

**Mandates of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment; the Working Group of Experts on People of African Descent; the Working Group on the issue of human rights and transnational corporations and other business enterprises; the Working Group on Enforced or Involuntary Disappearances; the Special Rapporteur on the rights to freedom of peaceful assembly and of association; the Special Rapporteur on the situation of human rights defenders; the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism and the Special Rapporteur on violence against women and girls, its causes and consequences**

Ref.: OL GBR 19/2025  
(Please use this reference in your reply)

28 November 2025

Excellency,

We have the honour to address you in our capacities as Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment; Working Group of Experts on People of African Descent; Working Group on the issue of human rights and transnational corporations and other business enterprises; Working Group on Enforced or Involuntary Disappearances; Special Rapporteur on the rights to freedom of peaceful assembly and of association; Special Rapporteur on the situation of human rights defenders; Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism and Special Rapporteur on violence against women and girls, its causes and consequences, pursuant to Human Rights Council resolutions 52/7, 45/24, 53/3, 54/14, 59/4, 52/4, 58/14 and 59/20.

We would like to share with your Excellency's Government our views regarding the United Kingdom (UK)'s existing national legislation and export controls governing the trade in weapons, equipment and devices used by law enforcement and other public authorities that are capable of inflicting torture and other cruel, inhuman or degrading treatment or punishment, and to encourage your Excellency's Government to update those laws in light of recent developments.

In particular, we note that the UK's laws are not fully in line with the weapons, restraints and equipment identified by the Special Rapporteur on torture in her 2023 report to the General Assembly ([A/78/324](#)), in which she presented two lists:

- Annex I of the Special Rapporteur on Torture's report contains a list of category A items identified as inherently cruel, inhuman or degrading and that, as such, are considered to be prohibited due to either (a) their technical specifications; or (b) the purpose for which they are being used can be achieved by less harmful means hence their purpose is deemed to be illegitimate; and
- Annex II of the report contains a list of category B goods that ought to be controlled at the national and international levels, as while they have a legitimate use, they can be misused for torture and therefore necessitate some level of oversight.

We also write in light of the recent adoption in July 2025 by the European Parliament and European Council of Ministers of amended regulations (EU) 2025/928,

which has updated its own lists to incorporate many of the items identified by the Special Rapporteur on Torture.<sup>1</sup>

We would be grateful if this letter could be shared with the relevant authorities, most notably the Attorney General's Office, the Ministry of Justice, and the Department for Business and Trade.

We refer to a prior communication on this topic, [GBR 14/2024](#) concerning the 2024 Emergency Tech Show, held in Birmingham during 18-19 September 2024, where a British company participating in the event as an exhibitor, the Squad Group Limited, was reportedly filmed while demonstrating a body-worn electric-shock device called the Generated Low Output Voltage Emitter (the "G.L.O.V.E"). We appreciate your Excellency's Government [response](#) on 30 January 2025.

### **Developments:**

1. The current scale of torture and other forms of ill-treatment is alarming worldwide, with a particular trend of heavy-handed and sometimes brutal policing of protests and misuse of equipment to injure and harm individuals during arrests and detention. Over the past year, the misuse of less lethal weapons in assemblies has caused serious injuries and deaths of protesters. Brutal assaults, mass arbitrary arrests and detention, torture during interrogations, unlawful killings and enforced disappearances have also been recorded. Demonstrators, including human rights defenders, political opponents, journalists, workers, students and even bystanders, including Indigenous Peoples and women and girls, have been exposed to risks of ill-treatment, compounded by an increased militarization of the police and abuses in counter-terrorism and national security contexts.<sup>2</sup>
2. Following the UK's withdrawal from the European Union, the UK broadly retained the content of Regulation (EU) 2019/125 (EU Anti-Torture Regulation), through the Trade in Torture etc. Goods (Amendment) (EU Exit) Regulations 2020<sup>3</sup>, thereby enabling the Secretary of State to control the export of goods that can be used for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment.
3. The EU's weapons and equipment lists were subsumed unchanged into the new UK law.
4. Key provisions from the EU Anti-Torture Regulation that were not incorporated into UK law relate to:

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32025R0928>

<sup>2</sup> See, inter alia, A/80/137.

<sup>3</sup> <https://www.legislation.gov.uk/ukxi/2020/1479> ; [https://www.legislation.gov.uk/ukxi/2020/1479/pdfs/ukxiem\\_20201479\\_en.pdf#:~:text=Purpose%20of%20the%20instrument%20.1%20These%20Regulations,domestic%20export%20control%20legislation%20operates%20effectively%20post%20Dexit](https://www.legislation.gov.uk/ukxi/2020/1479/pdfs/ukxiem_20201479_en.pdf#:~:text=Purpose%20of%20the%20instrument%20.1%20These%20Regulations,domestic%20export%20control%20legislation%20operates%20effectively%20post%20Dexit); <https://www.legislation.gov.uk/eur/2019/125/contents>

