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**NOTE**

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Subject: COUNCIL DECISION in support of a global reporting mechanism on illicit conventional arms and their ammunition to reduce the risk of their diversion and illicit transfer ('iTrace VI') - Annex

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**ANNEX**

**PROJECT DOCUMENT**

**Project in support of a global reporting mechanism on illicit conventional arms and ammunition to reduce the risk of their diversion and illicit transfer  
(‘iTrace VI’)**

**iTrace Global Reporting Mechanism on Conventional Arms and Their Ammunition**

**1. Background and rationale for CFSP support**

1.1. This Decision builds on successive Council Decisions to combat the destabilising impact of the diversion and trafficking of conventional arms and their ammunition in conflict-affected areas, in particular Decisions 2013/698/CFSP, (CFSP) 2015/1908, (CFSP) 2017/2283, (CFSP) 2019/2191, and (CFSP) 2023/387, which established and enhanced the iTrace global reporting mechanism on conventional arms and their ammunition.

The diversion of conventional arms and their ammunition, and unauthorised access to the components and technologies required to manufacture and operate them, poses a clear challenge to the Union's security. This includes their acquisition and re-transfer by hostile states; the activities of unauthorised recipients of such weapons that thwart the Union's development and crisis management, humanitarian, and stabilisation efforts in areas of the world affected by armed conflict; and their use by criminals, organised criminal groups, and terrorists to carry out attacks on European soil.

The activities conducted under Decision (CFSP) 2023/387 confirm that the nature of the battlefield has changed during successive iTrace Actions. Hostile states and unauthorised recipients increasingly employ widely available technologies, including those used to manufacture uncrewed aerial systems, to enhance the capabilities of traditional conventional weapons and ammunition. The potential for low-capacity actors to develop increasingly sophisticated weaponry is expanding rapidly and will continue to shape armed conflicts worldwide.

The iTrace Project has been instrumental in alerting EU Member States to these developments and supporting national and multilateral action to counter weapon diversion and illicit supply chains. EU Member States reaffirmed the strategic importance of iTrace in the Council Conclusions on Arms Export Control of 14 April 2025. Since its inception, iTrace has operated in more than 40 conflict-affected states and has created the world's largest repository of diverted conventional arms and ammunition, supporting implementation of Common Position 2008/944/CFSP (consolidated), Article 11 of the Arms Trade Treaty, the International Tracing Instrument, the UN Programme of Action on SALW, and the Global Framework on Ammunition.

The project has documented thousands of diversion cases, supported criminal prosecutions, and informed sanctions against entities supplying hostile actors with weapons, ammunition, and associated components. These activities confirm iTrace as a strategically significant initiative supporting decision-making across the full spectrum of arms control and security processes.

1.2. The iTrace Project has demonstrated high responsiveness to a rapidly evolving global security environment. Demand for iTrace-generated information continues to grow as conflicts proliferate and become increasingly interconnected, requiring more complex supply-chain analysis and enhanced analytical and data-processing capacity.

This Decision therefore aims to continue and strengthen the project under Decision (CFSP) 2023/387 by providing Union policymakers and practitioners with systematically compiled policy-relevant information to support effective, evidence-based strategies against diversion and illicit arms transfers.

1.3. This Decision provides for the continued maintenance and enhancement of the iTrace Global Weapon Reporting System, including: increased field deployments; tailored support to Member States through consultations, bespoke data products, a 24-hour help desk, and post-shipment verification; and training and mentoring of national authorities in conflict-affected states to strengthen tracing and counter-diversion capacities.

## **2. Overall objectives**

The Action will support international efforts to counter the destabilising effects of diversion and trafficking of conventional arms and ammunition by providing policy-relevant information and operational support. In particular, it will:

- support implementation of Common Position 2008/944/CFSP (consolidated), the ATT, the UN Programme of Action, the ITI, and the Global Framework on Ammunition;
- assist Member States in diversion risk assessment and mitigation;
- identify diversion routes, actors, and networks to support legal proceedings;
- strengthen cooperation with UN bodies, INTERPOL (iARMS), Europol, and other partners;
- inform priority areas for international and regional cooperation and assistance;
- support monitoring of ATT implementation and pre-export diversion risk assessment; and
- enhance CAR's capacity to document and analyse weapon components and technologies.

