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Letter dated 24 March 2026 from the Panel of Experts on Libya established pursuant to Security Council resolution 1973 (2011) addressed to the President of the Security Council

On behalf of the members of the Panel of Experts on Libya established pursuant to Security Council resolution 1973 (2011), I have the honour to transmit herewith, in accordance with paragraph 23 of resolution 2769 (2025), the final report on its work.

The attached report was provided to the Security Council Committee established pursuant to resolution 1970 (2011) concerning Libya on 19 February 2026 and was considered by the Committee on 24 March 2026.

I would appreciate it if this letter and the report were brought to the attention of the members of the Security Council and issued as a document of the Council.

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Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya

Summary

As part of a newly established status quo, armed groups have become the main actors shaping governance outcomes in the State of Libya through coercive and cartel-like tactics. Operating through political front lines, these groups pervaded Libyan institutions, utilizing armed violence, political interference and economic pressure.

Armed groups instrumentalized violence – without accountability – to provide an umbrella of impunity to individuals who could generate ever-increasing streams of revenue. All relevant institutions were impelled to operate in an environment that shielded and enabled these armed groups to further their interests exclusively and assert hegemony over the State of Libya, as all accountability mechanisms were rendered ineffective.

The aftermath of the May 2025 events exhibited not only the outright impunity in which armed groups operate, but also the most significant reshuffling of Tripoli-based armed groups since August 2022. The Libyan Arab armed forces (LAAF) completed the restructuring of their presence in southern Libya to exert greater control over smuggling routes.

Libya increasingly served as a key operating environment for terrorist groups and individuals and regional criminal networks. In southern Libya, the presence of terrorist-affiliated groups, coupled with their sustained recruitment and revenue-generating activities, constituted latent security risks. Their footprint fed into wider regional instability rather than being translated into violent attacks within Libyan territory. These activities, which were transnational in nature, entrenched both terrorist and criminal ecosystems, which became inextricably interlinked.

The use of Libyan territory by LAAF, including by Subul al-Salam battalion, for the facilitation of the cross-border movements of fighters and arms and related materiel reinforced the role of Libya as a regional logistical and operational hub, with direct repercussions for internal security. These dynamics resulted in Libyan instability being extended across borders through the supply of fighters, arms and related materiel into neighbouring countries' conflicts, particularly in support of the Rapid Support Forces in the Sudan. In turn, these activities projected violence back into Libyan territory, materializing in cross-border armed movements and clashes on Libyan soil.

Armed groups were responsible for incidents that obstructed or undermined the municipal council elections. Acts that fell within the scope of paragraph 11 of Security Council resolution 2571 (2021) included, inter alia, forced closure of election centres; confiscation of voter cards and ballot boxes; threats to electoral staff; and forced closure of and direct attacks on the offices of the High National Elections Commission. Such acts also included threats to and arrests of candidates and their families who are not affiliated with the local armed actor in control, forcing some candidates to withdraw and to relocate from their municipality.

The Panel found armed groups in both the west and east responsible for systematic violations of international humanitarian and human rights law, including arbitrary detention, enforced disappearance, torture and other ill-treatment, denial of fair trial and right to privacy, and the arbitrary deprivation of life.

The arms embargo was continuously violated and further flouted openly through the announcement of military cooperation between Member States and armed actors across Libya. Since 2022, Libyan armed group leaders from both the west and the east have implemented a bilateral, symbiotically beneficial pact enabling them to circumvent the arms embargo. Means of transportation under the direct control of Libyan armed groups and their affiliates and the reliance on smuggling as a procurement strategy by both the Government of National Unity and LAAF hindered the implementation of the embargo. A previously identified network of shell companies, operated by two identified individuals, was responsible for multiple transfers, including transfer attempts intercepted by Italy in 2024 and Spain in 2025.

Various types of military and civilian dual-use items diversified the arsenals of armed groups. Given their more accessible nature, dual-use items were increasingly procured and utilized. Their indirect procurement channels and lower regulatory controls enabled armed groups to acquire such items as force multipliers.

The scale and level of the organization of illicit petroleum exports – both crude oil and refined products – reached unprecedented levels during the reporting period. This was only feasible due to the direct involvement of Ibrahim Al Dabiba and Saddam Haftar, both of whom provided an umbrella of impunity for individuals that effectively stripped the National Oil Corporation of its capacity to safeguard the interests of the State of Libya. As a result, the oil and fuel sector became characterized by a system of impunity, in which export and import transactions, exploitation agreements and service contracts were routinely rubber-stamped to serve the interests of competing networks affiliated with armed groups. A key by-product of this system is the Arkenu Oil Company, which was used as a Trojan horse to divert more than \$3 billion between January 2024 and November 2025.

The Panel identified a criminal network led by Maeen Ali Sharfeddin, who established a multilayered operation with international reach, capable of controlling the supply chain; diverted refined petroleum products at ports and other locations; ensured unhindered access for vessels entering and departing Libya without interference from law enforcement; and evaded any form of accountability.

Illicit exports of a variety of refined petroleum products expanded from Benghazi to other ports in eastern Libya. New export infrastructure was installed in commercial sections of Benghazi and Ras Lanuf harbours. Tubruq port emerged as a grey market for illicit exports, with port services and documentation creating a semblance of regularity to feign the appearance of legitimate exports. None of these export locations are under the control of the National Oil Corporation.

By the end of the reporting period, the newly introduced reinvestment exemption contained in paragraph 14 of Security Council resolution [2769 \(2025\)](#) had still not been fully operationalized, with only one exemption request and one request for guidance having been made under that paragraph. Member States and relevant financial institutions indicated to the Panel that they faced interpretative and operational challenges in implementing the paragraph. The Panel supported the Security Council Committee established pursuant to resolution [1970 \(2011\)](#) concerning Libya in efforts to provide guidance to all Member States for the effective implementation of this new provision concerning the reinvestment of the Libyan Investment Authority's frozen cash reserves in low-risk time deposits and fixed-income instruments.

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* Circulated mostly in the languages of submission only and without formal editing.

I. Background

A. Introduction

1. The present final report, provided to the Security Council pursuant to paragraph 23 of resolution [2769 \(2025\)](#), covers the period from 26 October 2024 to 14 February 2026, following the end of the reporting period of the Panel's previous report ([S/2024/914](#)).¹ It includes updates on ongoing investigations detailed in its previous report. A table of abbreviations and acronyms can be found in annex 1. An overview of the evolution of the sanctions regime concerning Libya can be found in annex 2.
2. In conducting its investigations, the Panel complied with the best practices and methods recommended by the Informal Working Group of the Security Council on General Issues of Sanctions (see [S/2006/997](#)). The Panel maintained the highest achievable standard of proof.
3. To counteract any risk to the Panel's objectivity, impartiality and independence, the Panel adapted its methodology to fast-developing new technologies, including the use of artificial intelligence. The Panel continued to treat open-source media only as lead information and complemented existing corroborative methods with additional evidentiary elements, especially in the establishment of violations and instances of non-compliance.
4. The Panel relied on corroborated evidence and adhered to its standards in respect of the opportunity to reply. Further information on methodology can be found in annex 3. The Panel maintained transparency, objectivity, impartiality and independence in its investigations.
5. The annexes are being circulated mostly in the language of submission and without formal editing. Owing to the word limits on reports of monitoring mechanisms, the Panel provides details relating to investigations in the annexes.

B. Cooperation with stakeholders and institutions

6. Member States, organizations and individuals consulted are listed in annex 4. The correspondence records of the Panel are in annex 5. The Panel submitted 50 letters with updates or analysis to the Committee on issues of interest. The Panel travelled to 14 Member States in the implementation of its mandate. It also, through in-person meetings and electronic platforms, maintained contact with Member States and other interlocutors, including other Panels of Experts and the Analytical Support and Sanctions Monitoring Team pursuant to Security Council resolutions [1526 \(2004\)](#) and [2253 \(2015\)](#) concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and the Taliban and associated individuals and entities. The Panel benefited from logistical support provided by the United Nations Support Mission in Libya. The Panel also had exchanges with the European Union military operation in the Mediterranean (Operation IRINI).
7. Following the Panel's appointment under resolution [2769 \(2025\)](#), the Panel immediately, on 4 April 2025, submitted a request to the Libyan authorities for the issuance of visas. In the absence of a response, the Panel resubmitted the request on 22 August 2025. On 7 October 2025, responsible Libyan authorities granted three-month multiple-entry visas to the Panel experts. The Panel travelled to Libya from 16 to 26 November 2025, where it met with the Libyan authorities and other relevant interlocutors in Tripoli from 16 to 23 November and met with the Libyan Arab armed

¹ All hyperlinks accessed on 14 February 2026.

forces (LAAF) in Benghazi from 24 to 26 November. The Panel met with 24 different Libyan stakeholders.

II. Acts that threaten the peace, stability or security of Libya or obstruct or undermine the successful completion of its political transition

A. Libyan armed groups dynamics

1. Key developments in the security landscape of Tripoli

8. On 12 May 2025, Abdelghani Al-Kikli, also known as Ghneiwa, the former head of the Stability Support Apparatus, was killed during an operation coordinated by the 444 Brigade at its Takbali camp in Tripoli. This operation formed part of a broader campaign against the Stability Support Apparatus, which involved coordinated action by armed groups mobilized in support of the Prime Minister, Abdulhamid Al Dabiba. The Panel found that the killing of Al-Kikli amounted to an arbitrary deprivation of life under international human rights law (see para. 55 below). The operation was coordinated by the 444 Brigade and carried out under the direct instruction of Abdulhamid Al Dabiba, in his capacity as Minister of Defence, and General Mahmoud Hamza, commander of the 444 Brigade.

9. His killing was immediately followed by an organized military operation to take control of the Stability Support Apparatus headquarters in Abu Salim and other strategic locations under its control.² An attempt was subsequently made to dismantle the Deterrence Apparatus for Combating Organized Crime and Terrorism and establish control over its stronghold in Suq al-Jum'ah district (Tripoli). In contrast to the coordinated operation against the Stability Support Apparatus, the actions against the Deterrence Apparatus were initiated by Mahmoud Hamza,³ who has a long-standing personal conflict with the Deterrence Apparatus leader Abdelraouf Kara. This operation was undertaken without consensus and preparation among armed groups aligned with the Government of National Unity, enabling the Deterrence Apparatus to mobilize local support within its area of influence and resist effectively.⁴ Clashes continued until mid-May, when a stalemate was reached. Thereafter, tensions remained high within Tripoli and no significant progress towards a sustainable agreement had been reached.

10. Armed groups opportunistically exploited the consecutive episodes of violence to advance their interests. They sought control over State institutions, reinforcing their position not only within the broader security landscape, but also within their existing alliances. Control over the physical premises of State institutions represented both economic and political opportunities: it (a) enabled revenue-generation through the implementation of racketeering schemes and (b) allowed armed groups to act as gatekeepers, regulating access to the institutions under their control. During the May 2025 events, the Joint Operation Force, a Misratah-based armed group, took control of the National Oil Corporation headquarters and two facilities of the Libyan Intelligence Service, namely, its Sabaa headquarters and a Tripoli training facility (see annex 6).

11. The Stability Support Apparatus under Al-Kikli's leadership had established a network of security agencies, reinforcing a system of coercion and racketeering,

² Confidential sources (armed group members, civilians).

³ Confidential sources (armed group member).

⁴ Confidential sources (armed group members).

aimed at controlling key State institutions.⁵ The military operation did not result in a restoration of the rule of law. Instead, it reshaped the armed-group landscape in western Libya, resulting in, inter alia, growing tensions between Misratan-dominated armed groups and other actors in the western region and increased domination over Tripoli and State institutions by Misratan armed group leaders. In that regard, Ibrahim Al Dabiba was the fulcrum of the security, political and economic decisions taken by his uncle, the Prime Minister, Abdulhamid Al Dabiba. This enabled him to consolidate his position as one of the key armed group actors (see annex 7).⁶

(a) Polarized western Libya

12. Since the clashes in May 2025, geographic and political tensions among western Libyan armed groups have escalated due to rivalry between Misratah- and Tripoli-aligned forces and armed groups from Zawiyah to the Tunisian border. Details about the growing tensions along territorial lines among armed groups in western Libya, which resulted in increasing instability, can be found in annex 8.

(b) New rule among Tripoli-based armed groups

13. Prior to the killing of Al-Kikli, fighters from Misratah had been building up their capacity and numbers within Tripoli and Tajurah (approximately 25 km south-east of Tripoli). These forces were primarily composed of the Joint Operation Force, which further reinforced its positions following the May 2025 events. This armed group has established itself in Tripoli ever since, controlling security around the National Oil Corporation headquarters and exerting pressure on its leadership to obtain service contracts (see annex 6).

14. The events of May 2025 further highlighted the role of Ibrahim Al Dabiba, who directly sponsored a recruitment campaign supporting the offensive against the Deterrence Apparatus for Combating Organized Crime and Terrorism. The Panel found that this recruitment campaign was launched in Misratah to enlist fighters with weekly payments ranging between 700 and 5,000 Libyan dinars (equivalent to 129 and 921 dollars, respectively), depending on whether recruits possessed a vehicle or weapons.⁷ At the time of writing, some of these recruits were based in the Andalus neighbourhood of Tripoli, where Abdulhamid and Ibrahim Al Dabiba reside. The degree of control over these newly recruited forces remained volatile, with efforts under way to integrate some of them under the Ministry of Defence and the Ministry of the Interior.

15. The influence of Ibrahim Al Dabiba extended beyond armed groups, as he assumed the role of kingmaker in the light of his security, political and economic functions. He played a central role in several pivotal developments in Libya, including through his direct involvement in the agreement between the Al Dabibas and the Haftars, leading to the establishment of the Arkenu deal (paras. 98 and 104–106). His sway over key economic sectors was based on his alliance with multiple armed group leaders, with Al-Kikli, in the past, and, more recently, with Abdulsalam Al-Zobi.

16. Hailing from Misratah, Al-Zobi became the most prominent figure among the Tripoli-based armed groups. He exerted his influence to generate revenue, both through racketeering schemes and fuel smuggling (see annex 9, sect. D), positioning himself strategically within the military structure. He established and retained command of 111 Brigade, whose members have been in control of the southern part

⁵ S/2024/914, paras. 13–16.

⁶ “Armed group actors” refers to individuals that wield power vis-à-vis armed groups, including through directing or financing them.

⁷ Confidential sources (civilians, armed group members).

of Tripoli ever since. His influence grew after he was appointed by Abdulhamid Al Dabiba as undersecretary of the Ministry of Defence. Despite his lack of military background, he held the power to greenlight military operations in western Libya and to decide on assignments, appointments and promotions within the Libyan Army. This was manifested in his direct administration of the military salary system and his objection to the implementation of a salary system that would threaten these revenue-generating schemes.

(c) Obstruction of a centralized salary system

17. In late August 2025, the Ministry of Finance, in collaboration with the Central Bank of Libya, began implementing a long-standing project to automate the disbursement of public sector salaries. Under this system, the Central Bank pays salaries directly to public sector employees, removing the Ministry of Finance from the payroll management process. Each employee's salary is linked to a unique identification number in the Central Bank database.

18. The primary objectives of this system are to: (a) simplify the payment of salaries within the public sector; (b) strengthen control over public expenditure, where salaries account for approximately 65 per cent of the national budget; and (c) combat identity theft and the existence of ghost or fraudulent employees.

19. Since the announcement of the implementation of the system, three main stakeholders refused to cooperate and actively sought to obstruct it. The Government of National Stability declared its refusal on the grounds of protecting the privacy rights of its workforce against data collection. A similar position was adopted by the Ministry of the Interior and the Ministry of the Defence of the Government of National Unity. As national identity cards are State-issued, the Panel assessed the data protection arguments to be irrelevant.

20. The armed group leaders Imad Trabelsi and Abdulsalam Al-Zobi, who exercised de facto control over the Ministry of the Interior and the Ministry of Defence, respectively, engaged in coordinated pressure tactics, including threats, with the aim of keeping their respective administrations outside the new system.

21. Following his appointment as undersecretary of the Ministry of Defence and promotion to the rank of colonel by Abdulhamid Al Dabiba in July 2024, one of Al-Zobi's first acts was to transfer almost 1,000 soldiers to the Border Guards and Critical Facilities Directorate under its command and reassign all payments of salaries (see annex 10 and para. 72) under the administration of 111 Brigade.⁸ The measure granted this armed group direct control over salary disbursement and reinforced Al-Zobi's grip over security forces beyond 111 Brigade, effectively by-passing the formal military structure and the authority of the Chief of the General Staff.

2. Efforts by the Libyan Arab armed forces to assert control over smuggling activities

22. On 11 January 2025, the LAAF general command issued a decree dissolving 128 brigade, previously commanded by Hassan Al-Zadma, and reconstituted it as 15 brigade, which was subsequently redeployed to Jufrah. The Panel found that this decision was taken to curtail Al-Zadma's growing influence in southern Libya. Senior LAAF leadership exhibited unease over Al-Zadma's expanding power base, including his reliance on support from the Awlad Sulayman tribe, his high degree of operational autonomy and his direct engagement with foreign actors.⁹ These foreign engagements

⁸ Confidential sources (Libyan officials).

⁹ Confidential sources (armed group members).

enabled Al-Zadma to, inter alia, provide logistical support to the Rapid Support Forces in the Sudan (see paras. 32-35).

23. Prior to Al-Zadma's dismissal, local armed groups had generated sustained revenues from cross-border smuggling activities, primarily of fuel, arms and narcotics, coordinated under his supervision. Following Al-Zadma's removal, all areas previously under his control were taken over by Saddam Haftar; 87 battalion assumed control over border zones and key smuggling routes in southern Libya. The groups loyal to Al-Zadma were expelled from restructured smuggling networks, which were placed under the authority of newly appointed commanders loyal to Saddam Haftar.¹⁰ These measures constituted a systematic dismantling of Al-Zadma-aligned networks and a reassertion of centralized control over trafficking corridors linking Libya to the Niger, Chad and the Sudan.

24. Similar dynamics emerged in eastern and south-eastern Libya, notably in Kufrah, which represents a strategic area for LAAF leadership, given its proximity to international borders and its role in transborder movements, including of fighters and goods. As of December 2025, Kufrah airport was under the de facto control of Subul al-Salam battalion, reinforced by elements of 166 brigade and 87 battalion.¹¹ This reinforcement indicated the disquietude of LAAF regarding Subul al-Salam's growing influence in the Kufrah area, which the group consolidated through its tribal ties with the local Tubu population. The deployment of these LAAF land forces to Kufrah further demonstrated Saddam Haftar's effort to contain the influence of Subul al-Salam and prevent the group from developing such operational autonomy. Subul al-Salam's ability to maintain independent international contacts and engage in transborder trafficking and smuggling activities constituted a direct challenge to the authority of LAAF in the Kufrah area. The reinforced presence of units directly under the command of Saddam Haftar was intended to place Subul al-Salam under closer supervision and guarantee exclusive LAAF control over strategic routes and installations.

25. The Panel found that the overall LAAF strategy was systematically implemented to ensure that revenue-generating areas were under the control of fighters integrated into a chain of command led by a member of the Haftar family.

B. Regional dynamics

1. Security threats in the region posed by terrorist groups and individuals

Revenue-generating activities and financing networks (annex 11)

26. Although the Panel identified no terrorist attacks in Libya during the reporting period, cells and individuals affiliated with listed terrorist entities, including Islamic State in Iraq and the Levant-Libya (ISIL-Libya) (QDe.165) and the Organization of Al-Qaida in the Islamic Maghreb (QDe.014), remained present in the Fazzan region and continued to engage in criminal activities to generate revenue. Human trafficking and smuggling became the main source of earnings,¹² with terrorist groups exploiting irregular migratory flows transiting through southern Libya.

27. Terrorist groups continued to exploit natural resources in the region. Gold smuggling constituted a source of revenue for local groups and individuals linked to listed terrorist entities, in particular Jama'a Nusrat ul-Islam wa al-Muslimin (QDe.159). These activities relied on well-established transnational smuggling

¹⁰ Confidential sources (armed group members).

¹¹ Confidential sources (armed group members).

¹² Confidential sources (from southern Libya).

networks operating across southern Libya, Chad, the Niger and Mali. In addition, cocaine trafficking along the same Sahelian routes¹³ – where groups affiliated with Da'esh have increased their influence – remained an important source of funding.

28. Individuals and groups affiliated with listed terrorist entities operating in Libya also increasingly used cryptocurrency to move and store funds,¹⁴ reflecting an evolution in financial practices aimed at reducing traceability and evading oversight mechanisms.

2. Recruitment, facilitation and movement of terrorist fighters

29. Terrorist cells affiliated with ISIL-Libya continued to play an active role in recruitment activities in Libya. These cells leveraged their involvement in human trafficking and smuggling to identify and transfer individuals with specific skill sets to staff the ranks of terrorist groups operating in the Sahel region.¹⁵

30. The Panel newly identified three cases in which individuals linked to listed terrorist entities established trade companies in Libya that were used as cover structures to finance the movement of at least six fighters from the Syrian Arab Republic to Libya in batches throughout 2025. These activities underscored the continued relevance of Libya as a transit and facilitation hub for terrorist networks.

31. Terrorist groups operating in and through Libya increasingly used online platforms and advanced digital tools, including artificial intelligence, to generate targeted messages in support of their recruitment efforts. These practices enhanced the reach and efficiency of recruitment activities, contributing to the continuance of terrorist networks despite limited operational capabilities on the ground.

C. Regional security dynamics

1. Reconfiguration of Libya-based networks of support to the Rapid Support Forces¹⁶

32. Following the dismissal of Al-Zadma (see para. 23), the logistical system of support to the Rapid Support Forces, operating through southern Libya, underwent a significant reconfiguration. The Panel found that, between January 2025 and January 2026, Subul al-Salam and its leader, Abdulrahman Hashim Al-Kilani, incrementally consolidated control over supply chains used to deliver fighters, arms and related materiel from Libya to the Rapid Support Forces in the Sudan. This control, combined with knowledge of the region and tribal connections, enabled the group to use multiple routes to support the Rapid Support Forces. In response to regional security developments, Subul al-Salam and their Rapid Support Forces counterparts alternated between routes, maintaining parallel logistical pathways to ensure continuity and efficiency in the transportation of fighters, fuel, arms and related materiel in an interconnected and centralized manner (see annex 12).

33. The Panel found that Subul al-Salam was involved across multiple stages of the supply chain to the Rapid Support Forces. Subul al-Salam exercised functional control over key logistical, security and facilitation components required to sustain the transportation of fighters, fuel, arms and related materiel, including militarized vehicles. In early June 2025, it supported the armed operations of the Rapid Support Forces by deploying units on the ground, providing fighters to Rapid Support Forces -

¹³ Confidential sources (from Libya, Chad and Mali).

¹⁴ Confidential sources (including Libyan institutional sources).

¹⁵ Confidential sources.

¹⁶ Confidential sources (armed groups from Libya, the Sudan and Chad, and officials).

affiliated factions, escorting them across Libyan territory and facilitating access to fuel and spare vehicle parts. These actions culminated in the advance of the Rapid Support Forces into the Uwaynat area. The Panel found that Subul al-Salam, through its support to the Rapid Support Forces, weakened border security in southern Libya, including through the facilitation of cross-border illicit activities and the empowerment of non-State armed actors in the Fazzan region.

34. The continued flows of illicit arms (see para. 62) created a parallel market, leading to the diversion and redirection of arms and related materiel destined for the Rapid Support Forces to markets in Libya, the Niger and Chad, further entrenching a war economy along the southern borders of Libya. The Panel documented one case in which ammunition of a type previously documented by the Panel in a seizure of materiel exported from Libya¹⁷ and later identified in Misratah – originally destined for the Rapid Support Forces was diverted and resold to individuals involved in gold trafficking in the Niger and linked to Da'esh (7.62 x 39 mm calibre, packaging marked “7.62S 120PC 352” and locally referred to as “malleable [*layinah*] bullets”).

35. The Rapid Support Forces-affiliated fighters remained present in Libya during the reporting period, resulting in armed clashes between the Sudanese parties on Libyan territory, notably in June and November 2025. This presence went beyond tactical incursions.¹⁸ The Panel assessed that the Rapid Support Forces benefited from: (a) a rear base under the auspices of LAAF, located approximately 75 km south-south-west of Kufrah, for the coordination of logistical operations from Libyan territory; (b) access to the Maateen al-Sarrah airbase; and (c) the use of facilities located near Kufrah airbase¹⁹ that served both as transit points for Colombian fighters and as sites for the modification of vehicles imported through Libya (see para. 61). From these facilities, joint movements for both militarized vehicles and Colombian fighters (see para. 38) departed towards the Sudan.

2. Regional security cooperation and the projection of State-like authority in southern Libya

36. On 13 November 2025, LAAF and the Chadian National Army announced the formation of a joint force to secure the Libya-Chad border. The Libyan component of this force was drawn from Subul al-Salam. This arrangement placed Subul al-Salam in charge of controlling key routes used to supply the Rapid Support Forces through Libya and Chad, largely across territory under the effective control of Tubu communities. In practice, this amounted to an inter-State-like security arrangement, operationalized by LAAF by means of local armed proxies, leveraging tribal ties to exercise control over territory.

37. These types of arrangements reflect a broader trend²⁰ in which LAAF is striking security agreements with Member States to present itself as a legitimate security actor and act as a State-like counterpart. Under the command of Saddam Haftar, LAAF has increasingly imposed itself as a regional security provider, particularly in the areas of counter-terrorism, border security and the control of cross-border movements of individuals and goods.

¹⁷ S/2013/99, para. 171.

¹⁸ S/2024/914, annex 12.

¹⁹ 24°14'38.9"N, 23°14'04.3"E.

²⁰ S/2024/914, para. 29.

3. Foreign fighters, mercenaries

(a) Transfer of foreign fighters through Libya

38. Libyan territory was used for the transfer of mercenaries to other conflict areas in the region. With the support of LAAF, through Subul al-Salam, Colombian fighters transited through Libya to support the Rapid Support Forces in the Sudan, with Kufrah serving as a key stopover (see para. 35). Libya functioned not only as a transit point, but also as an operational, logistical and tactical base, further reinforcing regional spillover dynamics. In the first half of November 2025, the Sudanese Armed Forces conducted air strikes targeting shipments of vehicles and foreign fighters on Libyan territory in an attempt to disrupt supply chains supporting the Rapid Support Forces.²¹

(b) Syrian fighters as force multipliers

39. Syrian fighters remained present in Libya throughout the reporting period.²² In western Libya, Syrian fighters were deployed at several locations in Tripoli, including Takbali camp, Salah Eddine camp, the Abu Salim area, and Yarmouk military base, as well as in Misratah. They participated in armed confrontations during the May 2025 events (see para. 9). As tensions escalated, Tripoli-based armed groups mobilized Syrian fighters to bolster their military operations, reflecting a continued reliance on foreign combatants as readily deployable force multipliers in times of crisis. Persistent rivalries among Libyan armed groups sustained the presence of Syrian fighters, whose availability reinforced volatility on the ground and undermined efforts to advance stabilization and military reunification initiatives.

40. In eastern and southern Libya, the Panel found that Syrian fighters were present at strategic military sites, including the Maateen al-Sarrah airbase,²³ which was significantly enhanced during the reporting period in support of elements that used to be part of the private military company formerly known as ChVK Wagner.

4. Role of the 5+5 Joint Military Commission in military reunification

41. During the reporting period, the activities of the 5+5 Joint Military Commission remained restricted to ceasefire-related matters (see annex 13). No concrete progress was made towards the establishment of a unified joint military unit, and the Commission's work continued to focus on confidence-building measures and the preservation of existing ceasefire arrangements.

42. The Chiefs of General Staff in both western and eastern Libya continued to play largely symbolic roles, lacking the authority and influence necessary to oversee or enforce substantive steps towards military reunification. This situation was further compounded by the appointment of general Khaled Haftar as chief of staff in eastern Libya and the recent death of the former Chief of the General Staff of the Libyan Army, General Mohammed al-Haddad. These developments further reduced the prospects for the chiefs of staff to exercise a meaningful coordination role in any reunification process.

43. Members of the Commission continued to consider that military reunification could not be advanced in the absence of political unity. This assessment contributed to a restrictive interpretation of the Commission's role, under which military reunification was viewed as contingent upon broader political agreements rather than

²¹ Confidential sources (armed groups from Libya and the Sudan).

²² Confidential sources (armed groups and Syrian fighters).

²³ 21°41'21" N, 21°49'41" E.

as a process that could be pursued incrementally and separately through technical or security sector arrangements.

44. The Panel observed growing interest among Libyan actors in the establishment of joint military or security bodies. This interest appeared to be driven in part by expectations that progress towards joint structures could facilitate a gradual alleviation of arms embargo restrictions. The Panel also found that alternative or parallel formulas were being explored to encourage military reunification outside the Commission framework. However, in the absence of a unified command structure and effective oversight mechanisms, such initiatives risked remaining ad hoc and created incentives for attempts to circumvent the arms embargo under the guise of coordination or cooperation.

