

NEW WEAPONS FUELING THE SUDAN CONFLICT

SUBTITLE: EXPANDING EXISTING ARMS EMBARGO ACROSS SUDAN TO PROTECT CIVILIANS

Executive summary

Since the escalation of the conflict in April 2023, Sudan has been engulfed in a massive human rights and humanitarian crisis. The fighting between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF) and their allies has killed over 16,650 people and displaced millions of others making Sudan the largest internal displacement crisis globally. All parties to the conflict are using a wide variety of arms to commit serious violations of international human rights and humanitarian law, in some instances amounting to war crimes and crimes against humanity.

This conflict is being fuelled by an almost unimpeded supply of weapons into Sudan by states and corporate actors around the world. Nearly all neighbouring countries are used by various armed groups and states as supply lines to transfer weapons into and around Sudan.

The response of the international community, and particularly the UN Security Council (UNSC), has been woefully inadequate. The current UN arms embargo is both too narrowly focused – covering only the Darfur region – and too poorly implemented to have any meaningful impact on curbing these weapons flows. It took almost a year for the UNSC to adopt a resolution calling for immediate cessation of hostilities and unhindered humanitarian access. Despite this, fighting continues across the country with no effective measures to end violations or protect civilians.

This report reveals the true extent of these failures: despite the mandatory UNSC embargo which has been in place for two decades, recently manufactured weapons and military equipment from countries such as Russia, China, Türkiye, and the United Arab Emirates (UAE) are being imported in large quantities into Sudan, and then diverted into Darfur. Weapons and ammunition are also being smuggled into the country directly through Darfur including after April 2023. An

assessment of visual evidence places some of these weapons directly in the hands of parties to the conflict who stand accused of serious human rights abuses.

The research has also identified recently-manufactured or recently-transferred small arms and ammunition from countries such as Serbia, Yemen, and China being used on the battlefield by various parties to the conflict. Advanced drone jammers, mortars and anti-materiel rifles manufactured in China have been used by both sides of the conflict, including in Darfur. A variety of recently-manufactured armoured personnel carriers from the UAE have been used by the RSF, also in Darfur. Shipment-level trade data indicates that hundreds of thousands of blank guns have been exported to Sudan in recent years, along with millions of blank cartridges; Amnesty International believes that these are being converted *en masse* into lethal weapons in Sudan.

One disturbing trend identified by Amnesty International is the diversion of small arms normally sold into the civilian market to government forces and armed opposition groups. Companies in Türkiye and in Russia have exported variants of small arms such as Tigr designated marksman rifles (DMR)s or Saiga-MK rifles, manufactured by Kalashnikov Concern and normally marketed to civilian gunowners, to arms dealers with strong links to the Sudanese Army. Türkiye's main weapons manufacturer, Sarsilmaz, supplies the Sudanese Armed Forces, while Turkish hunting shotguns and rifles normally made for the civilian market and manufactured by small companies like Derya Arms, BRG Defense or Dağlıoğlu Silah, largely escape export control regulations and have been exported *en masse* to Sudan in recent years. Both the Russian and Turkish arms are used by parties to the conflict.

The UN Security Council must take urgent measures to stop the flow of arms and protect civilians. The existing arms embargo that currently applies only to Darfur, and which is poorly implemented and frequently violated, is completely inadequate. Since its inception in 2004, Amnesty International has been urging the UNSC to expand the arms embargo regime to the rest of Sudan and to strengthen its monitoring and verification mechanisms. This call, given the escalating violence across the country, is now more urgent than ever. The expansion of the arms embargo must be adequately resourced to be able to effectively monitor and prevent international transfers and illicit diversion of arms to the country. It must cover the widest

possible scope of weapons to combat the widespread diversion of shotguns, hunting rifles, blank guns and related ammunition into the conflict.

Irrespective of whether the UNSC arms embargo is extended to cover the whole of Sudan, all states and corporate actors must immediately cease supplies of all arms and ammunition to Sudan. This includes the direct or indirect supply, sale or transfer of arms and military materiel, including related technologies, parts and components, technical assistance, training, financial or other assistance. States must also explicitly prohibit the transfer to Sudan of firearms marketed to civilians – such as shotguns or hunting rifles – which Amnesty International has repeatedly documented in the hands of parties to the conflict.

States parties to the Arms Trade Treaty, which include Serbia (since December 2014) and China (since October 2020) have a legal obligation not to authorize any transfer of conventional arms if they have knowledge at the time of authorization that the arms or items would be used in the commission of genocide, crimes against humanity or war crimes. States Parties must also conduct an objective and non-discriminatory assessment of all exports of conventional arms and deny export authorization if there is a substantial risk that the arms could be used to commit or facilitate a serious violation of international human rights or humanitarian law.

As a part of their obligation to respect and ensure respect for international humanitarian law (IHL), all states are prohibited from transferring or permitting private actors to transfer weapons to a party to an armed conflict - whether a state or non-state armed group - where there is a clear risk that this would contribute to the commission of IHL violations. Corporate actors involved in the transfer of weapons to Sudan may also contribute to IHL violations when they act with a sufficient connection to the conflict which, if they were aware that said weapons will likely be used to commit international crimes, may entail criminal responsibility.

There is a clear global consensus that companies have a responsibility to respect human rights throughout their global operations including with respect to the manufacture, export, import, and sale of arms that may be used to commit serious human rights violations. Although States have an obligation to regulate the arms industry, the corporate responsibility to respect human

rights exists over and above obligations to comply with national laws and regulations. This responsibility requires companies to conduct human rights due diligence throughout their entire value chain to identify, prevent, and mitigate any actual or potential involvement in human rights abuses. The standard of human rights due diligence required is heightened with respect to business activity impacting conflict-affected areas.

In light of the substantial risk that all arms and ammunition being transferred to Sudan - including those marketed to civilians - will be used by parties to the conflict to commit grave human rights abuses, companies must immediately cease their involvement in this supply of arms to avoid causing or contributing to these abuses. If a company identifies that the products they sold have contributed to such abuses, they should provide for or cooperate in remediation process to any persons harmed as a result.

To conduct research into these weapon flows, Amnesty International investigators analyzed 1,900 shipment records from two different shipment-level trade data providers, and open source and digital evidence, including about 2,000 verified photos and videos, showing recently manufactured or recently imported weapons in use by parties to the conflict in Sudan including in Darfur, and remote sensing techniques. The organization also interviewed 17 regional arms and Sudan experts between February and March 2024 to corroborate data analysis and understand key weapons supply lines used by various groups.

Methodology

To conduct this research into recent arms flows into Sudan and Darfur, Amnesty International investigators implemented a mixed-methods approach. Shipment-level trade data was collected from two providers, covering 2013-2023 and 2020-2023 respectively.¹ The data includes all items exported under the standardized code HS 93+, used by customs authorities around the world. Items classified under HS 93 include small arms and ammunition (and their parts). Amnesty International was able to obtain details about more than 1,900 shipments of weapons from various countries into Sudan. HS 93+ codes cover all small arms (handguns, rifles, launchers that can be operated by one single person) and a broad range of ammunition, but excludes fighting vehicles and drones.

Amnesty International corroborated the presence of weapons systems identified in the trade data by compiling and analyzing a large number of videos and images gathered from social media, mainly X (formerly Twitter), Telegram and Facebook. The photos and videos include celebratory footage posted by the RSF or the SAF, content from known SAF or RSF operatives posted on social media and propaganda videos among others. The Digital Verification Corps (DVC), a global network of universities working with Amnesty International to verify videos and photos of potential human rights violations from conflicts and crises around the world, assisted with the selection of digital content to be analyzed by weapons experts. Where possible, digital evidence was verified by the Evidence Lab, the organisation's digital investigations team.

In addition, Amnesty International interviewed 17 people, including eight security, weapons, and Sudan experts, and nine Sudanese journalists and activists with knowledge of local Arabic dialects and weapons transfers into Sudan and Darfur between February and March 2024. Some of the interviews were in person in Nairobi and Kampala, and others were conducted remotely.

Information provided by these sources was corroborated with more targeted open-source data collection, including through remote-sensing techniques.

Given the security situation in Sudan, Amnesty International researchers have not been able to conduct research in-country for this briefing. While shipment-level data does provide a rare, and sometimes relatively detailed, insight into Sudan's trade, it also suffers from an important sample bias. Sudan itself

¹ Export Genius and Market Inside were used for this study.

does not release customs data, so the country's shipment-level trade data aggregates exports from its trade partners ("mirror data") that release data. However, several countries that are known to transfer weapons and equipment to Sudan do not release customs data about these transfers. Also, shipment-level trade data only covers exports of Turkish, Russian and Indian *direct* transfers to Sudan, but many other countries have been found to supply both the RSF and the SAF either directly or through third parties. These clandestine transfers do not appear in shipment-level trade data.

Sudan has a relatively strong defense industry, mainly manufacturing copies of foreign small arms. This makes the distinction between foreign and locally manufactured weapons difficult using digital evidence gathered remotely as differences between the original and their local copies can be extremely subtle. As small arms have been in wide circulation in Sudan for several decades, distinguishing between older systems and recent foreign supplies is also very difficult. Both these methodological limits place important constraints on the number of weapons that Amnesty International can identify as recent transfers to Sudan or Darfur. These limitations also make it difficult to trace precise chains of custody from exporting state to Sudan, as well as movement of weapons within Sudan.

All companies and actors cited in this report were presented with our findings prior to publication and given the opportunity to respond and provide additional information. Out of the 27 companies and actors contacted by Amnesty International, Shell Special Vehicles, The Armored Group, Sarsilmaz and Wail Shams Trading replied with comments. Details of the responses received are included in relevant sections of the report ²responses can be found in full annexed to this report.

² Out of the 25 companies contacted by Amnesty International, Shell Special Vehicles, The Armored Group, Sarsilmaz and Wail Shams Trading replied with comments.

Background

Intense fighting erupted in Sudan in April 2023 between the SAF and the RSF paramilitaries.³ Over the following 15 months, other armed groups and actors joined the conflict, aligning themselves either with the SAF or the RSF.⁴ The fighting came after months of tensions between the two groups over security force reforms, proposed as part of the negotiations for a new transitional government, among other issues.⁵

Impact of the conflict on civilians

The clashes, which initially started in the capital Khartoum, quickly spread to other areas of Sudan, including Darfur, North Kordofan and later Gezira state.⁶ The conflict has led to massive civilian suffering and large-scale destruction.⁷ More than 16,650 people have been killed nationwide since April 2023.⁸ Amnesty International has documented civilian casualties in both indiscriminate strikes and direct attacks on civilians.⁹ Some of the violations by parties to the conflict amount to war crimes. Many civilians were caught in the crossfire as members of the SAF and RSF, often using explosive weapons with wide area effects, launched frequent and indiscriminate attacks in and from densely populated civilian neighbourhoods.¹⁰ People were consequently killed inside their homes, or while desperately searching for food and other necessities. Others were killed and injured while fleeing from the violence, and in places where they had sought safety.¹¹

The crisis has also led to massive civilian displacement. According to the UN, over 7.3 million people have been internally displaced since April 2023. Sudan now has over 11 million internally displaced people making it the largest displacement crisis in the world.¹² Among those displaced are refugees from other

³ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

⁴ Sudan Tribune, "SLM-Minawi joins Sudan's fight against RSF", 24 March 2024, <https://sudantribune.com/article283695/>

⁵ International Crisis Group, "Stopping Sudan's Descent into Full-Blown Civil War", 20 April 2023, crisisgroup.org/africa/horn-africa/sudan/stopping-sudans-descent-full-blown-civil-war/; New Lines Magazine, "In Sudan, a Deadly Reckoning for Rival Forces", 17 April 2023, newlinesmag.com/reportage/in-sudan-a-deadly-reckoning-for-rival-forces/

⁶ Amnesty International, "Sudan: Fresh fears for civilians as fighting extends to Wad Madani", 19 December 2023, <https://www.amnesty.org/en/latest/news/2023/12/sudan-fresh-fears-for-civilians-as-fighting-extends-to-wad-madani/>

⁷ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

⁸ ACLED, May 2024 update, <https://acleddata.com/2024/05/17/sudan-situation-update-may-2024-the-rsf-sets-its-eyes-on-north-darfur/>

⁹ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

¹⁰ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

¹¹ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

¹² UNOCHA update as of June 2024, <https://reports.unocha.org/en/country/sudan/>

countries, especially Ethiopia, Eritrea and South Sudan, who had sought refuge in Sudan.¹³ In addition, over 2.1 million people have fled to neighbouring Central African Republic, Chad, Egypt, Ethiopia and South Sudan, where they live in dire conditions.¹⁴

Humanitarian organizations are warning that the war in Sudan is pushing the country toward famine and to a catastrophic loss of life, especially among children.¹⁵ According to the latest data released by the Nutrition Cluster in Sudan, more than 2.9 million children in Sudan are acutely malnourished and an additional 729,000 children under five are suffering from severe acute malnutrition, the most dangerous and deadly form of extreme hunger. In addition, Save the Children, a humanitarian NGO, estimates that nearly 230,000 children, pregnant women, and new mothers could die in the coming months due to hunger.¹⁶

Rampant human rights and humanitarian law violations in Darfur

The new escalation of violence in Sudan coincided with the 20th anniversary of the Darfur conflict that has caused immense human suffering in the region.¹⁷ Since 2003, civilians in Darfur have been subjected to extreme violence.¹⁸ Civilian populations, of specific ethnic groups, accused of supporting armed insurgent groups, have previously been targeted by the Sudanese government.¹⁹ Amnesty International has documented crimes under international law committed in Darfur including large-scale violations and abuses, including war crimes and crimes against humanity.²⁰

Since the renewal of the conflict in April 2023, Amnesty International, has documented numerous human rights and humanitarian law violations in Darfur. Civilians were killed and injured in targeted attacks in West Darfur, where the RSF and allied militias carried out ethnically-motivated attacks against the Masalit and other non-Arab communities, killing and injuring thousands of civilians and displacing hundreds of

¹³ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

¹⁴ June 2024, UNOCHA update, <https://reports.unocha.org/en/country/sudan/>

¹⁵ UNICEF, "Statement by UNICEF Executive Director Catherine Russell on children in Sudan at risk of famine", 8 March 2024, <https://reliefweb.int/report/sudan/statement-unicef-executive-director-catherine-russell-children-sudan-risk-famine-enar>