### **3. Long-term sustainability and outcomes**

The Action will provide a durable and structured framework for the sustained monitoring of the illicit spread of conventional arms and their ammunition. It will significantly expand the volume, scope, and analytical value of arms-related information available to Union institutions, Member States, and international partners, and will support the targeted development of effective conventional arms control and export control policies, including sanctions and risk-mitigation measures.

In particular, the Action will:

- further populate and maintain the iTrace information management system as a long-term repository for verified data on illicit conventional arms, ammunition, components, and associated technologies;
- provide arms control policy makers and practitioners with a robust analytical tool to identify diversion risks, define priority areas for assistance and cooperation, and support regional and sub-regional coordination mechanisms;
- retain sufficient flexibility to generate policy-relevant outputs in response to evolving security and policy requirements;
- enhance the effectiveness of international and regional arms monitoring organisations through sustained information-sharing and technical support; and
- build durable national capacity in conflict-affected states to identify, trace, and report illicit conventional arms, thereby strengthening engagement in international arms control and law enforcement processes.

### **4. Description of Action**

#### *4.1. Project 1: Technical capacity development in weapon identification and tracing*

**Objective:** To strengthen the ability of national authorities in conflict-affected states to identify, document, trace, and manage illicit conventional arms and ammunition, and to address diversion risks at source.

**Activities:** Training and mentoring will be delivered through repeated field missions and joint investigations. Activities will include instruction on conventional arms identification and documentation, evidence handling and chain of custody, implementation of the International Tracing Instrument, marking and record-keeping practices, and assessments of physical security and stockpile management. Training will be tailored to national needs and delivered to law enforcement bodies, prosecutors, and, where appropriate, peace support personnel and UN or EU missions.

**Results:** The project will enhance national tracing capacity, improve access for iTrace field investigation teams, increase the volume and quality of data collected, and support implementation of the ATT, ITI, PoA, GFA, SDG 16.4.2, and Union-supported arms control initiatives.

**Indicators:** Up to 40 in-field training and mentoring visits over the three-year project period.

#### *4.2. Project 2: Maintenance of the iTrace system and in-field investigations*

Objective: The project will sustain in-field research into conventional arms and ammunition circulating in conflict-affected areas. The project will prioritise countries of particular concern to Member States, including, inter alia, Iraq, Lebanon, Libya, Somalia, Sudan, Syria, Ukraine, and Yemen<sup>8</sup>. These on-the-ground investigations will provide concrete evidence of diverted conventional arms in the hands of insurgent and terrorist forces, which would otherwise be invisible to external observers (including EU arms-exporting Member States). They will also trace the linkages among weapons, ammunition, and their component parts and technologies found in these different conflict-affected regions. CAR will request the prior approval of the EU Council's Working Party on Non-Proliferation and Arms Exports before substantive engagement in all countries not previously subject to iTrace field investigations or iTrace training and mentoring programmes.

Activities: Qualified arms experts will be deployed to conduct in-field analysis of illicit conventional arms, ammunition, components, and associated technologies recovered in conflict-affected environments. Activities will include enhanced photographic documentation; forensic exploitation; recovery of obliterated or damaged markings; verification of manufacturer, importer, and end-user information; and analysis of associated packaging, shipping, and logistical documentation. Investigations will also assess patterns of use, modification, and battlefield adaptation, including the integration of commercial components and emerging technologies.

All verified evidence will be uploaded to the iTrace information management system and, where appropriate, to the online mapping portal, enabling comparative analysis across regions and time periods. Engagement with trusted local partners will support sustained data collection, while structured coordination with Member States will clarify investigative scope, manage sensitivities, and avoid conflicts of interest.