D. Acts that violate applicable international human rights law or international humanitarian law, or acts that constitute human rights abuses

1. Acts that obstruct or undermine the completion of the elections in Libya

45. While the first round of municipal council elections took place in November 2024 as planned, the second round, scheduled for August 2025, was staggered across three stages, in August, October and December 2025, due to several incidents that fell within the scope of paragraph 11 of resolution of [2571 \(2021\)](#).

46. The Panel identified at least 16 incidents across Libya in the lead-up to the second round of municipal elections that partially took place in August 2025.²⁴ These incidents, considered together with other disruptions, obstructed or undermined the municipal council elections. The Panel found that armed groups were directly and indirectly involved with the day-to-day running of local authorities while playing a key role in the organization of the municipal council elections by providing security arrangements. Moreover, in the lead-up to municipal elections and thereafter, disruptions were caused by the continuous attempts of Libyan political figures to change municipal boundaries as currency to reward armed groups for their support, allowing them to gain and maintain control over local governance.

47. The Panel found that all incidents identified involved perpetrators that were either armed actors or security apparatuses operating under the de facto authority of armed actors. They include, inter alia, forced closure of election centres; confiscation of voter cards and ballot boxes; threats to the staff of the High National Elections Commission by armed groups or their local representatives; and forced closure of and direct attacks on the offices of the High National Elections Commission by armed actors. Such acts also included threats to and the arrest of candidates and their families who are not affiliated with the local armed actor in control, forcing some candidates to withdraw and to relocate out of the municipality. More details on acts that obstructed or undermined the elections can be found in annex 14.

2. Violations of international humanitarian law and international human rights law committed in the context of deprivation of liberty

48. Acts that threaten peace, security and stability in Libya persisted on a large scale with flagrant impunity. The lack of accountability contributed to an environment in which perpetrators openly claimed responsibility for some of these acts. The extradition of Osama Najim back to Libya in January 2025 contributed to a widespread perception among victims and lawyers that international accountability mechanisms had been

²⁴ Confidential sources (victims, witnesses, electoral actors).

ineffective and irrelevant.²⁵ Despite the limitations in the domestic justice system and erosion of trust in the ability of the international justice system to hold perpetrators accountable, many victims still resorted to approaching the State prosecution system. Rights-holders chose this avenue despite limited prospects for accountability and reparations for the gross human rights violations that they had allegedly suffered.

49. The Panel investigated 14 incidents of serious violation of international humanitarian law and international human rights law that had taken place in the Tripoli detention facility controlled by the Deterrence Apparatus and the Internal Security Agency, as well as in the LAAF-controlled detention facilities located in Sabha, Sirte, Benghazi and Bayda'.²⁶ Armed groups continued to systematically use detention to:

(a) Harass, detain and torture to muzzle targeted civilians, including journalists, activists and municipal election candidates, for expressing a dissenting opinion against the status quo. This included three cases where electoral candidates and their relatives were detained;

(b) Settle personal scores with civilians and political opponents in the community;

(c) Exert and maintain control over the population outside the remits of the Libyan State judicial institutions;

(d) Instil fear in the civilian population to frighten or coerce them into compliance and impose any new changes stemming from shifts in armed groups dynamics.

More details on violations of international humanitarian law and international human rights law in the context of detention can be found in annex 15.

(a) Responsibility of the Deterrence Apparatus for combating organized crime and terrorism

50. The Panel identified five cases of violations of international humanitarian law and international human rights law committed by individuals under the effective command of the Deterrence Apparatus. Violations continued to follow a consistent pattern of unlawful deprivation of liberty; enforced disappearance; incommunicado detention; torture, cruel, inhuman and degrading treatment, including the withholding or denial of adequate healthcare and sexual abuse; violations of the right to privacy; denial of fair trial rights; and arbitrary deprivation of life, in one case due to torture and medical negligence.

51. As previously reported by the Panel, the detention of individuals relied on the employment of a coercive quasi-judicial system that still lacked any independent judicial oversight.²⁷ Victims and witnesses continued to identify Osama Najim as responsible for administering and facilitating unlawful arrest, the mistreatment of detainees in the Mitiga detention facility, the use of Libyan and foreign detainees alike for forced labour, and recruitment of detainees. The recruitment was part of the effort of the Deterrence Apparatus to create a digital army. Members of the Deterrence Apparatus continued to threaten victims and witnesses for providing their testimonies.

²⁵ Confidential sources (victims, lawyers).

²⁶ Confidential sources (victims, witnesses, lawyers).

²⁷ S/2024/914, para. 42.

(b) Responsibility of the Internal Security Agency in Tripoli

52. In one case documented by the Panel, activist Abdel Mun'im Al-Maryami was arbitrarily detained by the Internal Security Agency in Sorman, west of Tripoli, on 30 June 2025. On 4 July 2025, his death was announced under suspicious circumstances while in custody at the office of the Attorney General, after he had been handed over by the Internal Security Agency. In an official statement, the Attorney General said that Al-Maryami had been handed over to his office on 3 July 2025 and that he had been due to be released, when he fell down the stairwell shaft and sustained life-threatening injuries that led to his death on 4 July 2025. With all evidence considered in relation to his treatment and the detention conditions, the Panel found that his detention and subsequent death amounted to violations of, among other things, the prohibition of arbitrary and unlawful deprivation of liberty, inhuman and degrading treatment, detainees' fair trial rights and the prohibition of arbitrary deprivation of life.²⁸

(c) Responsibility of the Libyan Arab armed forces

53. The Panel investigated eight cases of arbitrary and unlawful detention, enforced disappearance, torture and other ill-treatment, denial of fair trial and right to privacy, and the arbitrary deprivation of life in temporary and permanent places of detention under the control of LAAF. These included Gernada detention facility in Bayda', Kweifiya detention facility in Benghazi, and a detention facility under the exclusive control of the Tariq bin Ziyad brigade in Sidi Faraj in Benghazi.

54. In three cases, detainees were subjected to systemic and brutal beatings to extract confessions that led to their deaths in custody within days to a couple of months. One additional case documented is in relation to the unlawful detention of a minor. In two of the cases, the LAAF authority in charge filmed detainees during their time in detention, in violation of their right to privacy. This propensity to film detainees in their custody is consistent with a widely used practice by LAAF units; on 5 May, a short video emerged purportedly showing Ibrahim Al-Dersi, a member of the House of Representatives, shackled around the neck and exhibiting visible signs of torture. The fate of Al-Dersi has remained unknown since his arbitrary detention in May 2024.²⁹

3. Violations of international humanitarian law and international human rights law committed in the context of the May 2025 events

55. On 12 May 2025, Abdelghani Al-Kikli, former head of the Stability Support Apparatus, was killed alongside seven of his guards in Takbali camp in Tripoli under the control of 444 Brigade.³⁰ The Panel found that the killing of Al-Kikli and his guards amounted to an arbitrary deprivation of life. The act was carried out under the direct instruction of Abdulhamid Al Dabiba, in his capacity as Minister of Defence, and Mahmoud Hamza, commander of the 444 Brigade. The Panel also reviewed video evidence of members of the 444 Brigade mistreating the dead bodies of those killed individuals.³¹ Five other of Al-Kikli's guards survived the attack but sustained gunshot wounds during the face-off and have remained forcibly disappeared ever since. In response to the Panel's findings, the Government of National Unity confirmed the killing of Al-Kikli alongside other Stability Support Apparatus elements who

²⁸ Articles 6, 9, 10 and 14 of the International Covenant on Civil and Political Rights.

²⁹ The Panel could not independently corroborate the authenticity of the video.

³⁰ Confidential sources (armed group leaders, witnesses, victims).

³¹ The rights to life, to be free from torture, cruel, inhuman or degrading treatment, to be protected from enforced disappearance, to remedy, to privacy, to religion and to culture all entail obligations to protect the dead.

accompanied him on 12 May 2025 inside Takbali camp. According to the reply, despite being permitted into Takbali camp after he presented himself at the gate alongside his men, Al-Kikli was killed on the grounds of armed and impermissible entry into Takbali. The Panel found the explanation contradictory and inconsistent with its findings. The Government of National Unity also stated that an investigation was still ongoing. Details of the response of the Government of National Unity to the Panel's findings can be found in annex 16.

56. During immediate subsequent operations to seize control of Abu Salim, any civilians who were deemed to be aligned with Al-Kikli were attacked in the hours and days after his killing. These attacks were conducted by armed military elements, some of whom belonged to 444 Brigade. These attacks included attempts at deprivation of liberty, and the ransacking, burning and destruction of private property, forcing many to flee Abu Salim.

57. Armed confrontations ensued between the 444 Brigade and the Deterrence Apparatus that persisted for several days, leading to approximately a dozen casualties, including civilians. In one incident, a projectile landed on Mitiga detention facility, leading to the death of one detainee and the injury of others. The Panel found that the Deterrence Apparatus had launched attacks from next to Mitiga detention facility on 13 May 2025, exposing the area to direct attacks. Irrespective of who attacked first, under international humanitarian law, direct attacks on civilians and civilian objects, such as prisoners and prisons, are prohibited. Moreover, launching attacks from next to a detention facility violates the obligation to take the necessary precautions to protect civilians and civilian objects from the dangers resulting from military operations, including by avoiding locating, to the maximum extent feasible, military objectives within or near densely populated areas.³²

III. Arms embargo

A. Overview

58. Pursuant to paragraphs 9 to 13 of resolution 1970 (2011), as modified by subsequent resolutions, the Panel monitored the arms embargo and investigated and identified violations³³ and instances of non-compliance.³⁴ The Panel identified 15 incidents of the transfer of arms and related materiel and three cases of military training activities in violation of paragraph 9 of resolution 1970 (2011).³⁵

59. In many aspects, the arms embargo continued to be stripped of substantive impact and rendered largely symbolic, as Libyan armed actors and some Member States alike openly flouted the arms embargo and announced military cooperation with armed actors in the west and east. The Panel found that, since 2022, both sides

³² Customary international humanitarian law; article 58 of Additional Protocol I of 1977 to the Geneva Conventions of 12 August 1949.

³³ The Panel considers "a violation" to have occurred when there has been a physical transfer of arms and military materiel, training, or the provision of materiel support that is not explicitly covered by exemptions or exceptions to the arms embargo.

³⁴ An instance of "non-compliance" refers to those occurrences where an entity has not taken the appropriate action, as contained in the resolution, for example: (a) to prevent "a violation", by not inspecting aircraft or vessels bound for Libya; or (b) to provide required or requested information to the Committee and/or its Panel. Non-compliance may also refer to a situation that objectively is a violation, but where the responsible party could not reasonably be expected to (a) initiate an exemption request or (b) have known at the time that a transfer would amount to a violation.

³⁵ "Transfer incidents" relate to the transfer of arms and related materiel or military equipment; "training incidents" relate to training provided by a third party to Libyan recipients relating to military activities, if neither are covered by exemptions or exceptions to the arms embargo.

had implemented a bilateral mutually beneficial arms procurement pact. The initiative for that pact came from influential Libyan businessmen based in the United Arab Emirates. It was negotiated between high-level representatives of the Government of National Unity and LAAF, under the patronage of Ibrahim Al Dabiba and Saddam Haftar. Under this arrangement, certain materiel, such as armoured vehicles, could be jointly procured by the parties.³⁶ This scheme allowed third parties to support Libyan actors without compromising their relationship with either side. It also enabled LAAF and Tripoli-based armed groups to receive military equipment under the cover of the Government of National Unity, in violation of the arms embargo.³⁷

60. Some Member States extended support across the political divide in Libya, evidenced by the presence of identical uncrewed aerial vehicles and ground control stations at Mitiga, Misratah and Khadim airbases (see annex 17). Armed groups adopted new strategies to circumvent the arms embargo: (a) LAAF and the Deterrence Apparatus attempted to use private jets to transport materiel; and (b) armed groups across Libya utilized a shipping line controlled by the United Arab Emirates-based dual national of Libya and Saint Kitts and Nevis, Ahmed Alushibe,³⁸ which operated its own vessels and containers, avoiding scrutiny by external parties. Interdictions of embargoed cargo remained rare, even when transiting through third countries (see recommendation 8).

61. During the reporting period, there was a growing utilization of dual-use³⁹ items by armed groups, which are put to military use after importation to Libya, with or without being weaponized. This is particularly observable for soft-skin pickup trucks and uncrewed aerial vehicles. A previously unseen number – over 2,500 in 2025 alone – of soft-skin Toyota Land Cruiser 70-type pickup trucks were imported to Benghazi throughout 2025 in regular shipments. They were collected and processed in a military facility in Kweifiya, 11 km east of Benghazi,⁴⁰ and transferred onwards to a conversion facility in Kufrah, where they were militarized, including for further export to the Sudan (see para. 35).

62. Military and civilian cargo flights to military bases in eastern Libya at least doubled between October 2024 and October 2025, compared with the previous reporting period, especially on the United Arab Emirates-eastern Libya airbridge, involving multiple airlines and flight paths, with some flights between Boosaaso, Somalia and eastern Libya (see annex 18).

B. Implementation of new arms embargo exemptions and exceptions under Security Council resolution 2769 (2025)

63. In paragraph 6 of resolution 2769 (2025), the Security Council introduced a new exemption measure to the arms embargo permitting the provision of technical assistance and training solely to promote the reunification process of Libyan military

³⁶ Official sources, armed group members, private company.

³⁷ Examples of such joint procurement include: (a) the 2022 deliveries by MV *Luccello/Victory Roro* (IMO 7800112) to Benghazi and Tripoli; (b) the 2022 intercepted delivery of armoured vehicles on board the MV *Meerdijk* (IMO 9377925) destined for Benghazi, which followed a delivery of identical vehicles to Tripoli; and (c) the 2025 delivery of armoured vehicles by MV *Aya 1* (IMO 9293557) to Misratah and Benghazi. See [S/2022/427](#), para. 73, and annex 30; [S/2023/673](#), para. 80, and annex 27, paras. 106-110, and annex 72; and the present report, paras. 71 to 76, and annex 22.

³⁸ Also known as Ahmed Abraham Ahmed Gadalla; date of birth 30 March 1980; Saint Kitts and Nevis passport No. RE0019116 (expired 7 October 2024).

³⁹ Note that the term “dual-use” used in the present report refers to items that have both civilian and military applications. See [S/2022/427](#), para. 61.

⁴⁰ 32° 13' 17" N, 20° 12' 25" E.

and security institutions, as notified to the Committee in advance. Paragraph 6 was invoked only twice, by one Member State. Panel engagements with relevant stakeholders revealed that the reason for the rare reliance on paragraph 6 was twofold: (a) disagreements among the Libyan parties on who should participate; and (b) to a lower degree, the unclear role of the Presidential Council in the process. In one of the two cases in which paragraph 6 was invoked, the notification was incomplete (see table 3, annex 19).

64. In paragraphs 6 and 7 of resolution [2769 \(2025\)](#), the Security Council also introduced new provisions in relation to temporary entries into Libya of arms and related materiel. The Panel revised its methodology accordingly, developing profile indicators specifically for temporary entries of military aircraft and naval vessels, to assist in determining the likelihood of violations and other occurrences, thus narrowing the focus of Panel investigations (see annex 3, appendix 3.E).

65. Five Member States conducted 124 military cargo flights to Libya. The Panel requested each to provide details about the purpose of the flights and the cargo delivered. Two Member States indicated that no arms embargo-relevant items were transported; one Member State responded that the flights were conducted to address the logistics needs of its armed forces military advisers who were in Libya to provide training, assistance and consultancy services to the Libyan armed forces in line with the established legal framework;⁴¹ two did not respond (see annex 20).

66. Naval vessels of several Member States visited western and eastern Libyan ports. The Panel identified the periodic visits of Turkish naval vessels to Khums as falling under six profile indicators for temporary entries of naval vessels. Türkiye responded that visits had been conducted to ensure the safety and security of Turkish advisory and training personnel.⁴² The Panel assessed that the explanation given was not commensurate with bi-weekly or monthly rotations and the almost constant presence of two, sometimes three, Turkish naval vessels in Khums port. The Panel found that these visits did not fulfil the exemption or exception requirements of paragraphs 6 or 7 of resolution [2769 \(2025\)](#), thus constituting a violation of paragraph 9 of resolution [1970 \(2011\)](#) (see table 3).

67. None of these Member States provided any documentation that would allow the Panel to establish whether paragraph 7 of resolution [2769 \(2025\)](#) applied to these temporary entries (table 3). Paragraph 7 de facto established an incentive for Member States to employ military means of transport to evade being found in violation of the arms embargo (see recommendation 2).

C. Maritime violations, non-compliance and other maritime issues

Maritime transfers

68. Larger, non-lethal military equipment, such as naval-type vessels and armoured vehicles, continued to be transferred to Libya by sea by means of commercial carriers. As in previous cases, the Panel noted a shirking of responsibility among the commercial actors involved, which, for maritime transfers, almost always implicates upwards of five parties. In exchanges with the Panel, parties repeatedly cited the long-standing reputations of business partners, robust internal sanctions compliance policies, and allegedly cogent documentation, which the Panel assessed as invalid justification for serious due diligence shortcomings. Moreover, parties consistently sought to evade responsibility by invoking the sanctity of contractual indemnity

⁴¹ See, however, [S/2024/914](#), para. 81.

⁴² Letter dated 12 January 2026.

clauses and sanctions disclaimers. While such defences may bear relevance in determining contractual obligations and civil liabilities, they are irrelevant in the context of a United Nations arms embargo. In such commercial transfers, all parties, State and non-State alike, become gatekeepers for the implementation of the embargo; they are subject to an enhanced due diligence standard commensurate with their respective roles and functions, and thus bear collective responsibility for violations. In all cases investigated by the Panel, shell companies, nominal consignees and entities previously reported by the Panel were used as shippers or consignees in cargo manifests. These features constituted clear red flags that should have prompted the parties to re-evaluate and apply strict compliance measures (see recommendations 3 and 9).

1. Vessel transfers (annex 21)

69. The Panel identified transfers of 23 vessels to Benghazi. Of these, it classified five as fast patrol vessels and two as fast interceptor craft, and thus naval-type vessels, owing to their design, structure and designation. Two types of vessels had been exhibited as models of naval-type vessels, with gun mounts, at a naval defence exhibition in April 2025.⁴³ The Panel inspected fast patrol vessels of the same make and model after their interception en route to Benghazi (see paras. 89 to 90).

70. All these transfers were organized by the network headed by Amro Salem Ismael Ibrahim, who is based in the United Arab Emirates.⁴⁴ This network was previously found to be in violation of the arms embargo for vessel transfers.⁴⁵ The Panel identified an additional member of the network, Omar Mahmoud Hasan Mustafa.⁴⁶ The Panel found these two individuals and several entities to be in violation of paragraph 9 of resolution 1970 (2011) for the transfer of the naval-type vessels, and thus military equipment, to Libya (see tables 1 and 3). The Panel found several instances that constituted non-compliance with paragraph 19 of resolution 2213 (2015) for failure to inspect the cargo vessels, including during transit, despite indicators of prohibited items (see table 3). The Panel documented repeated occurrences of such non-compliance,⁴⁷ which significantly undermined the effective implementation of the arms embargo (see recommendation 8).

Table 1

Naval-type vessels⁴⁸ transferred to Benghazi between September 2024 and December 2025

Name	IMO/MMSI number	Length	Vessel type	Producer, point of origin	Delivered to Benghazi by (vessel), (date)
Al Karama 1	MMSI 341627001	17 m	FIC	Grandweld Shipyards, United Arab Emirates	MV <i>BBC Rheiderland</i> (IMO 9614696), 30 September 2024
Al Karama 2	MMSI 341628001	17 m			
TBZ11	IMO 1032244	40 m	FPV	Penguin International Limited, Singapore	MV <i>St Maria</i> (IMO 9467134), 6 January 2025
TBZ13	IMO 1089106	38 m			

⁴³ See www.grandweld.com/grandweld-shipyards-makes-landmark-debut-at-navdex-2025/.

⁴⁴ Date of birth 1 June 1986; national of Jordan; Jordanian passport No. Q221984 (expiration: 20 Oct. 2025).

⁴⁵ See S/2024/914, paras. 67–69.

⁴⁶ Date of birth 28 May 1991; national of Jordan; Jordanian passport No. R734621 (expiration: 4 March 2028).

⁴⁷ See, for example, S/2024/914, para. 87 and annex 31, para. 7.

⁴⁸ All vessels were initially registered under the Saint Kitts and Nevis flag; registrations have since been terminated.

<i>Name</i>	<i>IMO/MMSI number</i>	<i>Length</i>	<i>Vessel type</i>	<i>Producer, point of origin</i>	<i>Delivered to Benghazi by (vessel), (date)</i>
TBZ14	IMO 1089118	38 m		Grandweld Shipyards, United Arab Emirates	MV <i>Bahri Diriyah</i> (IMO 9498482), 22 June 2025
TBZ15	IMO 1089120	38 m			
TBZ16	IMO 1089132	38 m			

Abbreviations: FIC, fast interceptor craft; FPV, fast patrol vessel; IMO, International Maritime Organization; MMSI, Maritime Mobile Service Identity.

2. Armoured vehicles: the case of MV Aya 1 (annex 22)

71. On 18 July 2025, Operation IRINI intercepted the MV *Aya 1* (IMO 9293557)⁴⁹ en route from Port Rashid, United Arab Emirates to Benghazi, Libya. Operation IRINI identified missing cargo documentation and inspected, at sea, a sample of 6 containers out of a total of 332. The inspection revealed 12 militarized vehicles in some of the containers onboard. Based on photographic evidence provided by Operation IRINI, the Panel assessed these vehicles as military equipment.

72. Operation IRINI contacted the carrier, which is ultimately controlled by Ahmed Alushibe, regarding the cargo documentation and informed the Libyan Ministry of Defence of the matter. The vessel was ordered to Astakos port, Greece, where it arrived on 27 July 2025; however, no further inspections were carried out. The Libyan Ministry of Defence claimed 154 of the vehicles on board by providing an end-user certificate dated 6 May 2025, signed by the Prime Minister, Abdulhamid Al Dabiba, in his capacity as Minister of Defence, and by the director of military procurement. The Ministry of Defence contended that the Committee had approved a related arms embargo exemption request for use of the vehicles by the Border Guards and Critical Facilities Directorate. Subsequently, on 1 August 2025, Operation IRINI released the vessel on the basis of its exchanges with the Libyan Ministry of Defence, on the condition that it sail to Tripoli instead of Benghazi to unload the vehicles. The vessel sailed towards Tripoli but changed course and called in at Misratah, Benghazi and Tubruq.

73. The Panel is aware that the above-mentioned arms embargo exemption request invoked by the Libyan Ministry of Defence, dated 29 July 2025, had been made under paragraphs 2 (d) and 2 (e) of resolution 2769 (2025), thus simultaneously invoking an exception and submitting a request for approval. The exception would only apply to forces declared under the control of the Libyan Government; however, the intended recipient, the Border Guards and Critical Facilities Directorate, which is under the control of Abdulsalam Al-Zobi (see para. 16), has not been declared as such.⁵⁰ No approval was granted by the Committee as at the time of writing of the present report.

74. The end-user certificate was technically invalid, as one of the signatories was not among those notified to the Committee at the time of notification.⁵¹ The list of signatories was eventually updated in December 2025. The Ministry of Defence was not the consignee indicated in the cargo manifest of any of the vehicles contained in the end-user certificate. Should the Ministry of Defence be identified as a consignee, it would face challenges in financing business transactions because a higher level of due diligence is applied to it by the banking sector as opposed to the private companies falsely identified as the recipient of the cargo.⁵²

⁴⁹ Flag State: Panama. Vessel later renamed as *Zulfa 1*.

⁵⁰ See S/2024/914, para. 60.

⁵¹ See S/2024/914, para. 61.

⁵² Ministry of Defence, Tripoli, 22 November 2025.

75. Of the 154 vehicles contained in the end-user certificate, most of which were Toyota Land Cruiser 70-type-based, 123 were unloaded in Misratah and 31 in Benghazi. An additional 86 armoured vehicles of the same base type were on board the MV *Aya 1* and offloaded in Misratah. Of these 86 armoured vehicles, the Panel identified the Ministry of Defence and the Ministry of the Interior as consignees for 16 and 23 of them, respectively. The remaining consignees for these vehicles were: (a) four automobile import companies in Misratah (21 vehicles) and (b) Al-Katiba 55 in Tripoli (26 vehicles), a Warshafana-based armed group reported by the Panel for violations of international human rights law in the Mayah detention centre.⁵³

76. The Panel assessed that this transfer: (a) included at least 240 vehicles subject to the arms embargo;⁵⁴ (b) was part of the procurement scheme described in paragraph 59 above, intended at circumventing the arms embargo; and (c) was implemented through a purpose-built transportation channel under the control of Alushibe. The transfer of the 154 vehicles contained in the end-user certificate and of the additional 86 armoured vehicles did not fall under the exception of paragraph 2 (d) of resolution 2769 (2025), as neither the Border Guards and Critical Facilities Directorate nor Al-Katiba 55 were declared under the control of the Libyan government. It was also not approved in advance under paragraph 2 (e) of resolution 2769 (2025). The transfer of the 240 vehicles to Libya was thus a violation of paragraph 9 of resolution 1970 (2011) (see table 3). The Panel further assessed that, in relation to this transfer, Operation IRINI failed to implement its mandate under paragraph 5 of resolution 2292 (2016), as amended by paragraph 2 of resolution 2733 (2024).

D. Arms and related materiel transfers

77. The Panel identified an additional 11 incidents of arms transfers⁵⁵ into Libya that constituted violations of paragraph 9 of resolution 1970 (2011) (see table 3). Violations are presented in chronological order and in tabular format (see annex 23). Infographics and details about the violations can be found in annexes 24 and 25. Annex 26 contains a summary of the types of arms and military materiel transferred into Libya in violation of paragraph 9 of resolution 1970 (2011) since the imposition of the embargo. The summary illustrates the variety and technical complexity of the weapons and military materiel now available in Libya and serves as a baseline to assist in the identification of any future violations.

78. The Panel also identified three incidents of equipment transfers that appeared on open-source platforms, but was unable to independently corroborate them beyond geolocation or other means (see annex 27). This included the forces affiliated with the Government of National Unity operating an advanced anti-tank guided missile type in a military exercise and two armoured personnel carrier types previously unidentified in western Libya.⁵⁶

79. During a military parade held on 26 May 2025 at the “military city”, about 60 km to the south-west of Benghazi, which was attended by numerous foreign military and diplomatic representatives, including some at deputy ministerial levels, LAAF boasted an extensive arsenal of arms and related materiel. It included an advanced

⁵³ See S/2023/673, paras. 64–65.

⁵⁴ One hundred and fifty-four vehicles contained in the end-user certificate, regardless of their configuration, by virtue of their end-user being the Ministry of Defence and by virtue of being used for military purposes, in accordance with past practice of the Committee; 86 determined as armoured by the Panel.

⁵⁵ “Transfer” relates to the transfer of arms and military equipment.

⁵⁶ The same types of materiel were previously reported to be in use by LAAF; see S/2021/229, annex 56, and S/2024/914, annex 58.

surface-to-air defence system, a large quantity of armoured personnel carriers, various types of infantry fighting vehicles, a heavy-duty helicopter and a large number of uncrewed aerial vehicles and electronic warfare systems.⁵⁷ LAAF provided its views to the Panel regarding the parade in the context of the arms embargo.⁵⁸ The Panel found that the justifications provided either did not apply or were not convincing; rather, the statement illustrated the determination of LAAF to circumvent the arms embargo. The Panel found LAAF to be in violation of paragraph 9 of resolution 1970 (2011) for several transfers (see annex 24).

E. Dual-use items

80. Compared with military equipment, dual-use items face lower regulatory barriers and rely on commercial supply chains, making them not only more cost-effective, but also more accessible for actors under an arms embargo. The Panel found that dual-use items were customarily shipped from third countries, and rarely from the producing country directly to Libya. This was also observable during the above-mentioned military parade, at which LAAF displayed dual-use items with military applications, such as: (a) soft-skin vehicles and civilian vessels used for mobility of troops and materiel, as well as for providing a mobile platform for mounted weaponry; (b) various types of uncrewed aerial vehicles for intelligence, surveillance, target acquisition and reconnaissance roles, or as uncrewed combat aerial vehicles; (c) anti-uncrewed aerial vehicle equipment for protecting military establishments; and (d) all-terrain vehicles used for multiple purposes (see annex 24). The Panel assessed that such items could not only close gaps in military capacity, but also serve as a quantitative force projection.

