so far been unable to determine whether the items in question were in fact exported under licence from either the United States or the UAE. Either way, the controls that were in place proved ultimately unsuccessful in preventing the Taliban from accessing the technology. In the second case detailed in this Frontline Perspective, the export licence did not identify serial numbers, nor did the manufacturer provide them to the retailer. Although the retailer stated that night vision devices were relatively atypical items that were often ordered on request, it did not keep records of the transactions. For an exporting authority or company, such practices can complicate the re-export monitoring of transferred devices.

The picture in Afghanistan itself has changed enormously since the Taliban takeover of 2021. Commercial supply lines may no longer be as relevant to the Taliban since their wholesale capture of military equipment during the collapse of government control. The supply chain vulnerabilities such as those identified in this Frontline Perspective may equally be at risk of exploitation by other armed groups and terrorist networks. Both military and dual-use night vision devices offer capabilities that significantly enhance night-time attack capabilities. By exploiting alternative commercial supply lines to access similar capabilities, illicit actors may undermine even enhanced efforts to monitor the end use of sensitive equipment provided through government-to-government transfers.

COMMERCIAL SUPPLY LINES MAY NO LONGER BE AS RELEVANT TO THE TALIBAN SINCE THEIR WHOLESALE CAPTURE OF MILITARY EQUIPMENT DURING THE COLLAPSE OF GOVERNMENT CONTROL.

LIST OF ABBREVIATIONS

ANA	Afghan National Army
ANDSF	Afghan National Defence and Security Forces
CAR	Conflict Armament Research
CSTC-A	Combined Security Transition Command–Afghanistan
DOD	United States Department of Defense
ITAR	International Traffic in Arms Regulations
ND	National Directorate of Security
nm	Nanometre
UAE	United Arab Emirates

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ENDNOTES

1 Most export control regimes do not provide distinct definitions or classifications of night vision devices, such that these items may fall under different classifications. The Wassenaar Arrangement, for example, classifies certain devices on its export control list for dual-use goods and technologies, including under Category 6.A.2 (optical sensors). Other devices may qualify as military items under Munitions List 15 (imaging or countermeasure equipment), while weapon sights more broadly—including those utilising night vision technology—could be controlled through Munitions List 1d, which includes optical weapon sights with electronic image processing.

2 For example, the Special Mission Wing—a special operations aviation unit that conducted counterterrorism and counternarcotics missions in Afghanistan—was the only ANDSF unit with night vision and rotary-wing air assault capabilities (USDOD, 2019, pp. 67–68). Other Afghan units known to have been supplied with night vision include Afghan special forces and commandos (Trevithick, 2019). US forces in Afghanistan transferred a total 3,779 night vision devices to the ANDSF in financial years 2017–20 (SIGAR, 2020).

3 In addition to promptly responding to CAR's trace requests, representatives of Yukon Advanced Optics Worldwide also invited CAR to supply the PULSAR sights documented in Afghanistan in order for the company to retrieve any video or sound files that may have been stored on the devices.

4 As security conditions deteriorated, CSTC-A struggled to implement enhanced end-use monitoring requirements for night vision devices. To respond to the operational challenges, it modified several

policies, making some devices subject only to routine rather than enhanced measures, and allowing ANDSF reports to supplement CSTC-A's inventories and inspections (SIGAR, 2020, p. 7).

5 On 10 July 2021, Yukon Advanced Optics Worldwide responded to a formal trace request issued by CAR on 30 June 2021. This response confirms that: 1) Yukon Advanced Optics Worldwide shipped the PULSAR Trail XQ50 Thermal sight, bearing the serial number 9025621, the subject of CAR's trace request, to Sellmark Corporation on 5 October 2018; and 2) Sellmark Corporation sold the item to Amazon (Amazon.comdedc LLC #9908523, 1250 NW Swigert Way, Troutdate, Oregon 97060) on 15 October 2018.

On 10 July 2021, Yukon Advanced Optics Worldwide responded to a formal trace request issued by CAR on 30 June 2021. This response confirms that: 1) Yukon Advanced Optics Worldwide shipped the PULSAR Trail XQ50 Thermal sight, bearing the serial number 9025451, the subject of CAR's trace request, to Sellmark Corporation on 5 October 2018; and 2) Sellmark Corporation sold the item to Amazon (Amazon.comdedc LLC #9908523, 1250 NW Swigert Way, Troutdate, Oregon 97060) on 15 October 2018.

On 10 July 2021, Yukon Advanced Optics Worldwide responded to a formal trace request issued by CAR on 30 June 2021. This response confirms that: 1) Yukon Advanced Optics Worldwide shipped the PULSAR Trail XQ50 Thermal sight, bearing the serial number 9032474, the subject of CAR's trace request, to Sellmark Corporation on 19 November 2018; and 2) Sellmark Corporation sold the item to Amazon (Amazon.comdedc LLC #9908523, 1250 NW Swigert Way, Troutdate, Oregon 97060) on 19 November 2018.

On 10 July 2021, Yukon Advanced Optics Worldwide responded to a formal trace request issued by CAR on 30 June 2021. This response confirms that: 1) Yukon Advanced Optics Worldwide shipped the PULSAR Trail XQ50 Thermal sight, bearing the serial number 9012188, the subject of CAR's trace request, to Sellmark Corporation on 30 March 2018; and 2) Yukon Advanced Optics Worldwide were unable to locate any further information on the transfer of the item.