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<sup>8</sup> Also encompassing work to support Council Decision 833/2014 (consolidated), including items documented in Ukraine.

Results: The project will generate a robust and comparable body of verified evidence on diversion and trafficking across multiple theatres. It will enhance Member States' understanding of illicit supply chains, trafficking methodologies, and concealment techniques, and strengthen their capacity to disrupt illicit transfers through export controls, sanctions, and law-enforcement action.

Indicators: Up to 75 field deployments, including extended missions where required, over the three-year project period.

#### *4.3. Project 3: Tailored support to Member States*

Objective: To provide Member State arms export control authorities and policy makers with tailored operational and analytical support addressing diversion risks and post-export controls.

Activities: Support will include regular bilateral consultations and capital visits, operation of a 24-hour help desk, maintenance of secure online dashboards streaming encrypted iTrace data, maintain, secure, and substantially enhance the iTrace Global Weapon Reporting System, including a revised data model and machine learning-assisted data input and analytics, and the provision of post-shipment or post-delivery verification missions upon official request.

Results: The project will strengthen diversion risk assessments, enhance post-export monitoring, support licensing decisions under Common Position 2008/944/CFSP and the ATT, and facilitate informed engagement in international policy processes.

Indicators: Up to 20 visits to Member State capitals; continuous operation of dashboards and help desk services.

#### *4.4. Project 4: Outreach, policy advice, and international coordination*

Objective: To promote the effective use of iTrace outputs and to strengthen international coordination and information-sharing in support of conventional arms control.

Activities: Activities will include participation in international conferences and policy processes, targeted diplomatic engagement, policy advisory support, and the development of formal information-sharing arrangements with relevant organisations capable of contributing data to iTrace.

Results: Improved international awareness of iTrace, enhanced cooperation with non-EU partners, and strengthened policy coherence across arms control and sanctions frameworks.

Indicators: Up to 50 outreach and policy advisory activities over the project period.

#### *4.5. Project 5: iTrace research outputs*

Objective: To produce authoritative research outputs derived from iTrace data that inform policy debates and operational responses to diversion and trafficking.

Activities: In-depth analysis leading to the preparation, review, publication, and dissemination of up to 20 policy-focused outputs addressing major trafficking patterns, regional trends, and emerging risks.

Results: Enhanced policy relevance of iTrace data, increased transparency, and sustained visibility of the Action within international policy and media environments.

#### *4.6. Project 6: Conventional weapon, ammunition, and component tracing and investigations*

Objective: To conduct formal trace requests and associated investigations in order to identify diversion mechanisms, unauthorised re-transfers, sanctions violations, and the structure of illicit conventional arms supply networks.

Activities: A continuous programme of trace requests will be submitted to national governments and relevant entities for illicit conventional arms, ammunition, and components documented through iTrace investigations. These activities will be supported by follow-up analytical work, including supply-chain reconstruction, network mapping, and assessment of financial, logistical, and intermediary actors involved in diversion. CAR will continue to research and apply emerging technologies and methodologies to enhance traceability and analytical depth.

Tracing activities will be closely coordinated with exporting and transit states, notably Member States' arms export control authorities, and will support the identification of unauthorised re-transfers, post-export diversion, and breaches of end-user commitments. Findings will inform targeted counter-diversion measures, including export-licensing risk assessments, sanctions implementation, and network-disruption options.

Results: The project will further expand the global repository of traced conflict weapons and ammunition, deepen understanding of the human, financial, and logistical dimensions of diversion, and provide policymakers with actionable options to address illicit transfers, complementing traditional arms embargoes and export controls.

## **5. Locations**

Projects will be implemented through field deployments in conflict-affected regions, bilateral activities in Member State capitals, participation in international forums, and research and publication activities conducted in selected European locations.

## **6. Duration**

The combined duration of the Action is 36 months.