81. When such dual-use items are employed for military purposes and the end-user is an armed actor in Libya, the arms embargo applies. Furthermore, some dual-use items could be qualified as falling under paragraph 9 of resolution 1970 (2011), in the category of paramilitary equipment (see recommendation 9).

F. Military training sessions

82. The Panel identified three military training sessions provided to Libyan armed actors, two by Belarus and one by Italy, in violation of paragraph 9 of resolution 1970 (2011) (see annexes 28, 29 and 30). The Panel also identified five instances of training provision that appeared on open-source platforms, but was unable to independently corroborate them beyond geolocation or other means (see annex 31).

G. Aviation violations and incidents of non-compliance

1. Military transport aircraft

83. Egypt provided military flight assistance with four military transport aircraft to LAAF paratroopers during the 26 May 2025 LAAF military parade. While temporary, this provision of assistance did not fall under the exception of paragraph 7 of resolution 2769 (2025) and thus constituted a violation of paragraph 9 of resolution 1970 (2011) (see table 3 and annex 32).

⁵⁷ See <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025.

⁵⁸ Undated letter received on 21 September 2025.

2. Civilian aircraft

84. During the previous reporting period, only one airline, Sapsan Airline, operated on the United Arab Emirates-eastern Libya airbridge, using its two aircraft.⁵⁹ In comparison, during the period covered by the present report, 11 cargo aircraft operated on this airbridge by four Kyrgyzstan-registered airlines, specifically Flysky Airlines, New Way Cargo Airlines, Sapsan Airline and Skyline Airline. These airlines conducted 458 flights, twice as many as identified during the previous reporting period, via multiple flight paths including some between Boosaaso, Somalia and Benghazi and Kufrah, Libya. Cargo flight arrivals identified at Kufrah airbase, which had been seldom used for such purposes before February 2025,⁶⁰ increased tenfold, from 24 in 2024 to 239 in 2025.⁶¹ A hangar at the north end of the airbase was being rebuilt as at the time of writing.

85. Flysky and Sapsan also conducted 30 flights between Türkiye and eastern Libya from March to September 2025.

86. The Panel also newly identified an air route between Belarus and eastern Libya, operated by six cargo aircraft of three Belarusian-registered airlines: Rada Airlines, Rubystar Airways and TransAVIAexport Airlines. These airlines conducted 42 flights between November 2024 and the end of October 2025, which coincided with the scheduled training that took place for the 87 battalion of LAAF by Belarus.

87. An additional Belarusian commercial airline, Belavia Airlines, provided flights for the 36 special operations forces battalion and 87 battalion of LAAF after they completed training in Belarus.⁶² The Panel found that Belavia conducted an additional 38 flights using its four-passenger aircraft from Minsk to Benghazi in November 2024 and December 2025. Contemporaneously, both Belavia and the three above-mentioned Belarusian airlines started to intensify their flight frequency to Benghazi in line with the commencement of the training for 87 battalion in Belarus (see table 3 and annexes 28 and 29).

88. These flights met the Panel's air delivery profile indicators (see annex 3), which, when considered collectively, indicated a violation of paragraph 9 of resolution 1970 (2011) (see table 3 and annex 18).

H. Member State action: interception by Spain (annex 33)

89. On 27 August 2025, Spain, in implementing paragraph 19 of resolution 2213 (2015), intercepted the MV *Lila Mumbai* (IMO 9253143)⁶³ en route from Port Rashid, United Arab Emirates, to Benghazi, Libya, as the vessel was approaching Ceuta, Spain, for provisioning. Subsequently, cargo consisting of 10 vessels was offloaded in Algeciras, Spain (see table 2). The Panel inspected these vessels on 6 November 2025 and established that they consisted of: (a) two fast patrol vessels of the same make and model that had been already transferred to Libya (see para. 69); (b) six fast interceptor craft with gun mounts; and (c) two fast landing craft. Five of the interceptor craft and the two fast landing craft were at different stages of completion, indicating that shipbuilding work would be undertaken after arrival in Benghazi. Owing to the vessels' design, structure and designation, the Panel classified all as

⁵⁹ The Panel previously reported Sapsan Airline's activities as a violation of para. 9 of resolution 1970 (2011). See S/2022/427, table 3 and annex 96; S/2023/673, annex 61; and S/2024/914, tables 3 and 4 and annex 39.

⁶⁰ Six flights were identified from July 2024 to January 2025.

⁶¹ Source: Planet Labs.

⁶² Belarus responses dated 4 June and 24 November 2025.

⁶³ Flag: Liberia.

naval-type vessels and thus military equipment or spare parts. Had Spain not intercepted the MV *Lila Mumbai*, the delivery of these vessels to Benghazi would have fallen within the scope of paragraph 9 of resolution 1970 (2011).

90. The network of Amro Ibrahim and Omar Mustafa (see paras. 70 and 94) was involved in every step of this attempted transfer, as: (a) a network company was the shipper, with the direct involvement of Omar Mustafa in the process; (b) the consignee was a company that Omar Mustafa had represented in an attempted transfer of uncrewed aerial vehicle components (see para. 94); (c) the two fast patrol vessels were built for, owned, controlled and flag-registered by network companies controlled by Omar Mustafa and Amro Ibrahim; and (d) the fast interceptor craft and fast landing craft were marketed by a network company controlled by Amro Ibrahim, similar to previously transferred fast interceptor craft.⁶⁴ That company was not registered as a shipyard but as a repair shop. This shows how “grey” outlets, posing as shipyards – although without the requisite industrial licence – can be used as expendable front companies for exporting embargoed items to keep the reputation of the producing primary shipyard intact.⁶⁵

Table 2
Vessels intercepted by Spain en route to Benghazi

<i>Amount</i>	<i>Name or hull number</i>	<i>IMO/MMSI number</i>	<i>Length</i>	<i>Vessel type</i>	<i>Producer, seller or marketer, point of origin</i>
1	TBZ17	1089144	38 m	FPV	Grandweld Shipyards, United Arab Emirates
1	TBZ18	1089156	38 m		
6	#8-i1516GR, #10-i1516GR, #18-i1516GR, #19-i1516GR, #20-i1516GR, #21-i1516GR	n/a	15 m	FIC	2020 Volume by Asha Co., United Arab Emirates
2	1612#3, 1612#4	n/a	17 m	FLC	

Abbreviations: FIC, fast interceptor craft; FLC, fast landing craft; FPV, fast patrol vessel; IMO, International Maritime Organization; MMSI, Maritime Mobile Service Identity.

I. Update on previously reported cases and seizures

1. Spain (annex 34)

91. In relation to previously reported law enforcement operations carried out by the Spanish authorities,⁶⁶ the latter informed the Panel that, at the time of writing, the cases were pending judicial consideration and concerned: (a) an investigation following the transfer of anti-drone systems and ground control stations under the control of the Deterrence Apparatus at Mitiga from a third country to Libya; and (b) four seizures in 2023 of arms and related materiel for LAAF, destined for Benghazi via three private jets and one maritime container.

⁶⁴ S/2024/914, para. 69 and annexes 27 and 32.

⁶⁵ A similar case was reported in S/2024/914, annex 34, para. 7.

⁶⁶ See S/2024/914, para. 88.

2. Italy (annex 35)

92. On 20 and 21 May 2025, the Panel inspected the uncrewed aerial vehicle components seized by the Italian authorities in June 2024.⁶⁷ The Panel found that: (a) the components consisted of two incomplete military grey fuselages with associated wings and V-tail surfaces; (b) the fuselages had cabling, hydraulics and fuel tanks; and (c) each wing contained hardpoints for the attachment of three pylons. The components were disguised and misdeclared as wind power equipment.

93. The Panel assessed that the components were consistent with the Fei Long-1 (Flying Dragon-1 or FL-1) medium-altitude long-endurance uncrewed aerial vehicle. Owing to the multi-role platform capabilities of the FL-1, including the possibility of attaching pylons for payload mounting, the FL-1 components would be considered as spare parts, whose delivery to Benghazi would have fallen within the scope of paragraph 9 of resolution 1970 (2011).

94. The Panel identified the involvement of Omar Mustafa (see paras. 70 and 90) as representing the consignee, Danube Shipping Company (Benghazi), for the uncrewed aerial vehicle components. The Panel identified the same company as consignee of several vessels, including naval-type vessels, delivered and intended to be delivered to Benghazi.⁶⁸

3. Other cases

95. The Panel identified an additional responsible party for a previously reported violation of paragraph 9 of resolution 1970 (2011) for vessel transfers (see table 3 and annex 36).

J. Summary of violation and non-compliance responsibilities

96. The Panel found that the Member States, entities or individuals listed in table 3 are in violation of and/or are non-compliant with the arms embargo. Further details can be found in annexes 18, 19, 20, 24, 25, 28, 29, 30 and 32.

Table 3

Summary of responsibility for violations of paragraph 9 of resolution 1970 (2011) and/or incidents of non-compliance with inspection, reporting and provision of information requirements⁶⁹

Country/entity/individual ^a	Violation of resolution 1970 (2011), para. 9	Non-compliance with resolution 2213 (2015), para. 19	Non-compliance with resolution 2769 (2025), paras. 24 and 25	Non-compliance with resolution 2769 (2025), para. 6	Reason
Belarus	✓		✓		Training ^d Information ^c
Egypt	✓		✓		Assistance (aviation) ^f Information ^c
Italy	✓		✓		Training ^d Information ^c

⁶⁷ See S/2024/914, paras. 89–90 and annex 50.

⁶⁸ Para. 33 and annex 24 of the present report; and S/2024/914, para. 69 and annex 32, sect. C.

⁶⁹ The table contains violations of and non-compliance with the arms embargo, including identified responsible countries, entities and individuals and the reasons. Additional equipment transfers involving unidentified responsible parties are included in annex 23 to the present report.

Country/entity/individual ^a	Violation of resolution 1970 (2011), para. 9	Non-compliance with resolution 2213 (2015), para. 19	Non-compliance with resolution 2769 (2025), paras. 24 and 25	Non-compliance with resolution 2769 (2025), para. 6	Reason
Libya (forces affiliated with the Government of National Unity)	✓	✓	✓		Procurement ^e Non-inspection ^g Information ^c
Pakistan	✓		✓		Transfer ^b Information ^c
Russian Federation			✓		Information ^c
Türkiye	✓	✓	✓		Transfer (maritime) ^b Non-inspection ^g Information ^c
United Arab Emirates		✓	✓		Non-inspection ^g Information ^c
United Kingdom			✓		Information ^c
United States			✓	✓	Information ^{c,h}
Al-Katiba 55 Mushat (Libya)	✓				Procurement ^e
LAAF	✓		✓		Procurement ^e Information ^c
Entitiesⁱ					
2020 Volume Boats Maintenance & Repairing LLC (United Arab Emirates)	✓				Transfer (maritime) ^b Procurement ^e
Aerotel FZCO (United Arab Emirates)	✓				Procurement ^e
Africa Auto FZE (United Arab Emirates)	✓				Transfer (maritime) ^b
Al Bahar Motors (United Arab Emirates)	✓				Transfer (maritime) ^b
Al Baariq Company (Libya)	✓				Procurement ^e
Al Fooz Al Qadem Shipping Ltd. (Marshall Islands)	✓				Transfer (maritime) ^b
Alicem Shipping Ltd. (Liberia)	✓				Transfer (maritime) ^b
Atqan Company to Import Motors and Transportation (Libya)	✓				Procurement ^e

Country/entity/individual ^a	Violation of resolution 1970 (2011), para. 9	Non-compliance with resolution 2213 (2015), para. 19	Non-compliance with resolution 2769 (2025), paras. 24 and 25	Non-compliance with resolution 2769 (2025), para. 6	Reason
BBC Chartering GmbH & Co. KG (Germany)	✓				Transfer (maritime) ^b
Belavia Airlines (Belarus)	✓		✓		Assistance (aviation) ^f Information ^c
Cigisped Middle East LLC (United Arab Emirates)	✓				Transfer (maritime) ^b
Danube Shipping Company (Libya)	✓				Transfer (maritime) ^b
Etehad Libya to Import Cars and Parts Company (Libya)	✓				Procurement ^e
FDZ Logistics LLC (United Arab Emirates)	✓				Transfer (maritime) ^b
Flysky Airlines (Kyrgyzstan)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Grandweld Shipyards, branch of Atos International LLC (United Arab Emirates)	✓		✓		Procurement ^e
HGF Denizcilik Ltd Sti (Türkiye)	✓				Transfer (maritime) ^b
II Solution FZE (United Arab Emirates)	✓		✓		Transfer (maritime) ^b
Mujaf Middle East FZE (United Arab Emirates)	✓				Transfer (maritime) ^b
Multham International Limited (Hong Kong, China)	✓		✓		Transfer (maritime) ^b Procurement ^e
National Shipping Company of Saudi Arabia (Saudi Arabia)	✓				Transfer (maritime) ^b
New Way Cargo Airlines (Kyrgyzstan)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Penguin International Limited (Singapore)	✓				Procurement ^e
Penguin Shipyard Asia PTE Ltd (Singapore)	✓				Transfer (maritime) ^b

<i>Country/entity/individual^a</i>	<i>Violation of resolution 1970 (2011), para. 9</i>	<i>Non-compliance with resolution 2213 (2015), para. 19</i>	<i>Non-compliance with resolution 2769 (2025), paras. 24 and 25</i>	<i>Non-compliance with resolution 2769 (2025), para. 6</i>	<i>Reason</i>
Peters & May Ltd (United Kingdom)	✓		✓		Transfer (maritime) ^b
Rada Airlines (Belarus)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Rubystar Airways (Belarus)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Sapsan Airlines (Kyrgyzstan)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Sincere Car Trading FZCO (United Arab Emirates)	✓				Transfer (maritime) ^b
Skyline Airlines (Kyrgyzstan)	✓		✓		Transfer (aviation indicators) ^b Information ^c
Space Cargo (United Arab Emirates)			✓		Information ^c
TAE Airlines (Belarus)	✓		✓		Transfer (aviation indicators) ^b Information ^c
UDS Shipping Services LLC (United Arab Emirates)	✓				Transfer (maritime) ^b
Individuals					
Ahmed Alushibe (also known as Ahmed Gadalla) ⁷⁰	✓				Transfer (maritime) ^b
Amro Salem Ismael Ibrahim ⁷¹	✓				Transfer (maritime) ^b Procurement ^e
Omar Mahmoud Hasan Mustafa ⁷²	✓				Transfer (maritime) ^b Procurement ^e

(Footnotes on following page)

⁷⁰ Also known as Ahmed Abraham Ahmed Gadalla; date of birth 30 March 1980; Saint Kitts and Nevis passport No. RE0019116 (expired 7 October 2024).

⁷¹ National of Jordan; date of birth 1 June 1986; residence, United Arab Emirates.

⁷² Date of birth 28 May 1991; national of Jordan; Jordanian passport No. R734621 (expiration: 4 March 2028).

(Footnotes to table)

^a Listed alphabetically by generic group.

^b Transfer: transfer of arms and related materiel to Libya.

^c Information: failure to meet the requirement to provide complete and accurate information to the Panel on request or to the Committee upon notification.

^d Training: provision of military training.

^e Procurement: procurement of arms and related materiel.

^f Assistance: provision of assistance related to military activities, such as the provision of aircraft in support of such activities.

^g Arrival/departure non-inspection: failure to inspect vessels or aircraft used to transfer arms and related materiel to Libya.

^h Information: failure to provide timely, complete and accurate information pursuant to paragraph 6 of resolution [2769 \(2025\)](#) to the Committee.

ⁱ Inclusion of Member States mentioned next to the commercial entity does not signify any involvement in the operations of these entities and is only indicative of the jurisdiction of incorporation. The mention of the Member States is essential in order to avoid any misattribution to similarly named commercial entities registered in other jurisdictions.

IV. Petroleum: the most significant source of revenue for armed groups

A. Framework of armed group control

97. The Panel previously highlighted how armed groups infiltrated the oil sector by diverting State revenues derived from the main natural resource and source of income of Libya.⁷³ The Panel found that armed group actors,⁷⁴ mainly Ibrahim Al Dabiba and Saddam Haftar, developed and honed their capabilities to exert control over the National Oil Corporation at every level of the decision-making process. The effect was twofold: not only did it enable armed groups to expand their influence and military capabilities, but it also affected the public interest by directly undermining the permanence of the Libyan State by preventing its institutions from accessing oil revenues.

98. Ibrahim Al Dabiba and Saddam Haftar struck a mutually beneficial deal by creating the first prototype of a structure to access crude oil revenues, namely, Arkenu Oil Company (hereinafter Arkenu).⁷⁵ It was agreed that the primary beneficiary of this first prototype would be LAAF, while Ibrahim Al Dabiba would be the main beneficiary of a subsequent iteration of Arkenu. Ibrahim Al Dabiba fulfilled his end of the deal by securing a direct share of oil revenues for LAAF. Considering LAAF control over the areas where most Libyan oil fields are located, Saddam Haftar's buy-in was instrumental to bring Ibrahim Al Dabiba's plan to fruition. The latter subsequently exerted pressure on officials within the oil sector and played a central role in the suspension of the Minister of Oil and Gas in March 2024 with the aim of installing a replacement amenable to the implementation of the Arkenu deal. However, once Arkenu came about, he was ultimately left without a supporting counterpart, as Saddam Haftar and LAAF reneged on their promise to guarantee control of "Arkenu 2.0", namely, Juliana Company, once it had been created.⁷⁶

99. More broadly, armed group actors instrumentalized violence – without accountability – to provide an umbrella of impunity to individuals who, through their

⁷³ See [S/2024/914](#), paras. 94–114.

⁷⁴ "Armed group actors" refers to individuals that wield power vis-à-vis armed groups, including through directing or financing them.

⁷⁵ See [S/2024/914](#), para. 96.

⁷⁶ Confidential sources (Libyan energy sector officials, armed group members).

technical expertise and established networks, could generate ever-increasing streams of revenue. In a symbiotic relationship, these individuals actively furthered the interests of armed group actors and vice versa. In the oil and fuel sector, this climate of impunity led to routine rubber-stamping of export and import transactions, exploitation agreements and service contracts in order to serve competing networks supported by armed group actors. This resulted in the systemic inability of State institutions, including the National Oil Corporation and Brega Petroleum Marketing Company, to effectively monitor and/or control crude oil exports, crude oil revenues, imports, distribution and exports of refined petroleum, and domestic fuel consumption. With all relevant institutions dragooned into operating in an environment that shielded and enabled these individuals, the prospect of any meaningful oversight of the oil sector all but vanished. Consequently, accountability mechanisms were rendered ineffective, allowing illicit practices to thrive.

100. Oil revenues provided an illustrative example. The Libyan State budget depends on hydrocarbon revenues for more than 90 per cent of its income.⁷⁷ The above-described situation prevented the relevant institutions from obtaining a comprehensive and accurate account of oil production levels and the revenues generated therefrom. In 2025, the amount of oil revenue entering Libya stood at \$18.78 billion (excluding royalties and taxes), despite the suspension of the offset procedure in April 2025.⁷⁸ On the basis of production levels⁷⁹ and the average Brent crude oil price, estimated revenues should have been around \$27 billion.

B. Farhat Bengdara, Al Masraf Bank and the National Oil Corporation

101. Farhat Bengdara was serving as Chairman of the Arab Bank for Investment and Foreign Trade (United Arab Emirates), better known as Al Masraf Bank, when he was appointed Chairman of the National Oil Corporation in 2022. His appointment was backed by the Haftar family, following his role in facilitating the diversion of \$300 million from an Al Masraf bank account belonging to the Libyan Foreign Bank in 2019 to support the Libyan National Army's offensive against Tripoli, including through the financing of Project Opus.⁸⁰ He retained both chairmanship positions, despite the conflict of interest.

102. The Panel found that under Bengdara's leadership, the National Oil Corporation was subjected to the increasing control of armed group actors through deliberate financial, contractual and governance practices that thwarted institutional oversight. These practices included an attempt to pressure National Oil Corporation subsidiaries to channel operational funds through Al-Masraf Bank, restructuring the National Oil Corporation to nullify internal checks and balances, and directing oil services contracts toward entities controlled by or associated with armed group actors, in particular Saddam Haftar and Ibrahim Al Dabiba. Detailed findings on Farhat Bengdara can be found in annex 9, section B.

103. In response to the Panel's findings, Bengdara explained that he had no oversight in relation to the respective funds held at Al Masraf Bank. However, he explained that those funds were attached to a loan to three companies based in the United Arab Emirates, without providing details. Bengdara further explained that he had played a

⁷⁷ See International Monetary Fund, "IMF Executive Board concludes the 2025 article IV consultation with Libya", press release No. 25/217, 25 June 2025.

⁷⁸ Confidential sources (Libyan officials).

⁷⁹ National Oil Corporation, "NOC Achieves Highest Average Crude Oil Production in a Decade", 1 January 2026.

⁸⁰ Confidential sources (Libyan officials); and [S/2021/229](#), paras. 86–92 and annex 76.

peripheral role in the conclusion of both Arkenu contracts and that they had been approved by the Government of National Unity. Based on the cumulative and substantial evidence collected by the Panel, his claims were found not to be credible.

C. Rafat Al-Abbar and the Arkenu deal

104. An individual called Rafat Al-Abbar,⁸¹ acting as a proxy for Saddam Haftar, played a central role in establishing and enforcing the contractual relationship between the National Oil Corporation and Arkenu, in contravention of Libyan law and contrary to the interests of the Libyan State. Al-Abbar exercised de facto control over decision-making within the National Oil Corporation during and after the Bengdara era by establishing a shadow governance structure, obstructing oversight mechanisms and ensuring compliance through pressure exerted at multiple institutional levels (see annex 9, section C). The Panel found that Arkenu – under the control of Saddam Haftar – diverted more than \$3 billion in oil revenues to bank accounts outside Libya,⁸² failed to pay taxes due to the State and did not comply with core contractual obligations, particularly investment commitments and limits on authorized export volumes.

105. The Panel found that the Arkenu contract was implemented in a manner that systematically undermined National Oil Corporation oversight and enabled large-scale illicit oil exports. Despite a contractual obligation to invest \$1 billion in the Sarir and Mesla oil fields, only a marginal portion of this amount was invested, and production declined rather than increased (see figure I). Moreover, amendments to the contract fundamentally altered its terms to the benefit of Arkenu, allowing it to export quantities far exceeding contractual limits, amounting to at least 42.1 million barrels between January 2024 and December 2025. These exports were facilitated through established international traders and newly created broker companies. The Panel further found that Arkenu served as a prototype for similar arrangements, to be used as a Trojan horse to feign private investment, enabling armed group actors to illicitly export petroleum. The Panel found a correlation between Arkenu's operations and the increased military capabilities of LAAF, which posed a direct threat to the political transition, peace, security and stability in Libya. Detailed findings on Rafat Al-Abbar and Arkenu Oil Company can be found in annex 9, section C (see also recommendations 1, 10 and 11).

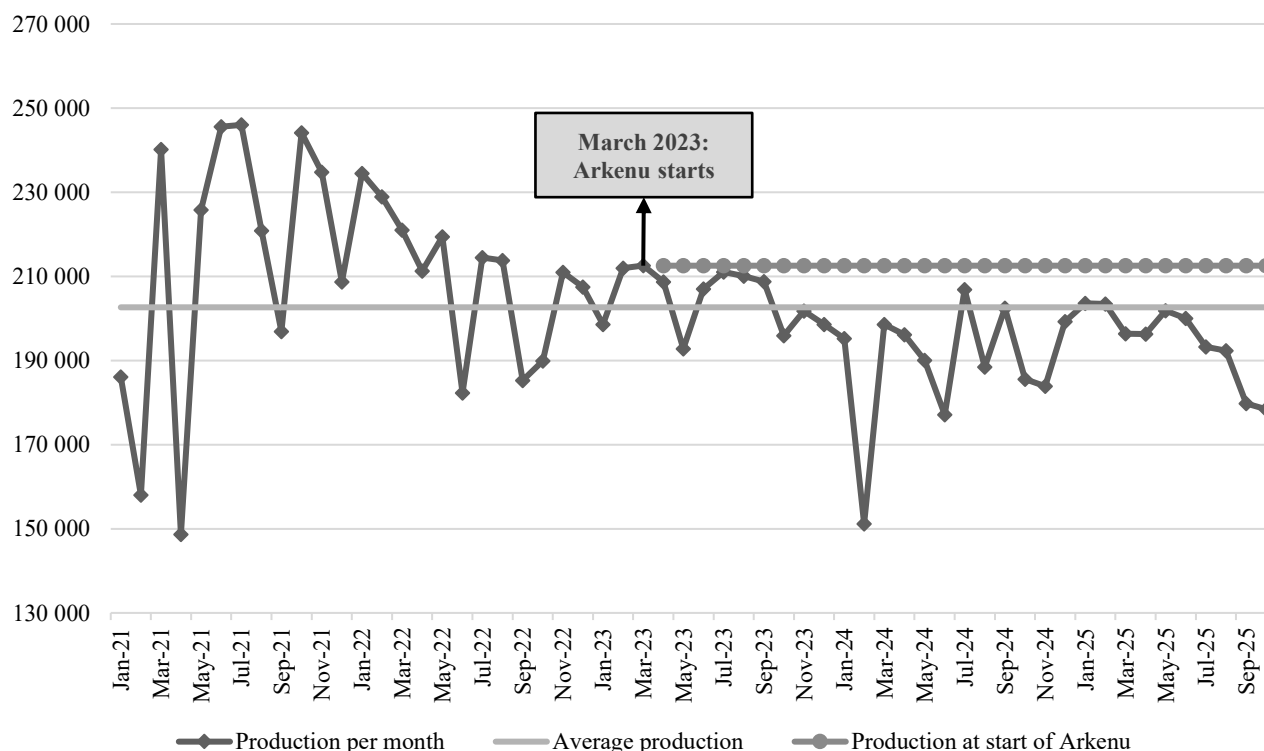
106. During a meeting with the Panel,⁸³ Al-Abbar denied that he played any role in the oil sector beyond advising the National Oil Corporation chairman and representing the business interests of the National Oil Corporation vis-à-vis a Member State. Based on the irrefutable and substantial amount of evidence collected by the Panel, his claims were found not to be credible.

⁸¹ Rafat Mohammed Abdelsalam Al-Abbar; year of birth, 1980; national of Libya; also known as Refaat Al-Abbar.

⁸² Confidential sources (Libyan energy sector officials).

⁸³ Meeting with Rafat Al-Abbar on 14 October 2025.

Figure I
Sarir and Mesla oil field production, 2021-2025 (barrels per day)



Source: Confidential.

Note: Figure developed by the Panel of Experts.

D. Illicit maritime exports of refined petroleum

107. Since the Panel's previous report,⁸⁴ illicit maritime exports of refined petroleum have continued unabated, and have expanded from their epicentre, Benghazi old harbour, to commercial terminals at Tubruq port and Ras Lanuf harbour, none of which are under the control of the National Oil Corporation. Between October 2025 and January 2026, Benghazi old harbour was upgraded significantly. While diesel remained the primary illicitly exported product, less refined products were also illicitly exported.

108. The Panel observed two *modi operandi*: (a) clandestine exports from all three above-mentioned locations, using (i) evolving obfuscation techniques, (ii) new ship-to-ship transfer locations and (iii) on-site storage in Port Said, Egypt; and (b) grey-market exports from Tubruq port involving unsuspecting carriers, professional port services, cargo documentation and certificates of origin. Since November 2024, at least 50 tanker vessels have illicitly exported diesel and other refined petroleum products from Libya, amounting to around 992,636 metric tons; diesel from Benghazi old harbour alone amounted to 578,000 metric tons (688 million litres). These numbers include only identified tankers and voyages.

⁸⁴ S/2024/914, paras. 106–110 and annexes 62–65.

1. Clandestine exports

109. Illicitly exported diesel was sold mainly as bunker fuel at ship-to-ship locations; some tanker shipments were delivered to shore in Egypt. Sporadically, shipments by tankers reached Berbera, Somalia and Port Sudan, the Sudan, and one shipment was destined for a location in South America. Shipments by container reached the Syrian Arab Republic, Türkiye and the United Arab Emirates (see paras. 114 and 115).

110. These exports were predominantly undertaken: (a) by tanker vessels controlled by the previously reported⁸⁵ criminal network (see paras. 117 to 120); and (b) in containerized flexi-tanks (paras. 113 to 115).

2. Grey market exports

111. The Panel found: (a) often-incomplete cargo documentation revealing red flags; (b) fraudulent and invalid origin certificates issued by the Tubruq Chamber of Commerce, a non-authorized body; and (c) uneconomical and unusual cargo loading from tanker trucks, despite the existence of an official National Oil Corporation maritime petroleum terminal nearby. The Panel therefore assessed that most carriers were either complicit in or indifferent to their involvement in illicit exports.

