
Two Sides of the Same Coin? The Legal and Illegal Trade in Small Arms

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The illegal guns that are touted by thugs, rebels, and paramilitaries across the globe were once manufactured—and often sold—perfectly legally. This article investigates the distinction between the legal and illegal trade in small arms and light weapons¹ and outlines some of the methods that are used to perpetrate illegal arms sales and some of the methods used to divert arms from legal control.

The Scope of the Legal Trade in Small Arms

A number of estimates, ranging from \$3–10 billion, have been produced as to the annual value of the legal trade in small arms.² The Small Arms Survey has estimated that the figure is approximately \$4–6 billion.³ Every state not under an international embargo has the right to purchase arms. All of these states have police and/or military forces, and in most cases, civilians also have the right to own firearms. The Norwegian Initiative on Small Arms Transfers (NISAT) database of small arms transfers⁴ has registered small arms imports by 194 countries. Thus, the legal trade in small arms is indeed global.

The Mechanics of Legal Transfers

At present, there are no legally binding international treaties governing how legal arms transfers should be conducted.⁵ The current system of export licensing

is based upon national legislation and is therefore somewhat uneven. For example, the British government can grant companies an Open Individual Export License that is valid for two years and covers unlimited shipments of specified goods to specific customers.⁶ In contrast, South African arms exporting companies are required to apply for separate licenses before signing each sales contract. In addition, South Africa requires licenses to market and ultimately export military equipment.⁷

The only general observation that can be made is that commercial arms exports are licensed by the government of the exporting state, and that before issuing a license, they require an end user certificate signed by a member of the government of the importing state. An end user certificate is a document that states the final user of the arms in question, though many countries also require it to state the use to which the weapons will be put before issuing an export license. There are, however, exemptions even to these principles—for example, exports of military equipment from Canada to the United States (the market for roughly half of Canada's military exports) do not require an export license.⁸ Furthermore, arms sales by governments generally do not require an export license—this is an important factor in gray market transfers (see below).

The one case where international law intrudes on the export of small arms is in the case of states or organizations that are subjects of arms embargoes, such as those initiated by the UN Security Council, the EU, and the OSCE. To enforce these edicts, states initiate their own national legislation making exports to embargoed destinations unlawful. For example, at the end of February 2002, the United Kingdom recognized international embargoes against 19 states, with a further embargo in force against “terrorists” throughout the world.⁹ In addition, the United Kingdom has initiated unilateral export restrictions against 32 states, some of which are also subject to international sanctions.

There are numerous international regimes governing the export of various types of arms and technology that could be used to make weapons of mass destruction difficult if not impossible,¹⁰ including the Missile Technology Control Regime (MTCR) or the Nuclear Suppliers Group. However, no such international regime applies to the trade in small arms.

The recently negotiated UN Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components, and Ammunition, introduced some minimum standards for the legal trade in small arms.¹¹ As of March 2002, the protocol had not been ratified by any of the signatory states. The most important part of the protocol pertains to the transit system. Governments are required to exchange documents whenever an arms shipment leaves, transits, or arrives in their territory.¹² This process creates a chain of documentary evidence that makes diverting arms for illegal purposes more difficult and assists police forces investigating such diversions. Linked to this

regime is a requirement for firearms to be indelibly marked at the time of manufacture and import. The protocol also introduced requirements for states to criminalize transgressions of this regime and for governments to keep comprehensive records on the trade in firearms.

Other documentation in addition to export licenses and end user certificates is generally required to cover the details of the transaction. The requirement for these documents will differ according to the various national legislations involved and the complexity of the deal. Examples include:

- Invoices: specifying the goods shipped, price, and terms of sale;
- Letters of Credit: addressed to a bank stipulating that a certain sum shall be paid under clearly stated conditions;
- Air Waybills: a contract between a shipper and carrier(s) for the transport of goods by air;
- Customs Entries: a declaration form required for customs clearance.
- Delivery Receipts: signed by the purchaser confirming that the goods have been delivered;
- Flight Plans: showing the intended route of an aircraft;
- Shipper's Certificates for dangerous goods: a statement by the shipper that the consignment conforms to national and IATA regulations;
- Transfer Manifests: listing cargo transferred between carriers.

Depending upon national legislation and specific circumstances, falsification of these documents could be a criminal offence in itself, leaving the perpetrator liable to prosecution under laws covering air safety, fraud, or money laundering.