¹⁶ Sudan: "Nearly 230,000 children and new mothers likely to die from hunger without critical action", 13 March 2024, <https://www.savethechildren.net/news/sudan-nearly-230000-children-and-new-mothers-likely-die-hunger-without-critical-action-save>

¹⁷ Amnesty International, "Sudan: New conflict escalation exacerbates 20 years of suffering for civilians in Darfur", 24 April 2023, [amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/](https://www.amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/)

¹⁸ Amnesty International, "Sudan: New conflict escalation exacerbates 20 years of suffering for civilians in Darfur", 24 April 2023, [amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/](https://www.amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/)

¹⁹ Amnesty International, "Sudan: New conflict escalation exacerbates 20 years of suffering for civilians in Darfur", 24 April 2023, [amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/](https://www.amnesty.org/en/latest/news/2023/04/sudan-new-conflict-escalation-exacerbates-20-years-of-suffering-for-civilians-in-darfur/)

²⁰ Amnesty International, "Sudan: Fresh evidence of government-sponsored crimes in Darfur shows drawdown of peacekeepers premature and reckless", 11 June 2019, [amnesty.org/en/latest/press-release/2019/06/sudan-fresh-evidence-of-government-sponsored-crimes-in-darfur-shows-drawdown-of-peacekeepers-premature-and-reckless/](https://www.amnesty.org/en/latest/press-release/2019/06/sudan-fresh-evidence-of-government-sponsored-crimes-in-darfur-shows-drawdown-of-peacekeepers-premature-and-reckless/); Amnesty International, *Scorched Earth, Poisoned Air: Sudanese Government Forces Ravage Jebel Marra, Darfur* (Index no. AFR 54/4877/2016), 29 September 2016, [amnesty.org/en/documents/afr54/4877/2016/en/](https://www.amnesty.org/en/documents/afr54/4877/2016/en/); Amnesty International, "Sudan: New conflict escalation exacerbates 20 years of suffering for civilians in Darfur"

thousands.²¹ Amnesty International documented these ethnically motivated attacks in the towns of Ardamata,²² El Geneina, Misterei and Tandelti of West Darfur.²³ In Nyala, South Darfur, Amnesty International documented indiscriminate attacks that killed and injured civilians and destroyed civilian infrastructure.²⁴ In Kabkabiya, North Darfur, indiscriminate attacks killed and injured humanitarian workers.²⁵ Women and girls in Darfur continued to be subjected to conflict-related sexual violence, including rape, by members of the warring sides, mainly RSF and allied militias.²⁶ Fighters, mostly RSF and allied militia, continued to engage in widespread looting of homes, businesses and public institutions, including hospitals, humanitarian organizations' warehouses, and banks in the Darfur region.²⁷

Inadequate regional and international response

The regional and international response has been woefully inadequate.²⁸ Diplomatic and other efforts by key actors have so far failed to end the violence, protect civilians, provide sufficient humanitarian aid, or hold perpetrators to account.²⁹ In the past year, a growing list of global and regional powers, including Egypt, Saudi Arabia, United Arab Emirates (UAE) and USA have initiated individual and/or joint processes to resolve the conflict, with the Jeddah process standing out as the most prominent.³⁰ At the same time, multilateral institutions, including the African Union (AU),³¹ the Intergovernmental Authority on Development (IGAD),³² the UN, and the League of Arab States, have actively sought to intervene, with the AU and IGAD developing separate roadmaps toward the resolution of the conflict. Often at odds or in competition with each other, all of these multiple actors, processes, and roadmaps have had limited success.³³ In addition, the international humanitarian response to Sudan remains significantly

²¹ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²² Amnesty International, "Sudan: Civilians suffering 'unimaginable horror' amid ethnically motivated violence in Darfur", 22 November 2023, <https://www.amnesty.org/en/latest/news/2023/11/sudan-civilians-suffering-unimaginable-horror-amid-ethnically-motivated-violence-in-darfur/>

²³ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²⁴ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²⁵ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²⁶ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²⁷ Amnesty International, "Sudan: "Death came to our home": War crimes and civilian suffering in Sudan", 3 August 2023, <https://www.amnesty.org/en/documents/afr54/7037/2023/en/>

²⁸ Amnesty International, "Sudan: One year since conflict began, response from international community remains woefully inadequate," 12 April 2024, <https://www.amnesty.org/en/latest/news/2024/04/sudan-one-year-since-conflict-began-response-from-international-community-remains-woefully-inadequate/>

²⁹ Amnesty International, "Sudan: One year since conflict began, response from international community remains woefully inadequate," 12 April 2024, <https://www.amnesty.org/en/latest/news/2024/04/sudan-one-year-since-conflict-began-response-from-international-community-remains-woefully-inadequate/>
³⁰ Reuters, "Sudanese warring parties dig in as Jeddah talks falter again", 6 December 2023, <https://www.reuters.com/world/africa/sudanese-warring-parties-dig-jeddah-talks-falter-again-2023-12-06/>

³¹ <https://au.int/en/pressreleases/20240117/au-chairperson-appoints-high-level-panel-resolution-conflict-sudan>

³² <https://igad.int/communique-of-the-42nd-extraordinary-assembly-of-igad-heads-of-state-and-government/>

³³ ISS, "Sudan exposes the AU's weak response to humanitarian crises", 7 September 2023, <https://issafrica.org/iss-today/sudan-exposes-the-aus-weak-response-to-humanitarian-crises>

underfunded despite humanitarian organizations warning of famine.³⁴ As of June, the UN's appeal was only 16 percent funded seriously undermining delivery of much needed emergency aid and services.³⁵

It took almost a year for the United Nations Security Council to adopt a resolution on Sudan that called for the “immediate cessation of hostilities” and for “all parties to ensure the removal of any obstructions and enable full, rapid, safe, and unhindered humanitarian access...” but despite the resolution, fighting continues throughout the country with no measures of protecting civilians being put in place.³⁶

UN embargo on Darfur and weapons supply lines

The UN Security Council imposed an arms embargo on non-governmental entities in Darfur in 2004.³⁷ This was strengthened the following year to cover all parties to the N'djamena Ceasefire Agreement, which included the Sudanese government forces in Darfur.³⁸ The current measures require states (including the Government of Sudan) to take “all necessary measures” to prevent the sale or transfer of arms and/or technical assistance and training to non-governmental entities or individuals and to the Sudan government.³⁹ These measures only apply to the five states in Darfur. Transfers of weapons to other parts of Sudan are permitted under the embargo, provided they supply the necessary end user documentation to ensure compliance with previous embargo resolutions. In addition to the UNSC sanctions regime on Darfur, there has been an EU arms embargo on the whole of Sudan since 1994.⁴⁰

Amnesty International and other organizations have strongly criticized both the scope and the implementation of the UNSC embargo since its imposition in 2004 and called on the UNSC to both extend the embargo to the whole of Sudan, and adequately invest in its full implementation.⁴¹ In previous reports related to the conflict in Darfur, Amnesty International has documented substantial flows of weapons into Sudan with onward diversion into Darfur.⁴² Some states and other actors have been fueling the current conflict in Sudan by supplying weapons and ammunitions to the warring sides, including in the Darfur

³⁴ UNICEF, “Statement by UNICEF Executive Director Catherine Russell on children in Sudan at risk of famine”, 8 March 2024, <https://reliefweb.int/report/sudan/statement-unicef-executive-director-catherine-russell-children-sudan-risk-famine-enar>

³⁵ UNOCHA update, 24 June 2024, <https://reports.unocha.org/en/country/sudan/>

³⁶ UN, “Security Council calls for immediate cessation of hostilities in Sudan”, 8 March 2024, <https://news.un.org/en/story/2024/03/1147432>

³⁷ UNSC resolution 1556 (2004)

³⁸ UNSC resolution 1591 (2005)

³⁹ UNSC resolution 1591 (2005); UNSC resolution 1945 (2010)

⁴⁰ Official Journal of the European Communities, Council Decision 94/ 165/CFSP of 15 March 1994, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31994D0165>; for detail on the evolution of the embargo see EU arms embargo on Sudan: https://www.sipri.org/databases/embargoes/eu_arms_embargoes/sudan

⁴¹ Amnesty International, “Sudan: Some states are actively fuelling the conflict by providing arms and ammunition”, 1 September 2023, https://www.lemonde.fr/en/opinion/article/2023/09/01/sudan-some-states-are-actively-fuelling-the-conflict-by-providing-arms-and-ammunition_6118526_23.html

⁴² Amnesty International, “Sudan: Arming the perpetrators of grave abuses in Darfur”, AI Index: AFR 54/139/2004, <https://www.amnesty.org/en/wp-content/uploads/2021/09/afr541392004en.pdf>; Amnesty International, “Sudan: Arms continuing to fuel serious human rights violations in Darfur”, AI Index: AFR 54/019/2007, <https://www.amnesty.org/en/wp-content/uploads/2021/07/afr540192007en.pdf>

region.⁴³ In January 2024, the UN Panel of Experts on the Sudan noted that the transfers of arms and ammunition into Darfur during the ongoing conflict constituted violations of the arms embargo.⁴⁴

These weapons follow numerous supply lines into Sudan, some of them directly supplying Darfur.⁴⁵ Based on the analysis of flight-tracking and remote-sensing data, independent researchers⁴⁶ and media outlets⁴⁷ identified the Am Djarass airport in eastern Chad as an avenue used by the UAE to transfers weapons into Darfur, an allegation further supported by the UN Panel of Experts.⁴⁸ These findings were also corroborated by local journalists and security experts during interviews conducted by Amnesty International.⁴⁹

In late March 2024, the Permanent Representative of Sudan to the United Nations accused the UAE of committing an act of aggression against Sudan, in part for providing weapons, armored military vehicles, drones, provisions, food, ammunition, and other forms of military support to the RSF.⁵⁰ It also accused Chad of allowing its territory, particularly the airports of Am Djarass and Abéché, to be used to transport weapons and materiel and to evacuate injured RSF fighters to the Zayed Military Hospital in Abu Dhabi.⁵¹ On 21 April 2024, the United Arab Emirates rejected the allegations made by the Permanent Representative of Sudan.⁵²

The UN Panel of Experts also identified supply lines for weapons, vehicles and fuel from South Sudan, Libya and the Central African Republic, again corroborated by Amnesty International interviews.⁵³ In addition, media reports indicate⁵⁴ drones manufactured in Iran have been supplied to the Sudanese Armed Forces via Port Sudan. Weapons are also flowing from Eritrea and Ethiopia, documented by media sources and

⁴³ Amnesty International, "Sudan: Some states are actively fuelling the conflict by providing arms and ammunition", 1 September 2023, https://www.lemonde.fr/en/opinion/article/2023/09/01/sudan-some-states-are-actively-fuelling-the-conflict-by-providing-arms-and-ammunition_6118526_23.html

⁴⁴ See the Panel report, "Final report of the Panel of Experts on the Sudan", 15 January 2024,

<https://documents.un.org/doc/undoc/gen/n24/005/64/pdf/n2400564.pdf?token=joHOUTIOOxR8mgkveV&fe=true>

⁴⁵ See the Panel report, "Final report of the Panel of Experts on the Sudan", 15 January 2024,

<https://documents.un.org/doc/undoc/gen/n24/005/64/pdf/n2400564.pdf?token=joHOUTIOOxR8mgkveV&fe=true>

⁴⁶ A new mystery airlift between the UAE and Africa, Gerjon's Aircraft Finds, June 30 2023. <https://gerjon-substack.com/p/a-new-mystery-airlift-between-the>

⁴⁷ U.A.E. Talks Peace in Sudan War, but Secretly Backs One Side, The New York Times, 29 October 2023. Url:

<https://www.nytimes.com/2023/09/29/world/africa/sudan-war-united-arab-emirates-chad.html>

⁴⁸ See the Panel report, "Final report of the Panel of Experts on the Sudan", 15 January 2024,

<https://documents.un.org/doc/undoc/gen/n24/005/64/pdf/n2400564.pdf?token=joHOUTIOOxR8mgkveV&fe=true>

⁴⁹ Amnesty International interview with 17 people including eight security, weapons experts and nine Sudanese journalists and activists on various dates between February and March 2024.

⁵⁰ Letter by the Sudan Permanent Representative to the UN to the President of UNSC dated 28 March 2024, on file with Amnesty International.

⁵¹ Letter by the Sudan Permanent Representative to the UN to the President of UNSC dated 28 March 2024, on file with Amnesty International.

⁵² See UAE letter here: <https://twitter.com/UAEMissionToUN/status/1782215597486424439/photo/1>

⁵³ Amnesty International interview with 17 people including eight security, weapons experts and nine Sudanese journalists and activists on various dates between February and March 2024.

⁵⁴ Abdelaziz, K., Hafezi, P., & Lewis, A., Sudan civil war: Are Iranian drones helping the army gain ground? Reuters, 10 April 2024. Url:

<https://www.reuters.com/world/middle-east/are-iranian-drones-turning-tide-sudans-civil-war-2024-04-10/>

confirmed during Amnesty International interviews with Sudanese journalists and security experts.⁵⁵ The Sudanese authorities regularly seize small arms from smugglers in Kassala, near the Eritrean border.⁵⁶

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⁵⁵ *In Sudan's East, Murky Arms Trade Thrives as War Rages*, Voice of America, 31 August 2023. Url: <https://www.voanews.com/a/in-sudan-s-east-murky-arms-trade-thrives-as-war-rages/7248561.html>. Amnesty International interview with 17 people including eight security, weapons experts and nine Sudanese journalists and activists on various dates between February and March 2024.

⁵⁶ X video, 28 November 2023: https://twitter.com/war_noir/status/1729461962130546946/video/1; Telegram Video, 27 November 2023: <https://t.me/SAFgov/690>.

2. Evidence of foreign weapons used in Sudan, including in Darfur

2.1 Turkish weapons

Despite the substantial risk that arms could be used for serious violations of international human rights and humanitarian law, states continue to transfer weapons to Sudan. Amnesty International's Evidence Lab and the Digital Verification Corps were able to identify numerous instances of recently manufactured Turkish weapons being used by various parties to the conflict in Sudan. In some cases, shipment-level trade data provides useful details about the nature of the transfers, or the entities involved in them.