112. The Panel found illicit exports undertaken by the Arabian Gulf Oil Company and Benghazi-based oil companies for 28 deliveries to Greece, consisting of kerosene (1) and very-low-sulfur fuel oil (27). The Panel also identified shipments of very-low-sulfur straight-run fuel oil to Egypt (2), Belgium (3), Germany (2), Spain (1) and Malta (1).

3. Containerized exports

113. The Panel newly identified illicit exports of refined petroleum products using flexi-tanks loaded in containers, transported either by unknowing or complicit carriers.

114. With respect to unknowing carriers, the Panel identified shipments of at least 99 containers from Benghazi destined for the Syrian Arab Republic, Türkiye and the United Arab Emirates. The petroleum was misdeclared as paint solvent or metal scrap; one sample revealed a mix of diesel and Jet A-1 fuel.

115. With respect to complicit carriers, the Panel identified petroleum transfers from Tubruq and Benghazi to the United Arab Emirates by the MV *Aya I* (IMO 9293557), ultimately controlled by Ahmed Alushibe (see paras. 60 and 72), including a transfer of at least 22 containers with flexi-tanks filled with heavy fuel oil.

116. A detailed account of the investigations related to illicit exports of refined petroleum products can be found in annex 9, section F.

E. Criminal network growing through illicit export of petroleum

117. A previously identified criminal network⁸⁶ continued to operate primarily out of Benghazi and expanded its activities to Tubruq and Ras Lanuf, consolidating its role as a leading facilitator of illicit petroleum exports from Libya. The network's operational capacity, global reach and nimble financial capabilities enabled sustained illicit exports with repercussions extending beyond Libya, adversely affecting regional and international peace and security. The network relied on a complex web

⁸⁵ S/2024/914, para. 110 and annex 65.

⁸⁶ Ibid., para. 110 and annex 65.

of shell companies, maritime assets and complicit actors to obscure ownership, evade oversight and launder proceeds derived from fuel smuggling.

1. Network structure, methods and international reach

118. The Panel found that the network was led by Maeen Ali Sharfeddin, a Libyan-Turkish dual national. Sharfeddin controlled multiple companies registered in Türkiye and the United Arab Emirates that lacked concrete commercial activity and were used to facilitate illicit financial flows. The Panel found that Sharfeddin operated in close coordination with Ali Al-Mashai and LAAF top command, whose control over Benghazi old harbour and associated armed personnel enabled the transformation of the harbour into a fuel smuggling hub. The Panel identified 11 network members based outside of Libya who played a direct role in supporting the illicit network activities. The network operated at least 24 tanker vessels through single-purpose shell companies with legal and administrative facilitation provided by network members to circumvent due diligence. The Panel further found that the network increasingly relied on ship-to-ship transfers and onshore storage in Egypt to conceal the Libyan origin of cargo and to distribute fuel to international buyers.

2. Criminal acts at sea and institutional impunity

119. The Panel found that the network engaged in acts meeting the threshold of serious crimes under international maritime law, comprising an armed robbery against ships (against MT *Florian* (IMO 9046590) in December 2023) and an act of piracy under article 101 of the United Nations Convention on the Law of the Sea (against MT *Anhona* (IMO 9354521) in May 2024). To the Panel's knowledge, no investigation has been launched by Libyan authorities.

120. The Panel further found that network members travelled to two Member States, relying on both forged documentation and bribery, in an attempt to obstruct enforcement actions. Table 4 provides an overview of the network members. Detailed evidence on the network's structure, vessel movements, financial facilitation and criminal incidents can be found in annex 9, section H.

Table 4
Members of the fuel criminal network

	Name	Role in network	Other information
1	Maeen Ali Sharfeddin ⁸⁷	Leader; ^a company representation; ^b maritime operations; ^c financing of vessel operations; main link to LAAF; laundering of proceeds	Use of fraudulent documentation; bribery attempts
2	Aleksandros Cenevezoz ⁸⁸	Maritime operations; ^c company representation ^b	Committed piracy and armed robbery against ships
3	Dimitrios Nomikos ⁸⁹	Maritime operations; ^c company representation ^b	

⁸⁷ Date of birth 27 January 1996; national of Libya and Türkiye; Turkish passport No. U22244382 (expiry: 27 August 2029).

⁸⁸ Date of birth 18 July 1961; national of Greece and Türkiye; Turkish passport No. U14342539 (expiry: 21 April 2027).

⁸⁹ Date of birth 5 November 1961; national of Greece; national Greek identification No. A01602603.

	<i>Name</i>	<i>Role in network</i>	<i>Other information</i>
4	Sadik Inan ⁹⁰	Maritime operations ^c	Committed piracy and armed robbery against ships
5	Fahrettin Kutlu	Company representation ^b	
6	Nurettin Kutlu	Company representation ^b	
7	Mohanad Abubaker Albanghazi ⁹¹	Company representation ^b	
8	Sinan Koroglu ⁹²	Company representation ^b	Captain of MT <i>Nobel</i> ; complicit in acts of piracy
9	Georgios Symeonidis ⁹³	Company representation ^b	
10	Rajesh Goli ⁹⁴	Maritime operations ^c	
11	Karim Mohamed Osman Hamed ⁹⁵	Maritime operations; ^c company representation ^b	
12	Selçuk Sencer Esenyel	Company registrations; legal counsel; company representation ^b	Forged and used fraudulent documentation; bribery attempts
13	Ali Al-Mashai ⁹⁶	Link to Saddam Haftar; enabling network to operate in ports under LAAF control	

^a Leader of the criminal network.

^b Represented companies controlling the network's vessels.

^c Managed network vessels and maritime and port-side technical operations.

F. Focal point established pursuant to Security Council resolution 2146 (2014) and accountability mechanism

121. As demonstrated above, the National Oil Corporation and its subsidiaries, as well as Brega Petroleum Marketing Company, were completely prevented from working independently and were exposed to the predatory influence of armed group actors. The implementation of national and international mechanisms aimed at addressing illicit petroleum exports has failed. The focal point mechanism pursuant to resolution 2146 (2014), whose role is to inform the Security Council Committee established pursuant to resolution 1970 (2011) concerning Libya of illicit petroleum exports, has proven to be inoperable and thus ineffective. This is caused by an environment in which armed group actors have pressured any State official that would threaten their interest. During its past two mandates, the Panel had to mitigate the risk of reprisals against the official holding the focal point position by reducing engagement to a minimum. Other national mechanisms aimed at curbing illicit petroleum exports, such as the committee for the review of fuel consumption established by the Attorney General, were equally unsuccessful, as they faced

⁹⁰ Date of birth 20 February 1964; national of Türkiye; Turkish passport No. U25777329 (expiry: 31 December 2031).

⁹¹ Date of birth 21 August 1985; national of Libya and Türkiye; Turkish passport No. U22526036 (expiry: 24 October 2029).

⁹² Date of birth 2 Sep 1964; national of Türkiye; Turkish passport No. S35939315.

⁹³ Date of birth 19 May 1990; national of Greece; national Greek identification No. A0541875.

⁹⁴ Date of birth 10 August 1992; national of India; Indian passport No. W7220611 (expiry 21 November 2032).

⁹⁵ Date of birth 13 February 1982; national of Egypt; Egyptian passport No. A24359374.

⁹⁶ Also known as Ali Abdel Salam Ahmed; date of birth 18 August 1985; national of Libya.

immediate adverse reactions by armed groups, including direct threats and fabricated fuel shortages for consumers (see recommendations 5 and 6).

V. Asset freeze

A. Implementation of paragraph 14 of Security Council resolution 2769 (2025): progress to date

122. In paragraph 14 of resolution 2769 (2025), the Security Council decided to allow the Libyan Investment Authority's frozen cash reserves to be invested in low-risk time deposits and fixed income instruments, with appropriate financial institutions selected by the LIA, in accordance with specified conditions and notification procedures. Under the same provision, the Council requested the Panel to assess the effect and performance of these investments in its annual final reports. At the time of writing of the present report, the Committee had received one notification from a Member State invoking paragraph 14 of resolution 2769 (2025), transmitting a request from the Libyan Foreign Investment Company to reinvest its frozen assets, on which the Committee was yet to take action. No other notifications seeking the Committee's approval for reinvestments of frozen cash reserves under paragraph 14 of resolution 2769 (2025) had been submitted. The Panel assessed that the situation did not stem from a lack of willingness on the part of the Libyan Investment Authority, but rather from interpretative challenges encountered by Member States and relevant financial institutions in implementing provisions contained in paragraph 14.

123. During the reporting period, the Committee received one request for guidance regarding the reinvestment of the Authority's frozen cash reserves under paragraph 14 of resolution 2769 (2025). The request raised several issues related to the practical modalities of potential reinvestments under paragraph 14, as well as obstacles that might be encountered during their operationalization, including with respect to compliance with the asset freeze regime.

124. At the Committee's request, the Panel supported efforts to provide guidance to Member States and relevant financial institutions for the effective implementation of paragraph 14 of resolution 2769 (2025), by preparing an implementation assistance notice. In preparing this notice, the Panel sought to clarify the classification of frozen cash reserves eligible for the exemption introduced under paragraph 14, proposed the establishment of notification and reporting procedures consistent with the asset freeze regime, and provided clarification on the interpretation of the terms "case-by-case basis" and "jurisdiction" in the context of potential Libyan Investment Authority reinvestments. The proposed notice was before the Committee at the time of writing. In the Panel's assessment, timely issuance of a dedicated implementation assistance notice on paragraph 14 of resolution 2769 (2025) would enable more effective preservation of Libyan frozen assets, reduce the risk of their erosion and help to address challenges arising from the nature of frozen cash assets held in financial institutions that do not offer cash custody services (see recommendation 4).

B. Implementation of the asset freeze and/or travel ban on designated individuals

1. Ahmad Oumar Imhamad Al-Fitouri (LYi.023)

125. The Panel determined that Ahmad Oumar Imhamad Al-Fitouri (LYi.023) was killed on 12 December 2025 in the western city of Sabratah. Libya, the country of nationality and residence, has yet to communicate the death certificate to the Panel.

2. Quren Salih Quren Al Qadhafi (LYi.004) and Hannibal Muammar Qadhafi (LYi.010)

126. During the reporting period the Committee received additional identifying information concerning other designated individuals, including passport copies, related to Quren Salih Quren Al Qadhafi (LYi.004) and Hannibal Muammar Qadhafi (LYi.010) (see annex 37). The Committee may wish to take this information into consideration, including with regard to the possible updating of the sanctions list (see recommendation 7).

C. Challenges faced by a non-listed individual

127. During the reporting period, the Committee received an exemption request related to a non-listed individual under the 1970 (2011) sanctions regime, whose assets had been frozen in a Member State on the basis of an alleged association with a designated individual. The Panel recalls that designations under the Libya sanctions regime are personal and nominative in nature. The Panel further notes that association with a sanctioned individual, in and of itself, does not constitute a basis for designation in the absence of a specific listing decision by the Committee or the Security Council.

VI. Recommendations

128. The Panel recommends:

To the Security Council:

- Recommendation 1. To include in the forthcoming resolution a measure prohibiting any payments for crude oil exported from Libya to be credited outside the account of the National Oil Corporation at the Libyan Foreign Bank in order to ensure the permanence of the Libyan State and hinder the financing of armed groups [see para. 104].
- Recommendation 2. To modify paragraph 7 of resolution 2769 (2025) to include a notification requirement for activities currently described therein as an exception to the arms embargo [see para. 67].

To the Committee:

- Recommendation 3. To urge Member States that, in the implementation of paragraph 19 of resolution 2213 (2015), national authorities and private sector companies should exercise more vigilance regarding the actual end-users of dual-use items exported from their territories or by their companies, in particular for such items that could fall under the category of paramilitary equipment [see para. 68].
- Recommendation 4. To issue an implementation assistance notice to facilitate harmonized implementation across Member States of paragraph 14 of resolution 2769 (2025) concerning the reinvestment of the Libyan Investment Authority's frozen cash reserves [see para. 122].

- Recommendation 5. To consider designation of individuals and entities determined by the Committee to have violated the arms embargo and/or provided support for armed groups or criminal networks through illicit exploitation of crude oil or refined petroleum in Libya and illicit export of crude oil or refined petroleum from Libya pursuant to paragraph 18 of resolution [2769 \(2025\)](#) [see para. 121].
- Recommendation 6. To consider the designation of vessels under resolution 2146 (2014) determined by the Committee to have illicitly exported refined petroleum products from Libya, in the absence of a functioning focal point pursuant to resolution [2146 \(2014\)](#) [see para. 121].
- Recommendation 7. To update the sanctions list entries of Quren Salih Quren Al Qadhafi (LYi.004) and Hannibal Muammar Qadhafi (LYi.010) to reflect additional identifying information [see para. 126].

To Member States:

- Recommendation 8. To fully implement paragraphs 19, 20 and 21 of resolution [2213 \(2015\)](#) relating to inspections “in their territory, including seaports and airports, [...] [of] vessels and aircraft bound to or from Libya [...], if [...] the cargo contains [embargoed items]”, and to report to the Committee accordingly [see para. 70].
- Recommendation 9. To urge their national authorities and private companies under their jurisdictions to exercise necessary vigilance in the export of military and civilian dual-use items, and paramilitary equipment and their spare parts, to Libya, particularly with regard to the actual end-users and export conducted through third parties [see para. 68].

To the Government of Libya:

- Recommendation 10. To reinstate the National Oil Corporation as the exclusive marketer and exporter of crude oil by immediately suspending the contract with Arkenu Oil Company, and refrain from entering into similar contractual arrangements, in order to stop illicit exports of petroleum, preserve the permanence of the Libyan State and support the reunification process [see para. 105].
- Recommendation 11. To ensure transparent and independent access to relevant oversight mechanisms by providing them with an accurate account of all activities under the National Oil Corporation and its subsidiaries, including imports to and exports from Libya of refined petroleum products and awarding of service contracts [see para. 105].

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Annex 1 Abbreviations and acronyms

ADS-B	Automatic Dependent Surveillance - Broadcast
AEPR	Port Rashid Mubarak Group Shipyard
AFRICOM	United States Africa Command
AGO	Attorney General's Office
AGOCO	Arabian Gulf Oil Company
AIS	Automatic Identification System
a.k.a.	Also known as
APC	Armoured Personnel Carrier
AQIM	Al-Qaida in the Islamic Maghreb
ATV	All-terrain Vehicle
CBL	Central Bank of Libya
COAS	Chief of the Army Staff
Committee	Committee established pursuant to Security Council resolution 1970 (2011) concerning Libya
CS	Confidential Source
DACOT	Deterrence Apparatus for Combating Organized Crime and Terrorism
DOB	Date of Birth
DOSAAF	Voluntary Society for Assistance to the Army, Aviation and Navy of the Republic of Belarus
DWT	Dead Weight Tonnes
EMA	Egyptian Military Academy
EU	European Union
EUBAM	EU Border Assistance Mission in Libya
EUC	End-user Certificate
EUNAVFOR MED IRINI	European Union Naval Force Mediterranean Operation Irini
EW	Electronic Warfare
FIC	Fast Interceptor Craft
FLC	Fast Landing Craft
FPV	Fast Patrol Vessels
FTF	Foreign Terrorist Fighters
FZCO	Free Zone Company
FZE	Free Zone Establishment
GCS	Ground Control Station
GECOL	General Electricity Company of Libya
GIS	Geospatial Information Section
GM	General Motors Company
GNMTC	General National Maritime Company
GNS	Government of National Stability
GNU	Government of National Unity
GNU-AF	Government of National Unity Affiliated Forces
HFO	Heavy Fuel Oil
HoR	House of Representatives
HNEC	High National Election Commission
IAN	Implementation Assistance Notice
IATA	The International Air Transport Association
ICCPR	International Covenant on Civil and Political Rights
ICRC	International Committee of the Red Cross
ID	Identification
IED	Improvised Explosive Devices
IFV	Infantry Fighting Vehicle
IHL	International Humanitarian Law
IHRL	International Human Rights Law

IMO	International Maritime Organization
ISA	Internal Security Agency
ISIL	Islamic State in Iraq and the Levant
ISTAR	Intelligence, Surveillance, Target Acquisition and Reconnaissance
JMC	Joint Military Commission
JNIM	Jama'a Nusrat ul-Islam wa al-Muslimin
JOF	Joint Operation Forces
km	Kilometre(s)
LAAF	Libyan Arab armed forces
LC	Land Cruiser
LCs	Letters of Credit
LFB	Libyan Foreign Bank
LIA	Libyan Investment Authority
LIS	Libyan Intelligence Service
LLC	Limited Liability Company
LPTIC	Libyan Post, Telecommunications and Information Technology Company
LYD	Libyan Dinar
m	Metre(s)
MALE	Medium-Altitude Long-Endurance
MANPADS	Man-Portable Air-Defense System
Medoil	Mediterranean Oil Services Co.
MGO	Marine Gasoil
MIASIT	Bilateral Assistance and Support Mission in Libya
MoD	Ministry of Defence
MoF	Ministry of Finance
MoI	Ministry of Interior
MSN	manufacturer's serial number
MT	Motor Tanker
MV	Motor Vessel
NAVDEX	Naval Defence Exhibition
nm	Nautical Miles
NOC	National Oil Corporation
OPL	Off Port Limits
OTR	Opportunity to Reply
PC	Presidential Council
PMC	Private Military Company
POF	Pakistan Ordnance Factories
RHIB	Rigid Hulled Inflatable Boats
RSF	Rapid Support Forces
SAF	Sudanese Armed Forces
SOF	Special Operation Forces
SSA	Stability Support Apparatus
STS	Ship-to-Ship
SUV	Sport Utility Vehicle
TBZ	Tariq Bin Ziyad (brigade)
UAE	United Arab Emirates
UAV	Uncrewed Aerial Vehicle
UCAV	Uncrewed Combat Aerial Vehicles
UID	Unidentified
UN	United Nations
UNSC	United Nations Security Council
UNSMIL	United Nations Support Mission in Libya
USD	United States Dollar
UTC	Universal Time Coordinated

VIN	Vehicle Identification Number
VLSFO	Very Low Sulphur Fuel Oil
VPK	Military Industrial Company
VTOL	Vertical Take-Off and Landing
ZT Guide	Zhong Tian Guide Control Technology Company

Annex 2 Overview of the evolution of the Libya sanctions regime

1. By resolution [1970 \(2011\)](#), the Security Council expressed grave concern at the situation in Libya, condemned the violence and use of force against civilians and deplored the gross and systematic violation of human rights. Within that context, the Council imposed specific measures on Libya, under Chapter VII of the Charter of the United Nations, including the arms embargo, which relates to arms and related materiel of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment, and spare parts for the aforementioned, in addition to the provision of armed mercenary personnel. The arms embargo covers both arms entering and leaving Libya. The Council also imposed travel ban and asset freeze measures, and listed individuals as subject to one or both measures, in the resolution. Furthermore, the Council decided that the travel ban and the asset freeze were to apply to the individuals and entities designated by the Committee established pursuant to resolution [1970 \(2011\)](#) concerning Libya involved in or complicit in ordering, controlling or otherwise directing the commission of serious human rights abuses against persons in Libya.
2. By resolution [1973 \(2011\)](#), the Council strengthened the enforcement of the arms embargo and expanded the scope of the asset freeze to include the exercise of vigilance when doing business with Libyan entities, if States had information that provided reasonable grounds to believe that such business could contribute to violence and use of force against civilians. Additional individuals subject to the travel ban and asset freeze were listed in the resolution, in addition to five entities subject to the freeze. The Council decided that both measures were to apply also to individuals and entities determined to have violated the provisions of the previous resolution, in particular the provisions concerning the arms embargo. The resolution also included the authorization to protect civilians and civilian populated areas under threat of attack in Libya. In addition, it included a no-fly zone in the airspace of Libya and a ban on flights of Libyan aircraft.
3. On 24 June 2011, the Committee designated two additional individuals and one additional entity subject to the targeted measures. By resolution [2009 \(2011\)](#), the Council introduced additional exceptions to the arms embargo and removed two listed entities subject to the asset freeze, while allowing the four remaining listed entities to be subjected to a partial asset freeze. It also lifted the ban on flights of Libyan aircraft.
4. By resolution [2016 \(2011\)](#), the Council terminated the authorization related to the protection of civilians and the no-fly zone. On 16 December 2011, the Committee removed the names of two entities previously subject to the asset freeze.
5. In resolution [2040 \(2012\)](#), the Council directed the Committee, in consultation with the Libyan authorities, to review continuously the remaining measures with regard to the two listed entities – the Libyan Investment Authority and the Libyan Africa Investment Portfolio – and decided that the Committee was, in consultation with the Libyan authorities, to lift the designation of those entities as soon as practical.
6. In resolution [2095 \(2013\)](#), the Council further eased the arms embargo in relation to Libya concerning non-lethal military equipment.
7. By resolution [2144 \(2014\)](#), the Council stressed that Member States notifying to the Committee the supply, sale or transfer to Libya of arms and related materiel, including related ammunition and spare parts, should ensure such notifications contain all relevant information, and should not be resold to, transferred to, or made available for use by parties other than the designated end user.
8. By resolution [2146 \(2014\)](#), the Council decided to impose measures, on vessels to be designated by the Committee, in relation to attempts to illicitly export crude oil from Libya and authorized Member States to undertake inspections of such designated vessels.
9. By resolution [2174 \(2014\)](#), the Council introduced additional designation criteria and requested the Panel to provide information on individuals or entities engaging or providing support for acts that threaten the peace, stability of security of Libya or obstructing the completion of the political transition. The resolution strengthened the arms embargo, by requiring prior approval of the Committee for the supply, sale or transfer of arms and related materiel, including related ammunition and spare parts, to Libya intended for security or disarmament assistance to the Libyan government, with the exception of non-lethal military equipment intended solely for the Libyan government. The Council also renewed its call upon Member States to undertake inspections related to the arms embargo and required them to report on such inspections.
10. By resolution [2213 \(2015\)](#), the Council extended the authorizations and measures in relation to attempts to illicitly export crude oil from Libya until 31 March 2016. The resolution further elaborated the designation criteria listed in resolution [2174 \(2014\)](#).

11. By resolution [2214 \(2015\)](#), the Council called on the 1970 Committee concerning Libya to consider expeditiously arms embargo exemption requests by the Libyan government for the use by its official armed forces to combat specific terrorist groups named in that resolution.
12. By resolution [2259 \(2015\)](#), the Council confirmed that individuals and entities providing support for acts that threaten the peace, stability or security of Libya or that obstruct or undermine the successful completion of the political transition must be held accountable, and recalled the travel ban and asset freeze in this regard.
13. By resolution [2278 \(2016\)](#), the Council extended the authorizations and measures in relation to attempts to illicitly export crude oil, while calling on the Libyan Government of National Accord (GNA) to improve oversight and control over its oil sector, financial institutions and security forces.
14. By resolution [2292 \(2016\)](#), the Council authorized, for a period of twelve months, inspections on the high seas off the coast of Libya, of vessels that are believed to be carrying arms or related materiel to or from Libya, in violation of the arms embargo.
15. By resolution [2357 \(2017\)](#), the Council extended the authorizations set out in resolution [2292 \(2016\)](#) for a further 12 months.
16. By resolution [2362 \(2017\)](#), the Council extended until 15 November 2018 the authorizations and measures imposed in resolution [2146 \(2014\)](#), in relation to attempts to illicitly export crude oil from Libya. These measures were also applied with respect to vessels loading, transporting, or discharging petroleum, including crude oil and refined petroleum products, illicitly exported or attempted to be exported from Libya.
17. By resolution [2420 \(2018\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolution [2357 \(2017\)](#), for a further 12 months from the date of adoption of the resolution.
18. By resolution [2441 \(2018\)](#), the Council extended until 15 February 2020 the authorizations and measures imposed in resolution [2362 \(2017\)](#), in relation to attempts to illicitly export crude oil from Libya.
19. By resolution [2473 \(2019\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#) and [2420 \(2018\)](#), for a further 12 months from the date of adoption of the resolution.
20. By resolution [2509 \(2020\)](#), the Council extended until 30 April 2021 the authorizations and measures imposed in resolution [2146 \(2014\)](#), as amended in paragraph 2 of resolutions [2362 \(2017\)](#) and [2441 \(2018\)](#), and modified the designation period in paragraph 11 of resolution [2146 \(2014\)](#) to be one year, and requested the Panel to report on any information relating to the illicit export from or illicit import to Libya of petroleum, including crude oil and refined petroleum products.
21. By resolution [2526 \(2020\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), and [2473 \(2019\)](#), for a further 12 months from the date of adoption of the resolution.
22. By resolution [2571 \(2021\)](#), the Council extended until 30 July 2022 the authorizations and measures imposed in resolution [2146 \(2014\)](#), as amended in paragraph 2 of resolutions [2362 \(2017\)](#), [2441 \(2018\)](#) and [2509 \(2020\)](#), in relation to attempts to illicitly export petroleum, including crude oil and refined petroleum products, from Libya.
23. By resolution [2578 \(2021\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), and [2526 \(2020\)](#) for a further 12 months from the date of adoption of the resolution.
24. By resolution [2635 \(2022\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), [2526 \(2020\)](#) and [2578 \(2021\)](#) for a further 12 months from the date of adoption of the resolution.
25. By resolution [2644 \(2022\)](#), the Council extended until 30 October 2023 the authorizations and measures imposed in resolution [2146 \(2014\)](#), as amended in paragraph 2 of resolutions [2362 \(2017\)](#), [2441 \(2018\)](#), [2509 \(2020\)](#) and [2571 \(2021\)](#) in relation to attempts to illicitly export petroleum, including crude oil and refined petroleum products, from Libya.
26. By resolution [2684 \(2023\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), [2526 \(2020\)](#), [2578 \(2021\)](#) and [2635 \(2022\)](#) for a further 12 months from the date of adoption of the resolution.

27. By resolution [2701 \(2023\)](#), the Council further extended until 1 February 2025 the authorizations and measures imposed in resolution [2146 \(2014\)](#), as amended in paragraph 2 of resolutions [2441 \(2018\)](#) and [2509 \(2020\)](#); affirmed the Council's readiness to consider changes, when appropriate, to the asset freeze at the request of the Government of Libya, including allowing the LIA, which is under a specific asset freeze measure, to reinvest frozen liquid assets for the purpose of preserving their value and benefiting the Libyan people at a later stage.

28. By resolution [2733 \(2024\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), [2526 \(2020\)](#), [2578 \(2021\)](#), [2635 \(2022\)](#), and [2684 \(2023\)](#) for a further 12 months from the date of adoption of the resolution; and modified paragraph 5 of resolution [2292 \(2016\)](#) to require Committee approval for certain modes of disposal of seized items.

29. By resolution [2769 \(2025\)](#), the Council further extended until 1 May 2026 the authorizations and measures imposed in resolution [2146 \(2014\)](#), as amended in paragraph 2 of resolutions [2441 \(2018\)](#) and [2509 \(2020\)](#); introduced a new exemption to the arms embargo for any technical assistance or training by Member States to Libyan security forces intended solely to promote the process of reunification of Libyan military and security institutions, as well as the temporary introduction into Libya of weapons or other military equipment intended solely for use by the non-Libyan providers of such technical assistance and training, for the delivery of such assistance and for their protective use, requiring an advance notification to the Committee; asserted that the arms embargo is not to be applied to military aircraft or naval vessels, temporarily introduced into the territory of Libya solely to deliver items or facilitate activities otherwise exempted or not covered by the arms embargo, including humanitarian assistance, as well as arms and related materiel for defensive purposes; decided to allow the LIA's frozen cash reserves to be invested in low-risk time deposits and fixed income instruments, with appropriate financial institutions selected by the LIA, in accordance with specified conditions and notifications procedures; and further elaborated the designation criteria.

30. By resolution [2780 \(2025\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), [2526 \(2020\)](#), [2578 \(2021\)](#), [2635 \(2022\)](#), [2684 \(2023\)](#) and [2733 \(2024\)](#) for a further 6 months from the date of adoption of the resolution.

31. By resolution [2804 \(2025\)](#), the Council further extended the authorizations, as set out in resolution [2292 \(2016\)](#) and extended in resolutions [2357 \(2017\)](#), [2420 \(2018\)](#), [2473 \(2019\)](#), [2526 \(2020\)](#), [2578 \(2021\)](#), [2635 \(2022\)](#), [2684 \(2023\)](#), [2733 \(2024\)](#) and [2780 \(2025\)](#) for a further six months from the date of adoption of the resolution.