- The transparency, reporting and notification processes in the EU Anti-Torture Regulation,
  - Information exchanges and co-ordination across Member States,
  - Access to the group of technical experts, and
  - Procedures to review and revise the lists of prohibited and controlled goods in a landscape that is constantly changing with new technology.
5. In addition to the above-mentioned law, we take note that the 2002 Export Control Act sets out the general legal framework and scope of Government powers to regulate the trade via an export licensing system.<sup>4</sup> Licensing, enforcement and penalties powers are in the Export Control Order 2008 (as amended)<sup>5</sup>. The UK strategic export control list is approximately 400 pages long.<sup>6</sup>
  6. On 31 July 2025, the EU Anti-Torture Regulation was amended and expanded the range of law enforcement equipment covered by regulation, incorporating many of the Special Rapporteur's items on her Category A list.
  7. On 27 August 2025, your Excellency's Government sent Notice 2025/24 to exporters of amendments to the EU regulation (EU) 2019/125 (torture and capital punishment goods), which applies to Northern Ireland.<sup>7</sup>
  8. Such amendments do not apply to England and Wales, or Scotland, and we are informed that amendments to the UK law are now under consideration.

### **The Special Rapporteur's Category A and B items**

9. In this regard, we wish to encourage your Excellency's Government to reflect on the Special Rapporteur on torture's two lists, which reflect state-of-art appraisal of existing law enforcement and security equipment available on the market. These lists have been compiled after close consideration of international jurisprudence and views of international and regional human rights bodies on incompatibility/compatibility of said goods with the international prohibition on torture and other cruel, inhuman or degrading treatment or punishment.
10. It is our assessment that the inclusion of the identified items on the Special Rapporteur's prohibited list (Category A goods) in any amended UK legislation would be necessary to ensure compliance with obligations

<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2002/28/contents>

<sup>5</sup> <https://www.legislation.gov.uk/uksi/2008/3231/contents>

<sup>6</sup> <https://assets.publishing.service.gov.uk/media/660d281067958c001f365abe/uk-strategic-export-control-list.pdf>

<sup>7</sup> <https://www.gov.uk/government/publications/notice-to-exporters-202524-amendment-to-eu-regulation-eu-2019125-torture-and-capital-punishment-goods-applying-to-northern-ireland>

pursuant to articles 7 and 10 of the International Covenant on Civil and Political Rights (ICCPR), ratified by the United Kingdom in 1976; at a minimum, articles 1, 2 and 16 of the United Nations Convention against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment (CAT), ratified by the United Kingdom in 1988; and article 3 of the European Convention for the Protection of Human Rights and Fundamental Freedoms, as reflected in the UK Human Rights Act 1998.

11. The lists – and the rationale for their banning or regulation – can be consulted in full in the Special Rapporteur’s report which is available online.<sup>8</sup>
12. Items on the Special Rapporteur on Torture’s prohibited list (Category A) that are not yet excluded under current UK rules include:
  - Ammunition containing multiple non-metallic projectiles and multi-barrel kinetic projectile launchers, millimetre wave weapons, gang chains, leg irons, lathis and sjamboks, hoods and blindfolds, and electric- or weighted- batons, shields and gloves.
13. The EU’s updated list of prohibited equipment, restraints and weapons has now included the following from the Special Rapporteur on torture’s list:
  - Gang chains
  - Leg irons
  - Hoods and blindfolds (but not spit hoods)
  - Weighted batons
  - Lathis
  - Body armour with spikes or serrations made of metal or other hard material
  - Sjamboks.
14. The EU has also added a new section on weapons and equipment disseminating incapacitating or irritating chemicals or impact projectiles and related ammunition which are not suitable for use by law enforcement authorities for the purpose of riot control or self-protection. The two items included are:
  - Fixed equipment for the dissemination of incapacitating or irritating chemical substances in enclosed spaces, which can be attached to a wall

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<sup>8</sup> <https://www.ohchr.org/en/documents/thematic-reports/a78324-thematic-study-global-trade-weapons-equipment-and-devices-used>

or to a ceiling inside a building, comprises a canister of irritating or incapacitating chemical agents and is activated using a remote-control system. This item alludes to equipment or devices of the kind used in prisons and other places of detention.

- Equipment and explosive projectiles for dispensing injurious quantities of riot control agents from aerial platforms. This includes equipment where the mode of dispersal is inherently inaccurate, or the equipment or projectiles are able to disperse amounts of riot control agent that are injurious.

We support the banning of these additional items.

15. Items on the Special Rapporteur on Torture’s “controlled list” (category B) that are not found under UK anti-torture export controls include:

- Malodorants, batons, handcuffs, full body restraints, and dazzling lights and lasers.

16. While these items are commonly used, they have a risk of causing torture or other ill-treatment or punishment if misused. There is evidence from around the world that law enforcement officers misuse standard batons.<sup>9</sup>

17. Between 2015 and 2018, despite examples of widespread misuse of less lethal weapons including chemical irritant against peaceful protestors, the UK licensed the export of a wide range of policing equipment to Hong Kong, including a 2015 open licence for an unlimited amount of crowd control ammunition, tear gas ammunition, CS hand grenades and tear gas agents.<sup>10</sup> Other licences granted included standard licences for ammunition containing chemical irritants, shackles and ballistic/crowd control shields.<sup>11</sup> It is these types of scenarios that require regulation.