2.1.1 BRG 55 "sporting" rifles

A video posted by the RSF on its official X account, claimed to have been shot in Nyala (South Darfur) on 15 February 2024, shows one RSF soldier equipped with a BRG 55 rifle (see images below).⁵⁷ Another BRG 55 can be seen in a video that the RSF claimed to have shot in Al Fasher (North Darfur) on the 23 May 2024.⁵⁸ The presence of these rifles in Nyala almost certainly is a violation of the UNSC arms embargo, albeit Amnesty is unable to assess which entity is responsible for the violation. These rifles can also be seen in footage collected by France 24 from Facebook accounts of RSF.⁵⁹ Social media posts by armorers in Khartoum, a few days before the beginning of the conflict, also show these rifles being advertised for sale⁶⁰⁶¹

The BRG 55 is a 5.56x45mm M4-pattern assault rifle manufactured by the Turkish company BRG Defence (also known as Burgu Metal)⁶². BRG Defence was founded in 2013 and the BRG 55 is the only rifle manufactured by the company, identifiable by its large, distinctive white logo on the receiver. While the production start date of the BRG 55 is unknown, it is first mentioned online in 2020. Shipment-level trade data indicates that BRG Defense has exported 250 of these rifles to Sudan in 2022 and 2023, for a total

⁵⁷ X video, 15 February 2024. Url: https://x.com/Quick_news12/status/1758176375440126263

⁵⁸ Telegram video, 23 May 2024. <https://t.me/RSFSudan/6328>

⁵⁹ <https://observers.france24.com/en/africa/20230626-sudan-rsf-rapid-support-forces-loot-houses-take-hostages>. While these images have not been published before 3 June 2023, Amnesty is unable to confirm where they have been taken.

⁶¹ <https://www.facebook.com/photo/?fbid=547959324133976&set=pb.100067597397385.-2207520000>

⁶² <https://brgdefence.com/en/about-us/>

value of USD 100,000.⁶³ All of these rifles have been imported into Sudan by a single exporter, referred to as “Osman Altigani Ali” in shipping records,⁶⁴ under the label “sporting rifles”.⁶⁵



Edited screenshot of video posted by @Quick_news12 on X, with rifle highlighted.⁶⁶



⁶³ Mirror data on Sudan’s imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁶⁴ It also appears as consignee for other shipments, as “Osman Altigane Ali For Weapons”.

⁶⁵ Mirror data on Sudan’s imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁶⁶ X video, 15 February 2024. Url: https://x.com/Quick_news12/status/1758176375440126263

Close up of BRG 55 receiver.⁶⁷

2.1.2 12GA hunting shotguns

Shotguns manufactured by small Turkish companies such as Dağlıoğlu Silah, Derya Arms, and Hatsan Arms are also circulating in Darfur in the hands of all parties to the conflict. A video posted on X on 4 July 2023⁶⁸ depicting the rendition of SAF fighters to the RSF in front of the RSF headquarters in Al-Daein, East Darfur, shows two FD-63 shotguns, manufactured by Dağlıoğlu Silah. FD-63 are distinctive, and relatively rare, AK-pattern 12GA shotguns with Type 56-1 style foldable buttstocks. While AK-pattern rifles are extremely common in Sudan and constitute a staple of armed groups engaged in the conflict, these AK-pattern shotguns have specific distinctive physical features, including a longer and wider barrel, distinctive muzzle, 90° angled gas block and boxy magazines. Images of these shotguns first appeared online in 2016, indicating the likely start of their manufacture, and any such weapons found in Darfur would almost certainly result from a violation of the UNSC arms embargo.

⁶⁷ Astroclassic.pl, undated. <https://astroclassic.pl/p/karabin-samopowtarzalny-burgu-brg55-kal-556x45mm-223-rem-lufa-368-mm-z-mag-10-nabojowym/>

⁶⁸ X video, 24 Juillet 2023. <https://twitter.com/bilarakib/status/1683342817467195393>



Edited screenshot of the video (with distinctive features highlighted), compared to a FD-63 variant.⁶⁹ The shotgun on the left is equipped with a larger magazine.

In 2022 and 2023, at least 650 FD63 shotguns were exported to Sudan, for a total value of USD 308,000, according to shipment-level trade data.⁷⁰ Dağlıoğlu does not appear as an exporter in shipment-level trade data; all Dağlıoğlu shotguns exported to Sudan have been exported by a company called Erdinç Doğa Av Malzemeleri, one of the largest exporters of weapons and ammunition to Sudan.⁷¹ The unique importer, on the Sudanese side, of these shotguns is Al-Bayarg for Firearms, which also imports from Türkiye large numbers of blank guns and rounds, as will be discussed below.⁷² Derya Silah MK-12 shotguns, another M-16-pattern 12-gauge platform, have also been seen in use in a RSF official video by the troops of General

⁶⁹ Eternal Arms, undated. <https://eternalarms.com.tr/fd-63-tac-12-ga-semi-auto-shotgun/>.

⁷⁰ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁷¹ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁷² Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

Taben Mahel, an ally of the RSF in West Darfur.⁷³ At least 200 of these MK-12 shotguns were exported by Derya Silah to Sudan in February 2023, to a company called El-Sayd Group, for a total value of USD 70,000.⁷⁴



Edited screenshot of a video showing a Derya MK-12 variant in a RSF video allegedly shot in West Darfur on 19 April 2024.⁷⁵

⁷³ X video, 19 April 202. https://twitter.com/Quick_news12/status/1781422180296802321/video/1

⁷⁴ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁷⁵ X Video, 19 April 2024. Url: https://twitter.com/Quick_news12/status/1781422180296802321

Shotguns manufactured in Türkiye and exported by Turkish companies have been spotted elsewhere in Sudan. The high-profile RSF member Sufian Brema has been filmed alongside soldiers equipped with Hatsan SD-12 shotguns, allegedly in Khartoum.⁷⁶ These M16-pattern shotguns are manufactured by the Hatsan Arms company, and at least 50 SD-12 have been exported in 2022 by Erdinç Doğa Av Malzemeleri to Al-Bayarg.⁷⁷



Left: Edited screenshot of a video showing a Hatsan SD-12 used by RSF member Sufian Brema's aides.⁷⁸

Right: A Hatsan SD-12, as seen on the official Hatsan online store.⁷⁹

2.1.3 Al-Burhan personal security team equipment

⁷⁶ X Video, 19 April 2024. https://x.com/Sufyan_Brema/status/1696219557545800127

⁷⁷ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁷⁸ X video, 28 August 2023. https://twitter.com/Sufyan_Brema/status/1696219557545800127

⁷⁹ Hatsan store, undated. <https://www.hatsanstore.com/hatsan-escort-sd-12-tactical-otomatik-av-tufegi-pmu3809>

Sarsilmaz, Türkiye's main small arms manufacturer and most important supplier, supplies small arms to the SAF, including its leader Abdel Fattah al-Burhan and his main aides⁸⁰ and allies, such as the *wali* of Darfur and leader of the Sudanese Liberation Army, Minni Minawi.⁸¹

Al-Burhan security personnel can be seen in various videos equipped with modern Turkish AK-pattern rifles, some of them very recently manufactured and exported into Sudan. During his visit to Shendi, in River Nile State, Al-Burhan's security personnel were equipped with SAR 15T rifles manufactured by Sarsilmaz.⁸² The SAR 15T, a modernized, 7.62x39mm version of the AK, was first introduced by Sarsilmaz at the ADEX trade show in Baku in 2022.⁸³ In addition to AK-pattern rifles, Sarsilmaz exported more than 500 M4-pattern rifles to Sudan in July and December 2022 as well as in April 2023, just before the outbreak of the conflict. Of those 500, 405 were SAR56, and the remaining were a combination of SAR 223T and MPT-76H.⁸⁴ In a reply to Amnesty International, Sarsilmaz stated that the company "indubitably and unconditionally respected and paid regard to Universal Human Rights throughout its operations" and that the "export of Sarsilmaz products had taken place for the use of the Sudanese state security agencies before the ongoing crisis started in the region".

Smaller Turkish companies are also supplying the personal security team of the SAF leadership. On 28 August 2023, during his visit to the Flamingo base in Port Sudan, Al-Burhan's security detail was equipped with R56 rifles manufactured by the Turkish company System Defence.⁸⁵ These rifles first appeared online in 2022. According to the trade data, the Sudanese Ministry of National Defense received 40 R56 from System Defence on 18 March 2022. These weapons were categorized as "other sports, hunting or target rifles", and labelled as "semi-automatic" rifles, despite their ability to fire in full automatic mode.⁸⁶ These rifles have been exported to two Sudanese companies (labelled as "Khalid omer attia for import and export enterprise" and "wail shams eldin hassan trading" in trade records).⁸⁷

⁸⁰ Telegram image, 27 March 2024. <https://t.me/SAFgov/1642?single>

⁸¹ X video, 24 March 2024. <https://twitter.com/yasin123ah/status/1772025563705721117/video/1>

⁸² Telegram video, 17 February 2024. <https://t.me/SAFgov/1204>

⁸³ [ADEX 2022] *New Turkish AK Rifle from Sarsilmaz*, *The Firearm Blog*, 3 September 2022. <https://www.thefirearmblog.com/blog/2022/09/23/adex-2022-turkish-ak-sarsilmaz/>

⁸⁴ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.

⁸⁵ Getty Images, 28 August 2023/ Url: <https://www.gettyimages.fr/detail/photo-d%27actualit%C3%A9/sudanese-army-chief-abdel-fattah-al-burhan-visits-photo-dactualit%C3%A9/1628359613>

⁸⁶ System Defence, Protect yours with us, undated. <https://www.systemdefence.com/doc/pdf/R56%20KATALOG.pdf>

⁸⁷ Mirror data on Sudan's imports of HS 93 commodities between 2019 and 2024, accessed through Market Inside.



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Left: Al-Burhan security detail equipped with SAR 15T;⁸⁸ Right: Al-Burhan security detail equipped with R56⁸⁹

2.2 Civilian variants of Russian small arms

Russia is an important supplier of weapons to Sudan. Kalashnikov Concern and Molot, both of which have the Russian State-owned defense conglomerate Rostec as a minority shareholder, have exported large quantities of AK- and SVD-pattern rifles to Sudan. Many of these recently supplied weapons, usually civilian variants marketed to individual gunowners or hunters, are being used by parties to the conflict in various parts of Sudan, including in Darfur. According to shipment-level trade data, since 2014, and mostly after 2019, at least 1,114 Saiga-MK .223 Rem and 1,500 Tigr DMRs have been exported to Sudan by

⁸⁸ Telegram Video, 17 February 2024. <https://t.me/SAFgov/1204>

⁸⁹ Getty Images, 28 August 2023. <https://www.gettyimages.com/detail/news-photo/sudanese-army-chief-abdel-fattah-al-burhan-visits-the-news-photo/1628359613>

Kalashnikov Concern, often as “civil hunting” or “hunting carbines,” despite being used in armed conflict.⁹⁰ These estimates are conservative, as, after 2019, the labelling of shipments became increasingly vague, likely to obfuscate their exact nature; the exact number of Tigr DMRs transferred to Sudan could in fact be well above 1500.

2.2.1 Tigr Designated Marksman Rifles

Tigr Designated Marksman Rifles (DMR) are ubiquitous in the ranks of both the RSF and the SAF, almost everywhere in Sudan. Amnesty International was able to identify Tigr DMRs at least 24 times in videos shot in various parts of the country, including in Darfur.⁹¹



A Tigr DMR (.308 version) in the shop of an armourer in Khartoum that has purchased these rifles directly from Kalashnikov Concern.⁹²

⁹⁰ Mirror data on Sudan’s imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

⁹¹ X video, 19 February 2024. https://x.com/gbh_19/status/1759624129475428449; X video, 22 July 2023. https://x.com/war_noir/status/1682771802806779904; X video, 24 October 2024. https://x.com/Sufyan_Brema/status/1716933957160423740. X video, 17 September 2023. <https://x.com/RSFLiveSD/status/1703411876736958827>. X video, 15 November 2023. <https://x.com/RSFLiveSD/status/1724897472932376635>. Telegram video, 27 February 2024. <https://t.me/azwyokgsbzzz/10011?single>; X video, 29 February 2024. https://x.com/Quick_news12/status/1763156359753674990. Facebook video, 23 August 2023. <https://www.facebook.com/watch/?v=968964484337614>. X video, 13 March 2024. https://x.com/Quick_news12/status/1767964932560081339; X video, 29 February 2024. https://x.com/Quick_news12/status/1763156359753674990; X video, 13 March 2024. <https://x.com/RSFSudan/status/1767964339045122347>; X video, 18 March 2024. <https://x.com/wdalbehair/status/1769806217407267019>; Facebook video, 17 March 2024. <https://www.facebook.com/watch/?v=727825269503421>; X video, 24 March 2024. <https://x.com/9klid/status/1772006307291185658>; Telegram video, 25 March 2024. <https://t.me/RSFSudan/6063>; Telegram video, 26 March 2024. <https://t.me/RSFSudan/6067>; X video, 15 August 2023. https://x.com/Sufyan_Brema/status/1691536283720351744; X video, 4 September 2023. https://x.com/Sufyan_Brema/status/1698738904587804705; X video, 29 October 2023. https://x.com/Sufyan_Brema/status/1718629673205104883; X video, 19 April 2024. https://x.com/Quick_news12/status/1781422180296802321; Telegram video, 25 March 2024. <https://t.me/RSFSudan/6337>.