## **7. Implementing entity and Union visibility**

CAR embeds small field investigation teams with local defence and security forces, peacekeeping/peace support personnel, and other actors with security mandates. Whenever these forces/missions secure illicit arms or evidence-collection sites, CAR's teams recover all available evidence on them and their user groups. CAR then proceeds to trace all uniquely identifiable items and conducts long-range investigations into their illicit transfers, the supply chains, and support to parties that threaten peace and stability.

Working with national export licensing authorities and non-governmental entities, CAR reconstructs the supply chains that are responsible for delivering arms into armed conflicts, identifying illicit activity and the diversion of arms from legal to illicit markets. CAR records the gathered information on its iTrace global arms monitoring system, which with more than 1 million conflict weapons, ammunition, and related material, is the largest repository for conflict arms data worldwide.

CAR uses this information to a) alert Member States to the diversion of conventional arms and their ammunition and, b) enable targeted counter-diversion initiatives, including revised export control measures and international diplomatic action.

This methodology is proven to detect diversion almost immediately, with CAR field teams having advised Member States of diverted weapons whilst still deployed in conflict-affected areas. In some cases, CAR's teams have discovered unauthorised re-transfers within two months of weapons having left the factory door.

Decision (CFSP) 2019/2191 supported CAR in continuing and augmenting the iTrace project established by Decision (CFSP) 2013/698 of 25 November 2013 and renewed by Decisions (CFSP) 2015/1908, (CFSP) 2017/2283, (CFSP) 2019/2191, and (CFSP) 2023/387. The projects, referred to as iTrace I, II, III, IV, and V, respectively, have firmly established iTrace as a significant conflict weapon monitoring initiative worldwide and provided direct support to EU export licensing authorities and arms control policy makers. EU Member States recognised the critical importance of the iTrace project most recently in its Council Conclusions on Arms Export Control of 14 April 2025, in which the Council committed to continue supporting, and further developing, the iTrace global reporting mechanism on conventional arms and their ammunition.

Furthermore, on 2 December 2015, the EU action plan against illicit trafficking in and use of firearms and explosives called for ‘extending the use of iTrace’ and recommended that any national law enforcement authority detecting the diversion of weapons and ammunition check findings against records in iTrace. In 2019, CAR concluded a memorandum of understanding with Europol to assist in these activities. CAR has, furthermore, provided iTrace data to INTERPOL’s iARMS system and assisted INTERPOL in identifying weapons uploaded into iARMS by Member States.

CAR shall take all appropriate measures to publicise the fact that the Action has been funded by the European Union. Such measures will be carried out in accordance with the Communication and Visibility Manual for European Union External Actions laid down and published by the European Commission.

CAR will thus ensure the visibility of the Union contribution with appropriate branding and publicity, highlighting the role of the Union, ensuring the transparency of its actions, and raising awareness of the reasons for the Decision, as well as Union support for the Decision and the results of this support. Material produced by the project will prominently display the Union flag in accordance with Union guidelines for the accurate use and reproduction of the flag.

## 8. Methodology and safeguards for national government partners

The iTrace Action will maintain politically balanced reporting. In line with CAR's core principles of independence and objectivity, the Action will report on illicit conventional arms and their ammunition, and the components and technologies required to manufacture and operate them, which CAR field investigation teams document in conflict-affected states, without prejudice to their type or provenance and regardless of the affiliation of the party holding those weapons. CAR recognises that Member States that disclose information in the interests of transparency, may expose their arms exports to greater public scrutiny. CAR will, therefore, to the fullest extent feasible:

- (a) recognise, in its public reporting, Member States that have provided information to the iTrace Action in the interests of public transparency; and
- (b) ensure that iTrace public reporting firmly differentiates the aforementioned Member States from states that consistently do not disclose information in support of iTrace investigations.