32. To date, the Committee has published seven implementation assistance notices, which are available on the Committee's website.⁹⁷

⁹⁷ <https://main.un.org/securitycouncil/en/sanctions/1970/implementation-assistance>

Annex 3 Methodology

1. The Panel ensured compliance with the methodological standards recommended by the Informal Working Group of the Security Council on General Issues of Sanctions ([S/2006/997](#)). Those standards call for reliance on verified, genuine documents and concrete evidence and on-site observations by the experts, including taking photographs, wherever possible. When physical inspection is not possible, the Panel will seek to corroborate information using multiple, independent sources to appropriately meet the highest achievable standard, placing a higher value on statements by principal actors and first-hand witnesses to events.
2. The Panel used satellite imagery of Libya procured by the United Nations from private providers to support investigations, as well as open-source imagery. Commercial databases recording maritime and aviation data were referenced. Public statements by officials through their official media channels were accepted as factual unless contrary facts were established. Any mobile phone records from service providers were also accepted as factual. While the Panel wishes to be as transparent as possible, in situations in which identifying sources would have exposed them or others to unacceptable safety risks, the Panel decided not to include identifying information in this document and instead placed the relevant evidence in United Nations secure archives.
3. The Panel continued to treat open-source media only as lead information. Taking into account fast-developing technologies such as the use of artificial intelligence, and to counteract any risk to the Panel's objectivity, impartiality and independence, the Panel adapted its evidentiary threshold methodology vis-à-vis how it qualifies a violation or non-compliance versus general reporting of trends and patterns. To make a specific finding on a violation or non-compliance, the Panel complemented existing corroborative methods – such as geolocation – with additional evidentiary elements including independent and technical sources. In determining whether a violation or non-compliance occurred, the Panel adhered to the evidentiary standard of preponderance of evidence.
4. The spelling of toponyms within Libya often depends on the ethnicity of the source or the quality of transliteration. The Panel has adopted a consistent approach in the present update. All major locations in Libya are spelled or referenced as per the UN Geospatial Information Section (GIS) map at appendix 3.A.
5. The Panel has placed importance on the rule of consensus among the Panel members and agreed that, if differences and/or reservations arise during the development of reports, it would only adopt the text, conclusions and recommendations by a majority of five out of the six members. In the event of a recommendation for designation of an individual or a group, such recommendation would be done based on unanimity.
6. The Panel is committed to impartiality in investigating incidents of non-compliance by any party.
7. The Panel is equally committed to the highest degree of fairness and has offered the opportunity to reply to Member States, entities and individuals involved in the majority of incidents that are covered in this update. Their response has been taken into consideration in the Panel's findings. The methodology for this is provided in appendix 3. B.
8. The Panel had no opportunity to review the edited version of the Report in English language, nor its translations into the other five United Nations official languages.
9. The Panel's methodology in relation to its investigations concerning IHL, IHRL and human rights abuses, is provided in appendix 3.C.
10. The Panel's methodology in relation to its investigations concerning vessels and aircraft in the context of the arms embargo is contained in appendix 3.D.
11. The Panel's methodology in relation to its investigations concerning specifically temporary entries of military aircraft and naval vessels is contained in appendix 3.E.

Appendix 3.B: ‘The opportunity to reply’ methodology used by the Panel

1. Although sanctions are meant to be preventative not punitive, it should be recognized that the mere naming of an individual or entity⁹⁹ in a Panel’s report could have adverse effects on the individual. As such, where possible, individuals concerned should be provided with an opportunity to provide their account of events and to provide concrete and specific information/material in support. Through this interaction, the individual is given the opportunity to demonstrate that their alleged conduct does not fall within the relevant listing criteria. This is called the ‘opportunity to reply’.
2. The Panel’s methodology on the opportunity to reply is as follows:
 - (a) Providing an individual with an ‘opportunity to reply’ should be the norm;
 - (b) The Panel may decide not to offer an opportunity of reply if there is credible evidence that it would unduly prejudice its investigations, including if it would:
 - (i) Result in the individual moving assets if they get warning of a possible recommendation for designation;
 - (ii) Restrict further access of the Panel to vital sources;
 - (iii) Endanger Panel sources or Panel members;
 - (iv) Adversely and gravely impact humanitarian access for humanitarian actors in the field; or
 - (v) For any other reason that can be clearly demonstrated as reasonable and justifiable in the prevailing circumstances.
3. If the circumstances set forth in 2 (b) do not apply, then the Panel should be able to provide an individual an opportunity to reply.
4. The individual should be able to communicate directly with the Panel to convey their personal determination as to the level and nature of their interaction with the Panel.
5. Interactions between the Panel and the individual should be direct, unless in exceptional circumstances.
6. In no circumstances can third parties, without the knowledge of the individual, determine for the individual its level of interaction with the Panel.
7. The individual, on the other hand, in making their determination of the level and nature of interaction with the Panel, may consult third parties or allow third parties (for example, legal representative or his/her government) to communicate on his/her behalf on subsequent interactions with the Panel.

⁹⁹ Hereinafter just the term individual will be used to reflect both.

Appendix 3.C: Violations relating to IHL, IHRL, and acts that constitute human rights abuses investigative methodology

1. The Panel's methodology, in relation to its investigations concerning IHL, IHRL and human rights abuses, is set out as below:

- (a) All Panel investigations are initiated based on verifiable information being made available to the Panel, either directly from sources or from media reports.
- (b) In carrying out any investigations on the use of explosive ordnance against the civilian population, the Panel will rely on at least three or more of the following sources of information:
 - (i) At least two eye-witnesses or victims;
 - (ii) At least one individual or organization (either local or international) that has also independently investigated the incident;
 - (iii) If there are casualties associated with the incident, and if the casualties are less than ten in number, the Panel obtains copies of death certificates and medical certificates. In incidents relating to mass casualties, the Panel relies on published information from the United Nations and other organizations;
 - (iv) Technical evidence, which includes imagery of explosive events such as the impact damage, blast effects, and recovered fragmentation. In all cases, the Panel collects imagery from at least two different and unrelated sources. In the rare cases where the Panel has had to rely on open-source imagery, the Panel verifies that imagery by referring it to eye or by checking for pixilation distortion;
 - a. In relation to air strikes, the Panel often identifies the responsible party through crater analysis or by the identification of components from imagery of fragmentation; and
 - b. The Panel also analyses imagery of the ground splatter pattern at the point of impact from mortar, artillery, or free flight rocket fire to identify the direction from which the incoming ordnance originated. This is one indicator to assist in the identification of the perpetrator for ground fire when combined with other source information.
 - (v) The utilisation of open source or purchased satellite imagery wherever possible, to identify the exact location of an incident, and to support analysis of the type and extent of destruction. Such imagery may also assist in the confirmation of timelines of the incident;
 - (vii) Access to investigation reports and other documentation of local and international organizations that have independently investigated the incident;
 - (vii) Other documentation that supports the narrative of sources, for example, factory manuals that may prove that the said factory is technically incapable of producing weapons of the type it is alleged to have produced;
 - (viii) In rare instances where the Panel has doubt as to the veracity of available facts from other sources, local sources are relied on to collect specific and verifiable information from the ground. (For example, if the Panel wished to confirm the presence of an armed group in a particular area);
 - (ix) Statements issued by or on behalf of a party to the conflict responsible for the incident; and/or
 - (x) Open-source information to identify other corroborative or contradictory information regarding the Panel's findings.
- (c) In carrying out its investigations on deprivation of liberty and associated violations the Panel relies on the following sources of information:
 - (i) The victims, where they are able and willing to speak to the Panel, and where medical and security conditions are conducive to such an interview;
 - (ii) The relatives of victims and others who had access to the victims while in custody. This is particularly relevant in instances where the victim dies in custody;
 - (iii) Interviews with at least one individual or organization (either local or international) that has also independently investigated the incident;
 - (iv) Medical documentation and, where applicable, death certificates;
 - (v) Documentation issued by prison authorities;
 - (vi) Interviews with medical personnel who treated the victim, wherever possible;
 - (vii) Investigation and other documentation from local and international organizations that have independently investigated the incident. The Panel may also seek access to court documents if the detainee is on trial or other documentation that proves or disproves the narrative of the victim;

- (viii) Where relevant, the Panel uses local sources to collect specific and verifiable information from the ground, for example, medical certificates;
- (ix) Statements issued by the party to the conflict responsible for the incident; and/or
- (x) Open-source information to identify other corroborative or contradictory information regarding the Panel's findings.

(d) In carrying out its investigations on other violations, which can include forced displacement and threats against medical workers, the Panel relies on information that includes:

- (i) Interviews with victims, eyewitnesses, and direct reports where they are able and willing to speak to the Panel, and where conditions are conducive to such an interview;
- (ii) Interviews with at least one individual or organization (either local or international) that has also independently investigated the incident;
- (iii) Documentation relevant to verify information obtained;
- (iv) Statements issued by the party to the conflict responsible for the incident; and/or
- (v) Open-source information to identify other corroborative or contradictory information regarding the Panel's findings.

(e) Upon completion of its investigation, wherever possible, the Panel provides those responsible with an opportunity to respond to the Panel's findings in so far as it relates to the attribution of responsibility. Detailed information on incidents will not be provided when there is a credible threat that would threaten Panel sources.

(f) If a party does not provide the Panel with the information requested, as called upon by paragraphs 14 and 15 of resolution [2644 \(2022\)](#), the Panel may consider this for reporting to the Committee.

2. The Panel will not include information in its reports that may identify or endanger its sources. Where it is necessary to bring such information to the attention of the Council or the Committee, the Panel may include more source information in confidential annexes.

3. The Panel will not divulge any information that may lead to the identification of victims, witnesses, and other particularly vulnerable Panel sources, except: (a) with the specific permission of the sources; and (b) where the Panel is, based on its own assessment, certain that these individuals would not suffer any danger as a result. The Panel stands ready to provide the Council or the Committee, on request, with any additional imagery and documentation to support the Panel's findings beyond that included in its reports. Appropriate precautions will be taken though to protect the anonymity of its sources.

Appendix 3.D: Use of maritime and air delivery profile indicators

1. In the context of the arms embargo, the Panel uses maritime and air delivery profile indicators¹⁰⁰ to assist in determining the likelihood of violations and occurrences, and thus determine the focus of Panel investigations. These indicators of suspicious activities and documentation, when considered collectively, indicate that a vessel or aircraft is likely to be carrying illicit cargo (see tables 3.D.1 and 3.D.2). Multiple indicators are required before a vessel, aircraft or airline is classified as of interest to the Panel or reported as being in violation of or in non-compliance with the arms embargo. This annex summarises these indicators.

Table 3.D.1

Maritime non-compliance profile indicators

#	Type of indicator	Description	Indicators
1	Visibility	Automatic Identification System (AIS) ^a	▪ “Dark activity” periods. ▪ AIS “spoofing”. ▪ Transparency and accuracy in information registered via AIS. ▪ Consistency in AIS outages.
2	Route(s) and port calls	Vessel voyage and port calls	▪ Unusual routing. ▪ Uneconomical routing. ▪ Unusual or uneconomical loitering or port visit durations. ▪ Visits to known smuggling locations. ▪ Berthing at military bases.
3	Ownership and commercial control	Identity of owner, operator and manager	▪ Frequent change of vessel’s owner, operator and/or manager ▪ Single-fleet owner, operator and/or manager. ▪ Companies lack corporate on-line presence. ▪ Disguised ownership. ▪ Company previously reported on or investigated by UN Panels.
4	Vessel identity	Vessel Name, IMO number and MMSI	▪ Frequent change of vessel’s name ▪ Vessel’s name/IMO number painted on hull inconsistent with registered name. ▪ Displaying wrong IMO or MMSI numbers on AIS.
5	Vessel peculiarities	Accuracy of vessel documentation	▪ Inconsistent data in ship documentation.
6	Information transparency	Transparency of information provided by crew	▪ Inaccurate ship particulars information provided by vessel’s master to relevant authorities. ▪ Inaccurate cargo information provided by vessel’s master to relevant authorities. ▪ Inaccurate voyage information provided by vessel’s master to relevant authorities. ▪ False declarations of last or next port of call. ▪ Port visits not reported vessel’s voyage documents.
7	Vessel Tonnage	Tonnage Range	▪ Comparison to historical tonnage of vessels known to be non-compliant.
8	Vessel Draught	Change of Draught	▪ Comparison of draught at loading and discharge. ▪ No registered draught change despite confirmed loading activities.
9	Commercial Relationships	Linkages	▪ Links between owners / operators / agents.
10	Commercial Activity	Uneconomic behaviour	▪ Low utilization profile. ▪ Unusual and/or uneconomical loading/discharging procedures.

¹⁰⁰ First developed for use in [S/2021/229](#).

#	Type of indicator	Description	Indicators
11	Flag of Registry	Flags of convenience and multiple flag changes	- Registration expirations or overlaps. - Operation under false flag. - Flag State refusal to allow inspections when requested.
12	Cargo documentation	Completeness and accuracy	- Completeness and accuracy in cargo documentation. - Transparency in information supplied to Panel.
13	Cargo Shielding	Cargo cover and shielding	- Weather deck cargo covered to shield from external view. - Containers or fences are used to shield a vessel's weather deck or offloading sites at ports from external view. - Heightened security measures at port. - Container loading plan inconsistent with discharge schedule.
14	Cargo Analysis	Volumetric and mass analysis	Do reported weight and packaging match declaration on documentation?
15	Vessel compliance history	Sanctions designated, reported or investigated vessel	- Previous listings under UN sanction regimes. - Previous reports by UN Panels. - Previous investigations by UN Panels.

^a Or Long-Range Identification and Tracking system (LRIT).

Table 3.D.2

Profile indicators of airbridge and air delivery

#	Activity	Details	Remarks
1	Flight volume	The number of unscheduled flights on a previously little used route	For example, a significant number of flights over a sustained period indicates a centrally organized supply chain.
2	Flight timings	Most flights are planned so that the cargo aircraft are unloaded during darkness	Disguises the nature of cargo being offloaded from onlookers in areas where access is difficult to control.
3	Flight routing	The flights often take off from a civilian airport, then land at a military airbase before departing on a flight track directly towards Libya	- Civilian cargo aircraft require time in civilian airports where the appropriate servicing and maintenance capabilities exist. - Indicative of the loading of military related equipment.
4	Flight safety	Signals from the aircraft ADS-B transponders are not visible on open-source ADS-B monitoring shortly after entering Egyptian airspace	- Airline captains sometimes "go dark" when approaching Libyan airspace as a countermeasure against being targeted by air defence systems, but usually not for the majority of the flight. - Deliberately switched off due to the covert nature of these flights. - Other legitimate flights (for example the scheduled Afriqiyah Airlines A320 from Benghazi to Alexandria always displays ADS-B data).
5	Flight safety	Signals from the aircraft ADS-B transponders are switched to MLAT (multi-lateration) mode ^b for the whole flight	MLAT mode only transmits aircraft code, heading, altitude and speed but NOT current location.

#	Activity	Details	Remarks
6	Flight transparency	Signals from aircraft ADS-B transponders are not available allowing the display of departure airport Signals from aircraft ADS-B transponder are not available allowing the display of destination airport	- Airlines have utilised a “blocking” service provided by some of the open-source ADS-B monitoring providers. - A deliberate attempt by the airline to avoid scrutiny and disguise covert or illicit flights.
7	Flight availability	Scheduled or non-scheduled route	Ticket unavailability from the air operator for passenger aircraft flights suggests movement of military personnel. For example: Cham Wings flights from Syria to Benghazi.
8	Aircraft documentation	The use of fake Air Operating Certificates (AOC)	The Panel has identified the use of at least one fake AOC used to justify an ADS-B signal blocking service.
9	Flight documentation	The submission of incomplete or inaccurate Cargo Manifests and Air Waybills The lack of detailed flight documentation submitted	- Fake consignees listed. - Fake consignors listed. - Used to disguise the true nature of the actual cargo. - Customs value listed as zero. - Failure to supply, for example: 1) Flight Plan; 2) Aircraft Technical Logbook; 3) Journey Flight Log; 4) Weight and Balance Report; 5) Take-off and Landing Balance; and 6) General Declaration.
10	Air operator transparency	Limited, inaccurate or no information provided to requests for information	Indicative of covert or illicit activity.
11	Air operator web presence	Lack of corporate website or very limited contact information on website	A reputable cargo aircraft company would have an easily sourced online presence as part of the company marketing strategy.
12	Cargo agency web presence	Lack of corporate website	A reputable cargo agent would have an easily sourced online presence as part of the company marketing strategy.
13	Air operator’s relationships	Corporate links	- Change of ownership or operating conditions for aircraft between linked companies. - Ownership or operation links with previously reported entities or individuals for violation or non-compliance.
14	Sanctions Listings	Current or previous listings of owner, operator, or aircraft	- Previous reports by other UN Panels and Monitoring Groups. - Sanctions notices by subscription databases.

^b Aircraft without, or that are not broadcasting on, ADS-B transponders do not broadcast their latitude/longitude, so flight monitoring software uses multilateration of 1090 MHz Mode S transponder signals to determine the aircraft's location by using the time difference of arrival (TDOA) when an aircraft is detected across four or more receivers/ground stations.

Appendix 3.E: Use of specific profile indicators for investigations concerning temporary entries into Libya of military aircraft and naval vessels

1. In resolution [2769 \(2025\)](#), the Council introduced new provisions in relation to the arms embargo, specifically the exemption and exception contained in paragraphs 6 and 7 respectively. Thus, the Panel adapted its methodology to identify instances of possible non-compliance with or violation of the arms embargo. The Panel developed specific profile indicators for temporary entries of military aircraft and naval vessels to assist in determining the likelihood of violations and occurrences and thus narrowing the focus of Panel investigations. These indicators, when considered collectively, indicate that a vessel or aircraft may be a) undertaking activities not subject to the exemption of paragraph 6; or b) carrying cargo not subject to the exception of paragraph 7 (table 3.E.1). Multiple indicators are required before a temporary entry into Libya of a military aircraft or naval vessel is classified as of interest to the Panel and thus prompting an investigation. This annex summarises these indicators.

Table 3.E.1

Profile indicators for investigations concerning temporary entries of military aircraft and naval vessels

#	Type of indicator	Description	Indicators
1	Overall transparency	Visibility of temporary entry and transparency in stated goals for the entry	- No official press release, no press briefing, or no media coverage. - Activity during visit inconsistent with announced goals. - For paragraph 6 of resolution 2769 (2025) activities only: Absence of or inaccurate notification to the Committee.
2	(Air)port of departure	Airport of departure of military aircraft Port of departure of naval vessel	Inconsistency of (air)port of departure with any stated goals or the spirit of paragraphs 6 or 7.
3	Transparency (military cargo aircraft only)	Signals from aircraft ADS-B transponders are not available for all flights allowing the display of departure and destination airports	Lack of transparency of route taken by military cargo aircraft, including airports of departure and destination.
4	Destination	Airport of destination in Libya for military aircraft Port of destination in Libya for naval vessel	- Inconsistency of (air)port of destination with any stated goals or the spirit of paragraphs 6 or 7. - Heightened security at destination (air)port.
5	Frequency	Frequency of temporary entries into Libya of military aircraft or naval vessels	Frequency inconsistent with any stated goals or the spirit of paragraphs 6 or 7.
7	Duration	Duration of stay in Libya of military cargo aircraft or naval vessel	Duration of stay inconsistent with any stated goal or spirit of paragraphs 6 or 7.
8	Timing	Time of entry to and exit from Libya of military cargo aircraft or naval vessel	- Arrival and departure under cover of darkness. - Overnight cargo loading or discharge operations. - Timing of temporary entry inconsistent with stated goals or spirit of paragraphs 6 or 7.
9	Type of aircraft or vessel	Type of military aircraft or naval vessel	Type of military aircraft or naval vessel inconsistent with any stated goals of spirit of paragraphs 6 or 7.
10	Quantity of aircraft or vessel	Quantity of military aircraft or naval vessel	Quantity of military aircraft or naval vessel inconsistent with any stated goals of spirit of paragraphs 6 or 7.
11	Type of materiel	Type of weapons or other military equipment intended solely for use by the non-Libyan providers of such	Type of weapons and other military equipment exceeding the need of the non-Libyan providers of technical assistance and training.
12	Quantity of materiel	Quantity of weapons or other military equipment intended solely for use by the non-Libyan providers of such technical assistance and training	Quantity of weapons and other military equipment exceeding the need of the non-Libyan providers of technical assistance and training.

Annex 4 Member States, organisations and institutions consulted

1. This list excludes individuals and certain organisations or entities with whom the Panel met, in order to protect source(s) confidentiality.

Table 4.1

Member States, organizations and institutions consulted^{a b c}

<i>Country/ Location</i>	<i>Government</i>	<i>Representative or International Organization</i>	<i>Institution / NGO</i>
Algeria ^b	Permanent Mission		
Bahrain ^f	Permanent Mission Central Bank of Bahrain ^d		
Belarus	Permanent Mission		
Belgium	Permanent Mission Ministries of Foreign Affairs and of Finance ^d Treasury		
Canada	Permanent Mission ^d Royal Canadian Mounted Police ^d		
China ^a	Permanent Mission		
Colombia	Permanent Mission ^{d f}		
Egypt	Permanent Mission ^d		
France ^a	Permanent Mission Treasury		
Germany	Ministry of Foreign affairs		
Greece ^c	Ministries of Interior and Finance, and Hellenic Coast Guard Permanent Mission ^c		
Ireland	Permanent Mission ^d		
Italy	Ministries of Finance, Interior, Defence and Justice Permanent Mission ^d		EUNAVFOR MED Operation IRINI ^d
Japan ^b	Permanent Mission		
Latvia ^f	Permanent Mission		
Libya	Permanent Mission Ministries of Foreign Affairs, Defence, Oil and Gas, and Finance Presidential Council	French Embassy Russian Embassy Turkish Embassy United Kingdom Embassy UNSMIL EUBAM	Brega Petroleum Marketing Company Central Bank of Libya Deterrence Apparatus for combatting Organized crime and Terrorism High National Election Commission Libyan Arab Armed Forces Libyan Investment Authority National Oil Corporation Office of the Attorney General Stability Support Apparatus 2146 Focal Point ^d
Luxembourg	Permanent Mission Ministry of Foreign Affairs, Finance Commission de Surveillance du Secteur Financier		

<i>Country/ Location</i>	<i>Government</i>	<i>Representative or International Organization</i>	<i>Institution / NGO</i>
Malta ^b	Ministries of Foreign Affairs, Interior, Finance (customs) and Transport Permanent Mission ^d		
Pakistan ^c	Permanent Mission		
Panama ^c	Permanent Mission		
Qatar			
Republic of Korea ^{b c}	Permanent Mission ^d		
Russian Federation ^a	Permanent Mission		
Singapore	Permanent Mission Ministry of Foreign Affairs ^d Customs ^d Maritime and Port Authority ^d		Attorney-General's Chambers ^d
Slovenia ^{b c}	Permanent Mission		
Somalia ^c	Permanent Mission ^d		
Spain	Permanent Mission ^d Ministry of Foreign Affairs Ministry of Economy, Trade and Business Ministry of Finance Ministry of Interior Customs Guardia Civil National Police		
Switzerland ^b	Permanent Mission ^d		
Tunisia	Permanent Mission ^d		
Türkiye	Permanent Mission Ministry of Foreign Affairs		LIA
United Arab Emirates	Permanent Mission		
United Kingdom ^a	Permanent Mission Ministry of Foreign Affairs ^d Treasury ^d Office of Financial Sanctions Implementation ^d		
United States ^a	Mission to the UN State Department ^d Treasury ^d		

^a Countries indicated 'a' are permanent members of the Security Council.

^b Countries indicated 'b' are elected members of the Security Council (2024).

^c Countries indicated 'c' are elected members of the Security Council (2025).

^d Via VTC or other electronic platform.

^e Outside of Libya.

^f Countries indicated 'f' are elected members of the Security Council (2026).

Annex 5 Summary of Panel correspondence (2701 (2023) and 2769 (2025)) mandates¹⁰¹

Table 5.1

Correspondence with Member States (2701 (2023) Mandate) (1 November 2024 to 15 February 2025)^a

<i>Member State</i>	<i># letters sent by the Panel</i>	<i># replies from Member State</i>	<i># awaiting reply from Member State</i>
Türkiye	1	0	1
Total	1	0	1

^a 31 October 2024 being the last date that letters were included in annex 5 to S/2024/914 and 15 February 2025 being the end of the resolution 2701 (2023) mandate.

Table 5.2

Correspondence with Member States (2769 (2025) Mandate) (16 February 2025 to 7 February 2026)^a

<i>Member State</i>	<i># letters sent by the Panel</i>	<i># replies from Member State^b</i>	<i># awaiting reply from Member State</i>
Belarus	6	4	2
Belgium	1	1	0
Cameroon	2	0	2
Czechia	1	1	0
China	4	4	0
Egypt	3	1	2
Germany	2	0	2
Italy	3	0	3
Kyrgyzstan	2	2	0
Libya	8	1	7
Pakistan	1	0	1
Panama	2	2	0
Russian Federation	3	2	1
Singapore	2	2	0
Switzerland	1	1	0
Türkiye	8	7	1
United Arab Emirates	3	0	3
United Kingdom	2	1	1
United States	3	2	1
Total	57	31	26

^a 16 February 2025 being the commencement of the resolution 2769 (2025) mandate and 7 February 2026 being the last date for which replies were requested and could be included in the final draft of the report.

^b Includes all letters sent with a requested reply date by 7 February 2025.

¹⁰¹ Excluding updates to the Committee, letters to the Chair, visit/visa requests or other letters to Member States that do not require a response.

Table 5.3

Correspondence with regional organizations and other entities (2769 (2025) Mandate) ^a
(16 February 2025 to 7 February 2026) ^b

<i>Organization or entity</i>	<i># letters sent by the Panel ^c</i>	<i># replies</i>	<i># awaiting reply</i>
European Union	1	1	0
Libyan Arab armed forces (LAAF)	11	3	8
Total	12	4	8

^a There was no correspondence in this category between 31 October 2024, being the last date that letters were included in annex 5 to S/2024/914, and 15 February 2025, being the end of the resolution 2701 (2023) mandate.

^b 16 February 2025 being the commencement of the resolution 2769 (2025) mandate and 7 February 2026 being the last date for which replies were requested and could be included in the final draft of the report.

^c Includes all letters sent with a requested reply date by 7 February 2026.

Table 5.4

Correspondence with commercial companies (2769 (2025) Mandate)
(16 February 2025 to 7 February 2026) ^a

<i>Organization or entity ^b</i>	<i># letters sent by the Panel</i>	<i># replies ^c</i>	<i># awaiting reply</i>
2020 Volume Boats Maintenance & Repairing FZE (United Arab Emirates)	1	1	0
Arab Banking Corporation B.S.C. (Bahrain)	1	1	0
Alfa Jet Havacılık ve Taşımacılık A.Ş. (Türkiye)	1	1	0
Alicem Shipping Ltd. (Liberia)	2	2	0
Bank of Valletta (Malta)	1	0	1
BGN INT DMCC (United Arab Emirates)	1	0	1
British Arab Commercial Bank PLC (United Kingdom)	1	1	0
BBC Chartering GmbH & Co. KG (Germany)	1	1	0
BP PLC (United Kingdom)	1	0	1
Clearstream Banking AG (Germany)	1	1	0
Cigisped Middle East FZE (United Arab Emirates)	2	2	0
Emirates NBD Bank (United Arab Emirates)	1	0	1
Euroclear Bank SA/NV (Belgium)	2	2	0
Euroclear Belgium (Belgium)	1	1	0
Euroclear UK & International (United Kingdom)	1	1	0
Flysky Airlines (Kyrgyzstan)	1	0	1
Ford Motor Company (United States)	1	1	0
General Motors Company (United States)	1	1	0
Grandweld Shipyards (United Arab Emirates)	1	0	1
HSBC Luxembourg (Luxembourg)	2	2	0
INKAS Armored Vehicles LLC (United Arab Emirates)	1	1	0
National Shipping Company of Saudi Arabia (Saudi Arabia)	1	1	0
New Way Cargo Airlines (Kyrgyzstan)	1	0	1
Nexent Bank N.V. (Netherlands)	1	0	1
Olea Global Pte. Ltd. (Singapore)	1	1	0
Pecotox Air SRL (Moldova)	2	2	0
Penguin International Ltd. (Singapore)	1	1	0

<i>Organization or entity^b</i>	<i># letters sent by the Panel</i>	<i># replies^c</i>	<i># awaiting reply</i>
Peters & May (United Kingdom)	1	0	1
Production Firm LOGOS LLC (Russian Federation)	1	1	0
RADA Airlines LLC (Belarus)	2	2	0
Rubystar Airways (Belarus)	1	1	0
SAAB Dynamics AB (Sweden)	1	1	0
Sapsan Airline LLC (Kyrgyzstan)	1	0	1
Secure Armoured Vehicles LLC (United Arab Emirates)	1	1	0
Shell PLC (United Kingdom)	1	1	0
Skyline Airlines (Kyrgyzstan)	1	0	1
Société Générale S.A. (France)	1	0	1
Société Générale Securities Services S.p.A. (Italy)	1	1	0
Space Cargo Inc. (United Arab Emirates)	1	0	1
Tomcar LLC (United States)	1	1	0
Toyota Motor Corporation (Japan)	1	1	0
Trafigura Pte Ltd (Singapore)	1	0	1
UniCredit Bank GmbH (Germany)	1	0	1
Viasat (United Kingdom)	1	1	0
Zeta Energy Ltd (Malta)	2	2	0
Total	52	37	15

^a 16 February 2025 being the commencement of the resolution 2769 (2025) mandate and 7 February 2026 being the last date for which replies were requested and could be included in the final draft of the report.