⁹² Facebook, 17 September 2020. <https://www.facebook.com/112585397105226/photos/pb.100064023516146.-2207520000/175524434144655/?type=3>. Mirror data on Sudan’s imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

The Tigr, sometimes designated as “Tiger” in export markets, is the civilian variant of the SVD “Dragunov” DMR, manufactured by Kalashnikov Concern. The SVD and the Tigr differ mainly by the length of the barrel, the rifling twist rate, and by the absence of a bayonet lug under the front sights in the civilian variant.⁹³ Sudan manufactures its own version of the SVD, known as the ADY02 or Mokhtar-1, with the bayonet lug.⁹⁴



Above: A Tigr vers 1 (mod 2).⁹⁵

Below: a modern SVD, with the bayonet lug highlighted.⁹⁶

⁹³ Thames Valley Guns, Izhmash Tigr 7.62x54R, undated. [https://www.thamesvalleyguns.co.uk/izhmash%20Tigr\(2\).pdf](https://www.thamesvalleyguns.co.uk/izhmash%20Tigr(2).pdf). A limited number of US export variants seem fitted with a bayonet lug (albeit these might be aftermarket), but there is no military version of the SVD without these bayonet lugs. See US Tigr fitted with aftermarket bayonet lugs here: Apache Arms, Past Dragunov for Sale. Url: <https://www.apachearms.us/past-dragunovs-for-sale/>

⁹⁴ Facebook, 19 April 2017. <https://www.facebook.com/MilitaryIndustryCorporation/photos/a.245501455898972/272401533208964/?type=3>. Note that the Sudanese SVD is likely a copy of the Chinese version of the SVD, known as the Type-85 / NDM-86

⁹⁵ RP Arms, undated. <https://rparms.pl/karabiny-samopowtarzalne-centr-zapl/1135-tigr-ver-01-mod-02-svd-.html>

⁹⁶ Kalashnikov Group, undated. <https://en.kalashnikovgroup.ru/catalog/boevoe-strelkovoe-oruzhie/snayperskie-vintovki/snayperskaya-vintovka-svd>



Edited screenshots of a videos showing a SAF soldier with a Tigr, near al-Nilin mosque in Khartoum⁹⁷ and an RSF soldier with a Tigr, in an RSF official video shot in Nyala (South Darfur) on the 24th of October 2023.⁹⁸

⁹⁷ X video, 19 February 2024. https://twitter.com/gbh_19/status/1759624131568369686

⁹⁸ X video, 23 October 2023. https://twitter.com/Sufyan_Brema/status/1716933957160423740



Screenshot of [video](#) highlighting “Made in Russia” markings on a Tigr DMR used by the RSF.⁹⁹

Tigr DMRs have been spotted in official RSF videos shot in South, East¹⁰⁰ and West Darfur¹⁰¹, in addition to West Khordofan,¹⁰² Khartoum, Omdurman and other locations¹⁰³. While it is impossible to verify when these models were manufactured and transferred - Tigr variants have been produced since the late 1960’s - based on several physical features, including buttstock variants, polymer furniture, and their general condition, several Tigr DMRs seen in videos are likely to be relatively recent purchases. Only physical inspection and tracing of the serial numbers on these Tigr DMRs would allow confirmation of this finding.

⁹⁹ Telegram Video, 28 March 2024. <https://t.me/RSFSudan/6070>

¹⁰⁰ X video, 15 November 2023. <https://twitter.com/RSFLiveSD/status/1724897472932376635/video/1>

¹⁰¹ X video, 17 September 2023. <https://twitter.com/RSFLiveSD/status/1703411876736958827/video/1>

¹⁰² X video, 8 Mars 2023. <https://twitter.com/wdalbehair/status/1769806217407267019/video/1>

¹⁰³ Facebook video, 17 March 2024. <https://www.facebook.com/watch/?v=727825269503421>



An RSF soldier with a Tigr DMR in El-Geneina, likely in September 2023.¹⁰⁴

2.2.2. Saiga-MK series rifles

While also exported in large numbers to Sudan, Saiga-MK series rifles physically resemble many other AK-pattern rifles, and so can rarely be uniquely identified in digital evidence. Amnesty International was able to confirm their presence on the battlefield in Sudan in at least three videos claimed to have been shot in Khartoum and Omdurman.

Saiga-series rifles are semi-automatic rifles manufactured by Kalashnikov Concern and marketed as sport or hunting rifles to the civilian market, while being close copies of their military variants. As will be explained below, Saiga- and AK-series rifles can nonetheless be differentiated by various physical features; the image below shows the main differences between the AK-101 and the Saiga-MK 223 Rem:

¹⁰⁴ X video, 17 September 2023. <https://twitter.com/RSFLiveSD/status/1703411876736958827>



Top image: Saiga-MK 223 Rem.¹⁰⁵ Below: AK-101¹⁰⁶

The Saiga MK has its gas block and front sight pinned to the barrel, as opposed to the AK-101, where they are press-fitted. Additionally, the Saiga-MK lacks an additional rivet immediately above the magazine release catch, and are marked “223 rem” on the magazine.

While the AK-101 is chambered in the standard 5.56x45mm, the Saiga-MK uses its civilian equivalent, the .223 Remington, as often indicated on the magazine. Other differences include an additional rivet above the magazine release catch on the AK-101 and the fact that the latter has its gas block and front sight press-fitted, as opposed to pinned on the Saiga-MK. These technical details can most often only be spotted on very high-resolution video, creating an important sample bias as only the RSF and its official social media accounts publish such videos in a systematic manner. Saiga-MK .223 Rem have been spotted at least three times on RSF videos in March 2024, in Omdurman¹⁰⁷ and in Khartoum,¹⁰⁸ as can be seen on the images below:

¹⁰⁵ Kalashnikov Group, undated. <https://en.kalashnikovgroup.ru/catalog/grazhdanskoe-strelkovoe-oruzhie/karabiny/savga-mk-223-rem>.

¹⁰⁶ Kalashnikov Group, undated. <https://en.kalashnikovgroup.ru/catalog/boevoe-strelkovoe-oruzhie/avtomaty/avtomat-kalashnikova-ak101>

¹⁰⁷ Telegram video, 23 March 2023. <https://t.me/RSFSudan/6059>

¹⁰⁸ Telegram video, 5 march 2023. <https://t.me/RSFSudan/5999>



Left: Saiga-MK .223 Rem in Omdurman.¹⁰⁹ Right: same model in Khartoum¹¹⁰; Both video stills have been modified by Amnesty for illustration.

In addition to Saiga MKs, Amnesty International also identified at least one Saiga 9 in digital evidence obtained by France 24.¹¹¹ Footage of RSF fighters looting homes, allegedly in Khartoum (which Amnesty is unable to independently verify), shows the highly distinctive (due to its straight, narrow magazine) 9mm version of the AK platform.¹¹² Saiga-9 rifles have been exported by Kalashnikov Concern to Sudan (in unknown quantities) at least once in 2019.¹¹³

2.2.3. Molot rifles

¹⁰⁹ Telegram video, 5 March 2024. <https://t.me/RSFSudan/5999>

¹¹⁰ Telegram video, 23 March 2023. <https://t.me/RSFSudan/6059>

¹¹¹ France 24, 'Sudanese rebels entered my home and held me hostage, I thought I wouldn't survive', 26 June 2023.

<https://observers.france24.com/en/africa/20230626-sudan-rsf-rapid-support-forces-loot-houses-take-hostages>

¹¹² JBCNews, 18 June 2023. <http://www.jbcnews.net/article/548975-CNN-%D8%AA%D9%86%D8%B4%D8%B1-%D9%85%D9%82%D8%B7%D8%B9%D8%A7-%D9%8A%D9%88%D8%AB%D9%82-%D8%A7%D8%BA%D8%AA%D9%80-%D8%B5%D8%A7%D8%A8-%D8%B9%D9%86%D8%B5%D8%B1-%D9%85%D9%86-%D8%A7%D9%84%D8%AF%D8%B9%D9%85-%D8%A7%D9%84%D8%B3%D8%B1%D9%8A%D8%B9-%D9%84%D8%A7%D9%85%D8%B1%D8%A3%D8%A9-%D8%A8%D8%A7%D9%84%D8%AE%D8%B1%D8%B7%D9%88%D9%85-%D9%81%D9%8A%D8%AF%D9%8A%D9%88>

¹¹³ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

Amnesty International was able to identify several instances of Vepr-series rifles manufactured by the company Molot, being used by parties to the current conflict in Sudan.

As with Saiga series rifles, Molot small arms are relatively difficult to identify in videos, due to their external resemblance with other AK-pattern rifles. One video, allegedly shot in Kassala¹¹⁴, a major weapons trading hub near the Eritrea border, shows two Molot rifles and two Tigr DMRs that have been captured by the SAF in the region. In this video are shown what are most likely a Vepr 1V-E and a Vepr .308-pattern rifle. The Vepr 1V-E is also known as “Vepr mini” or “Mini RPK” due to its large magazine and distinctive RPK-pattern buttstock.¹¹⁵ In April 2024, digital evidence posted on the RSF’s official X account showed a Vepr 1V-E being used by its soldiers.¹¹⁶ The caption of the video claims it was shot in Omdurman, which Amnesty is unable to verify.



Left to right: a Molot Vepr 1V-E, a Tigr DMR and a Vepr.308 pattern rifle.

¹¹⁴ Amnesty is unable to independently geolocate the video.

¹¹⁵ These rifles have been advertised by armorers in Khartoum in the past: Facebook, 1 July 2015. <https://www.facebook.com/392438057608129/videos/421033651415236>

¹¹⁶ Telegram video, 15 April 2014. <https://t.me/RSFSudan/6123>



An RSF soldier equipped with a Vepr 1V-E, with its distinctive buttstock and striping marks on the foregrip.¹¹⁷

2.3 Serbian M05E1 assault rifles

Amnesty International also found evidence that Zastava M05E1 assault rifles, potentially recently transferred, are being used in Sudan.

Zastava M05E1 rifles are a relatively modern and distinctive AKM variant that is rarely seen in Sudan. However, in April 2024 several appeared in the hands of the Martyr General Hafiz Dawood Division of the RSF, in official videos shot in Sennar State.¹¹⁸ The few available other videos of the same division do not show the use of Zastava M05E1.¹¹⁹ Seeing a number of these otherwise uncommon rifles in use in one single division potentially suggests a recent transfer, as rapidly changing alliance patterns across militias in Sudan usually leads to quick dissemination of small arms across armed groups. However, while seeing several identical and recently manufactured rifles in the hands of one single unit does suggest a recent transfer, it does not necessarily imply that the transfers were direct from Serbia, and could have been

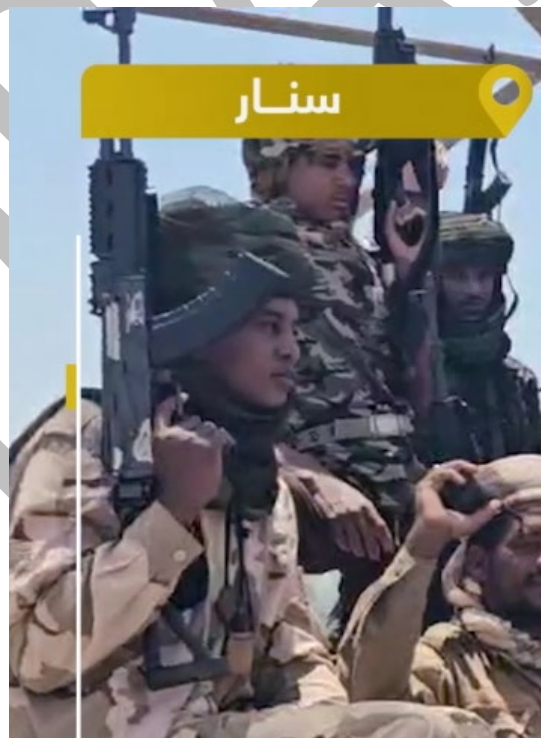
¹¹⁷ Telegram video, 15 April 2024. <https://t.me/RSFSudan/6123>

¹¹⁸ Telegram video, 17 April 2024. <https://t.me/RSFSudan/6160>

¹¹⁹ Youtube video, 23 January 2024. https://www.youtube.com/watch?v=2IMrqi_Exp0

supplied from actors in various countries. Amnesty has recently documented the use of these rifles in several conflicts in the Sahel, for instance in Burkina Faso.¹²⁰

Serbia ratified the Arms Trade Treaty (ATT) in December 2014. As a state party, Serbia has a legal obligation not to authorize any transfer of conventional arms if they have knowledge at the time of authorization that the arms or items would be used in the commission of genocide, crimes against humanity or war crimes.¹²¹ Under Article 7 of the ATT, Serbia must also conduct an objective and non-discriminatory assessment of all exports of conventional arms and deny export authorization if there is a substantial risk that the arms could be used to commit or facilitate a serious violation of international human rights or humanitarian law.¹²² Furthermore, under Article 11 of the Treaty, Serbia must take measures to prevent the diversion of conventional arms covered by Article 2(1) of the treaty, which includes small arms and light weapons.¹²³



¹²⁰ Amnesty International, "Sahel. Des fusils serbes identifiés parmi les armes utilisées par des groupes armés violents", 24 August 2021. <https://www.amnesty.org/fr/latest/news/2021/08/sahel-amnesty-identifies-serbian-weapons-in-stockpiles-of-brutal-armed-groups/>

¹²¹ Arms Trade Treaty, Article 6, <https://thearmstradetreaty.org>

¹²² Arms Trade Treaty, Article 7

¹²³ Arms Trade Treaty, Article 11

A RSF soldier equipped with a M05E1 (with the distinctive three vents and hatchet-like buttstock), in a RSF official video shot in Sennar. Several of these rifles are seen in the same video.¹²⁴

2.4 Chinese weapons and ordnance

Amnesty International research shows that recently-manufactured Chinese mortars have been used in El-Daein, East Darfur, and that recent Chinese small arms are widely present in other parts of Darfur and wider Sudan. In several cases, these constitute violations of the UN embargo and of China's obligations under the ATT.

PP87 82mm mortar bombs

In a report from Al-Daein, East Darfur, Saudi news outlet Al-Arabiya shows a Chinese¹²⁵ mortar produced in 2023. Other 2023-manufactured PP87 mortars have been documented in other parts of the country: the RSF for instance seized a number of PP87 mortars from the SAF in November 2023.¹²⁶ Amnesty is not able to determine who used these mortar bombs in Darfur, or how they were imported into Sudan.



PP87 mortar found in Al-Daein in East Darfur, filmed by Al-Arabiya Television crew.¹²⁷

¹²⁴ Telegram video, 17 April 2024. <https://t.me/RSFSudan/6160>

¹²⁵ Youtube video, 30 November 2023. <https://www.youtube.com/watch?v=Al7pw68rTxo>

¹²⁶ X video, 16 Novembre 2023. https://twitter.com/war_noir/status/1725192609658737060/video/1

¹²⁷ Youtube video, 30 November 2023. . See 1'12". <https://www.youtube.com/watch?v=Al7pw68rTxo>.