### 8.1 Operational clarity

CAR will request the prior approval of the EU Council's Working Party on Non-Proliferation and Arms Exports before substantive engagement in all countries not previously subject to iTrace field investigations or iTrace training and mentoring programmes. Any such request will present CAR's broad focus of investigations and methodology envisaged for the prospective country. At the time of this Council Decision's adoption, iTrace programmes had previously operated in the following countries: Afghanistan; Bahrain; Benin; Burkina Faso; Cameroon; Central African Republic; Chad; Congo DRC; Côte d'Ivoire; Egypt; Ethiopia; Gambia; Ghana; India; Iraq; Israel; Jordan; Kenya; Lebanon; Libya; Mali; Mauritania; Morocco; Mozambique; Myanmar; Nepal; Niger; Nigeria; Pakistan, Philippines; Saudi Arabia; Senegal; Somalia; Somalia; South Sudan; Sudan; Syria; Togo, Tunisia; Turkey; Uganda; Ukraine; United Arab Emirates; and Yemen.

## *8.2. Bias mitigation*

CAR recognises that the level of detail provided by national governments in response to trace requests, ranging from no response, to full disclosure and the provision of transfer documents, may result in Member States experiencing differing degrees of public exposure. CAR undertakes to mitigate any implicit bias, which such a disparity in trace responses might introduce into iTrace reporting, by:

- (a) Explicitly prefacing, in text, all cases reported by the iTrace Action whereby Member States have responded transparently to trace requests in a manner that, where applicable, affirms unambiguously the legality of the transfers subject to those trace requests;
- (b) Explicitly prefacing, in text, all cases reported by the iTrace Action whereby states have not responded to trace requests, stating that ‘given the absence of a trace response, CAR cannot pronounce on the legality of the transfer in question’ (this shall not apply to cases in which Member States have provided, in response to specific trace requests, reasons that prevent them from responding immediately or in full); and

## *8.3. The trace process*

Member States and non-governmental entities respond to trace requests issued by CAR within the framework of the iTrace Project entirely at their own discretion, in accordance with national legislation on export controls and data confidentiality. The tracing process, however, is the most concrete way to verify the accuracy of information presented in CAR's public outputs. By alerting parties to diversion in advance of public disclosure (through iTrace or CAR publications), CAR allows trace recipients the chance to respond to 'allegations' and set the record straight.

CAR initially sends trace requests for export-controlled items electronically to a government's Permanent Mission to the United Nations in New York, although it encourages national governments, for administrative reasons, to assign a point of contact in capital for future communications with the iTrace Action<sup>9</sup>. In the case of non-controlled items, CAR sends trace requests electronically to manufacturing or exporting entities.

The trace process follows CAR's internal standard operating procedure 02.02 and comprises the following steps:

- (a) Upon data capture, field investigation teams that have a requirement to trace conventional arms and their ammunition, mark them for tracing in the iTrace Global Weapon Reporting System;
- (b) CAR's Tracing Unit reviews all other data gathered on-site and, in conjunction with CAR's Analytics Unit, launches any additional trace requests that it deems relevant;
- (c) For items selected for tracing, the system automatically: i) assigns a trace request number to each item; ii) compiles trace requests for one or more items, which originate from a single country, into a single trace communication; and iii) assigns a correspondence number to each trace communication;
- (d) The sending of a trace request initiates a 28-day waiting period, taking into account national procedures, for instance in Member States. During the waiting period, the item may not be published or referenced in any of CAR's outputs;
- (e) If, at the end of the 28-day period, the Tracing Unit has not received a trace response, it may issue a reminder (by email or telephone call, with notes of all communications kept). The reminder does not initiate another 28-day period;

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<sup>9</sup> Member States are reminded that commitments to the International Tracing Instrument (ITI) and to the Arms Trade Treaty (ATT), pertaining to the retention of records for a minimum of 10 years, do not, in any respect, restrict Member States from sharing information when relevant records exist beyond the ITI and ATT minimum retention thresholds. Member States are encouraged to share with the iTrace Project all available information pertaining to the production and transfer of weapons, ammunition, and related materiel, where such records exist and irrespective of elapsed time.