In addition to the above controls, scholars have also asserted that exports of arms could be in breach of developing areas of international jurisprudence, such as international humanitarian and human rights law. Emanuela-Chira Gillard has written that there may be circumstances in which a state has a "secondary" responsibility for violations committed by another state.¹³ This concept would clearly cover the deliberate sale of arms to states that then used them to commit "wrongful acts" such as genocide.

Such a principle has, at best, an ambiguous position in international law, however. It has not been codified in a fully ratified international treaty. Furthermore, the majority of states do not have national legislation that expressly prohibits sales to certain types of regimes.¹⁴

One international initiative that has attempted to govern the conduct of arms exporting states is the EU Code of Conduct on Arms Transfers. The Code contains two important elements: the first, that states consult and inform each other when making license decisions. This measure is designed to ensure that if an export license is denied by one state, it will also be denied by the

others—thus ensuring that purchasers cannot keep reapplying to different EU governments until they receive a license. The second measure is a non-binding code of conduct in which EU member states agree not to export arms according to eight criteria, including the risk that the arms could be used in human rights abuses, prolong armed conflict, or disturb regional peace and security.¹⁵ Thirteen other European states have also committed themselves to be bound by the principles of the Code, though they do not partake in the consultative mechanism.¹⁶

While the information-sharing regime is valuable, the Code's eight criteria are merely guidelines that are not legally binding and can be interpreted by the members as they wish. The principle that each export be judged individually is a further weakness. States have excused exports to repressive regimes by stating that they have received assurances that the particular arms would not be used to violate human rights.¹⁷ The weakness of the EU Code has been summed up by one scholar as “well-intentioned legislative feebleness.”¹⁸

The Scope of the Illicit Trade in Small Arms

The illegality and accompanying secrecy surrounding the illicit trade in small arms makes accurately assessing the trade's precise value impossible. Estimates of the size of the illicit trade have ranged from 10-20 percent to 55 percent of the legal trade;¹⁹ the figure of 10-20 percent is probably more realistic.²⁰ Although

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the illegal trade has much greater transport costs, the weapons tend to be sold in smaller quantities. Illegal weapons are often second hand and therefore cheaper than new weapons bought via the legal trade; a Croatian defense minister complained that prices in the legal

market were three times higher than the illegal market.²¹ Therefore, the annual value of the illicit arms trade is unlikely to be more than \$1 billion.²² Illegal weapons are used by criminals and groups engaged in conflict around the world.

Defining the Illegal Market

A 1996 UN report²³ provides a useful definition of the illicit trade in arms as being “that international trade in conventional arms, which is contrary to the laws of States and/or international law.” An illicit arms transfer would necessarily breach international law; the laws of the exporting, transit, and/or importing states; or a combination of these laws. While they have been criticized

Two Sides of the Same Coin? The Legal and Illegal Trade in Small Arms

as being weak, the many legal instruments described above do ensure that, at the very least, arms shipments have the consent of the exporting and importing states and do not break international embargoes.

In addition to having to circumvent the licensing process of the exporting government, and in many cases the border controls of the importer, an illegal arms deal requires a considerable degree of additional—and fraudulent—deception. A raft of additional documentation (see above) is required to facilitate an international transfer. Bryan Johnson-Thomas has written this narrative of an illegal arms deal (provided by a pilot called “Bob”):

The standard operating procedure, said Bob, was to leave Bratislava at night with a full load of green boxes and in possession of a flight plan, manifests, and other paperwork all pointing to N’Djamena, in Chad. Every cargo, in theory, was destined for the Defence Ministry of the Republic of Chad—a country not under any kind of arms embargo and thus free to buy weapons from any source whatsoever.

The aircraft did not, of course, fly to N’Djamena on any of the ten flights that Bob had made so far. The flight plan to Chad was an elaborate fiction, and all the green boxes were instead delivered to Colonel Omar of the High Tech Group in Khartoum, Sudan ...

Paper by paper, line by line, Bob led me through the labyrinth of documentation exposing—and it’s easy once you know the tricks—the inconsistencies and downright impossibilities buried in a heap of apparently mutually self supporting paperwork.²⁴

The illegal trade in small arms can further be divided into two overlapping categories: the gray market and the black market. While formally breaking state and international laws, gray market transfers are conducted by—or with the complicity of—national governments. Black market transfers, in contrast, operate beyond governments’ knowledge or control.