Still from an RSF video shot in Omdurman, State of Khartoum, showing a captured PP87 mortar manufactured in 2023.¹²⁸

Anti-materiel rifles

Several videos show the presence of Zijiang M99 anti-materiel rifles (AMR), a Chinese design based on Accuracy International's AS 50 AMR. A number of videos verified by Amnesty International show these Zijiang M99 rifles in various locations, including in Khartoum.¹²⁹ One recent video, however, shot by RSF forces celebrating their attack on a humanitarian assistance convoy¹³⁰, shows a M99 being used in a desert location, allegedly near Al Fasher's el Halouf gate in North Darfur.¹³¹ While Amnesty is unable to independently verify the location of the footage, if this was in North Darfur, it would constitute another violation of the UN embargo, as M99 AMRs entered production in 2005, at least six months after the beginning of the embargo.

Portable drone jammer systems

By analyzing open-source data and images provided by local sources, Amnesty International also documented the use, by both SAF and the RSF, of several types of portable drone jammer systems recently

¹²⁸ X video, 16 Novembre 2023. https://twitter.com/war_noir/status/1725192609658737060/video/1
https://twitter.com/war_noir/status/1725192609658737060/video/1

¹²⁹ X video, 26 September 2023. https://twitter.com/Sufyan_Brema/status/1706755907365839355/video/1

¹³⁰ ReliefWeb, Three more killed in airstrikes on North Darfur capital, RSF attacks rebel convoy, 31 March 2024.

<https://reliefweb.int/report/sudan/three-more-killed-airstrikes-north-darfur-capital-rsf-attacks-rebel-convoy>

¹³¹ X video, 29 March 2024. <https://x.com/wadanwar16/status/1773709944962867378>; ReliefWeb, Three more killed in airstrikes on North Darfur capital, RSF attacks rebel convoy, 31 March 2024.

<https://reliefweb.int/report/sudan/three-more-killed-airstrikes-north-darfur-capital-rsf-attacks-rebel-convoy>

manufactured in China. Drone jammers most often use an electromagnetic pulse to disrupt drone communication and navigation systems.

During the SAF Omdurman offensive in March 2024, after which the Sudanese Army claimed control of the national broadcasting building in Omdurman, several videos surfaced online showing drone jammer guns seized from the RSF. The vents pattern of these drone jammers match those produced by a 2010-founded, Shenzhen-based company, Ching Kong Technologies. Private photographs provided to Amnesty International researchers, show labels with a model number, CKJ-G7, that matches those of the CKJ Jammer series by Ching Kong Technologies¹³². The jammers seen in the pictures below appear to be an advanced version of those sold by Ching Kong Technologies on its website, as not only are they fitted with a handle, but based on the markings of the control panel, they seem to be able to interact with a wider range of frequency bands. These elements, in addition to the sand/camo finish, do suggest that the drone jammers seized in Omdurman were a military version of the CKJ jammers.¹³³ Amnesty International is unable to confirm if these were exported directly to Sudan or to another country in the region.



Drone jammers seized by SAF in Omdurman.¹³⁴

¹³² Ching Kong Technology, undated. <https://www.szckt.com/products/new-portable-high-power-drone-jammer-gun-directional-blocking-1500m-for-uavs>

¹³³ The Ching Kong website states that some Ching Kong products have been pre-approved for military procurement systems. <http://www.ckjsecurity.com/>.

¹³⁴ Telegram video, 14 March 2024. <https://t.me/SAFgov/1454>.



Left: Close-up of the drone jammers, with label marked CKJ-G7-170.¹³⁵

Right: control panel of CKJ jammers, as sold online.¹³⁶

Chinese drone jammers are also being used by members of the SAF, as seen in recently published pictures¹³⁷ showing a Sudanese army soldier equipped with a SkyFend Hunter jammer.¹³⁸ While Amnesty International was able to confirm that the picture was recently posted and that the person in the photograph was a SAF member based on his social media activity, it is unable to confirm the alleged location in Al-Gezira State. SkyFend Hunter are manufactured by a Shenzhen-based company, Shenzhen Skyfend Technology Co., Ltd., which has been shipping jammer guns to at least one Russian company¹³⁹ sanctioned by the Ukrainian government, in December 2023.¹⁴⁰ These portable drone jammers constitute relatively expensive pieces of equipment: shipment-level trade data indicates that one single Skyfend Hunter jammer is priced at above USD 22,000, therefore representing an expensive piece of equipment.¹⁴¹

¹³⁵ Source: Amnesty contact in Sudan.

¹³⁶ Youtube video, 10 October 2022. <https://www.youtube.com/watch?app=desktop&v=MaGkuNSMIF0>

¹³⁷ Facebook image, 22 April 2024. https://www.facebook.com/photo?fbid=122132930384232774&set=pb.61556983225304.-2207520000&locale=ar_AR

¹³⁸ X image, 25 April 2024. <https://twitter.com/BenDoBrown/status/1783489208025272616>

¹³⁹ "Оружейная палата", or "Armory Chamber LLC", as it appears in trade data. Mirror data on China's exports of HS 85+ commodities between 2014 and 2024, accessed through Export genius.

¹⁴⁰ President of Ukraine, Entities, to which personal special economic and other restrictive measures (sanctions) are applied, 7 December 2023.

https://www.president.gov.ua/storage/j-files-storage/01/22/41/ac64f4cd0609367f8ebe222daeba7e39_1701950146.pdf

¹⁴¹ Mirror data on China's exports of HS 85+ commodities between 2014 and 2024, accessed through Export genius.



A SAF soldier equipped with a Skyfend Hunter drone jammer.¹⁴²

China acceded to the ATT in July 2023. Since then, like Serbia, China has legal obligations under Article 6 of the treaty not to authorize any transfer of conventional arms if they have knowledge at the time of authorization that the arms or items would be used in the commission of genocide, crimes against humanity or war crimes.¹⁴³ China is also legally obliged under the ATT's Article 7 to conduct an objective and non-discriminatory assessment of all exports of conventional arms and deny export authorization if there is a substantial risk that the arms could be used to commit or facilitate a serious violation of international human rights or humanitarian law.¹⁴⁴ Furthermore, under Article 11, China must also take measures to prevent the diversion of conventional arms covered by the Treaty.¹⁴⁵

¹⁴² Facebook image, 22 April 2024. https://www.facebook.com/photo?fbid=122132930384232774&set=pb.61556983225304.-2207520000&locale=ar_AR

¹⁴³ ATT, Article 6.3

¹⁴⁴ ATT, Article 7.

¹⁴⁵ ATT, Article 11.

2.5 Rifles transferred from Yemen

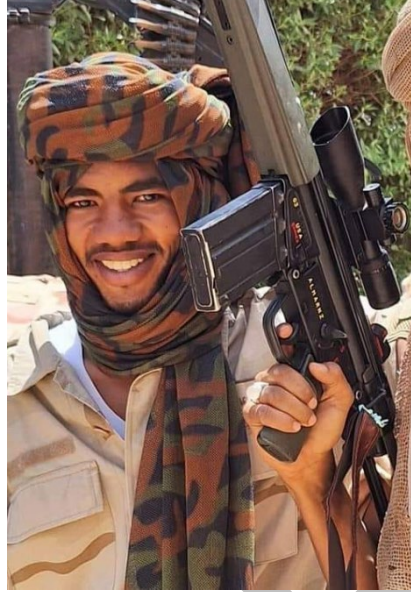
Based on the markings found on modified G3 rifles used by armed groups in Sudan, Amnesty International was able to identify small arms recently transferred from Yemen.

Several photos posted on various social media accounts shows the presence of visible markings, “Al-Marnz”, on modified G3 rifles that have been linked, in other research, to one or several Yemeni gunsmiths.¹⁴⁶ Amnesty International has been able to identify G3 rifles with these specific Yemeni markings in various parts of the country, including at least once in Darfur.¹⁴⁷ However, these rifles have been produced by numerous countries since the 1950’s and Amnesty International is unable to identify potential UN embargo violations based on these markings alone.

¹⁴⁶ Silah report, Kalashnikov & G3 Modifications on the Yemeni Market, 24 Septembre 2019.

<https://silahreport.com/2019/09/24/kalashnikov-g3-modifications-on-the-yemeni-market/>.

¹⁴⁷ X Video, 23 November 2023. Url: <https://twitter.com/RSFLiveSD/status/1724897472932376635>



Modified G3 with Al-Marnz markings seen with RSF forces.¹⁴⁸

2.6 UAE armored personnel carriers and infantry fighting vehicles

The UAE is an important supplier of weapons and armored personnel carriers (APCs) to the RSF. All Emirati APCs identified by Amnesty International have entered production after 2004, and their presence in Darfur likely comes in violation of UN resolutions.

¹⁴⁸ Left: Facebook image, 2 June 2023. <https://www.facebook.com/photo.php?fbid=818020526582100&set=pb.100051224812038.-2207520000&type=3>. The person on the left, Homar Gabriel Hamad, is a RSF member: Facebook profile, undated. <https://www.facebook.com/profile.php?id=100087768085958>. Right picture: X video, 15 November 2023. <https://twitter.com/RSFLiveSD/status/1724897472932376635>.

Nimr Ajban APCs, first spotted in Sudan in 2019,¹⁴⁹ have been seen in videos verified by Amnesty International being used, by the RSF, in various parts of Sudan, including in Khartoum.¹⁵⁰ One video, first posted on 25 March 2024 on Telegram, in a location that Amnesty International was unable to independently verify, shows a man claiming to be a SAF soldier and speaking with a North Sudanese accent showing the mostly-illegible data plate from a Nimr Ajban seized by the SAF.¹⁵¹ Numerous other types of Emirati APCs have been seen in videos in Sudan including at least one Shell Special Vehicles APC¹⁵². In April 2024, a video that the SAF claims to have shot in Mellit, North Darfur, shows several types of APCs allegedly seized from the RSF, including Streit Gladiator & Cougar APCs, a Terrier LT-79 and several INKAS Titan-S.¹⁵³ Contacted by Amnesty, the Armored Group (the manufacturer of the Terrier LT-79) claims to abide by all local and international export regulations and sanctions, including those imposed by the United Nations Security Council and unequivocally states it has never exported armored vehicles to Sudan. Shell Special Vehicles also stated that they have never exported Armored Personnel Carriers to Sudan.



A destroyed NIMR Ajban in Khartoum.¹⁵⁴

¹⁴⁹ X video, 5 June 2019. <https://twitter.com/trbrtc/status/1136245203252187136>.

¹⁵⁰ Youtube video, 17 May 2023. <https://www.youtube.com/watch?v=x7MxAMlplCw>

¹⁵¹ Telegram video, 25 March 2024. <https://t.me/azwyokgsbzzz/12229>

¹⁵² Shell LLC is a company based in the UAE that has no relation to Shell PLC, which is based in the UK.

<https://twitter.com/wdalbehair/status/1768189903005716848>. See reference image here:

<https://www.facebook.com/photo/?fbid=2814013148816521&set=a.1900266963524482>.

¹⁵³ X video, 14 April 2024. <https://twitter.com/Sudanesearmy1/status/1779533041691406415>

¹⁵⁴ X video, 28 May 2023. <https://twitter.com/skynewsarabia/status/1662941198934331394>

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3. A case of large-scale diversion? Insights from trade data on Sudan's arms procurement

By analyzing the records of more than 1,900 shipments of commodities categorized as HS 93+, Amnesty International was able to profile several of the country's most important importers as well as some of their main foreign partners. This analysis not only reveals the magnitude of Sudan's weapons trade, but also sheds light on some concerning trends, including the likely large-scale diversion of civilian weapons to armed groups, as well as possible large-scale conversion of less lethal weapons into lethal ones.

3.1 Sudan's import of foreign small arms

Entities that import significant quantities into Sudan can be broadly divided into two categories: companies that have close links with the Sudanese army or arms industry, and smaller importers that mostly target the civilian market. As discussed above, there is ample evidence to show that civilian weapons are being used by all sides in the current conflict. A careful analysis of the trade data indicates that some companies act as proxies for the parties to the current conflict.

On the importing side, based on available open-source data, the largest importer of weapons into Sudan is a company called Marble Engineering,¹⁵⁵ which was already flagged in the 2016 UN Panel of Experts report as a likely front company used by the Government of Sudan to import military aircraft into the country.¹⁵⁶ According to trade records, the company only appears to have procured commodities categorized as HS 93+ from the Indian company Ashoka Manufacturing (the largest supplier of weapons to the Sudanese market, as detailed below), labelled "munition metal components", many of them parts for S-8 80mm rockets.¹⁵⁷ These S-8 rockets are launched from B-8M1 rocket pods, which are mounted on SAF aircraft, or on pick-up trucks and used in various parts of the country, including near Khartoum.¹⁵⁸ The second largest Sudanese importer, Target Multiactivities co. Ltd., also procured exclusively from Ashoka Manufacturing, between 2016 and 2018, but there is no available information about the nature of the shipments.¹⁵⁹ Target Multiactivities is a subsidiary of the GIAD conglomerate,¹⁶⁰ whose structural links with SAF and the Sudanese arms manufacturing are well-documented.¹⁶¹ Al-Shagara Industrial Complex,

¹⁵⁵ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁵⁶ Final report of the Panel of Experts submitted in accordance with paragraph 2 of resolution 2265 (2016), 9 January 2017: <https://documents.un.org/doc/undoc/gen/n16/296/39/pdf/n1629639.pdf?token=BkK3xJOBtNobnWswW2&fe=true>. Para 82 and following.

¹⁵⁷ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁵⁸ Sudan War Monitor, Omdurman mosque and homes damaged; rocket strikes across the Nile, 24 June 2024. <https://sudanwarmonitor.com/p/omdurman-mosque-and-homes-damaged>

¹⁵⁹ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁶⁰ GIAD Group, Target MultiActivities, undated. <https://www.giad.com/en/Info/aTopics/?aTop=930>

¹⁶¹ Open Sanctions, Defense Industry System, undated, <https://www.opensanctions.org/entities/NK-Fo4Xpg6iQzSmofVQqtNcyp/>

an entity within the State-owned Military-Industry Corporation (MIC), imports large quantities of weapons from civilian companies in both Russia and Türkiye. Some of the shipments strongly suggest attempts at circumventing UNSC resolutions or export control laws.