^b Inclusion of Member States mentioned next to the commercial entity does not signify any involvement in the operations of these entities and is only indicative of the jurisdiction of incorporation. The mention of the Member States is essential to avoid any misattribution to similarly named commercial entities registered in other jurisdictions.

^c Includes all letters sent with a requested reply date by 7 February 2026.

Annex 6 The Joint Operation Force of Misrata

1. The Joint Operation Force (JOF), based in Misrata, has close links to Prime Minister Abdelhamid Dbeibah. A Prime Minister-issued executive decree created the group back in 2013, which has evolved since then. Ever since, it benefited from sustained political and financial support from the GNU. JOF operated under a broad mandate covering counter-terrorism activities, operations against criminal networks and customs, in particular at Misrata port. In July-August 2022, JOF directly supported Abdelhamid Dbeibah against Fathi Bashagha during the clashes for the Prime ministership.¹⁰² To that end, JOF engaged in clashes against other Misrata-based armed groups who were in favour of Bashagha.

2. The growing role of the Misrata-based force in Tripoli highlighted Abdelhamid Dbeibah's efforts to assert greater influence over Tripoli's security landscape. It also reflected his strategy to secure the loyalty of a powerful coalition of armed groups in western Libya, aligned with his interest. Following the killing of Abdelghani al-Kikli, former head of the Stability Support Apparatus (SSA), JOF attacked and took control of two Libyan Intelligence Service (LIS) facilities: Salah al-Din training facilities and the Sabaa headquarters and detention facilities. On 28 May 2025, JOF fighters spearheaded a violent forced entry into the National Oil Corporation (NOC) headquarters in Tripoli, to pressure officials into awarding supplier contracts to companies controlled by or associated with them.¹⁰³ Authorities, including NOC leadership, downplayed the incident, which is indicative of the continued impunity enjoyed by such armed groups, particularly when targeting state institutions.

3. Since then, JOF maintained an active presence along the Misrata-Tripoli corridor, where it established checkpoints and conducted raids against rival armed groups. These included armed clashes with the SSA - most notably in Khoms - prior to Kikli's killing, and with DACOT in the weeks that followed.¹⁰⁴

¹⁰² S/2023/673, Annex 10.

¹⁰³ Confidential Sources (Libyan officials and armed groups members)

¹⁰⁴ Confidential Report, May 2025.

Annex 7 Ibrahim Dbeibah, a central figure in armed groups politics.

1. Ibrahim Dbeibah is the nephew of Prime Minister Abdelhamid Dbeibah and officially serves as National Security Advisor within the Prime Minister's Office. His influence derives primarily from his father, Ali Dbeibah, who was instrumental in facilitating and bankrolling Abdelhamid Dbeibah's rise to power. Buttressed by his father, Ibrahim Dbeibah largely operates without any checks or balances.
2. Ibrahim Dbeibah positioned himself at a unique intersection of the security, economic, and political spheres. He benefited from sustained support from Misrata-based armed groups as well as influential Misratan figures across economic and religious circles. His direct collaboration with armed group leaders enabled him to rise as a key actor within the armed group ecosystem. Prior to the killing of Abdelghani al-Kikli, he and Ibrahim Dbeibah were in direct competition over the control of the Libyan Post, Telecommunications and Information Technology Company (LPTIC), despite prior mutually beneficial agreements. Like other armed group actors, Ibrahim Dbeibah consolidated his influence by placing proxies in key positions within State institutions and employing threat-based tactics against senior Libyan officials.

Annex 8 Polarization of western Libya

1. The Panel found that tensions in western Libya were increasingly being fuelled along geographical lines, with growing friction between a predominantly Misrata-led coalition and a constellation of local armed groups operating across the western region, from Zawiyah to the Tunisian border. Tensions between Abdelghani al-Kikli and armed group actors aligned with Prime Minister Abdulhamid Dbeibah prior to the May 2025 events were directly linked to appointments within military and State institutions that were widely perceived as over-representing Misrata, thereby threatening the existing balance of power among western Libyan armed groups.
2. On 1 June 2025, Presidential Council President Mohammed el-Menfi appointed Hassan Busriba, hailing from Zawiyah, as commander of the Stability Support Apparatus (SSA) in Tripoli. On 24 June 2025, Busriba and forces under his command entered Tripoli and took control of the SSA headquarters in Janzour. This marked the first instance of a Zawiyah-based armed group establishing a presence in Tripoli, in a move widely interpreted as an attempt to undermine Prime Minister Dbeibah's influence over the Tripoli security architecture.
3. In July 2025, a meeting held in Janzour at the initiative of Hassan Busriba brought together leaders of armed groups from across western Libya, including Zawiyah, Warshafana, al-Ajilat, Sabrata, Zuwara, and Zintan. The primary objective of the meeting was to coordinate responses among these groups to what they perceived as an existential threat posed by the growing dominance of Misrata-aligned armed groups. While the meeting did not result in the establishment of a formal or structured military alliance, it nonetheless reinforced coordination and cooperation among participating groups against Tripoli-based armed actors supporting Dbeibah.
4. Since the May 2025 clashes, tensions have continued to escalate, manifested through a series of incidents and armed confrontations, predominantly in Zawiyah (approximately 60 kilometres west of Tripoli). These incidents are assessed as a direct consequence of sustained rivalry between Tripoli-based armed groups aligned with Prime Minister Dbeibah and armed groups originating from Zawiyah and other parts of western Libya.

Annex 9 Armed groups' footprint on the oil sector

A. Framework of the armed groups' control

1. In its previous report, the Panel highlighted the infiltration of the oil sector by armed groups with the objective of diverting State revenues derived from Libya's key natural resource and main source of income.¹⁰⁵ The Panel's investigations found that armed group actors,¹⁰⁶ mainly Ibrahim Dbeibah and Saddam Haftar, have developed and honed their capability to exert control over the National Oil Corporation (NOC) at every level of the decision-making process. The impact was twofold: not only did it enable armed groups to expand their influence and their military capabilities, but it also affected public interest by directly undermining the permanence of the Libyan State, as State institutions were prevented from accessing oil revenues.

2. Armed group actors instrumentalised violence – without accountability – to provide an umbrella of impunity to individuals who, through their technical expertise and established networks, could generate an ever-increasing stream of revenue. In a symbiotic relationship, these individuals actively supported the interests of armed group actors and vice versa. In the oil and fuel sector, this environment of impunity has led to routine rubber-stamping of export and import transactions, exploitation agreements, and service contracts, to serve competing networks supported by armed group actors. This has resulted in the systemic incapacity of Libyan institutions, including the NOC and Brega Company, to effectively monitor and/or control crude oil exports, crude oil revenues, imports, distribution and exports of refined petroleum, and domestic fuel consumption. With all relevant institutions dragooned into operating in an environment that shielded and enabled these individuals, the prospect of any meaningful oversight of the oil sector has all but vanished. As a result, accountability mechanisms were rendered ineffective, allowing illicit practices to thrive.

3. Oil revenues provided an illustrative example. The Libyan State budget depends on hydrocarbon revenues for more than 90 percent of its income.¹⁰⁷ The situation described above prevents the relevant institutions from obtaining a comprehensive and accurate account of oil production levels and the revenues generated therefrom. In 2025, the amount of oil revenue entering Libya in USD only reached USD 18.78 billion (excluding royalties and taxes), despite the suspension of the offset procedure in April 2025. Based on production levels¹⁰⁸ and the average Brent price, estimated revenues should have been around USD 27 billion.

B. Farhat Bengdara, the NOC and Al Masraf Bank

4. Farhat Bengdara was appointed Chairman of the NOC in July 2022 and resigned effective 16 January 2025. During his tenure, Bengdara also remained Chairman of the Board of the Arab Investment and Foreign Trade Bank, commonly referred to as Al-Masraf Bank, despite several Libyan State institutions having raised concerns about an apparent conflict of interest. The Panel found that, while serving as Chairman of the NOC, Bengdara colluded with several armed group actors to schematize the allocation of oil services contracts to newly established entities associated with these actors. The Panel further found that he worked in collusion with armed group actors to divert Libyan oil and gas revenues.

1. USD 300 million appointment

5. Bengdara was appointed as Chairman of the NOC with the backing of the Haftar family, who had threatened to block oil fields should the GNU not appoint a chairman originating from Benghazi.¹⁰⁹ Beyond the political optics, the Panel found that Bengdara had previously curried favour with the Haftars, having facilitated the diversion of USD 300 million from Al-Masraf Bank that belonged to the Libyan Foreign Bank (LFB) to support the Libyan national army's offensive against Tripoli in 2019¹¹⁰, including the financing of Project Opus.¹¹¹ That financial support triggered the political backing that led to Bengdara's appointment as Chairman of the NOC.

¹⁰⁵ S/2024/914 para. 94 to 114.

¹⁰⁶ "Armed group actors" refers to individuals that wield power vis-à-vis armed groups, including through directing or financing them.

¹⁰⁷ <https://www.imf.org/en/news/articles/2025/06/25/pr-25217-libya-imf-executive-board-concludes-the-2025-article-iv-consultation>, 25 June 2025.

¹⁰⁸ <https://noc.ly/en/noc-achieves-highest-average-crude-oil-production-in-a-decade/>, 1 January 2026.

¹⁰⁹ CS (Libyan energy sector officials).

¹¹⁰ CS (Libyan energy sector and banking sector officials).

¹¹¹ S/2021/229, paras. 86-92 and annex 76.

6. In 2019, the LFB, which is also a partial shareholder of Al-Masraf Bank, held a time-deposit account at Al-Masraf Bank valued at USD 300 million. After the failed offensive on Tripoli and the signing of the ceasefire agreement in 2020, the LFB sought, beginning in 2021, to recover these funds. Al-Masraf Bank initially justified its inability to release the funds by citing administrative delays, and subsequently claimed that the funds had been used as collateral in a transaction that had no formal approval from the LFB. The LFB was eventually able to recover USD 70 million of the original 300 million in March 2025.¹¹² Despite threats of legal action, at the time of writing, the remainder of the amount had yet to be recovered.

2. NOC under the influence of armed groups

7. Following his appointment in 2022, Bengdara set the NOC's objective of daily crude oil production to reach two million barrels by the end of 2025. To support that objective, in April 2022 the GNU approved the allocation of LYD 34 billion (USD 7 billion) to the NOC.¹¹³ The Panel found that instead, Bengdara used the NOC objective to increase production as a ploy to put in place a system allowing armed groups actors to divert part of these funds.

8. Bengdara leveraged his position as both Chairman of the NOC and Al-Masraf Bank, backed by armed group actors, to pressure the chairmen of production companies – majority-owned by the NOC – to open bank accounts at Al-Masraf for the subsidiaries’ operational expenses, including those related to subcontractors. This was aimed at strengthening the financial position of Al-Masraf and impeding effective oversight by Libyan State entities over the movement of funds. The chairmen of the subsidiaries complied with opening such accounts but kept their use to a minimum because they recognized the broader implications.¹¹⁴

9. Bengdara also played a central role in facilitating the awarding of subcontracts to companies that did not meet the requirements set out under the relevant Libyan laws. He designed a system involving a different set of NOC-owned companies outside of Libya, positioning them as gatekeepers for access to funding and the granting of operational contracts. Companies such as the Dubai branch of Mediterranean Oil Services Co. (Medoil) and London-based Murzuq Oil Services were used to generate revenue for armed group actors and their associates within the oil sector.¹¹⁵

10. Bengdara also restructured the NOC, with the primary objective of forestalling internal checks and balances and minimizing external oversight. This included reshuffling of professional staff, creation of new positions and departments, reorganization of working methods and reshaping of contractual relationships with international partners. For instance, he established a “Strategic Planning” department outside the NOC’s formal structure, which operated as a vehicle for negotiating contracts outside the applicable legal and regulatory frameworks.¹¹⁶ Additionally, he created a specific position in charge of the marketing of crude oil, to bypass and supersede existing decision-making procedures, enabling the export of crude oil outside the remits of established internal oversight.¹¹⁷

11. Bengdara further used his position and connections with armed groups to force NOC subsidiaries to enter into contractual arrangement, both in oil production and the import of fuel. The Panel found that he instructed subsidiaries to contract with specific service companies that were either directly controlled by armed groups or subcontracted by structures under their control, resulting in overcharging for services rendered, if rendered at all.¹¹⁸ Bengdara oversaw the lapse of long-standing partnerships in fuel supply contracts all at once, including for the offset mechanism,¹¹⁹ which subsequently favoured smaller traders over oil majors and refineries. These changes coincided with the sustained high levels of imports of fuel that could be managed internally by the NOC, without the oversight of external financing via the LFB (see below section D).¹²⁰ Bengdara also directly coordinated with Al-Kikli for the appointment of the former Waha Oil Company chairman¹²¹ who was arrested in February 2025 by the Attorney General Office on financial crime charges.¹²²

¹¹² CS (Libyan banking sector officials).

¹¹³ Prime Minister's resolution no. 384 of 2022, 16 April 2022, <https://lawsociety.ly/legislation/-م-بتشكيل-154-لسنة-2022>, قرار رقم 154 لسنة 2022م بتشكيل اللجنة وتحديد مهامه.

¹¹⁴ CS (Libyan energy sector officials).

¹¹⁵ CS (Libyan energy sector officials).

¹¹⁶ See also S/2024/914, para. 96. This department was made dormant following his resignation.

¹¹⁷ CS (Libyan energy sector officials).

¹¹⁸ CS (Libyan energy sector officials and Armed group members).

¹¹⁹ S/2024/914, para. 98.

¹²⁰ S/2024/914, paras. 97 et seq.

¹²¹ CS (Armed groups members).

¹²² <https://libyaherald.com/2025/02/waha-oil-company-chairman-detained-including-for-ld-770-million-contract-fraud/>, 11 February 2025

12. Overall, the Panel found that, during his tenure as Chairman of the NOC, Bengdara implemented staffing and governance practices that significantly weakened the institution's capacity to act as an independent State entity by enabling control by armed group actors or their associates. After his resignation, Bengdara's immunity was lifted and oversight bodies launched investigations leading to the Attorney General issuing an arrest warrant.¹²³ He has been residing outside of Libya since, avoiding travel to western Libya, but has travelled to Benghazi on several occasions.

C. Rafat al-Abbar and the Arkenu deal

13. The Panel previously reported about Arkenu Oil Company,¹²⁴ established in 2023 as Libya's first private oil company, which is indirectly controlled by Saddam Haftar through his proxies, in particular Rafat al-Abbar. During this reporting period, the Panel found that: a) Arkenu actively diverted over USD 3 billion in oil revenue to bank accounts outside Libya; b) the manner in which the contractual relationship was established between Arkenu and the NOC was not in accordance with the relevant Libyan laws; c) taxes due were not paid to the Libyan State; and d) the key terms of the contract were not implemented by Arkenu, particularly the investment obligations and the quantities of oil that Arkenu was authorized to export.

14. Throughout the Bengdara era, Rafat al-Abbar played an instrumental role in controlling decision-making processes within the NOC (appendix 9.A). Following Bengdara's exit, he ensured that, at key levels of the institution, pressure was exerted to further the interests of Saddam Haftar and his close associates. Al-Abbar identified and targeted NOC employees at different levels and established a shadow decision-making structure within the NOC by leveraging his alliance with Saddam Haftar. The absence of effective support from the institutional hierarchy, internal or external oversight mechanisms, or law enforcement authorities, forced compliance at all levels within the NOC.

15. Al-Abbar was instrumental in securing the contract between the NOC and Arkenu and in enforcing its implementation outside the legal and contractual framework, contrary to the interests of the NOC. One aspect of this control involved monitoring and actively obstructing any attempts to activate oversight mechanisms or to produce accurate data regarding Arkenu's activities.

16. The "management committee," as defined in the contract between Arkenu and the NOC, served as the primary forum for both parties to review contractual obligations and monitor implementation. Belqacem Shengeer was appointed chairman of this joint committee as the NOC's representative with the support of Al-Abbar. Shengeer is a former member of the NOC Board of Directors and was the technical architect behind the creation of Arkenu. Despite formally representing the NOC in Tripoli, he resides in Benghazi.

17. Shengeer was able to prevent any attempts by the NOC to protect Libya's interests. He did not provide any report of the committee activities, impeding any oversight. Shengeer directly represented the interests of Saddam Haftar and members of the LAAF top command. The non-implementation of two major aspects of the contract illustrates how Arkenu benefitted from the LAAF's capacity to obstruct any effort by the NOC to safeguard its institutional and financial interests.

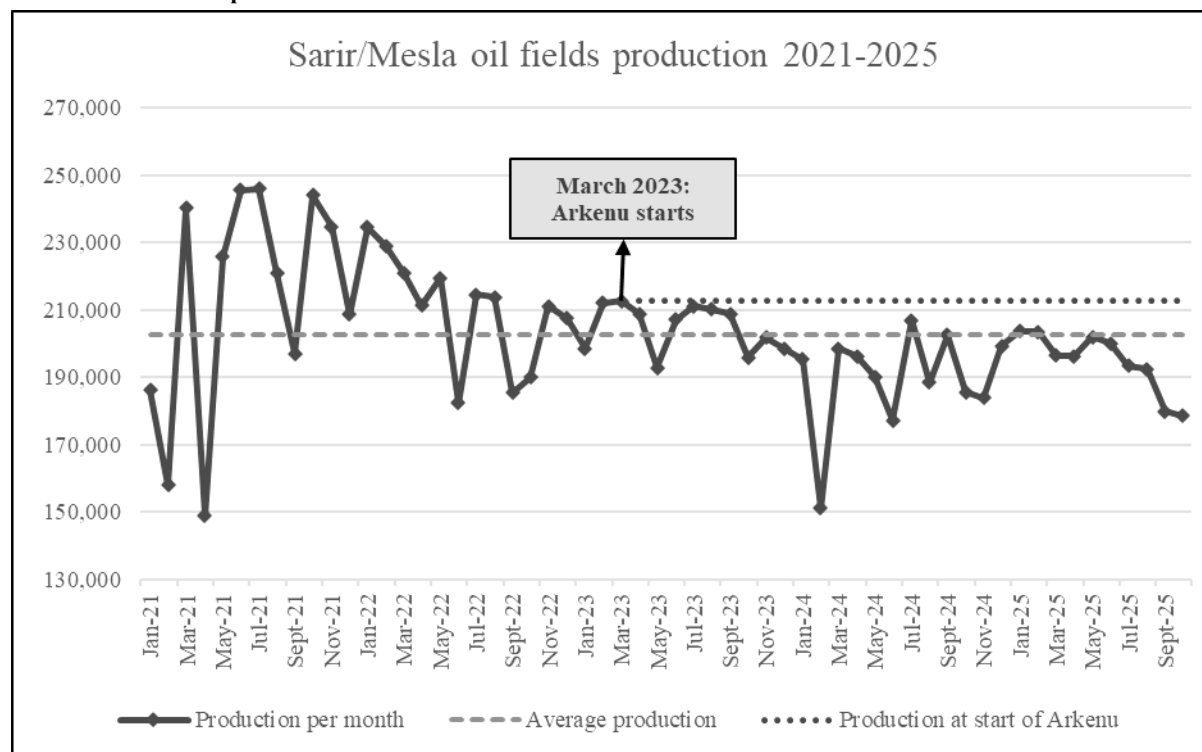
1. The USD 1 billion investment

18. Under the contract, Arkenu was required to invest USD 1 billion to improve the production capacity of the Sarir and Mesla oil fields, both serviced by the NOC subsidiary Arabian Gulf Oil Company (AGOCO). The Panel found that only a small fraction of this amount was in effect invested through implementing partners. In fact, production at the two fields did not increase following the signature of the Arkenu contract, but rather declined, with most monthly production remaining below the baseline established in the contract (table 9.1).

¹²³ CS (Libyan officials).

¹²⁴ S/2024/914, paragraph 96.

Table 9.1
Sarir/Mesla oil fields production 2021-2025



2. The production share

19. Under the initial Arkenu contract signed in March 2023, Arkenu was authorized to export a production share of 40 per cent of the production increase. In December 2024, an amendment to the contract changed the terms of the original contract entirely, stipulating that 40 per cent of the overall production be allocated to Arkenu, without any new obligation for Arkenu or compensation for the NOC. The Panel found that the quantities exported by Arkenu significantly exceeded the limits set out in the contract. Between January 2024 and December 2025, the Panel determined that Arkenu exported at least 42.1 million barrels of crude oil through 42 shipments to destinations worldwide.

20. To export such large quantities of crude oil, Arkenu relied on a) subsidiaries of well-established and large traders, such as BGN Energy FZE (UAE) and b) newly created broker companies in Libya, enabling other top commanders of the LAAF to benefit directly from oil exports without any contractual relationship with the NOC. The company Al-Gandal embodied a key example of this system. Al-Gandal was registered in early 2023, with front individuals listed as its owners. Al-Gandal operated as a sales representative for Arkenu, seeking to secure export contracts with oil shipping companies by widely advertising and eventually negotiating sales – exclusively below the NOC market price – through social media messaging applications. Once an agreement was reached via these applications, clients were instructed to travel to Dubai to sign contracts in person and to open bank accounts at banks selected by the network, facilitating the concealment of significant financial transactions. The Panel reviewed a sample contract put forward by Al-Gandal, providing for the export of two million barrels of crude oil per month for a period of one year (appendix 9.B), with the price fixed at USD 8 below NOC international market rates per barrel.¹²⁵

21. Since the establishment of Arkenu, armed groups based in western Libya have sought to promote similar contractual arrangements that would allow the export of petroleum products or natural gas by entities other than the NOC, thereby opening the door to unchecked control over Libya's natural resources. The Panel found that pressure exerted by armed group actors on the concerned Libyan authorities – coupled with infighting – was the primary factor preventing the conclusion of a production contract for the NC7 gas field through the establishment of a new company that would have been called Juliana.

¹²⁵ CS (oil sector operator).

22. The Panel found that Arkenu served as a litmus test for similar arrangements to be used as a Trojan horse by armed group actors – particularly networks under the control of Saddam Haftar and Ibrahim Dbeibah – to feign private investment into the oil sector and provide a facade of legitimacy for the illicit export of petroleum. This compelled NOC to grant companies under the control of these armed group actors access to international petroleum markets. Owing to Arkenu's establishment in contravention of the relevant Libyan laws, the non-implementation of contractual obligations and over-exploitation of contractually assured shares, and exports without any benefit for the Libyan State, the Panel found that Arkenu's exports fell into the category of illicit exports of crude oil from Libya under paragraph 18 of resolution 2769 (2025).

23. The Panel found that the timeline of the diversions of oil revenues through Arkenu corresponds with: a) the east desisting from disputing the lack of access to Libyan public funds; and b) the observed significant improvements in the military capabilities of LAAF, representing a direct threat to the political transition process and to the peace and security in Libya.

D. Fuel supplies for illicit export

24. Illicit export of refined petroleum products,¹²⁶ both by land and by sea, continued to represent a major source of income for armed groups. Illicit petroleum export from the west remained fragmented, with most exports being transported overland in a smuggling-type fashion. In contrast, access to fuel supplies in areas under GNU control were centralized by Abdelsalam al-Zobi, who leveraged his position in the military structure and his access to Misrata port to organize the diversion of large quantities of fuel. Exports from the east moved at wholesale volumes, mainly by sea but also by land, and demonstrated a high level of organization under the enabling umbrella of the LAAF. The two main protagonists of the fuel supply chain – the NOC for imports, Brega Company for internal distribution – lost the ability to challenge vastly inflated demands by what is considered the “big consumers”, particularly by the General Electricity Company of Libya (GECOL).¹²⁷

25. While the Panel's previous findings on GECOL¹²⁸ elicited a public reaction from the company's leadership, including its chairman Mohamed al-Mashay, there was no official response to the Panel.¹²⁹ Despite public criticism and the announced launch of an investigation by the Attorney General, Al-Mashay retained access to State resources and continued to collude with armed groups actors in both western and eastern Libya. Al-Mashay continued to facilitate the diversion of fuel officially allocated to GECOL unchecked, thereby contributing to broader patterns of public fund misappropriation and financing of armed groups. The Panel also established that there is a direct relationship between Al-Mashay and LAAF top command.

26. Imported diesel remained the primary illicitly exported product. GECOL's demand for diesel remained at highly exaggerated levels. Despite several requests to meet Chairman Al-Mashay, the Panel was only able to meet with GECOL representatives at the technical level. In turn, they provided a large amount of data to explain GECOL electricity production. However, that data failed to substantiate claims that all fuel ordered by GECOL was used for electricity production;¹³⁰ while diesel was certainly a source for electricity generation, only part of the diesel shipments destined to the power plants were actually used for that purpose. GECOL pursued a consistent policy of a lack of transparency towards oversight bodies; during periodic meetings aimed at projection planning and alleviating fuel shortages, GECOL leadership routinely refused and wilfully ignored requests for transparency regarding their consumption of liquid fuels and natural gas. Thus, GECOL continued to operate outside the Libyan legal framework, due to the relationship of its chairman with armed group actors.

27. While the NOC is responsible for importing fuel, Brega Company supplies it to the big consumers in Libya. The handover of responsibility is upon arrival at ports. Brega Company usually receives a bulk fuel load from the NOC onboard a tanker vessel, which it then allocates to multiple consumers, the largest of which by far is GECOL. However, prior to delivery to the designated consumers, the fuel was diverted by armed groups, including the allotments for GECOL. For instance, LAAF directly diverted shipments by sea before they could reach their intended destination.

28. Upon arrival at ports under LAAF control, fuel was directly diverted onwards. While Brega Company may retain de jure responsibility under contractual or statutory frameworks, it does not exercise effective control at the points of diversion. Therefore, it is unable to prevent or formally report the diversion without exposing its personnel to serious risks and targeted

¹²⁶ The Panel recalls that exports are only legal if undertaken under the umbrella of the NOC, and that the NOC does not export imported refined product, in particular not gasoline or diesel.

¹²⁷ S/2024/914, paras. 12-18 and 99-106.

¹²⁸ S/2024/914, paras. 12-18 and 99-106.

¹²⁹ <https://alwasat.ly/news/libya/466502>, 8 February 2025.

¹³⁰ Meeting with GECOL, Tripoli, 19 November 2025.

retaliation by armed group actors. The diversion occurs as a result of coercion and circumstances beyond Brega Company's reasonable control.

E. Overland fuel smuggling

29. LAAF was involved in coordinating overland fuel smuggling operations, which were routed through ports and delivery logistics under their control. Fuel intended for GECOL in the east is largely redirected and transported along established smuggling routes toward Libya's southern borders, particularly through Al-Al-Kufra and into Sudan. These operations were conducted under the protection of armed elements and structured to bypass institutional oversight mechanisms. The persistence of such activities undercut State revenues and led to the deterioration of regional security by entrenching cross-border illicit networks (paras. 31-39 of the main part of this report).

F. Illicit maritime exports of refined petroleum (appendix 9.C)

30. Since the Panel's last report,¹³¹ illicit maritime exports of refined petroleum continued unabated, with a diversification in products and locations. While diesel remained the primary product, less refined products were also exported, such as heavy fuel oil (HFO) and straight-run fuel oil. Benghazi old harbour remained the epicentre for exports until October 2025, when vessel visits drastically decreased in the context of a modernization of the harbour's fuel loading infrastructure, which was completed in January 2026. The Panel further identified that illicit exports expanded to commercial cargo terminals at other locations, namely Tubruq port and Ras Lanuf harbour since November 2023 and October 2025 respectively. None of these terminals are under the control of the NOC.¹³² Obfuscation and trafficking patterns further evolved, differing along the lines of clandestine exports out of all three locations, and grey market exports from Tubruq (see also appendix 9.C).

31. Illicitly exported diesel was sold as bunker fuel (as marine gasoil, MGO) by tanker vessels at STS locations and delivered to shore in Greece (para. 37 below) and Egypt (para. 49 below). On rare occasions, direct shipments went as far as Berbera, Somalia and Port Sudan, Sudan; a shipment of mixed product to a South American country did not arrive (para. 51 below). Less refined or mixed product was shipped by container to the Syrian Arab Republic, Türkiye and the United Arab Emirates (paras. 39 and 40 below).

32. Over the reporting period, at least 36 tanker vessels illicitly exported diesel from Benghazi old harbour, amounting to around 578,000 metric tons (688 million litres). The Panel identified that the estimated volume of all exported refined product across the eastern Libyan ports was close to one million metric tons. As this number only includes those tankers and voyages that the Panel was able to identify, the actual number is likely higher.