The Scope of the Gray Market

The Cold War was the heyday of gray market arms transfers. The superpowers, their allies, and China delivered arms to rebel and insurgent groups involved in conflicts throughout the world. The full extent of the Cold War gray market will probably never be known. Significant supplies of arms were sent by the Soviet Union to groups in Ethiopia, Angola, Namibia, Mozambique, South Africa, Western Sahara, and to the PLO. The United States sold arms to groups in Afghanistan, Angola, Nicaragua, and Cambodia.²⁵ Both superpowers attempted to subvert the global influence of the other by clandestinely arming the enemies of their enemies.

Such gray sales by the United States ranged from being approved by Congress—in the case of aid to the *mujahideen* in Afghanistan—to the Iran-Contra affair, which was initiated by government employees but was otherwise

illegal under U.S. statutes. The sums involved in these operations were immense. For example, between 1979 and 1989, the CIA covertly channeled between \$2 billion worth of aid to the *mujabideen*. An insider described the supply network used to disguise the source of the arms:

The great bulk came from China, Egypt, and later on from Israel. I had no idea that Israel was a source until quite recently, as, had it been known, there would have been considerable trouble with the Arab nations ... These were weapons that had been captured in large quantities during Israel's invasion of Lebanon and which they were delighted to sell.²⁶

Gray market sales have not ended with the Cold War. Post-Cold War U.S. transfers have been made to groups in Northern Iraq opposed to Saddam Hussein, and they have returned to Afghanistan after 11 September to supply the Northern Alliance forces fighting the Taliban. A number of other governments have been implicated in attempts to destabilize foreign countries through the transfer of small arms: NATO member states equipping and training the Kosovo Liberation Army prior to, and during, the 1999 bombing campaign; support for the Kurds in Turkey by Russia, Greece, Syria, and Armenia; Turkish support for Chechen guerillas; Pakistani aid to Kashmiri militants; French government support for the ex-armed forces of Rwanda and the *Interhamwe* militia; Ugandan support for groups in Sudan; and Sudanese support for groups in Northern Uganda.²⁷ One particularly interesting case is the Iranian supply of weapons to the government of Bosnia-Herzegovina while Bosnia was under a Security Council embargo. The United States, which was engaged in policing the embargo, knew about these supplies but did not intervene, as it wished to support the beleaguered government in Sarajevo.²⁸

The Mechanics of a Gray Market Sale

One good example of the ambiguous legality of gray market sales lies in a British company's sale of arms to Sierra Leone.²⁹ In May 1997, President Kabbah and his government were exiled from Sierra Leone following a coup that installed a military junta. The following October, the United Nations Security Council passed a Resolution (which had been proposed by the United Kingdom) imposing an arms embargo on Sierra Leone. The United Kingdom then made it a criminal offence for any British citizen to supply arms to anyone in, or connected with, Sierra Leone.

In December 1997, Tim Spicer—the British head of Sandline International, a private, U.K.-based military company—was approached by a group of investors with mining interests in Sierra Leone. They had lost their concessions in the coup, and were willing to finance military aid to Kabbah.

Spicer then met with Kabbah and signed a contract to provide him with supplies of arms and other military aid in order to support his return to power. Fulfilling their terms of the contract, Sandline facilitated a shipment of 2,500 assault rifles, 180 rocket launchers, 50 machine guns and ammunition to Sierra Leone in late February 1998.

In early 1998, British customs officials began an investigation into the arms deal, which was a direct breach of the international embargo, British national legislation, and the ECOWAS moratorium on arms transfers into West Africa.³⁰ It turned out, however, that Spicer had had a series of meetings with British officials in which he had kept the British government fully informed of his activities. He had even shown the British High Commissioner³¹ Peter Penfold the contract with Kabbah hours after it had been signed; he subsequently received Penfold's blessing and encouragement. British customs, when they started their investigation, had not been aware of his contacts with the Foreign Office.

In May 1998, it was announced Spicer would not be prosecuted, despite his clear breach of British law, as his contacts with the government weakened the legal case and that a prosecution "in any event would not be in the public interest."³² In this case, government complicity mitigated against the illegality of the act, placing it in a gray area between illegality and prosecution.