Wail Shams Trading, the fifth largest Sudanese weapons-importing entity based on open-source records,¹⁶² procures large quantities of weapons and rifles labelled as hunting, sports or targeting rifles from various companies in Russia and Türkiye. Its main supplier is Kalashnikov Concern, and the value of some shipments are above USD 500,000.¹⁶³ Wail Shams Trading, in particular, is a large importer of Tigr DMRs and Saiga-MK rifles, which have been identified by Amnesty International as being used in conflict areas of Sudan, including in Darfur, by both the SAF and the RSF. According to shipment level trade data, until at least 2020, Wail Shams Trading was headquartered at the Military Officers' Club in Khartoum, an elite and exclusive venue owned by the Sudanese Army.¹⁶⁴ In a response to Amnesty International, the General Manager of Wail Shams Trading claimed that the company was only headquartered at the Army Officer's Club until 2016. In 2021, a weapons shipment originating from Russia, but transiting through Addis Ababa, was blocked by the Sudanese customs administration at Khartoum airport. It was later cleared by the Ministry of the Interior, despite formal protests from the Public Prosecution in Sudan.¹⁶⁵ Observers claimed that Public Prosecution was worried about potential transfers to forces loyal to ousted President Omar Al-Bashir.¹⁶⁶

Responding to Amnesty International, Wail Shams Trading claimed that it complies with all international laws and regulations regarding the sale of arms and equipment to Sudan and stated that the RSF was responsible for the diversion of the weapons imported, arguing that its store and warehouse were robbed by the RSF after the outbreak of the conflict. Amnesty International is unable to verify this additional information shared by Wail Shams Trading.

¹⁶² Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁶³ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁶⁴ Archived from: عنوان للنشاط الثقافي والترفيهي, *Khartoum Star*, 15 November 2018. Url: <https://web.archive.org/web/20191223232627/https://khartoumstar.com/2018/11/15/%d9%86%d8%a7%d8%af%d9%8a-%d8%a7%d9%84%d8%b6%d8%a8%d8%a7%d8%b7-%d8%b9%d9%86%d9%88%d8%a7%d9%86-%d9%84%d9%84%d9%86%d8%b4%d8%a7%d8%b7-%d8%a7%d9%84%d8%ab%d9%82%d8%a7%d9%81%d9%8a-%d9%88%d8%a7%d9%84/>

¹⁶⁵ Arms flown to Sudan from Ethiopia were legal, says ministry, *Reuters*, September 6 2021. <https://www.reuters.com/world/africa/sudan-investigating-weapons-flown-ethiopia-state-news-agency-2021-09-05/>

¹⁶⁶ Al Taghyeer Public Prosecution accuses customs of "trespassing" in arms shipment case, 7 March 2021, <https://www.altaghyeer.info/en/2021/09/07/public-prosecution-accuses-customs-of-trespassing-in-arms-shipment-case/>

On the exporting side, besides Ashoka Manufacturing, the largest exporters to Sudan are Kalashnikov Concern and Molot. Together the two companies have exported at least USD 5.8 million worth of small arms to Sudan since 2019. These small arms manufacturers are partially owned by Rostec, Russia's state-owned defense conglomerate. Both of these companies seem to trade with a limited number of Sudanese partners, and mostly export firearms under specific HS codes that relate to "sporting, hunting or target rifles". These "sporting, hunting or target rifles" are frequently seen being used in conflict settings by both the RSF and the SAF.

Turkish exports to Sudan come from a much wider diversity of suppliers, mostly small defense companies manufacturing predominantly handguns, 12-gauge shotguns designed for hunting, and so-called blank guns.

3.1.1. Blank guns and rounds

Shipment-level trade data reveals Turkish exports of very large quantities of blank guns and ammunition to Sudan.¹⁶⁷ Due to the magnitude of the trade, similar patterns established elsewhere in the Sahel, and the specific models that are imported in large numbers less-lethal weapons are massively converted into lethal small arms in Sudan.

CONVERSION OF TURKISH BLANK GUNS AND AMMUNITION INTO LETHAL WEAPONS

The term "blank gun" usually refers to less lethal firearms (usually handguns) that generate the typical flash and sound of lethal weapons, but do not fire a projectile. As opposed to lethal weapons that are designed to kill, blank guns are primarily designed for self-defense, but do normally not cause injury.¹⁶⁸

Since these blank guns are not designed to injure or kill, they can be very easily procured.

While the conversion of blank guns into lethal weapon is not a new phenomenon, it has been increasingly scrutinized over the last decade due to increased awareness of the security risk it constitutes, especially

¹⁶⁷ For simplicity, "blank", "sound" and "trauma" guns will be collectively referred to as "blank guns" in this report.

¹⁶⁸ Blank guns can nonetheless cause severe injury or death at immediate or hard contact range. Pircher, Rebecca, Markus Große Perdekamp, Annette Thierauf-Emberger, Lena Kramer, Stefan Pollak, and Dorothee Geisenberger. "Wound Morphology in Contact Shots from Blank Cartridge Handguns: A Study on Composite Models." *International Journal of Legal Medicine* 131, no. 5 (September 2017): 1333–39. <https://doi.org/10.1007/s00414-017-1650-2>.

in jurisdictions with strict gun control regulations, as in much of Europe. Turkish blank guns have already been flagged as the most prevalent source of converted firearms in Europe.¹⁶⁹

Blank guns are often easy to procure and closely resemble existing lethal handguns models, while only costing a fraction of the price, often less than USD 50. They can be sold, once converted, at a much higher price, up to USD 200 for Turkish blank guns in the Horn of Africa region.¹⁷⁰ According to research papers based on the identification of seized converted firearms by the Turkish police, there are two main ways in which blank guns can be converted:¹⁷¹

either by the complete re-barreling of the blank gun (by either sleeving the existing barrel or entirely replacing it), which requires adapted tools, or by removing or destroying the obstruction/restraint piece located in the barrel, to clear the way for projectile.¹⁷²

While in most cases re-barreled converted handguns can be loaded with standard lethal ammunition, with the new barrel withstanding the increased pressure, blank guns that have been converted using the second technique can only be loaded with converted blank rounds. Again, various techniques can be used, one of the most common one being the removal of the plastic wad and the addition of a metal sphere as projectile, often a buckshot pellet, as depicted in the pictures below.



¹⁶⁹ Nicolas Florquin et Benjamin King, 2018 From Legal to Lethal: Converted Firearms in Europe, <https://www.smallarmssurvey.org/resource/legal-lethal-converted-firearms-europe>.

¹⁷⁰ Monitoring Group on Somalia and Eritrea, 2017.

<https://documents.un.org/doc/undoc/gen/n17/302/02/pdf/n1730202.pdf?token=lbqiovWdGmDK89i5WW&fe=true>

¹⁷¹ Ogunc, Gokhan I., M. Tahir Ozer, Kagan Coskun, et Ali Ihsan Uzar. 2009. « Modified blank ammunition injuries ». *Forensic Science International* 193(1): 112-17. doi:[10.1016/j.forsciint.2009.09.021](https://doi.org/10.1016/j.forsciint.2009.09.021).

¹⁷² Ogunc, Gokhan I., M. Tahir Ozer, Kagan Coskun, et Ali Ihsan Uzar. 2009. « Modified blank ammunition injuries ». *Forensic Science International* 193(1): 112-17. doi:[10.1016/j.forsciint.2009.09.021](https://doi.org/10.1016/j.forsciint.2009.09.021).

Left: an unmodified blank round; right: a blank round converted through the addition of a metal sphere.¹⁷³

Blank weapons must be loaded with special ammunition that either does not contain a projectile, or shoots rubber projectiles or tear gas capsules that do not always require an export license. This has contributed to their widespread presence in numerous Sahelian and North African countries.¹⁷⁴

Conservative calculations based on shipment-level trade data indicate that between 2020 and 2023 at least 239,309 blank guns have been exported by a limited number of Turkish companies to Sudan.¹⁷⁵ In addition, nearly 26 million blank rounds have been imported by entities registered in Sudan.¹⁷⁶ Among these entities is the Al-Shagara Industrial Complex, a company within Sudan's State-owned defence conglomerate MIC. Between 2019 and 2023, Al-Shagara imported at least 2,400 blank guns from Türkiye, as well as 200,000 rounds of blank ammunition.¹⁷⁷ One single Khartoum armorer, Al-Bayarg, imported no less than 5.1 million blank rounds between 2020 and 2023.¹⁷⁸ While social media profiles of the Al-Bayarg shop in Khartoum do show several blank guns advertised for sale, the sheer magnitude of imports of blank weapons and ammunition, a rather niche market for products that have no use in a conflict setting, calls for closer scrutiny.¹⁷⁹

There are two main non-exclusive explanations for these massive imports: mass conversion and/or mislabelling of shipments. While MIC-affiliated companies have the proven capacity to manufacture small arms, including handguns, importing less lethal weapons from Türkiye and re-barrelling them would allow for quicker and cheaper production. As for the ammunition, this is unlikely to be the case as the low precision and unreliability of converted ammunition makes it unsuitable for military use. Amnesty International calls for further investigation and closer scrutiny on the concrete use of these large shipments of blank rounds to Sudan.

Many of the specific models of blank guns and blank rounds imported from Türkiye have a track record of smuggling into North African and Sahelian States.¹⁸⁰ The company Özkursan, which is headquartered in

¹⁷³ Modification Methods of Blank Pistols in 20Türkiye06 - Saribey - 2009 - Journal of Forensic Sciences - Wiley Online Library ». <https://onlinelibrary.wiley.com/doi/10.1111/j.1556-4029.2009.01012.x> (2 mai 2024).

¹⁷⁴ Savannah De Tessières, 2018, *at the crossroads of sahelian conflicts Insecurity, Terrorism, and Arms Trafficking in Niger* <https://www.smallarmssurvey.org/sites/default/files/resources/SAS-SANA-Report-Niger.pdf>. See p.46

¹⁷⁵ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁷⁶ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁷⁷ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁷⁸ The company (whose arabic scrip is ((لبيارق للأسلحة و الذخائر)) also appears in the shipment-level trade data as "albayarg for firearms", "amin abdelrahman khalafalla albayarg for firearms" and other. Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁷⁹ « ARES Releases Research Report 12: Digital Bazaar (Online Arms Trade, Syria) - Armament Research Services (ARES) ». 2022. <https://armamentresearch.com/ares-releases-research-report-12-digital-bazaar-online-arms-trade-syria/>. Facebook, 29 June 2020 <https://www.facebook.com/112585397105226/photos/pb.100064023516146.-2207520000/147243010306131/?type=3> (2 mai 2024).

¹⁸⁰ Savannah De Tessières, 2018, *at the crossroads of sahelian conflicts Insecurity, Terrorism, and Arms Trafficking in Niger* <https://www.smallarmssurvey.org/sites/default/files/resources/SAS-SANA-Report-Niger.pdf>.

Istanbul and currently is the largest supplier of blank rounds to Sudan,¹⁸¹ was already highlighted in a sanctions violation case regarding UN sanctions on Libya, seeking to export 2,500 blank guns and 500,000 rounds of blank ammunition to the Libyan civilian market.¹⁸² Voltran, another company that exports to Sudan large numbers of blank guns under the brand Ekol, was also identified by the UN Monitoring Group on Somalia and Eritrea as the supplier of a large shipment of blank guns off-loaded in the Eritrean port of Massawa, allegedly *en route* to Sudan in 2017.¹⁸³ Several investigative press reports suggest that Voltran products are still in high demand by weapons traffickers involved in Libya.¹⁸⁴ A large number of the most commonly exported Turkish blank guns to Sudan--Ekol handguns manufactured by Voltran, Zoraki pistols manufactured by Atak Arms, or Retay products,¹⁸⁵ for instance--are among the most commonly converted firearms seized in Europe.¹⁸⁶ This is due to their low prices and easy convertibility as tutorial videos are widely available on major social media platforms. Several of the specific models imported by the Al-Shagara Industrial Complex, in particular Retay 84FS¹⁸⁷ and Retay Mod 92, have been seized by law enforcement units in various countries, after having been converted and sold on the black market.¹⁸⁸

¹⁸¹ Mirror data on Sudan's imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁸² Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya. Url: <https://documents.un.org/doc/undoc/gen/n14/240/00/pdf/n1424000.pdf?token=oQe2dNZwGs0BamYfvz&fe=true>. The consignee of the shipment mentioned in the report is Özkursan Otomotivve Metal Makina, while the exporter that appears in the Sudan trade data is Ozkursan Muhimmat ve Makina sanayi anonim sirketi. Both are the same entity, sharing the same adress in istanbul.

¹⁸³ Report of the Monitoring Group on Somalia and Eritrea pursuant to Security Council resolution 2317 (2016): Eritrea. Url: https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s_2017_925.pdf

¹⁸⁴ « Turkish firm that violated UN arms sanctions on Libya got a facelift after exposé - Nordic Monitor », March 6 2021 <https://nordicmonitor.com/2021/03/turkish-firm-that-violated-un-arms-sanctions-on-libya-got-a-facelift-after-expose/>,

¹⁸⁵ "Police Professional | Illegal Conversion of Blank-Firing Pistols into Lethal Guns a 'Growing Concern', Says GMP.", 2December 2021

<https://policeprofessional.com/news/illegal-conversion-of-blank-firing-pistols-into-lethal-guns-a-growing-concern-says-gmp/>
"Legal Blank Firing Pistols Being Converted into Deadly Weapons, Police Warn." 5 May 2021. *Bracknell News*.
<https://www.bracknellnews.co.uk/news/national/19280286.legal-blank-firing-pistols-converted-deadly-weapons-police-warn/>

¹⁸⁶ Nicolas Florquin et Benjamin King, 2018 From Legal to Lethal: Converted Firearms in Europe, <https://www.smallarmssurvey.org/resource/legal-lethal-converted-firearms-europe>.

¹⁸⁷ X,"National Crime Agency (NCA), 19 May 2022 <https://t.co/P7B2sZyDQd>'.

¹⁸⁸ "Weapons of the Turkish Black Market.", Militant Wire, 18 November 2022 <https://www.militantwire.com/p/weapons-of-the-turkish-black-market>



A converted Retay 84FS seized by British Law enforcement.¹⁸⁹

Civilian weapons diverted *en masse*?

Shipment-level trade data analyzed by Amnesty International reveals a very large number of shipments labelled as “hunting”, “civilian”, “target” or “sporting” weapons, suggesting that they are destined to the market.¹⁹⁰ In addition to the ample evidence of these “civilian” weapons being diverted to the battlefield, the careful analysis of some of these shipments strongly suggests diversion techniques aimed at circumventing export control regulations.