- (f) When the Tracing Unit receives a response to a trace request, it notifies all relevant staff. Relevant staff discuss the response with the Tracing Unit and decide a course of action (i.e. did the responding party answer CAR's questions? Does CAR need to follow up or to ask for clarification? Can CAR issue a right of reply?);
- (g) Once all clarifications have been received, the Tracing Unit compiles a right of reply notification. This is a concise summary of the information provided in response to CAR's request and includes caveats that respond to missing or inconclusive information. The text is designed to be replicated verbatim in iTrace and in other CAR outputs and must be the fullest account of the information provided by the respondent to the trace request. The Tracing Unit forwards the draft text to the team responsible for requesting the trace for review. On acceptance of the text, the team notifies the Tracing Unit in writing and Tracing Unit sends the right of reply. Member States are reminded that agreement on a verbatim right of reply text is solely to ensure the accuracy of reporting and not intended to limit the scope of reporting on an item's full chain of custody. Unless demonstrably erroneous, all information included in a right of reply should aim to elucidate the fullest account of an item's identity, production, export, import, end users, and stated end use, including the names of any parties involved in the aforementioned activities;
- (h) Sending a right of reply initiates a further 28-day waiting period, during which CAR invites the responding party to suggest additions or amendments to the right of reply text;
- (i) If the responding party suggests amendments to the right of reply text, CAR amends the text and re-issues the right of reply. Each time the Tracing Unit re-issues a right of the reply, another 28-day waiting period commences. This process may be repeated until CAR deems that constructive exchange has concluded. CAR is not bound to accept right of reply amendments *ad infinitum*;
- (j) The right of reply process concludes either when the government or entity concerned notifies CAR that the text is acceptable, or when CAR deems that further modifications suggested by the government or entity concerned are invalid or superfluous, or when the 28-day waiting period has expired without a response. If the government communicates its disagreement with CAR, and CAR deems that the points raised are invalid or superfluous, CAR must reference the objections in the right of reply text. Should information pertaining to an item's production, characteristics, or supply chain be missing from a response, CAR may rely on its own identification capabilities, or other trusted sources, as a basis for its conclusions and public reporting;
- (k) In cases where the right of reply process is ongoing and publication is imminent, two weeks prior to 'lock text,' CAR communicates to the responding party that further edits will not be introduced into the relevant publication after the lock text date;

- (l) When the Tracing Unit has incorporated all amendments and additions into the right of reply text, it forwards the draft text to the team that was responsible for requesting the trace for review. On acceptance of the text, the CAR team notifies the Tracing Unit in writing. Following approval, the right of reply text is ‘locked’ and no further changes can be made to the right of reply text. Henceforth, this text must be replicated verbatim in any public or non-public outputs that refer to the case. It is, therefore, imperative that the Tracing Unit and relevant teams agree on a verbatim text in its entirety before issuing rights of reply; and
- (m) If a government or entity, in its response to CAR’s trace requests, identifies the next point in the supply chain, CAR issues a new trace request to that party, and the tracing process restarts from point (a).

#### *8.4. Advance notification*

CAR sends an advance notification to all parties that are referenced substantively in iTrace publications. This takes the form of a formal communication, which is prepared by the author of the upcoming publication and is sent by the Tracing Unit. The advance notification describes how the report will reference the relationship between the government or other entity cited and the case concerned and is designed to ensure that:

- (a) CAR has performed due diligence on any allegations or reference made to entities in its outputs; and
- (b) That the information presented in CAR’s outputs is accurate and fair.

Once sent, an advance notification initiates a 14-day waiting period, during which CAR invites recipients to check the accuracy of the information provided and present any objections. The item may not be published or referenced in any of CAR’s outputs during this 14-day period.

## **9. Reporting**

Narrative reports will be submitted quarterly, detailing activities and outputs by project, supported by real-time data accessible through the iTrace dashboard.