The Scope of the Black Market

The black market constitutes transfers of illicit arms that are conducted by private individuals, criminal organizations, or non-state actors such as rebel groups; often, all three groups will be involved at once. As black market arms are used by groups or individuals deemed to be illegal under national or international law, the arms will likely be used in "unacceptable acts" such as genocide, armed conflict, human rights abuses, or organized crime.

Small arms are lightweight, easy to conceal, can be used immediately by the purchaser, and can be recycled around the world's conflicts. These attributes, together with the illegal uses to which they are put, make them very attractive cargoes for smugglers. Once arms have entered the black market, they are effectively beyond government control and can be re-exported to other illegal clients throughout the weapon's lifetime.

Almost all firearms in the black market were originally manufactured under government control, came from military stockpiles, or were bought from licensed gun dealers.³³ The black market is ultimately sustained by the relatively easy access to legal weapons. Diversion from legal control to the illegal markets occurs through a number of methods:³⁴

- The gray market: once an insurgent group has been supplied with weapons, the supplier state has no control over where they will go next;
- Violations of the export licensing system, such as providing a forged end user certificate;
- Theft from military arsenals, which is often carried out by military personnel for financial gain;
- Battlefield recoveries of firearms after combat;
- Purchases from legal gun shops by civilians that are then resold to others.

The Mechanics of Black Market Deals

One well-documented example of an illegal deal came to light in 1989 after Colombian police raided the home of drug baron Gonzalo Rorríguez Gacha and discovered 232 Galil assault rifles that were made by the Israeli firm IMI. According to a study by a U.S. Senate subcommittee, the rifles were exported to Antigua and then diverted to Colombia. The deal had been initiated by an Israeli named Yair Klein, who had investigated the establishment of a “survival school” in Antigua that would train its clients in the use of firearms. Though the school was never started, the project did allow Yair to make a number of important contacts in Antigua. One of his new friends was Maurice Sarafti, a failed Antiguan melon farmer, whose contacts included cabinet minister and brother to the president, Vere Bird Jr.

A meeting between an IMI agent and the head of the Antiguan Defence Forces was arranged soon after IMI received an Antiguan Government order for 500 rifles plus ammunition, a letter authorizing Sarafti to represent the Antiguan

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government, and an end user certificate purportedly signed by Vere Bird Jr.³⁵ As the deal was apparently legal, the goods sailed aboard the *Elise Thusen* on 28 March 1989. Once in Antigua, a container loaded with the guns was transferred onto a second ship called the *Seapoint*. The *Seapoint* sailed toward Ila

Fuerte, an island not far from the border between Panama and Colombia, where she rendezvoused with a private yacht. The arms were unloaded a second time and made their way to Rodríguez Gacha in Medellín.

An account of how weapons are diverted from the legal civilian market was provided by Comandante Marcos,³⁶ one of the leaders of the Zapatista Arms of National Liberation (ZALN) that was involved in the 1994 armed

uprising in the Mexican state of Chiapas.³⁷ He stated that the most common method of acquiring arms was via the *hormiga* (ant) run from the United States to Mexico. “Straw men” would make legal arms purchases in gun shops in El Paso and other U.S. cities and pass them on to illegal dealers or smugglers. The weapons, in small numbers, would then be carried in the luggage of people walking across the border, or hidden inside private vehicles.

The Role of Arms Brokers

As mentioned in the accounts in this article, organizing illegal arms sales—be they black or gray—involves a large amount of skill, organization, preparation, and financial resources. Documents need to be forged, officials bribed, legitimate arms companies persuaded to sell their weapons, money laundered, and aircrews recruited. As this process is illegal, there is no way that the knowledge and contacts required can be easily obtained. Brokers themselves generally do not take possession of the arms—they bring together the buyer and seller, and facilitate the deal.³⁸ According to the UN committee investigating sanctions breaking in Angola:

Landing heavy cargo planes with illicit cargoes in war conditions and breaking international embargoes such as the one on Angola requires more than individual effort. It takes an internationally organized network of individuals, well funded, well connected and well versed in brokering and logistics, with the ability to move illicit cargo around the world without raising the suspicions of the law or with the ability to deal with obstacles.³⁹

Arms brokers provide an essential facilitating role in supplying illegal groups with weapons—without their activities, this supply would be much more difficult. However, in most countries their activities, as they rarely come into physical contact with the weapons, are completely unregulated.⁴⁰