Broad categories such as “civilian”, “hunting” or “sporting” can include various types of weapons and calibers, but, at least for Turkish exports, mostly relate to smooth-bore 12GA shotguns, which are excluded from the official Turkish list of controlled items.¹⁹¹ Available open-source trade data (2014-2023) includes only 21 different shipments categorized under the specific HS Code 930330000000, which

¹⁸⁹ X image, 19 May 2022 <https://t.co/P7B2sZyDQd>.

¹⁹⁰ Mirror data on Sudan’s imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁹¹ Duman Law, Law report on memorandum re. law no. 5201 and law no 2502, Undated. <https://www.duman-law.com/content/articles/Memorandum-re-Law-No-5201-and-Law-No-5202.pdf>. Online interview with Conflict Armament Research experts, 21 March 2024.

encompasses “other sports, hunting or target rifles”. Seventy-five shipments encompassing 16,254 shotguns and rifles include the word “hunting” in the product description, and these “hunting” rifles very frequently make their way into the hands of the RSF, the SAF, or their networks of proxies and allies. The State-owned Al-Shagara Industrial Complex imported large quantities of hunting rifles from Türkiye between 2020 and 2023 from one single supplier, Ebru Seymanur Ozman.¹⁹² The same supplier also provided 400 blank guns and 200,000 blank rounds. Another 3,073 hunting rifles were supplied to the Al-Shagara complex, 2,320 of them were a mix of M16-pattern shotguns or breech-loading double barrel shotguns. While an uncommon sight, double barrel shotguns have been seen in use by the RSF in West Darfur,¹⁹³ other types of shotguns and “hunting rifles” are very often used by all sides of the conflict as documented in various cases above.

¹⁹² Mirror data on Sudan’s imports of HS 93 commodities between 2014 and 2024, accessed through Export genius.

¹⁹³ https://twitter.com/Quick_news12/status/1760284314430775641

State obligations in relation to arms transfers

States must comply with international law in overseeing the transfer of arms from their territory to that of other states, particularly those subject to armed conflict. The Arms Trade Treaty places various duties upon States to control and assess whether their arms exports and transfers might be used to carry out crimes under international law or serious human rights violations. All states parties, including China and Serbia, and signatories, including Türkiye and the UAE, have specific obligations.

Under Article 6 of the Arms Trade Treaty, states parties are prohibited from authorizing any transfer (i.e. export, import, transit, trans-shipment and brokering) of arms, ammunition and parts and components that would violate UN Security Council Chapter VII measures, in particular arms embargoes, or a state party's existing relevant treaty obligations. In addition, transfers are prohibited where a state has knowledge that the arms being considered for authorisation would be used in the commission of genocide, crimes against humanity, or grave breaches of the Geneva Conventions of 1949.¹⁹⁴

Once a state party establishes that a transfer is not prohibited under Article 6, it must carry out an objective and non-discriminatory assessment of each proposed arms export as required by Article 7. This includes assessing whether there is a substantial risk that the arms or related items could be used to commit or facilitate a serious violation of international human rights law or international humanitarian law. If this risk cannot be effectively addressed and mitigated, then the transfer should not take place.¹⁹⁵

Under Article 11, an exporting state party must take measures to prevent the diversion of conventional arms covered by Article 2(1) of the treaty. If a state party detects a diversion of conventional arms the state party must take measures to address this, such as alerting potentially affected state parties, examining diverted shipments and taking follow-up measures through investigation and law enforcement.¹⁹⁶

Signatories to the ATT must refrain from acts which would defeat the object and purpose of the treaty outlined in Article 1.¹⁹⁷ This includes establishing “the highest possible common international standards for regulating or improving the regulation of the international trade in conventional arms”, eradicating “the illicit trade in conventional arms and prevent their diversion” for the purpose of “contributing to international and regional peace, security and stability”, “reducing human suffering” and “promoting cooperation, transparency and responsible action by States Parties in the international trade in conventional arms...”.¹⁹⁸

As a part of their obligation to respect and ensure respect for international humanitarian law (IHL), all states are prohibited from transferring or permitting private actors to transfer weapons to a party to an armed conflict - whether a state or non-state armed group - where there is a clear risk that this would contribute to the commission of IHL violations. Common Article 1 of the Geneva Conventions requires all states to “undertake to respect and to ensure respect for the present Convention in all circumstances.”¹⁹⁹ According to the International Committee of the Red Cross's (ICRC) commentary on Article 1 this requires

¹⁹⁴ Arms Trade Treaty, Article 6, thearmstradetreaty.org/hyper-images/file/ATT_English/ATT_English.pdf?templated=137253

¹⁹⁵ Arms Trade Treaty, Article 7

¹⁹⁶ Arms Trade Treaty, Article 11

¹⁹⁷ Vienna Convention on the Law of Treaties, Art 18 https://legal.un.org/ilc/texts/instruments/english/conventions/1_1_1969.pdf

¹⁹⁸ Arms Trade Treaty, Article 1

¹⁹⁹ Convention (I) for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field, Geneva, 12 Aug 1949, https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.30_GC-I-EN.pdf.

that states “refrain from transferring weapons if there is an expectation, based on facts or knowledge of past patterns, that such weapons would be used to violate the Conventions.”²⁰⁰IHL does not just bind states, but also private actors including armed groups and corporations whose activities have a nexus to an armed conflict.²⁰¹Therefore, corporate actors involved in the transfer of weapons to Sudan may also contribute to IHL violations which, if implemented with knowledge that said weapons will likely be used to commit international crimes, may also entail criminal responsibility.²⁰²

Corporate responsibility to respect human rights in relation to arms transfers

There is a clear global consensus that companies have a responsibility to respect human rights throughout their global operations including with respect to the manufacture, export, import, and sale of arms that may be used to commit serious human rights violations, as reflected in the UN Guiding Principles on Business and Human Rights.²⁰³ Although States have an obligation to regulate the arms industry,²⁰⁴ the corporate responsibility to respect human rights exists over and above obligations to comply with national laws and regulations.²⁰⁵ This responsibility requires companies to conduct human rights due diligence throughout their entire value chain to identify, prevent, and mitigate any actual or potential involvement in human rights abuses.²⁰⁶

In light of the substantial risk that all arms and ammunition being transferred to Sudan - including those marketed to civilians - will be used by parties to the conflict to commit grave human rights abuses, companies must immediately cease their involvement in this supply of arms to avoid causing or contributing to these abuses. If a company identifies that they sold have contributed to such abuses, they should provide for or cooperate in remediation process to any persons harmed as a result.²⁰⁷

The standard of human rights due diligence required is heightened with respect to business activity impacting conflict-affected areas.²⁰⁸ In such cases, heightened human rights due diligence requires that companies conduct an ongoing assessment of the conflict more broadly including by reviewing independent reporting on the conflict by inter-governmental organizations, international and local NGOs, and community groups to identify and log all instances of involvement of their products in incidents of suspected violations of international human rights and humanitarian law. Companies also need to assess

²⁰⁰ Commentary of 1966, Convention (I) for the Amelioration of the Condition of the Wounded and Sick in Armed Forces in the Field. Geneva, 12 August 1949, Article 1: Respect for the Convention, International Committee of the Red Cross, para. 162, https://ihl-databases.icrc.org/ihl/full/GCI-commentaryArt1#83_B. In other commentaries, the ICRC has said that “States are prohibited from transferring weapons to a party to an armed conflict, whether a State or non-state armed group, where there is a clear risk that this would contribute to the commission of IHL violations”, ICRC, Arms transfers to parties to armed conflict: what the law says, www.icrc.org/en/document/arms-transfers-parties-armed-conflict-what-law-says

²⁰¹ ICRC, Business and International Humanitarian Law: An Introduction to the Rights and Obligations of Business Enterprises under International Humanitarian Law, 2006, <https://shop.icrc.org/les-entreprises-et-le-droit-international-humanitaire-introduction-aux-droits-et-obligations-des-entreprises-au-regard-du-droit-international-humanitaire-2580.html> (Business and International Humanitarian Law); OHCHR, The Corporate Responsibility to Respect Human Rights: An Interpretive Guide, 2012, https://www.ohchr.org/Documents/Publications/HR.PUB.12.2_En.pdf.

²⁰² For instance, a Dutch court found a Dutch national, Guus Kouwenhoven, guilty of complicity in war crimes committed by the Liberian armed forces as a result of his import of weapons and ammunition into Liberia with awareness that the weapons he supplied would most likely be used by parties to the conflict to commit war crimes. ‘s-Hertogenbosch Court of Appeal, Public Prosecutor v. Guus Kouwenhoven, Appeals Judgment, 21 April 2017, <https://www.internationalcrimesdatabase.org/Case/3308/The-Public-Prosecutor-v-Guus-Kouwenhoven/>.

²⁰³ UN Guiding Principles on Business and Human Rights, Principles 11 and 14.

²⁰⁴ Amnesty International, Outsourcing Responsibility: Human Rights Policies in the Defence Sector (Index: ACT 30/0893/2019), 2019, <https://www.amnesty.org/en/documents/act30/0893/2019/en/>, pp. 43-44.

²⁰⁵ UN Guiding Principles on Business and Human Rights, Commentary to Principle 11.

²⁰⁶ UN Guiding Principles on Business and Human Rights, Principle 17.

²⁰⁷ UN Guiding Principles on Business and Human Rights, Principle 22.

²⁰⁸ United Nations Development Programme, Heightened Human Rights Due Diligence for business in conflict-affected contexts: A Guide, 2022, <https://www.undp.org/publications/heightened-human-rights-due-diligence-business-conflict-affected-contexts-guide>.

further risks to human rights on an ongoing basis including the risk of harm to vulnerable populations and the risk of arms diversion, which are rife with respect to the conflict in Sudan.²⁰⁹

The corporate responsibility to respect human rights applies equally to all companies in the arms industry regardless of how directly involved they may be in the transfer of arms to Sudan.²¹⁰ For instance, where an arms manufacturer receives information or otherwise identifies that weapons they produced have been used to commit grave human rights abuses in Sudan, their products may be directly linked to these abuses within the meaning of the UN Guiding Principles on Business and Human Rights.²¹¹ The term “directly linked” is defined to exclude extremely loose connections to a company’s operations, products or services; as such, a human rights harm may be directly linked to a company’s products via indirect business relationships beyond the first tier.²¹²

An arms manufacturer is required to conduct due diligence throughout their entire value chain, from the point of origin to the end users, in order to determine whether and how their arms ended up in the hands of the party to the conflict that committed these abuses. Once they have mapped this value chain, the manufacturer must use their leverage with the relevant business relationships - whether those are customers, dealers, distributors, brokers, transporters, financiers, or others - to prevent future arms transfers to Sudan. For instance, a condition that end users will comply with international human rights and humanitarian law in using the company’s products and services should be built into commercial contracts, with the possibility of products and services being suspended or withdrawn if this condition is not clearly met.²¹³ If the manufacturer lacks the requisite leverage to prevent these transfers, they can seek to increase their leverage by offering incentives or engaging with state actors, or alternatively they can consider end the business relationship.²¹⁴

Given the longstanding, widely documented, serious violations of international human rights and humanitarian law that have plagued Sudan for over two decades, and the escalating violence which has triggered thousands of civilian deaths and massive displacement, all states must cease arms transfers to the whole of Sudan, and exercise extreme caution when considering arms exports to the wider region.

²⁰⁹ Amnesty International, *Outsourcing Responsibility: Human Rights Policies in the Defence Sector* (Index: ACT 30/0893/2019), 2019, <https://www.amnesty.org/en/documents/act30/0893/2019/en/>, pp. 32-35.

²¹⁰ UN Guiding Principles on Business and Human Rights, Principle 14.

²¹¹ UN Guiding Principles on Business and Human Rights, Principle 13.

²¹² Expert letters and statements on the application of the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights in the context of the financial sector, Note by the Chair of the Negotiations on the 2011 Revision of the Guidelines, regarding the Terminology on “Directly Linked”, June 2014, <https://mneguidelines.oecd.org/global-forum/GFRBC-2014-financial-sector-document-3.pdf>

²¹³ OECD, *Due Diligence Guidance for Responsible Business Conduct*, 2018, <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>, p. 78

²¹⁴ UN Guiding Principles on Business and Human Rights, Principle 19.

Recommendations

To SAF and RSF

- Immediately end all deliberate attacks on civilians and civilian objects as well as indiscriminate attacks and attacks disproportionately affecting civilians and civilian objects, including the use of explosive weapons with wide area effects, including imprecise projectiles, in the vicinity of civilians.
- Allow and facilitate rapid and unhindered access for humanitarian actors to ensure aid reaches all those in need, as well as protect humanitarian relief personnel and facilities, and end all attacks on humanitarian workers.
- Immediately end rape and other sexual violence against women and girls across the country and ensure there are credible investigations, adequate punishment of perpetrators, treatment, and full reparation for survivors.
- Ensure accountability for past and recent crimes under international law and other serious violations and abuses in Sudan, including by surrendering the suspects wanted by the International Criminal Court and by fully cooperating with the UN fact-finding mission on Sudan.

To all countries sending arms and ammunitions and other supplies to the SAF and RSF and other armed groups in Sudan

- Immediately cease supplies of all arms and ammunition to Sudan, including the direct or indirect supply, sale or transfer of arms and military materiel, related technologies, parts and components, technical assistance, training, financial or other assistance.
- Urgently investigate the transfer of weapons aimed at the civilian market, such as shotguns, hunting rifles, blank guns and related ammunition, to parties to the conflict, and ensure all these weapons are explicitly covered by national arms control regimes, and that all future transfers to Sudan are prohibited.
- Take all measures necessary to regulate the arms industry by implementing rigorous licensing procedures for the export, transit and import of arms on a case-by-case basis, including full details of the brokers, transporters, and financiers involved in each transaction, whereby a license is only issued if the proposed arms transfers will not be delivered or diverted to Sudan. In this regard, companies should be required to conduct and share the findings of their human rights due diligence to receive a license to transfer arms as a matter of national legislation.
- Take all measures necessary to prevent the diversion of arms, including by exercising extreme caution in relation to arms transfers to the wider region, and through information sharing, investigation and law enforcement.