18. We note that the EU added law enforcement equipment including leg cuffs, malodorants, single kinetic impact projectiles and associated launchers, ammunition containing multiple kinetic impact projectiles, and multi-barrel launchers onto the Annex III list of goods whose export is controlled under the Regulation.

### **UN Guiding Principles on Business and Human Rights**

19. We further refer you to the United Nations Guiding Principles on Business and Human Rights<sup>12</sup> that recognise that State entities and corporations - including security, transportation, manufacturing, and

<sup>9</sup> Amnesty International, Blunt Force: Investigating the misuse of police batons and related equipment, 9 September 2021, available at: <https://www.amnesty.org/en/latest/research/2021/09/blunt-force/>.

<sup>10</sup> Strategic Export Controls: Reports and Statistics website, Export Control Joint Unit, <https://www.gov.uk/government/collections/strategic-export-controls-licensing-data-annual-reports>

<sup>11</sup> Strategic Export Controls: Reports and Statistics website, Export Control Joint Unit, <https://www.gov.uk/government/collections/strategic-export-controls-licensing-data-annual-reports>

<sup>12</sup> United Nations, Guiding Principles on Business and Human Rights, 2011, Principles 2, 3 and 11.

correctional service providers - have a role to play in preventing and mitigating adverse human rights impacts. States are required to establish national regulations, including imposing human rights due diligence responsibilities on operators which would encompass a risk assessment to rights-holders, as well as monitoring and reporting obligations. States are also obligated to investigate complaints and prosecute violations. Undertaking the recommended amendments proposed in this letter would bring the Trade in Torture etc. Goods (Amendment) (EU Exit) Regulations 2020 into alignment with business and human rights obligations.

### **Recommendations and questions**

Without prejudging the accuracy of the above-mentioned information, we would like to request the United Kingdom in the upcoming review of Trade in Torture etc. Goods (Amendment) (EU Exit) Regulations 2020 to make amendments to take into account the above-mentioned considerations.

Your Excellency, global action is essential to combat the widespread and transnational nature of the torture trade, as well as the use, production, development, financing and promotion of prohibited items. We respectfully request the United Kingdom's assistance in championing the establishment of an international legally binding treaty on torture-free trade. We recognise that the UK is an active member of the Alliance for Torture-Free Trade.

While international efforts are needed, global action starts at the domestic level. The Special Rapporteur on torture's report called on States to introduce or amend national legislation to align with the lists and other requirements in her report.

As it is our responsibility, under the mandates provided to us by the Human Rights Council, to seek to clarify all cases brought to our attention, we would be grateful for your observations on the following matters:

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.
2. Please describe forthcoming legislative review processes – and a timetable – to ensure your national legislation and licensing scheme are, in law and in practice, in accordance with the UK's obligation under international law, including the Special Rapporteur on Torture's lists pertaining to prohibited and controlled items.
3. Please further elaborate on how your present and/or proposed amendments and export system:
  - a. Please explain existing and/or planned disclosure and reporting requirements, and existing and/or planned penalties for non-compliance;
  - b. Establish a mechanism of early warning that will trigger a suspension or cancellation of transfers of controlled equipment where there are

reasonable grounds to believe that the item in question is at risk of being misused to torture or ill-treatment or punishment, and indicate how often it has been used in the past years;

- c. Keep the prohibited and controlled lists of goods updated to keep abreast of technological and industry developments;
  - d. Ensure regular transparent reporting on licensing, company infractions and penalties imposed.
4. Please provide information about the measures taken to protect the rights to freedom of peaceful assembly and of expression of those protesting peacefully against the existing and related legislations. Please also provide details on the measures that your Excellency's Government has undertaken or plans to undertake to protect the safety of human rights defenders participating in or monitoring peaceful protests and ensure that they can carry out their legitimate work and exercise their rights without fear of reprisals.
  5. Please highlight the steps that your Excellency's Government has taken, or is considering to take, including policies, legislation, and regulations, to fulfil its obligations to protect against torture and other cruel, inhuman or degrading treatment or punishment by law enforcement or security business enterprises under its jurisdiction, and ensuring that business enterprises within its territory conduct effective human rights due diligence to identify, prevent, mitigate and account for how they address their impacts on human rights throughout their operation, as set forth by the UN Guiding Principles on Business and Human Rights.

We remain available to assist your Excellency's Government as you seek to update your national legislation and regulations.

This communication, as a comment on pending or recently adopted legislation, regulations or policies, and any response received from your Excellency's Government will be made public via the communications reporting [website](#) after 48 hours. They will also subsequently be made available in the usual report to be presented to the Human Rights Council.

Please accept, Excellency, the assurances of our highest consideration.

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