The Trade in Conflict Goods

It is unsurprising to note that the international networks used to smuggle conflict goods are also used to smuggle arms. The techniques used in both involve smuggling, false documentation, and money laundering.⁴¹ The techniques required to illegally supply arms are almost exactly the same as those required to dispose of conflict goods. The same person can supply weapons and facilitate their payment. When Leonid Minin—a major supplier of weapons to conflicts in Africa—was arrested in Italy, he was found in possession of twenty grams of cocaine, \$150,000 in cash, and half a million dollars worth of African diamonds. There was also a cache of 1,500 documents detailing Minin’s dealings in oil, timber, gems, and arms.⁴²

When conflict goods are sold by criminal organizations separate from the arms brokers, the link between the two is still clear.⁴³ The sale of conflict goods enables groups to purchase weapons that they otherwise could not afford. For example, the Revolutionary United Front in Sierra Leone earns at least \$30-50 million per year from diamond sales, which is then spent on importing arms.⁴⁴

Recommendations

Compliance—or not—with international and domestic laws defines the legal and illegal trade in small arms. Unfortunately, these legal controls are weak and weapons are too easily transferred from the legal trade to feed the black and gray markets.

Governments wishing to reduce the humanitarian consequences of small arms and light weapons need to take responsibility for their arms exports trade, and take action to prevent diversion from the legal market. They should take the following actions:

- First, sign and ratify the UN Firearms Protocol. While its provisions are limited, it does initiate a minimum international legal standard for trade in small arms.
- Second, introduce domestic legislation to control and register the activities of arms brokers.⁴⁵
- Third, provide transparent, timely, and comprehensive reports on their own legal arms exports, so that it is possible to quickly discern the legality, and source of, suspect arms shipments.⁴⁶
- Fourth, to desist, or at least reduce, their activities in the gray market, which provides a source for the black market, muddies the legal waters, potentially provides employment for arms brokers and smugglers, and feeds violent conflict. ❧

Notes

1. In this article the term “small arms” is used to cover all the weapons covered by the term “small arms and light weapons.” This article uses the definition found in “Report of the Panel of Governmental Experts on Small Arms,” UN document A/52/298: 11-12.

2. See “Legal Transfers” *Small Arms Survey 2001*, Oxford University Press, Oxford, 2001: 145 for a commentary on the various estimates. Also see *Small Arms And Light Weapons: General Facts* produced by the Small Arms Working Group available at <<http://fas.org/asmp/campaigns/smallarms/sawg/facts.htm>>.

3. “Legal Transfers” op. cit.

4. “Countries” should not be used synonymously with ‘states’ as the database registers exports to politically autonomous regions that fall short of statehood (such as Greenland). Information

Two Sides of the Same Coin? The Legal and Illegal Trade in Small Arms

from the NISAT online database of small arms transfers, regulations and production, available at <www.nisat.org>.

5. The UN Firearms Protocol is discussed below.

6. NISAT online database op. cit.

7. See <<http://www.mil.za/SecretaryforDefence/Frame/Frame.htm>> for a description of South Africa's conventional arms control procedures.

8. See "Export of Military Goods from Canada Annual Report 2000" Department of Foreign Affairs and International Trade, 2001. Available at <http://www.dfait-maeci.gc.ca/~eicb/export/milit_tech-e.htm>.

9. See "List of Sanctions Regimes & Arms Embargoes," *Export Control Organisation*, at <<http://files.fco.gov.uk/und/sanctions/list.pdf>>.

10. See the SIPRI's export control project at <<http://projects.sipri.se/expcon/expcon.htm>> for more information.

11. See <http://www.odccp.org/crime_cicp_signatures_firearms.html> for a copy of the protocol and a list of states that have signed and ratified it. The Protocol follows a similar initiative by the OAS called the *Inter-American Convention Against The Illicit Manufacturing Of And Trafficking In Firearms, Ammunition, Explosives, And Other Related Materials*, a copy of which is available at <http://www.defenselink.mil/acq/acic/treaties/small/oas/smallarms_oas_home.htm>.

12. See "The UN Firearms Protocol addressing the trafficking problem," *IJSS Strategic Comments* Volume 7 Issue 6, July 2001 available at <<http://www.ijss.org/mem/full/sc/01/sc0706un.pdf>> for more commentary on the protocol.

13. "Whats legal? Whats illegal?" by Emanuela-Chira Gillard in Lumpe ed. Lumpe ed. *Running Guns: the global black market in small arms*, Zed Books, London, 2000.