To all companies in the arms industry, including those named above:

- Immediately cease any involvement in the transfer of arms and ammunition to Sudan, directly or indirectly, including of weapons marketed for civilian use.
- Urgently conduct heightened human rights due diligence throughout the company's value chain to identify, prevent, and mitigate any actual or potential involvement in human rights abuses that are directly linked to the arms a company manufactures, exports, imports, or sells.
- Use all leverage at a company's disposal via business relationships with customers, dealers, distributors, brokers, transporters, financiers, and others identified throughout a company's value chain to prevent the supply or diversion of any arms or ammunition to Sudan, including by inserting a condition that end users will comply with international human rights and humanitarian law in using the company's products and services into commercial contracts.
- Publicly communicate the company's policies and practices for preventing and mitigating actual or potential adverse human rights impacts identified throughout their value chain including by providing frequent updates on measures taken to address ongoing developments with respect to the armed conflict in Sudan, to the greatest extent possible under the law.
- Provide for or cooperate in remediation processes where the company has identified that they have caused or contributed to human rights abuses using weapons they have manufactured, exported, imported, sold, or otherwise transferred, directly or indirectly, into Sudan.

To The UN Security Council

- Expand the arms embargo regime that currently applies to Darfur to the rest of Sudan – given the significant escalation of the violence and its impact on civilians, and the flagrant violation of the existing embargo by various actors who are fuelling the Sudan conflict. The expansion of the arms embargo must be accompanied by a comprehensive and effective mechanism to prevent international sales and prevent illicit transfers of arms to Sudan. Ensure that adequate human and other resources are allocated to the UN Panel of Experts and the UN Secretariat to conduct investigations to help ensure compliance with the UN arms embargo on Sudan.
- Thoroughly investigate all breaches of the arms embargo, including evidence of systematic diversion of weapons designed for the transfer of weapons aimed at the civilian market, such as shotguns, hunting rifles, blank guns and related ammunition, to parties to the conflict both during ongoing conflict and before April 2023.
- As a step towards an extended embargo, call on all countries to respect and enforce the current UN Security Council's arms embargo regime on Darfur by ending all transfers of weapons and ammunition to the SAF, the RSF and other armed actors. Ensure that all countries and entities that have violated the Darfur arms embargo are held accountable.
- Expand the referral of the situation in Darfur to the ICC to also include investigation and prosecution of crimes under international law, in the rest of Sudan.
- Provide funding to the ICC for the investigation and prosecution of crimes under international law in Sudan including those committed in the context of the current conflict.

To the African Union Peace and Security Council

- Support and work with the UN Security Council to expand and enforce the arms embargo regime that currently applies to Darfur to the rest of Sudan – given the significant escalation of the violence and its impact on civilians, and the flagrant violation of the existing embargo by various actors who are fuelling the Sudan conflict.
- Call on all countries to immediately cease supplies of all arms and ammunition to Sudan, including the direct or indirect supply, sale or transfer of arms and military materiel, related technologies, parts and components, technical assistance, training, financial or other assistance.
- As a step towards the extension of the UNSC embargo to the whole of Sudan, call on all countries to respect and enforce the UN Security Council’s arms embargo regime on Darfur by ending and refraining from transfers of weapons and ammunition to the SAF, the RSF and other armed actors. Ensure that all countries and entities that have violated the Darfur arms embargo are held accountable.
- Call on all parties to the conflict in Sudan to end all attacks on civilians and civilian infrastructure and ensure unhindered and immediate humanitarian access.
- Publicly support the Fact-Finding Mission established by the United Nations Human Rights Council in October 2023 and call on the Sudanese authorities to fully cooperate with the mission including by facilitating access to the country.

To Sudan’s neighbouring countries, notably Chad, Egypt, Central Africa Republic (CAR), South Sudan, Ethiopia, Eritrea and Libya

- Immediately cease and refrain from facilitating the transfer of weapons and ammunitions to Sudan’s SAF and RSF and other armed actors. Ensure all individuals and entities in your countries that are facilitating the transfer of weapons and ammunitions to Sudan are held accountable.
- Keep the borders open and remove movement restrictions and ensure those fleeing the conflict are not rejected at the borders, are protected against refoulement, and have prompt access to asylum procedures.
- Ensure unimpeded humanitarian access for aid organizations and others that are responding to those fleeing the conflict in Sudan.

To Sudan’s international partners, including the EU, KSA, UK, US, and others

- Call on all countries to immediately cease supplies of all arms and ammunition to Sudan, including the direct or indirect supply, sale or transfer of arms and military materiel, related technologies, parts and components, technical assistance, training, financial or other assistance.
- Work with the UN Security Council to expand the arms embargo regime that currently applies to Darfur to the rest of Sudan – given the significant escalation of the violence and its impact on civilians, and the flagrant violation of the existing embargo by various actors who are fueling the Sudan conflict.
- As a step towards the extension of the UNSC embargo to the whole of Sudan, call on all countries to respect and enforce the UN Security Council’s arms embargo regime on Darfur by ending and refraining from transfers of weapons and ammunition to the SAF, the RSF and other armed actors.

Ensure that all countries and entities that have violated the Darfur arms embargo are held accountable.

- Call on parties to the conflict in Sudan to end all attacks on civilians and civilian infrastructure and ensure unhindered and immediate humanitarian access.
- Open safe and legal pathways and ensure protection and support for people fleeing Sudan. Refrain from returning Sudanese nationals to Sudan or to any third country where they may be at risk of being returned to Sudan.
- Increase emergency funding for humanitarian response in Sudan, as well as in refugee camps in neighbouring countries. Ensure specific support for putting in place protection, care, treatment, and support mechanisms for survivors of sexual violence.
- Protect and promote the work of human rights defenders, activists, journalists, and civil society actors still in Sudan and at risk of attacks and violence. This should include concrete support and emergency travel documentation for those who need to leave Sudan for their safety. In parallel, pro-actively foster contact and ensure longer-term support to Sudanese Human Rights Defenders (HRDs) in exile to be able to continue their important work.

To the UN Human Rights Council

- Extend the mandate of the Fact-Finding Mission on Sudan for at least one year to allow it to pursue its important documentation and reporting work.
- Ensure that the Fact-Finding Mission is properly staffed and resourced to be able to fulfil its mandate.

ANNEXES



Subject: Response to Allegations of Armored Vehicles Sale to Sudan

Dear Mr. Edwards,

Thank you for your letter dated July 5, 2024, regarding the allegations of The Armored Group's involvement in the transfer of armored vehicles to Sudan. We appreciate the opportunity to address these serious concerns.

First and foremost, The Armored Group (TAG) unequivocally states that we have never exported armored vehicles, including the Terrier LT-79 Armored Personnel Carrier, to Sudan. Our company adheres strictly to all local and international export regulations and sanctions, including those imposed by the United Nations Security Council. TAG is fully aware of and compliant with all international laws and regulations governing the export of military and security equipment. This includes adherence to UN Security Council Resolutions 1556 and 1591, which ban all transfers of weapons and military equipment to Darfur since 2004.

Moreover, TAG follows a rigorous due diligence process to ensure that all products are not misused or transferred to prohibited entities or regions. This process includes thorough vetting of all clients by TAG and similarly the government, all end-users are verified by submitting attested End User Certificated (EUC) using diplomatic channels while in strict compliance with the UN Guiding Principles on Business and Human Rights. Also, every shipment receives an export approval granted by the government, followed by customs and shipping line compliance approvals, and we do have a record of every shipment accordingly.

Given the nature of the allegations, we respectfully request that Amnesty International provide the following to assist us in verifying these claims:

1. Please provide clear, high-resolution images of the vehicle in question to help us confirm whether the vehicle is indeed manufactured by TAG.
2. If the vehicle is confirmed to be manufactured by TAG, the Vehicle Identification Number (VIN) will enable us to trace the vehicle's manufacturing and export history, ensuring full transparency.

Our commitment to human rights and compliance with international law is unwavering. We take these allegations with the utmost seriousness and are prepared to cooperate fully to clarify any misunderstandings.

We appreciate your cooperation in providing the requested information and look forward to resolving this matter promptly.

Yours sincerely,

The Armored Group (TAG)
press@armoredcars.com

RE: Request for information prior to publication

General Information - Shell Special Vehicles <info@shellarmoredvehicles.com>

Sat 7/6/2024 5:20 AM

To: AIS - Crisis Research <CrisisResearch@amnesty.org>

Cc: [REDACTED]@shellarmoredvehicles.com [REDACTED]@shellarmoredvehicles.com>

Dear Scott Edwards,

Greetings from Shell Special Vehicles LLC and are privileged to be of service to you.

We have clearly reviewed the document sent to us and would like to clarify that Shell Special Vehicles LLC has never exported any Armored Personnel Carriers to Sudan.

However it has come to our notice that the APC design we use based on Toyota Land Cruiser 79 series have been similar to many other competitors and subsequent to receiving this information from different parts of the globe we had approached the UAE authorities for a copyright registration which was duly approved.

Moreover most of the APC designs done on LC 79 are similar in nature, across different manufacturers.

Hope this would clarify the queries as mentioned in the aforesaid letter.

Regards,

[REDACTED]
Shell Special Vehicles LLC

Annex 3: Response from Sarsilmaz

DRAFT

ATTN: crisisresearch@amnesty.org

AMNESTY INTERNATIONAL INTERNATIONAL SECRETARIAT

Peter Benenson House, 1 Easton Street London WC1X 0DW, United Kingdom

Dear Mr. Edwards,

First and foremost, we, Sarsılmaz Silah Sanayi A.Ş., extend our sincere respect to you and the esteemed members of Amnesty International.

Furthermore, we wish to express our gratitude for bringing to our attention the matter outlined in your letter dated July 5, 2024, with reference number TC AFR 54/2024.5779, to which this response pertains.

We would like to emphasize that Sarsılmaz Silah Sanayi A.Ş. has indubitably and unconditionally respected and paid regard to Universal Human Rights throughout its operations since the very beginning of its foundation.

The mentioned export of Sarsılmaz products had taken place for the use of the Sudanese state security agencies before the ongoing crisis started in the region. As might be expected, the information regarding the fate of our products is unavailable to us as well due to the current circumstances.

With that being said, we would like to state that we appreciate the opportunity to express ourselves on this matter before the report relating to the issue is published and also would like to assert our commitment to the universal norms as well as international and national laws and regulations once again.

Yours faithfully,

SARSILMAZ SİLAH SANAYİ A.Ş

Annex 4: Response from Wail Shams Trading



14 July 2024

To Whom It May Concern at Amnesty International,

Dear All,

We, Wail Shams Al-Din Trading Company, write to you to respond to your inquiries regarding the sales of arms and equipment to Sudan before and after the conflict that began on April 15, 2023.

First, we would like to affirm that Wail Shams Al-Din Trading Company complies with all national and international laws and regulations concerning the sales of arms and equipment. We believe in the importance of respecting human rights and always strive to ensure that all our operations align with these principles.

We would also like to clarify the following points based on the findings you presented:

1-Wail Shams trading is a private company owned by Sudanese citizen working in firearms trade by the firearms and ammunition law 1986. This law allowing Sudanese people to own civilian firearms for self-defense and hunting

2-Kalashnikov Group is a Russian company JSC manufacturing firearms that is allowed to export civilian firearms only according to their law.

3-the address you mentioned in your letter is not correct from 2016 and I think you want to link between the company and SAF

The SAF is not buying firearms from local suppliers or your source wants that

4-Regarding pictures with Mikhail Kalashnikov I did not know that I need someone approval for that I have pictures with American actor both are celebrities

5-Addis Ababa event is for same reason and may be from same source they said its military firearms and released after they confirmed it is civilian in my opinion some political parties try to link it with SAF

6-After the break, out of conflict in April 15 after one week the RSF Robbed my store and ware house as 80 stores in the same business across the country as the robbing every bank store and houses in Khartoum area. I have reported this to Sudanese authorities if anything happens with this firearm is RSF responsibility.

7-if your serial numbers that will be useful regarding human rights We import firearms according to government regulations and low civilian standards as many countries no military full auto and we are not supplying MOD. Also regarding Kalashnikov group is not allowed to export military standard firearms.

If you make 2 minutes reach you will know that defense exports are done only by Rosapronexport

Russian defense export cooperation



Finally, I will attach pictures for RSF troop using US and British made advanced weapon systems

Tow-Galvin-Nwel. Surely no one asked about them but Russian are not the bad guys a lone.

Sudan does not import any western weapons from almost 40 Years.



Best regards,



General Manager

A handwritten signature in black ink.



14 July 2024

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The SAF is not buying firearms from local suppliers or your source wants that

4-Regarding pictures with Mikhail Kalashnikov I did not know that I need someone approval for that I have pictures with American actor both are celebrities

5-Addis Ababa event is for same reason and may be from same source they said its military firearms and released after they confirmed it is civilian in my opinion some political parties try to link it with SAF

6-After the break, out of conflict in April 15 after one week the RSF Robbed my store and ware house as 80 stores in the same business across the country as the robbing every bank store and houses in Khartoum area. I have reported this to Sudanese authorities if anything happens with this firearm is RSF responsibility.

7-if your serial numbers that will be useful regarding human rights We import firearms according to government regulations and low civilian standards as many countries no military full auto and we are not supplying MOD. Also regarding Kalashnikov group is not allowed to export military standard firearms.

If you make 2 minutes reach you will know that defense exports are done only by Rosapronexport

Russian defense export cooperation



ATTN: crisisresearch@amnesty.org

AMNESTY INTERNATIONAL INTERNATIONAL SECRETARIAT

Peter Benenson House, 1 Easton Street London WC1X 0DW, United Kingdom

Dear Mr. Edwards,

First and foremost, we, Sarsılmaz Silah Sanayi A.Ş., extend our sincere respect to you and the esteemed members of Amnesty International.

Furthermore, we wish to express our gratitude for bringing to our attention the matter outlined in your letter dated July 5, 2024, with reference number TC AFR 54/2024.5779, to which this response pertains.

We would like to emphasize that Sarsılmaz Silah Sanayi A.Ş. has indubitably and unconditionally respected and paid regard to Universal Human Rights throughout its operations since the very beginning of its foundation.

The mentioned export of Sarsılmaz products had taken place for the use of the Sudanese state security agencies before the ongoing crisis started in the region. As might be expected, the information regarding the fate of our products is unavailable to us as well due to the current circumstances.

With that being said, we would like to state that we appreciate the opportunity to express ourselves on this matter before the report relating to the issue is published and also would like to assert our commitment to the universal norms as well as international and national laws and regulations once again.

Yours faithfully,

SARSILMAZ SİLAH SANAYİ A.Ş