6 Amazon's website states: 'Amazon does not disclose customer information in response to government demands unless we're required to do so to comply with a legally valid and binding order' (Amazon, n.d.a).

7 On 30 July 2021, CAR submitted trace requests to Amazon regarding these items. At the time of writing, CAR had not received a response. Given the absence of a trace response, CAR cannot assess the legality of the transfer/s in question.

8 For night vision devices and components requiring a US State Department export licence, see USDOS (2016). For night vision sights requiring a US Commerce Department licence under some circumstances, see BIS (2022).

9 See "CJ Final Determination Listing" Directorate of Defense Trade Controls, 27 June 2022. https://www.pmddtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=6ea6afdcdbc36300529d368d7c96194b

10 The definition for 'military end user' is taken from the US Export Administration Regulations (15 CFR 744.21(g)): 'the national armed services, national guard, national police, government intelligence or reconnaissance organizations, or any person or entity whose actions or functions are intended to support military end uses. An item is specially designed for a military end user if it was developed for use by a military end user or users. If an item is developed for both military and non-military end users, or if the item was created for no specific end user, then it is not specially designed for a military end user. Contemporaneous documents are required to support the design intent; otherwise, use by a military end user establishes that the item is specially designed for a military end user' (USDOS, 2016).

11 This statement is relevant for some night vision devices, namely binoculars, binoculars, monoculars, goggles, and head- or helmet-mounted imaging systems, covered in Category XII(c)(1) of the US Munitions List. Night vision weapon sights included in Category XII(c)(2) are defined by their technical characteristics (US, n.d.).

12 On 29 January 2020, Polaris Vision Systems EU Ltd responded to a formal trace request issued by CAR on 27 January 2020. This response confirms that: 1) Polaris Vision Systems EU Ltd manufactured the TRAIL XQ50 thermal imaging sight bearing the serial number '9013831'; 2) Polaris Vision Systems EU Ltd sold the item to LightSpeed (P.O. Box. 81748 MAI Tower, Suite 1012 – 1013, Al Nahda, Dubai, United Arab Emirates), the distributor of Polaris Vision Systems outdoor sports products in the UAE, under export

license number GBSIE2017/11724; and 3) United Parcel Service exported the item as part of a larger order of 20 Trail XQ50 thermal imaging sights (tracking number: 1Z0217X10493174137). Polaris Vision Systems EU Ltd included a copy of the stock list undertaking form, export license, invoice and a spreadsheet listing the thermal rifle scopes supplied to LightSpeed by model, quantity, and serial number in its response to CAR.

On 10 May 2021, Polaris Vision Systems EU Ltd responded to a formal trace request issued by CAR on 6 May 2021. This response confirms that: 1) Polaris Vision Systems EU Ltd manufactured the TRAIL XQ50 thermal imaging sight bearing the serial number '9007698'; 2) Polaris Vision Systems EU Ltd sold the item to LightSpeed (P.O. Box. 81748 MAI Tower, Suite 1012 – 1013, Al Nahda, Dubai, United Arab Emirates), the distributor of Polaris Vision Systems outdoor sports products in the UAE, under export license number GBSIE2017/11724; and 3) United Parcel Service exported the item as part of a larger order of 14 Trail XQ50 thermal imaging sights (tracking number: 1Z0217X10493174137). Polaris Vision Systems EU Ltd included a copy of the export license and invoice in its response to CAR.

13 UK export licence on file with CAR.

14 UK Standard Individual Export Licence No. GBSIE2017/11724, provided to CAR by Polaris Vision Systems EU Ltd, on file with CAR.

15 Correspondence from the UK Department of International Trade to CAR, 9 August 2021 and 10 September 2021, on file with CAR.

16 UK Standard Individual Export Licence No. GBSIE2017/11724, provided to CAR by Polaris Vision Systems EU Ltd, on file with CAR. See also Schedule 2 of the UK's Export Control Order 2008 (DFID, 2021).

17 CAR interview with LightSpeed General Trading, LLC. Contemporaneous notes on file with CAR.

18 On 7 July 2021, LightSpeed responded to a formal trace request issued by CAR on 15 May 2020. This response confirms that: 1) LightSpeed received 72 units of the TRAIL XQ50 Thermal sight bearing the part number 76503, from Polaris Vision Systems EU Ltd. under export license number GBSIE2017/11724, in five shipments; 2) LightSpeed does not retain its sales records by serial number, as this information is not provided by the manufacturer or exporter of this material, and is therefore unable to confirm if their company sold the TRAIL XQ50 Thermal sight bearing the serial number ''9013831';', the subject of CAR's trace request; 3) the item is a commercial product, which is often sold over the counter for cash; 4) LightSpeed retains sales records in compliance with the United Arab Emirates VAT process and keeps complete records for restricted products (when this information is provided by the manufacturer or exporter); 5) LightSpeed does not keep large quantities of PULSAR products in stock; 6) LightSpeed started selling PULSAR products in 2005 and have not deviated from their terms of contract or agreement during this time period; and 7) LightSpeed has never sold any products directly to entities based in Afghanistan. LightSpeed included a copy of the export display notice in its response to CAR.

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19 On 25 August 2020, CAR submitted a trace request to the Government of the UAE regarding this item. At the time of writing, CAR had not received a response.

20 CAR correspondence with Polaris, on file with CAR.

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