14. Finland and Sweden being notable examples. There have also been several unsuccessful attempts to introduce such legislation into the U.S. See NISAT online database op. cit.

15. NISAT online database op. cit.

16. They are Bulgaria, Cyprus, the Czech Republic, Estonia, Hungary, Iceland, Latvia, Lithuania, Norway, Poland, Romania, Slovakia, and Slovenia.

17. Haug, Langvandslien, Lumpe, and Marsh, *Shining a light on Small Arms Transfers the record of state transparency*, Small Arms Survey Occasional Paper 4, 2002.

18. Scott Jones "EU and U.S. Codes of Conduct on Arms Transfers: Status and Review," *The Monitor Nonproliferation, Demilitarization, and Arms Control*, Volume 4. No. 4, 1988: 26.

19. See "Illicit Transfers" op. cit: 167, and Susannah Dyer and Geraldine O'Callaghan *Combating Illicit Light Weapons Trafficking: Developments And Opportunities*, British American Security Information Council, London, 1998: 3.

20. Listed in "Illicit transfers" op. cit: 167.

21. RT Naylor, "Gunsmoke and mirrors: financing the illegal trade," *Running Guns: the global black market in small arms*, op. cit: 158.

22. See "Illicit Transfers" op. cit: 167.

23. *Report of the Disarmament Commission*, United Nations A/51/42, 1996, available at <<http://www.un.org/Depts/dda/CAB/rep5142.pdf>>.

24. Bryan Johnson-Thomas, "The anatomy of a shady deal" *Running Guns: the global black market in small arms*, op. cit: 20.

25. Lora Lumpe and Lucy Mathiak, "Government Gun-Running to Guerillas" in *Running Guns: the global black market in small arms*, op. cit. and Michael Klare and David Anderson *A scourge of guns: The diffusion of small arms and light weapons in Latin America*, Federation of American Scientists/ Arms Sales Monitoring Project, Washington, 1996.

26. Mohammad Yousaf and Mark Adkin, *The Bear Trap Afghanistan's Untold Story*, Afghan Books, available online in full at <<http://www.afghanbooks.com/index1.htm>>.

27. Information from "Government Gun-Running to Guerillas" op. cit: 67.

28. John Sislin and Fredrik Pearson, *Arms and Ethnic Conflict*, Rowman and Littlefield, Lanham, 2001: 40.
29. Thomas Legg KCB QC and Sir Robin Ibbs KBE, *Report Of The Sierra Leone Arms Investigation*, The Stationary Office, London, 1998.
30. For more information on the ECOWAS moratorium see the NISAT online database op. cit.
31. A position of equal rank to ambassador.
32. *Report Of The Sierra Leone Arms Investigation* op. cit: 2.
33. The one major area of illicit “home” production of firearms is in the Peshawar region of Pakistan.
34. Typology developed from “Global Small Arms Transfers: The Legal-Illicit Link” in *Small Arms Survey 2002*, Oxford University Press, Oxford, 2002.
35. Bird later maintained that the certificate was a forgery.
36. Marcos has since renounced gun running.
37. John Ross, *Rebellion from the Roots: Indian Uprising in Chiapas*, Common Courage Press, Monroe, 1995. Cited in *A scourge of guns The diffusion of small arms and light weapons in Latin America* op. cit: 62.
38. See Bryan Wood and John Peleman, *The Arms Fixers- controlling the brokers and shipping agents*, PRIO Report 3/99, 1999, (available via <www.nisat.org>) for a comprehensive coverage of the problem of arms broking.
39. *Final report of the Monitoring Mechanism on Angola Sanctions*, United Nations S/2000/1225, 2001: 32.
40. See *The Arms Fixers- controlling the brokers and shipping agents* for more information.
41. See *Combating Illicit Light Weapons Trafficking: Developments And Opportunities* op. cit: 5.
42. Ian Traynor, “The international dealers in death,” *The Guardian*, 9 July 2001.
43. As is the case with UNITA. See *Final report of the Monitoring Mechanism on Angola Sanctions* op. cit.
44. Cited in Eric Berman, *Re-armament in Sierra Leone: One Year After the Peace Process*, Small Arms Survey Occasional Paper No. 1, 2000: 15.
45. For more information see *The Arms Fixers- controlling the brokers and shipping agents* op. cit.
46. For more information see *Shining a light on Small Arms Transfers the record of state transparency* op. cit.