1. Clandestine exports

33. Vessels engaging in clandestine exports continued operating without AIS for extended periods, including during port calls at Benghazi and sometimes at Tubruq and Ras Lanuf. Multiple STS loading instances were added to the transfer chains to further conceal the origin of the cargo. The previously identified STS locations¹³³ remained in use, although visits at Hurds Bank, off port limits (OPL) Malta,¹³⁴ declined over the reporting period, while visits at the location OPL Port Said, Egypt,¹³⁵ significantly increased. That location partly falls within the 18 nautical miles zone where Egypt levies fees for commercial activities like STS transfers.¹³⁶ The Panel identified two additional STS loading locations where transfers between vessels took place: a) in the vicinity of the location that the Panel previously identified as the site where vessels disconnected their AIS when approaching or leaving Benghazi,¹³⁷ about 130 nautical miles north of Benghazi;¹³⁸ and b)

¹³¹ S/2024/914, paras. 106-110 and annexes 62-65.

¹³² CS (Libyan energy sector officials).

¹³³ S/2024/914, annex 62, para. 8.

¹³⁴ Mostly east and south-east of 35°54'50.3"N 14°53'57.0"E.

¹³⁵ North and northwest of 31°26'47.3"N 32°20'02.5"E.

¹³⁶ Decree concerning the Territorial Waters of the Arab Republic of Egypt of 15 January 1951, as amended by Presidential Decree of 17 February 1958, Article 9,

https://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/EGY_1958_Decree.pdf.

¹³⁷ S/2025/914, annex 62, para. 7 and annex 65, figure 65.2.

¹³⁸ 34°20'06.0"N, 19°30'50.8"E.

about 60 nautical miles north-north-east off Alexandria, Egypt.¹³⁹ Some vessels also visited known petroleum STS locations such as OPL Kaloi Limenes and OPL Larnaca.

2. Grey market exports outside the NOC umbrella

34. Grey market exports were undertaken by vessels that continued transmitting their AIS signals during port calls at Tubruq port. The Panel had not identified them as previously having loaded cargo in Benghazi old harbour and found that some of the carriers were unaware that they had been engaging in illicit exports from Tubruq. Notwithstanding the fact that the NOC export regulations for refined petroleum products are not publicly available, these carriers were under the impression that they were engaged in legitimate business, having called at a commercial port in a regular fashion, with port-side services rendered by professional companies,¹⁴⁰ and having received the relevant documentation. However, the Panel found that their justifications were unsatisfactory: a) all cargo documentation reviewed by the Panel showed red flags and some of it was incomplete; b) cargo was loaded from tanker trucks, which is not only highly uneconomical, as it requires vessels to remain berthed for extended periods, but it is also uncommon to use truck-to-ship loading for the size of tanker vessels that called at Tubruq port, which averaged at 8,000 DWT; c) this is in particular the case where a maritime petroleum terminal operated by the NOC is in the immediate vicinity. The Panel therefore assesses that most carriers were either complicit in or indifferent to their involvement in illicit exports.

35. In relation to recurring vessel visits, the Panel found that they were implementing schedules based on contracts between the Arabian Gulf Oil Company (AGOCO) or Benghazi-based oil companies¹⁴¹ and foreign petroleum traders, with certificates of origin issued by the Tubruq Chamber of Commerce (appendix 9.D). As that entity is not authorized to provide such documentation, with all exports requiring explicit authorization by the NOC, the Panel assessed that documentation as both fraudulent and invalid.

36. The Panel reviewed documentation and identified: a) three Turkish companies and one German company responsible for a total of 28 deliveries of VLSFO (27) and kerosene (1) to Greece.¹⁴² The Panel also identified shipments of very-low-sulphur-straight-run fuel oil to Belgium (3), Egypt (2), Germany (2), Malta (1) and Spain (1).

37. More information regarding the export locations, trafficking patterns, and vessels involved can be found in appendix 9.C.

3. Containerized exports

38. Illicit exports of refined petroleum products were also undertaken using flexi-tanks loaded in containers, transported both by carriers who were unaware of their involvement in illicit exports and by those who were complicit.

39. In the first category, the Panel identified shipments from Benghazi destined to the Syrian Arab Republic, Türkiye and the United Arab Emirates, which comprised at least 99 containers loaded with flexible tanks. The cargo documentation misrepresented the containers' content as paint solvent or metal scrap, when in fact it was illicitly exported refined petroleum products. A sample analysis from one of these shipments revealed that the cargo that had been declared as mixed hydrocarbon and specified as paint solvent, was in fact a mix of diesel and Jet A1 fuel.

40. In the second category, the Panel identified that in August 2025, the MV Aya 1 (IMO 9293557, now Zulfa 1), owned by UDS Shipping Services LLC (UAE) and ultimately controlled by Ahmed Alushibe (paras. 72 and 115 and table 3 of the main part of the report), exported at least 22 containers (around 492 MT) with flexi-tanks filled with heavy fuel oil from Tubruq to the United Arab Emirates. The cargo manifest of the same shipment referred to other containers, exported from Tubruq and Benghazi indicating refinery byproducts. This was not the only transfer of this type; previous exports had also included other types of refined petroleum.

G. Alushibe and the banks

41. Ahmed Alushibe is a Libyan national who rose rapidly within the banking sector over the past 10 years with the support of Saddam Haftar. At the time of writing, he owned several banks in Libya, including Al-Wahda Bank and Al-Masraf Al-Tijari Al-Watani. The Panel found that Alushibe used the banking sector, with the support of armed group actors,

¹³⁹ 32°10'48.1"N 30°15'35.5"E.

¹⁴⁰ E.g. Alwatania Modern Shipping Co. Ltd.

¹⁴¹ Masar Al Fouz Oil Services Company and Emaar Libya Company for Oil Services.

¹⁴² Solid Madencilik Ltd.; Smart Mega Services A.Ş.; Whiteway Teknoloji Dış Tic. Ltd. Şti.; Select Energy GmbH.

to fraudulently obtain letters of credit (LCs) from the CBL. Attempts to conduct an official investigation into the LCs stymied when an Alushibe-owned bank in Benghazi actively blocked such initiatives. Alushibe resold the foreign currency obtained through the LCs at black market rates in Libya for LYD to economic actors based outside Libya, enabling him to reach a significant financial position in Libyan dinars. The Panel found that Alushibe subsequently used the funds at his disposal to purchase shipments of diverted fuel from armed group actors operating in both western and eastern Libya. With their support, and his maritime transport capabilities, he facilitated the illicit export of this fuel from Libya, particularly through ports under the control of armed groups, and resold it for profit. These activities enabled Alushibe to accumulate substantial financial gains and expand his influence. He also used a vessel under his control to illicitly export petroleum from Libya (see above para.).

42. Alushibe had been a close associate of Farhat Bengdara (section D above). Several shell companies used by Alushibe, including UDS Shipping Services LLC, are registered at the Al-Masraf Tower in Dubai, where the headquarters of Al-Masraf Bank is also located.

H. Criminal network growing through illicit export of petroleum

43. The criminal network previously identified by the Panel¹⁴³ continued to operate out of Benghazi and expanded its operations to Tubruq and Ras Lanuf (see above section F). This network proved to be the forerunner in illicit exports of petroleum from Libya. The combination of its global reach and wherewithal impacted peace and security well beyond Libya's borders.

1. Maeen Ali Sharfeddin and the criminal network

44. The Panel identified additional members as well as the leader of the network, Maeen Ali Sharfeddin, a Libyan-Turkish dual national based in Türkiye (network members and roles in table 9.2). Sharfeddin owns and controls several companies registered in Istanbul and Dubai, most of which presented minimal physical infrastructure, obscure business activities, and opaque managerial structures. The Al-Massa Group, one of his primary ventures, purported to operate in diverse sectors, including jewellery, luxury cars and yacht rentals, petroleum product shipping, and home appliances. The Panel assessed that these entities are used to facilitate financial transfers in support of illicit smuggling activities.

45. Sharfeddin is a direct associate of Ali al-Mashai¹⁴⁴ and engaged in money laundering activities that supported LAAF top command. Al-Mashai's command and control over military personnel stationed at Benghazi port and the overall resources of its old harbour were decisive factors in transforming it into a fuel smuggling hub.

46. The network operated through at least 24 tanker vessels averaging 6,700 DWT that were each owned, managed and operated by single-fleet, shell companies, most of which had been registered in the Marshall Islands. This was made possible through network member Selçuk Esenyel, head of a law office based in Istanbul (Türkiye), who served as a qualified intermediary for company registries; he rubber-stamped due diligence checks or provided "seasoned" clean companies for the network's use. Almost all members of the network identified by the Panel in table 9.2 held statutory officer positions and shares in one or more of these companies. In 2025, Marshall Islands progressively struck out several of these companies from its register for non-compliance with its terms. A list of the vessels operated by the network, including the network members and shell companies they are linked to, is in sub-appendix 9.C.2.

47. Since the Panel's last report, the network increased its efforts to obfuscate its activities. To avoid direct links to Libya, network vessels often consecutively transferred cargo to one another at STS locations, so cargos would be divided up into several tranches until they reached their buyers. Some vessels loaded the cargo in Libya, while others remained at STS locations to then undertake the distribution to buyers.

48. Throughout the reporting period, transfers at and to Hurds Bank by network vessels decreased. During the same period, exports from Tubruq increased with OPL Port Said as their main destination. Network member Osman Hamed operated an onshore storage in Alexandria and Port Said, where network vessels called several times to discharge their cargo

¹⁴³ S/2024/914, para. 110 and annexes 64-65.

¹⁴⁴ A.k.a. Ali Abdel Salam Ahmed; Nationality: Libya; DOB: 18 August 1985.

(sub-appendix 9.C.6). Network vessels were also active within the 18 nautical miles zone off Port Said where Egypt levies fees for commercial activities.¹⁴⁵

49. The Panel estimates that the combined exports between March 2022 and December 2025 by the network's vessels that the Panel identified amounted to 1.25 million metric tons of diesel (1.5 billion litres). At a conservatively estimated average market rate for diesel in the Mediterranean region of USD 750 per MT between March 2022 and October 2025, the market value of these criminal network exports would equal almost USD 1 billion.

2. Attacks on State institutions on an international scale: the case of the MT Nobel

50. Illicit fuel exports from Libya went as far as Central America; MT Nobel (IMO 9105114), one of the network's most utilized vessels, was carrying a cargo of fuel, part of which had been illicitly exported from Libya, when Panama prevented her transiting through the Panama Canal in mid-July 2025, despite having paid a fast-track premium.¹⁴⁶ This was due to a commercial dispute lodged with a Panamanian court against the vessel. MT Nobel was sailing under the command of network member Rajesh Goli with forged insurance certificates, barred maritime safety device¹⁴⁷ and no ship logs. The cargo manifest identified the shipper as Futura Energy DMCC (UAE), with the listed consignee not clearly identified.

51. Network member Esenyei travelled to Panama to obtain the vessel's release and continue transit through the Canal. Forged documentation was presented both in Panama and Cameroon, with the latter being the vessel's Flag State, to feign a previous transfer of ownership of the vessel. Sharfeddin personally travelled to Cameroon in November 2025, in an effort to meet a high government official. To facilitate this, the Libyan Embassy to Cameroon requested that meeting by a note verbale. The involvement of the Libyan Embassy showcased the network's capacity to mobilize the Libyan Ministry of Foreign Affairs officials that are affiliated with LAAF. Apart from lobbying, the network also attempted to bribe officials in both countries, with sums amounting to more than USD 1 million.

3. Impunity at sea

52. The network is also responsible for acts that meet the threshold of criminal acts under applicable maritime conventions and customary international law. To the Panel's knowledge, no investigations were launched by any Libyan authorities regarding these acts.

Armed robbery against MT Florian

53. On 6 December 2023, armed elements controlled by Ali al-Mashai approached the MT Florian (IMO 9046590), which was at anchorage off Benghazi within Libyan territorial waters, and seized the crew's passports and ship documents. On 10 December 2023, the same armed elements returned, accompanied by network members Aleksandros Cenevezoz¹⁴⁸ and Sadik Inan. The armed elements rendered the vessel's communications and camera systems unusable, assaulted the crew, and threatened them at gunpoint. Under instructions received by phone from Sharfeddin, they compelled the crew to bring the vessel into Benghazi old harbour. The crew was arbitrarily detained for several weeks in inadequate conditions. Sharfeddin-controlled ventures financed the provision of the MT Florian's communications access during the period of detention, which the group repurposed as a local bunker for its fuel trafficking activities. The Panel classified the incident involving the MT Florian as an armed robbery against ships.¹⁴⁹

Act of piracy against MT Anhona

54. On 24 May 2024, the MT Anhona (IMO 9354521) was located approximately 35 nautical miles north of Benghazi, outside of Libya's territorial waters, awaiting the arrival of MT Nobel (IMO 9105114) for a STS transfer of 42,700 metric tonnes of ultra-low sulphur diesel from the MT Anhona. A Damen Stan vessel¹⁵⁰ approached the MT Anhona, purporting to transport surveyors for cargo sampling. Instead, network members Cenevezoz and Inan, accompanied by armed elements

¹⁴⁵ Decree concerning the Territorial Waters of the Arab Republic of Egypt of 15 January 1951, as amended by Presidential Decree of 17 February 1958, Article 9,

https://www.un.org/depts/los/LEGISLATIONANDTREATIES/PDFFILES/EGY_1958_Decree.pdf.

¹⁴⁶ This is a higher transit fee paid to grant expedited transit through the canal to bypass standard wait durations.

¹⁴⁷ Global Maritime Distress and Safety System (GMDSS) was formally barred because of extended non-payment of service fees. The vessel was thus non-compliant with GMDSS requirements and legally unfit to sail.

¹⁴⁸ S/2024/914, para. 110 and annex 65.

¹⁴⁹ International Maritime Organization resolution A 26/Res.1025 adopted on 2 December 2009, Annex, paragraph 2.2.

¹⁵⁰ The LAAF operate several of these vessels.

under the command of Al-Mashai, boarded the vessel. They seized the vessel and crew documents, disabled communication systems, and detained the crew under armed guard.

55. The vessel was forced to proceed to Benghazi anchorage, where it conducted two STS transfers under duress: approximately 15,000 metric tonnes to MT Nobel on 25 and 26 May 2024, and 5,700 metric tonnes to MT Victoria (IMO 9107708) on 27 May 2024. The MT Nobel operated under the command of network member Goli. The crew was explicitly instructed not to identify the receiving vessels or record the operations;¹⁵¹ following the second discharge, the vessel was released with the remaining cargo onboard and was permitted to reactivate its Automatic Identification System (AIS) upon reaching 30 nautical miles offshore. The Panel classified the incident involving the MT Anhona as an act of piracy under Art. 101 UNCLOS.¹⁵²

Table 9.2

Members of the fuel criminal network

	<i>Name</i>	<i>Role in network</i>	<i>Other info</i>
1	Macen Ali Sharfeddin ¹⁵³	Leader; ^a company representation; ^b maritime operations; ^c financing of vessel operations; main link to LAAF; laundering of proceeds	Use of fraudulent documentation; bribery attempts
2	Aleksandros Cenevezoz ¹⁵⁴	Maritime operations; ^c company representation ^b	Committed piracy and armed robbery against ships
3	Dimitrios Nomikos ¹⁵⁵	Maritime operations; ^c company representation ^b	
4	Sadik Inan ¹⁵⁶	Maritime operations ^c	Committed piracy and armed robbery against ships
5	Fahrettin Kutlu	Company representation ^b	
6	Nurettin Kutlu	Company representation ^b	
7	Mohanad Abubaker Albanghazi ¹⁵⁷	Company representation ^b	
8	Sinan Koroglu ¹⁵⁸	Company representation ^b	
9	Georgios Symeonidis ¹⁵⁹	Company representation ^b	
10	Rajesh Goli ¹⁶⁰	Maritime operations ^c	Captain of MT Nobel; Complicit in acts of piracy
11	Karim Mohamed Osman Hamed ¹⁶¹	Maritime operations; ^c company representation ^b	
12	Selçuk Sencer Esenyel	Company registrations; legal counsel; company representation ^b	Forged and used fraudulent documentation; bribery attempts
13	Ali al-Mashai ¹⁶²	Link to Saddam Haftar; enabling network to operate in ports under LAAF control	

^a Leader of the criminal network

^b Represented companies controlling the network's vessels

^c Managed network vessels and maritime and port-side technical operations

¹⁵¹ CS (witnesses).

¹⁵² Article 101 of the United Nations Convention on the Law of the Sea.

¹⁵³ DOB: 27 January 1996; Nationalities: Libya/ Türkiye; Turkish passport no. U22244382 (Expiry: 27 August 2029).

¹⁵⁴ DOB: 18 July 1961; Nationalities: Greece/Türkiye; Turkish passport no.: U14342539 (Expiry: 21 April 2027).

¹⁵⁵ DOB: 5 November 1961; Nationality: Greece; National Greek ID A01602603.

¹⁵⁶ DOB: 20 February 1964; Nationality: Türkiye; Turkish passport no.: U25777329 (Expiry: 31 December 2031).

¹⁵⁷ DOB: 21 August 1985; Nationalities: Libya/Türkiye; Turkish passport no.: U22526036 (Expiry: 24 October 2029).

¹⁵⁸ DOB: 2 September 1964; Nationality: Türkiye; Turkish passport no.: S35939315.

¹⁵⁹ DOB: 19 May 1990; Nationality: Greece; National Greek ID no.: A0541875.

¹⁶⁰ DOB: 10 August 1992; Nationality: India; Indian passport no.: W7220611 (Expiry 21 November 2032).

¹⁶¹ DOB: 13 February 1982; Nationality: Egypt; Egyptian passport no. A24359374.

¹⁶² Aka Ali Abdel Salam AHMED; DOB: 18 August 1985; Nationality: Libya.

Appendix 9.A: Rafat Al-Abbar and the service contracts

1. Saddam Haftar relied primarily on Refat al-Abbar¹⁶³ to exercise his influence and advance his interests within the oil sector. Al-Abbar began his oil sector career at the Arabian Gulf Oil Company (AGOCO) in Benghazi as a mid-level manager. Political arrangements surrounding the formation of the GNU led to his appointment as Undersecretary of Oil and Gas in 2021. In that capacity, al-Abbar used his position to develop an in-depth understanding of the institutional and operational structure of the oil sector and positioned himself effectively to later become Saddam Haftar's agent within the sector.
2. Al-Abbar functioned as "shadow chairman" of the NOC, exerting direct pressure on its leadership and engaging directly with international partners, often proposing to resolve crises that he himself manufactured. Although officially functioning as an adviser to the NOC Chairman, the Panel found that, in practice, al-Abbar was the principal decision-maker in key negotiations involving the NOC.
3. His affiliation with Saddam Haftar enabled him to monetize his influence with operators accustomed to seeking the backing of armed groups to obtain or safeguard contracts. Al-Abbar's association with a longstanding operator in the oil sector specializing in drilling services illustrated this practice. The Panel found that Al-Abbar coerced the NOC and its subsidiaries into validating inflated contracts, exceeding standard market rates for similar services, which included daily oil drilling rig rates reaching USD 24,000 per rig for the benefit of that operator. Increases in the price for that operator's services were approved in a fast-tracked manner, inconsistent with existing NOC practices.
4. At the time of reporting, the GNU had not allocated an operational budget for 2025 to the NOC, leaving the Corporation and its subsidiaries unable to meet their contractual obligations to international partners. The NOC publicly announced its inability to pay operational subcontractors.¹⁶⁴ However, following al-Abbar's direct intervention, the abovementioned operator was able to secure the payments for his rigs, bypassing established payment suspension policies.
5. Regarding service contracts in general, the Panel assessed that the lack of transparency in the payments resulted in some subsidiaries reverting to payment-by-proxy. In payment-by-proxy operations, international partners pay operational expenses in exchange for a larger share of crude oil which further enabled bypassing oversight in the oil sector for the benefit of armed group actors.

¹⁶³ DOB October 1980, a.k.a. Refaat Mohamed Abdelsalam Alabbar, Rafat Abbar; Refat al-Abbar.

¹⁶⁴ Declaration from the NOC Chairman confirmed by the Panel, <https://libyaobserver.ly/economy/noc-warns-budget-shortfall-threatens-production>.

Appendix 9.B: Unauthorized crude oil marketing on behalf of Arkenu Oil Company

Figure 9.B.1

Sales proposal for Libyan crude oil via messenger app (message reproduced by the Panel)

Please find below the detailed technical specifications for the top 4 Libyan crude grades, along with availability and loading schedule:

1. Sarir-Mesla Crude

- API Gravity: 37.5°
- Sulfur Content: ~0.18%
- Viscosity at 40°C: ~3.2 cSt
- Pour Point: ~-10°C
- Crude Type: Light sweet crude
- Quantity Available: Up to 1 million barrels
- Laycan: Within 3 days for 1 million barrels cargo

2. Es Sider Crude

- API Gravity: 36–37°
- Sulfur Content: ~0.42%
- Viscosity at 40°C: ~4.5 cSt
- Pour Point: ~-10°C
- Crude Type: Light sweet crude
- Quantity Available: Up to 1 million barrels
- Laycan: Within 3 days for 1 million barrels cargo

3. Brega Crude

- API Gravity: 40°
- Sulfur Content: ~0.25%
- Viscosity at 40°C: ~3.8 cSt
- Pour Point: ~-12°C
- Crude Type: Light sweet crude
- Quantity Available: Up to 1 million barrels
- Laycan: Within 3 days for 1 million barrels cargo

4. Sharara Crude

- API Gravity: 43–44°
- Sulfur Content: ~0.16%
- Viscosity at 40°C: ~2.8 cSt
- Pour Point: ~-15°C
- Crude Type: Very light sweet crude
- Quantity Available: Up to 1 million barrels
- Laycan: Within 3 days for 1 million barrels cargo —

Special Offer for Crude Oil Sale

We are pleased to offer a special deal on crude oil with the following terms:

- Price: Brent -4 USD
- Payment Method: Bank-to-Bank via Letter of Credit (LC)
- Contract Duration: One-year contract
- Shipment Schedule: Two shipments per month, each shipment is 1 million barrels

Source: Confidential.

Figure 9.B.2

Sample contract by Al-Gandal for Libyan crude oil sales on behalf of Arkenu Oil Company

 مجموعة الجندل للإستثمار والخدمات النفطية Algandal group OIL SERVICES INVESTMENT	شركة مجموعة الجندل للإستثمار والخدمات النفطية طرابلس - ليبيا ، النوفلين ص. ب. 1223 Algandal group Co. for Oil Services Investment Tripoli – Libya, Alnofleen P.O. Box 1223
--	---

Subject: PROCEDURE CIF WITH ACCEPTED VERBIAGES
Date of issue:/...../.....
Contract Code : AG.....

Messer, END Buyer

**NON NEGOTIABLE CIF PROCEDURE
PAYMENT INSTRUMENT SBLC**

A. CHOICE I CIF SBLC

9.1 PAYMENT TERMSS CIF SBLC MT760

9.1.1 For the First Trial Shipment of (..... MT) quantity of the commodity, the Buyer is required to issue a (Cashback, Irrevocable, Assignable, Confirmed and Operative Standby Letter of Credit (SBLC)) issued from one of the top 25 prime world banks, and the SBLC confirmation must be written in the Verbiage. (The SBLC will be valid for One Year-One Day, covering the value of the entire first shipment and will remain in effect for the other (shipments during its validity period.) This SBLC will serve as a collateral security guarantee towards successful completion of providing all shipments as per the SPA. The payment of all shipments will be made via SWIFT MT after each shipment quantity is being discharged into the buyer's tanks at the discharge port.

9.1.2 The SBLC will act as a collateral guarantee, payable upon the arrival of the shipment at the port of discharge and upon completion of the SGS inspection by the buyer. The seller is only entitled to debit the dur CI value of the arrived shipments from the SBLC in case of non-performance and default by the buyer to perform the SGS inspection within (3) the days of the shipment arrival at the port of discharge or of the buyer fail to pay the due CI value for the delivered shipment via SWIFT MT .

9.1.3 Face value of the SBLC; shall be sufficient to cover the amount in USD for the whole monthly/consecutive shipments of the commodity plus any rollovers or extensions.

9.1.4 The SBLC must be sent to the Seller's Bank account and will be subjects to the Seller's Bank acceptance.

9.1.5 As soon as the Sales & Purchase Agreement (SPA) is executed, the mentioned price is fixed for the trial and the next (.) consecutive shipments of the commodity. In case the commodity (global plats price increases or decreases by a factor of % in comparison to the price agreed upon when the SPA was signed, either party (buyer/seller) has the option of terminating the agreement or temporarily suspending it, or negotiating a new price for continued agreement in between.

9.1.6 For any reason; should the Buyer or the Seller wish to terminate the signed contract by the two parties at any time before executing the Contract or prior to its end, the Buyer or the Seller should pay 5% (Five Percent) of the full amount of the Contract value to the other party.

9.2 CIF PROCEDURES SBLC (.)

9.2.1 Buyer sends an Official LOI (Letter of Intent) to seller.

9.2.2 Seller issues an FCO (Full Corporate Offer) to the buyer.

9.2.3 Buyer signs and stamps the FCO and sends it to the seller. (Signing the FCO confirms your acceptance of the seller's price and procedures).

9.2.4 Buyer issues an official ICPO to the seller, along with buyer incorporation certificate, and a copy of the passport of the signatory.

9.2.5 Once buyer credibility is established, seller will send SPA. Buyer executes this SPA and returns the stamped and sealed SPA to the seller's address.

9.2.6 Seller issues Proforma Invoice (PI) for the First trial Lift/First Delivery.

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info@algandal.com – www.algandal.com

9.2.7 Buyer bank will issue SWIFT MT. to seller bank as a proof of capability to conduct the deal.

9.2.8 Seller bank will confirm received and acceptance of the SWIFT MT.

9.2.9 For the first trial shipment of MT) Buyer is required to issue a (Cashback, Irrevocable, Assignable, Confirmed and Operative Standby Letter of Credit (SBLC) MT760) issued from one of the top 25 prime world banks, and the SBLC confirmation must be written in the Verbiage.

9.2.10 Seller obtains confirmation from his bank that the SBLC has been received.

9.7.1: Seller Bank will issue a 2% PB (Performance Band) to the buyer bank within 7 to 10 Days from the SBLC confirmation.

9.2.17 Seller bank will also provide the buyer's bank with the full POP documents within 10 to 15 days of the SBLC confirmation,

9.2.13 Buyer confirms shipping documents, with vessels captain while delivery commence to Buyer discharge port according to the contract.

9.2.14 Buyer provides evidence of Tank Storage at destination port. Seller loads First Lift/Trial Shipment at the Port of Loading.

9.2.15 After loading, Seller Bank will send to Buyer Bank a Commercial Invoice (CI) and a full set of Shipping Documents/Bill of Lading via (Bank to Bank and Mail for information).

9.2.16 Upon arrival of the shipment at the port of discharge and it is being discharged, the Buyer must arrange for conducting a Q&Q inspection by an SGS company and receive their report within a maximum of Three (03) days, and once a positive report is received, the Seller Bank will issue a full Commercial Invoice to the Buyer Bank. Then the Buyer must pay it via Swift Transfer (MT103) within a maximum of five (05) working days from the date the shipment is discharged.

NOTE: (IF THE BUYER FAILS TO CONDUCT THE SGS INSPECTION WITHIN THE TWO (02) DAYS PERIOD, THE SELLER IS AUTOMATICALLY ENTITLED TO CONSIDER HIS (PORT OF LOADING SGS REPORT) AS PROOF OF THE INTEGRITY OF THE FINAL DELIVERY INSPECTION. A DELIVERY NOTE REPORT WILL THEN BE OBTAINED FROM THE SHIPPING COMPANY AND SUBMITTED TO SELLER BANK TO DEDUCT THE DUE COMMERCIAL INVOICE (CI) VALUE OF THE DELIVERED SHIPMENT.)

9.2.17 MONTHLY DELIVERY: Following the successful completion of the trial shipment, the buyer can continue to pay for the subsequent shipments by SWIFT MT103 after each shipment has been discharged into the buyer tanks at the discharge port.

9.2. 18 NOTES TO BE CONSIDERED

9.2.18.1 The SBLC must be issued from top 25 prime World Banks.

9.2.18.2 The Buyer can issue any alternative to MT199 SWIFT Message, such as-SWIFT MT799 or SWIFT MT999.

9.2.18. 3 The Seller only work with CIF Procedure.

9.2.18.4 Once the Seller Get the POP; The Seller is not allowed to share online any confidential documents on behalf of a third party as proof of product (POP).

9.2.18.5 The Buyer must prepare and issue the ICPO in accordance with the above terms and procedures, and should send the signed sealed ICPO documents to the Seller company email addresses along with his Corporate License, and Passport Copy.



شركة مجموعة الجندل
للإستثمار والخدمات النفطية
طرابلس - ليبيا ، النوفلين
ص. ب. 1223

Algandal group Co.
for Oil Services Investment
Tripoli – Libya, Alnofleen
P.O. Box 1223

BANK OFFICER
SWFTCODE
BENEFIC ARY. BENEFICIARY COMPANY NAME
AMOUNT
CURRENCY USD
.....NORMAL.....

BANK GUARANTEE #:
CURRENCY USD
PRINCIPAL AMOUNT
DATE OF ISSUE
MATURITY DATE:
DATE OF EXPIRY-
BENEFICIARY COMPANY NAME
PLACE OF ISSUE
NARRATIVE

FOR THE VALUE RECEIVED BY US. WE THE UNDERSIGNED.....
HEREBY OPEN OUR IRREVOCABLE. TRANSFERABLE. ASSIGNABLE AND
CONFIRMABLE STANDBY LETTER OF CREDIT IN FAVOUR OF FOR THE
AMOUNT OF USD IN..... LAWFUL UNITED STATES DOLLAR UPON
PRESENTATION AND SURRENDER OF THIS STANDBY LETTER OF CREDIT AT OUR
COUNTER NOT LATER THAN FIFTEEN DAYS AFTER MATURITY.

PAYMENT SHALL BE AVAILABLE BY BENEFICIARY'S FIRST WRITTEN DEMAND VIA
SWIFT WIRE SYSTEM AND THE DEMAND HEREUNDER MUST BE MARKED, DRAWN
UNDER THE STANDBY LETTER OF CREDIT NUMBER

SUL PAYMENT SHALL BE MADE WITHOUT SET OFF AND CLEAR OF ANY DEDUCT ONS,
OR CHARGES FEES OR WIT-OLDING OF ANY NATURE, NOW OR HEREINAFTER
IMPOSED, LEVIED, COLLECTED, WITHELD OR ASSESSED BY THE GOVT. OR ANY
POLITICAL SUBDIVISION OR AUTHORITY THEREOF OR THE REIN.

THIS STANDBY LETTER OF CREDIT IS TRANSFERABLE AND ASSIGNARLL WITHOUT
PRESENTATION TO US THIS STANDBY LETTER OF CREDIT IS SUBIECT TO THIS
UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS UNDER THE
INTERNATIONAL CHAMBER OF COMMERCE, PARIS FRANCE, PUBLICATION NO 500/600
THIS IS AN OPERA VE INSTRUMENT AND NO MAIL OR PHONE CONFIRMATION SHALL
FOLLOW

ALL CHARGES ARE FOR THE APPLICANT
THIS CABLE IS AN OPERATIVE INSTRUMENT
THIS LETTER OF GUARANTEE EXPIRES ON.....
FOR AND ON BEHALF OF.....
BANK OFFICER NAME BANK OFFICER NAME

ISSUER BANK ISSLER BANK
DESIGNATION
OFFICER CODE OFFICER CODE

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Page: 3

B. CHOICE 2 CIF DLC

9.2.1 PAYMENT TERMS CIF DLC MT700

9.2.1.1 For the whole Trial Shipment of the quantity of the Commodity. Payment will be by 100% by MT103 Guaranteed by irrevocable, un-conditional, Confirmed Operative Documented Letter of Credit (DLC) MT700) of validity of Ninety days, only from any prime 25 banks or from a Bank having RMA with our Bank, and covering the Trial Shipment value, and the confirmation must be written in the Clause 49 in the Verbiage. And Value that will act as a collateral security guarantee towards successful completion and lifting of the Trial quantity with a maturity date of three (03) months. This DLC will serve as payment for the Trial shipment of the Commodity, and payment of the shipment will be made by SWIFT MT 103, this payment is 100% guaranteed payable directly into the Seller's Bank, payable immediately 100% at Destination, for the whole Trial shipment loaded with the delivery of documents and SGS Inspection documents

9.2.1.2 For the Contract Monthly Shipments of quantities of the Commodity, payment will be by 100% by MT103 Guaranteed by irrevocable, un-conditional, Confirmed Operative Documented Letter of Credit (DLC) MT700), only from prime 25 banks or from a Bank having RMA with our Bank, validity of One Year One Month Revolving until the end of the contract until final delivery; covering one (1) monthly shipments' quantity of the Commodity, and the confirmation must be written in the Clause 49 in the Verbiage. And Value that will act as a collateral security guarantee towards successful completion and lifting of the contracted quantity with a maturity date of Twelve (12) months. This DLC will serve as payment for the last month shipment of the Commodity, and payment of the shipment will be made by SWIFT MT 103, this payment is 100% guaranteed payable directly into the Seller's Bank, payable immediately 100% at Destination, for the whole of each monthly shipments loaded with the delivery of documents and SGS Inspection documents.

9.2.1.3 (The DLCs MT700 for the Commodity subjects to Seller's Bank acceptance). And The Contract DLC shall be for the whole period of the contract plus any Rollovers or extensions.

9.2.1.4 Face value of MT103 Guaranteed by previous mentioned Documented Letter of Credits (DLCs) MT700; shall be sufficient to cover the amount in USD for the value of Trial Shipment or for the value of each monthly consecutive shipment for the Commodity. The seller is entitled only to take the shipment value in case of default and non-obligation of the buyer to pay the shipment value.

9.2.1.5 The DLCs MT700 must be sent to Seller's Bank after Signing the Contract, and before Loading.

9.2.1.5 As soon as the Sales & Purchase Agreement (SPA) is executed, the mentioned price is fixed for the trial and the next 11 consecutive shipments of the commodity. In case the commodity (.....) global plats price increases or decreases by a factor of 10% in comparison to the price agreed upon when the SPA was signed, either party (buyer/seller) has the option of terminating the agreement or temporarily suspending it, or negotiating a new price for continued agreement in between.

9.2.1.7 For any reason; should the Buyer or the Seller wish to terminate the signed contract by the two parties at any time before executing the Contract or prior to its end, the Buyer or the Seller should pay 5% (Five Percent) of the full amount of the Contract value to the other party.

9.2.1 TRANSACTION PROCEDURES FOR CIF DLC MT700 (INCOTERMS 2020)

9.2.1.1 End Buyer sends Official LOI

9.2.1.2 Authorized mandates of the End Buyer if present to be mentioned in LOI, ICPO and SPA.

9.2.1.3 Negotiations are conducted between the Authorized Representative of the End Buyer with the Commercial Manager of Hakim Trading Est. for initial agreement on the Procedures, Conditions and Prices.

9.2.1.4 Seller sends to the Buyer: "Buyer's Approval Document for Hakim CIF Non-negotiable Procedure". Of the Pre Agreed Procedure, Conditions and prices.

9.2.1.5 Buyers Signs and Seals the Approval document and Returns it back within 48/72 hours, with a new updated LOI according to the Seiler's Approved Procedures Document; Signing and stamping the Document; means your Approval for all Terms and conditions. Then the FCO will be send to your address.

9.2.1.6 Seller Issues FCO according to the Seller's Approved Procedures document and send to Buyer.

9.2.1.7 Buyer fills up Buyer's details, sign/stamp the FCO & sends it with the Passport Copy to Seller along with ICPO with the approved seller's procedure.

9.2.1.8 Seller Issues Draft Contract or SPA, then Buyers Signs and Seals and Returns it back within 48/72 hours.

9.2.1.9 Seller issues and sign and seals the final Contract or SPA, and send it to the Buyer. Then Buyer Signs and Seals and Returns it back within 24/48 hours.

9.2.1.10 Seller issues the PROFORMA INVOICE (PI), while the Buyer signs, and seals the (PI) Invoice, and returns within 24/48 hours.

9.2.1.11 Buyer issues SWIFT MT199 or MT 705 or MT999 bank to bank, and sends draft DLC copy.

9.2.1.12 After Accepting the SWIFT MT199 by the Seller's bank.

9.2.1.13 **FOR THE TRIAL SHIPMENT Buyer issues**, Irrevocable, un-conditional, Confirmed Operative Documented Letter of Credit (DLC) MT 700) of validity of Ninety days from any World's Prime Bank or from a Bank having RMA with our Bank; covering the Trial Shipment's value and the confirmation must be written in the Clause 49 in the Verbiage.

9.2.1.14 **FOR THE CONTRACT MONTHLY SHIPMENTS Buyer Issues** Swift irrevocable, un-conditional, Confirmed Operative Documented Letter of Credit (DLC) MT700) to be Revolving until the end of the contract until final delivery (from prime 25 banks or from a Bank having RMA with our Bank), and the confirmation must be written in the Clause 49 in the Verbiage.

9.2.1.15 Seller makes Confirmation of the DLC from the Seller's bank.

9.2.1.16 Seller within 7 days, issues 2% (PB) performance Bond.

9.2.1.17 Seller after confirmation of the DLC, within 10 to 15 days; sends Full POP to Buyer.

9.2.1.18 Buyer confirms shipping documents, with vessels captain while delivery commence to Buyer discharge port According to contract.

9.2.1.19 In case the Vessel arrives to the destination port within three days and Buyer no carry out SGS inspection, automatically the Seller entitled to consider (SGS of loading port as final inspection and confirmation of delivery of shipment in the discharge port).

9.2.1.20 Buyer's bank will release the payment for the total value of each Shipment to Seller's bank (MT103) within two (2) working days. The payment will be 100% guaranteed payable directly to Seller's bank, payable immediately 100% at Destination, for the whole of each monthly shipment loaded with the delivery of documents and SGS Inspection documents from Discharge Port.

9.2.1.21 NOTES TO BE CONSIDERED.

9.2.1.21.1 The DLC must be from prime 25 banks or from a Bank having RMA with our Bank. and the confirmation must be written in the Clause 49 in the Verbiage.

9.2.1.21.2 We work only with CIF Procedure.

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9.2.1.21.3 We don't give any confidential documents from a third party.
9.2.1. 14 The Buyer must prepare and issue the ICPO in accordance with the above terms and procedures, and should send the signed sealed ICPO documents to the Seller company email addresses along with his Corporate License, and Passport Copy.

Accepted Verbiage CIF DLC MT700

27; SEQUENCE OF TOTAL: TO BE ADDED
40A; FORM OF DOCUMENTARY CREDIT IRREVOCABLE, OPERATIVE, UN-CONDITIONAL
20; DOCUMENTARY CREDIT NUMBER: TO BE ADDED
31C; DATE OF ISSUE:..... /...../.....
40E; ABDICABLE RULES:
31D; DATE AND PLACE OF EXPIRY:
50; APPLICANT : BUYER NAME AND ADDRESS
59; BENEFICIARY: SELLER NAME AND ADDRESS
32B; CURRENCY CODE, AMOUNT: USD (AMOUNT TO BE ADDED)
39A; PERCENTAGE CREDIT AMOUNT TOLERANCE: + / - PCT
41A; EBLLEADXXX by payment
43P; PARTIAL SHIPMENT: ALLOWED
43T; TRANSSHIPMENT : ALLOWED
44E; PORT OF LOADING /AIRPORT OF DEPARTURE: TO BE ADDED
44F; PORT OF DISCHARGE/ AIRPORT OF DESTINATION: TO BE ADDED
44C; LATEST DATE DE THE SHIPMENT'S: TO BE ADDED
46A; DESCRIPTION OF GOODS AND /OR SERVICES: TO BE ADDED
46A; DOCUMENTS REQUIRED OF GOODS: 1. SALE AND PURCHASE AGREEMENT
2. COMMERCIAL INVOICE.
71D; CHARGES: ALL BANKING CHARGES OUTSIDE THE ISSUING BANK'S COUNTRY,
INCLUDING REIMBURSEMENT CHARGES, IF ANY, ARE FOR BENEFICIARY'S
ACCOUNT
48; PERIOD FOT PRESENTION IN DAYS: TO BE ADDED
49; CONFIRMATION INSTRUCTIONS: CONFIRM
58A; REQUESTED COMFIRMATION PARTY: EBEBLLEADXXX
53A; REIMBURSEMENT BANK NAME (USD CORRESPONDENT BANK OF ISSUING BANK)
REQUIRED FOR CLAIMING:.



شركة مجموعة الجندل **Algandal group Co.**
 للاستثمار والخدمات النفطية for Oil Services Investment
 طرابلس - ليبيا ، النوفلين Tripoli – Libya, Alnofleen
 ص. ب. 1223 P.O. Box 1223

- 78: REIMBURSEMENT CLAUSE: TO ALLOW THE NOMINATED & CONFIRMING BANK TO CLAIM REIMBURSEMENT AT MATURITY DIRECTLY FROM THE REIMBURSING BANK STATED IN FIELD 53A FOR THE VALUE OF COMPLYING PRESENTATION UNDER THE LC
- 57A: ADVICE THROUGH BANK:

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Source: Confidential.

Appendix 9.C: Modus operandi of illicit petroleum exports via tanker vessels

A. Overview

1. The Panel found that tanker vessels were not used for illicit exports of petroleum in western Libya. However, tanker vessels illicitly exported petroleum from eastern ports.. Tanker vessels are instrumental to such operations because of their unparalleled capacity to transfer large amounts of cargo that can in turn be sold at high seas expediently. The Panel has been reporting about the illicit exports of petroleum via tanker vessels from Benghazi old harbour since March 2022.¹⁶⁵ During the present reporting period, the Panel identified Tubruq port and Ras Lanuf harbour as additional locations for illicit export of refined petroleum products via tanker vessels, including but not limited to diesel fuel.

2. During the reporting period, the Panel found that all illicit exports took place from commercial sections of Benghazi old harbour, Tubruq port and Ras Lanuf harbour. These locations operate outside of the control of the National Oil Corporation (NOC), the only entity in Libya authorized to export refined product. Around 70 percent of all diesel in Libya, and more recently also heavy fuel oil, are imported to Libya; the NOC reconfirmed to the Panel that it never exports diesel, gasoline or any other fuel that has been imported.

3. Sub-appendix 9.C.1 provides an updated list of tanker vessels identified by the Panel in Benghazi old harbour. The Panel identified unique visits only; unless the Panel assessed that a vessel left and returned, continuing presence in Benghazi old harbour over longer periods is only reflected with the date of the first sighting.

B. Benghazi old harbour

1. Continued exports and subsequent infrastructure upgrade

4. Benghazi old harbour remained the epicentre of illicit export of refined petroleum, namely diesel, from Libya (figure 9.C.1). Since the Panel's last report,¹⁶⁶ illicit exports of petroleum by tanker vessels from Benghazi old harbour (LYBEN) continued at comparable rates until October 2025, albeit with variations in frequency of vessels present simultaneously in the harbour. The number of vessels peaked at 16 vessels in December 2024, representing the highest number observed by the Panel to date. Average numbers reduced to five vessels until the summer of 2025, when the number of vessels peaked again, reaching 13. (table 9.C.1).

5. Late September of 2025 witnessed a sudden drop in vessel visits.¹⁶⁷ The decrease in the number of vessel visits coincided with infrastructure changes in the harbour. Throughout 2025, pre-existing shelters¹⁶⁸ were gradually dismantled; these shelters provided cover to tanker trucks and housed pumps, hoses, and other equipment needed to transfer the fuel from trucks to vessels. In early January 2026, six new, larger pumps without shelters were erected on each side of the harbour. These investments by LAAF demonstrated their long-term commitment to continue and increase illicit exports of petroleum.

¹⁶⁵ S/2023/673, annex 74 and S/2024/914, annex 62.

¹⁶⁶ S/2024/914, paras 106-110 and annex 62.

¹⁶⁷ Analysis based on 209 satellite images reviewed by the Panel (source: Planet Labs).

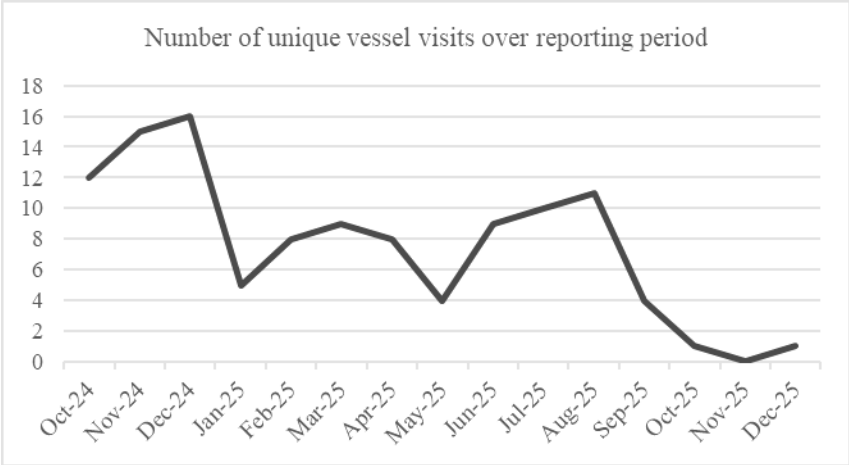
¹⁶⁸ S/2023/673, annex 74, figure 74.A.2.

Figure 9.C.1
Sample satellite imagery of 17 July 2025 showing 5 smaller tanker vessels and 23 tanker trucks next to 34,987 deadweight tonnes (DWT) MT Golroo (9167148)



Developed by Panel of Experts.
Source: Planet Labs, 17 July 2025, 13:05 UTC
Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Table 9.C.1
Number of unique vessel visits per month to Benghazi old harbour over the reporting period



Sources: S&P MIRS, Planet Labs, Confidential sources.

6. The Panel found that a higher than previously observed number of large vessels visited Benghazi old harbour. These included: a) the two largest vessels operated by the Maeen Sharfeddin criminal network (see also sub-appendix 9.C.2), MT Nobel (IMO 9105114)¹⁶⁹ and MT Angel K (IMO 9208473)¹⁷⁰; b) MT Eni (IMO 9258674);¹⁷¹ and c) MT Golroo (IMO 9167148).¹⁷² Periodic satellite imagery also showed a higher than previously observed number of tanker trucks on the pier (see above figure 9.C.1).

7. Between 13 October 2024¹⁷³ and 31 December 2025, the Panel identified at least 110 visits to Benghazi old harbour undertaken by 36 different tanker vessels (sub-appendix 9.C.1 for the entire list). Out of these 36, 14 were newly identified vessels, while 22 had conducted visits previously. The vessels with the most visits to Benghazi old harbour were MT Marisa N (IMO 8004090)¹⁷⁴ and MT Mardi (IMO 8853673),¹⁷⁵ which both had visited 23 times since March 2022. Both were operating under the control of the Maeen Sharfeddin criminal network. Of the 14 newly identified vessels, the Panel established that four were controlled by the Maeen Sharfeddin criminal network. In total, the number of vessels the Panel identified as being under the control of the network almost doubled from 12 to 24 (see sub-appendix 9.C.2 for the entire list).

8. In relation to the 36 different tanker vessels that visited during the reporting period, the most represented flag State continued to be Cameroon (nine vessels). The remaining predominantly represented flag States were Tanzania (four vessels) and Comoros (three vessels). Meanwhile, the flags of Liberia, Palau and Saint Kitts and Nevis were used by two vessels each. Another nine vessels had a different flag State each. The flag States of five vessels were unknown.

9. Since March 2022, the Panel identified a total of 296 visits made by 61 different tanker vessels. Each of these visits represented an illicit export of petroleum. However, to the Panel's knowledge, the relevant Libyan authorities did not launch any investigations into such visits, including through the 2146 focal point mechanism. Sub-appendix 9.C.1 provides a list of all the visits identified.

10. The Panel estimated that the combined exports since 13 October 2024 amounted to 578,000 metric tons of diesel (688 million litres), bringing the total illicit exports between March 2022 and December 2025 to 1.73 million MT (2.07 billion litres). At a conservatively estimated average market rate for diesel in the Mediterranean region of USD 750 per MT between March 2022 and October 2025, the market value of these exports would equal USD 1.3 billion. This amount directly corresponds to the loss of State revenue. This is a conservative estimate, as these exports only refer to vessels that the Panel could identify. Therefore, the actual volume of illicit exports from Benghazi old harbour is likely higher.

C. Tubruq port

11. The Panel identified Tubruq port (LYTOB) as an additional point of origin for illicitly exported refined petroleum products. The trafficking patterns differed significantly from those out of Benghazi old harbour. Vessels operated by the Maeen Sharfeddin criminal network also exported illicitly from Tubruq, mostly without AIS.

12. The Panel found that illicit exports by tanker vessels took place from Tubruq port's western quays, both as clandestine and grey market exports. Refined petroleum products came from two different sources: a) tanker vessels delivering imported fuel to Tubruq port upon order by the NOC on behalf of Brega Company (see below paras.); and b) the Arabian Gulf Oil Company (AGOCO) Marsa al-Hariga refinery. In both cases, exports took place without NOC approval.

13. The Brega Company fuel depot in Tubruq is located on the southern shore of Tubruq Bay, adjacent to the Tubruq power station and AGOCO's Marsa al-Hariga (LMHR) maritime terminal. The depot operates its own maritime terminal at Marsa al-Hariga, known as the "Tubruq Petroleum Terminal – Brega Jetty", which is situated east of the main terminal. On the opposite side of the bay, next to the city of Tubruq, lies Tubruq Port (LYTOB), which comprises both commercial and military harbour facilities (sub-appendix 9.C.3, figure 9.C.3.1).

14. Until October 2021, the Marsa al-Hariga Brega Jetty was used for fuel deliveries to Tubruq. Between October 2021 and October 2025, no tanker vessels discharged at the jetty. Fuel deliveries by tanker vessels resumed in October 2025. The

¹⁶⁹ Flag: Cameroon.

¹⁷⁰ Flag: Tanzania.

¹⁷¹ Flag: unknown.

¹⁷² Flag: Iran.

¹⁷³ S/2024/914, annex 62.

¹⁷⁴ Flag: Cameroon.

¹⁷⁵ Flag: Cameroon.

interruption was attributed to a) intermittent technical defects during this period; and b) direct interference by the LAAF in the delivery process. The Panel found that although the jetty was frequently unserviceable, it was operational during certain periods, including the summers of 2024 and 2025.

15. The Panel further determined that claims of persistent technical defects were used as a pretext to justify a) fuel deliveries by tanker trucks from the Benghazi depot instead of Tubruq; and b) fuel deliveries by tanker vessels to Tubruq port instead of the Marsa al-Hariga Brega Jetty. These tanker vessel deliveries began in March 2024, following the installation of the necessary infrastructure on Tubruq Port's eastern quay which was designated "Brega Terminal Berth No. 10". As this location was not a dedicated maritime terminal, vessels remained at berth for extended periods, while cargo was gradually discharged into tanker trucks, incurring extra costs. Both the use of tanker trucks for deliveries to Tubruq prior to 2024, and deliveries to the commercial port between March 2024 and October 2025 significantly eased illicit exports by reducing the transportation distances. However, it had twice the negative impact on the NOC and Brega Company; it incurred extra costs for planned truck movements that never took place, as well as the prolonged overstay of vessels discharging through tanker trucks.

16. The Panel identified multiple instances in which tanker vessels were instructed to discharge at Marsa al-Hariga's Brega Jetty but were redirected upon arrival by LAAF to discharge instead at Brega Terminal Berth No. 10 at Tubruq port.

17. While tanker vessels were discharging fuel from the eastern quay into tanker trucks, other tanker vessels were simultaneously loading fuel from tanker trucks at the western quays. The Panel found that the tanker trucks moved directly from the eastern quay to the western quays, shuttling the fuel between delivering and illicitly exporting vessels.

18. Between November 2023¹⁷⁶ and 31 December 2025, the Panel identified at least 86 visits to Tubruq's western quays undertaken by 30 different tanker vessels, which loaded cargo from tanker trucks. Out of these 30 tanker vessels, 6 operated – at least on some occasions – without AIS, and nine were operated by the Maen Sharfeddin criminal network. The Panel assessed that at least those nine vessels engaged in clandestine exports, and the remainder in grey market exports. The clandestine exports amounted to at least 106,680 metric tons of product; the remaining tankers exported at least 270,239 metric tons. Imagery of tanker vessels loading at Tubruq port and a list of vessels are at (sub-appendix 9.C.4).

D. Ras Lanuf harbour

19. Ras Lanuf harbour (LYRLA) is primarily an oil terminal in the Gulf of Sidra, whose quay serves a commercial terminal for dry cargo shipments for local oil and petrochemical companies. The commercial terminal is not under the control of the NOC. The cargo quay is seldomly used – in the first nine months of 2025, only three cargo vessels visited. One or more LAAF TBZ FPVs vessels were usually berthed at the southern section of the quay.

20. In early October 2025, three pumping stations were erected on the northern section quay of that terminal.¹⁷⁷ By late October, tanker vessels controlled by the criminal network started berthing next to the pumps and loaded cargo from tanker trucks. MT Angel K (IMO 9208473), one of the network's largest vessels, served as "buffer" bunker vessel for smaller vessels that would berth alongside her to undertake STS loading in the harbour. Vessels operated with and without AIS in the harbour.

21. Several network vessels that loaded in Ras Lanuf also directly transported cargo to Hurds Bank and OPL Port Said for STS transfer.

22. Between October 2025¹⁷⁸ and 31 December 2025, the Panel identified six visits to Ras Lanuf harbour's cargo quay undertaken by six different tanker vessels, which loaded cargo from tanker trucks. Five of these vessels were operated by the Maen Sharfeddin criminal network. They illicitly exported at least 41,950 metric tons of product. Imagery of tanker vessels loading at Ras Lanuf harbour and a list of vessels are at sub-appendix 9.C.4.

E. Changing trafficking patterns

23. Obfuscation and trafficking patterns further evolved since the Panel's last report. While vessels continued operating without AIS for extended periods, including during all port visits to Benghazi, additional STS loading instances, including

¹⁷⁶ First identified suspicious visit by a tanker vessel to Ras Lanuf harbour's cargo quay.

¹⁷⁷ 30° 29' 30" N, 18° 34' 53" E.

¹⁷⁸ First identified suspicious visit by a tanker vessel to Tubruq's western quays.

between vessels of the criminal network, were added to the transfer chains, to further conceal the origin of their cargo, including at Benghazi anchorage.

24. The Panel found that: a) some vessels, which were not involved in illicitly exporting petroleum from Libya for longer periods, had returned; b) while in 2024 trafficking occurred almost exclusively via STS loading, 2025 saw increasing deliveries to Member States not only for grey market transfers but also for smuggling transfers, including to Egypt (sub-appendix 9.C.5), Somalia and Sudan; and c) sporadic STS transfers took place at STS locations off Cyprus, Greece and Türkiye.

25. While the previously identified locations for STS activities remained in use – Hurds Bank, off Malta, and another location off Port Said, Egypt¹⁷⁹ – the Panel identified two additional STS loading locations where transfers between network vessels took place: a) in the vicinity of the location that the Panel previously identified as a site where vessels disconnect their AIS when approaching or leaving Benghazi,¹⁸⁰ about 130 nautical miles north of Benghazi;¹⁸¹ and b) about 60 nautical miles north-north-east off Alexandria, Egypt¹⁸² (figure 9.C.2).

26. Following these multiple STS operations, the Panel established that the diesel illicitly exported from eastern Libya is: a) sold as bunker fuel (marine gasoil, MGO) at Hurds Bank and OPL Port Said; and b) delivered to shore in Port Said and sold onward via the sea route, including as MGO.

27. Both Hurds Bank and OPL Port Said are close to busy maritime routes and are crowded with vessels engaged in legitimate bunkering business. This provided cover for vessels loaded with diesel illicitly exported from Libya to transfer their cargo via STS loading. The Panel found that Maltese bunkering companies received fuel illicitly exported from Libya via STS loading with vessels of the criminal network outside of Maltese territorial waters. This included Zeta Energy Ltd., whose vessels a) received fuel from criminal network vessels on at least three occasions between August 2022 and July 2024 at Hurds Bank and b) exported refined petroleum products from the western quays of Tubruq port on one occasion on 20 October 2025.

28. Zeta Energy Ltd. (Malta), in response to the Panel's findings of it receiving fuel at Hurds Bank on three different occasions, confirmed only one instance of this taking place – claiming that on that occasion it did bunker but only supplied fuel rather than received it. Regarding the two other occasions, it denied any STS transfers.

29. Regarding the export from Tubruq, Zeta Energy Ltd. shared the contact details of the shipper but claimed that its vessel had been under voyage charter at the time. Despite the Panel's request, no copy of the charter contract was shared, nor was the identity of the voyage charterer disclosed, for alleged confidentiality reasons. Based on the evidence gathered and all circumstantial evidence considered, the Panel found Zeta Energy's claims in relation to the STS activities at Hurds Bank not credible. Regarding the export from Tubruq, without a copy of the voyage charter, the Panel was unable to confirm whether the vessel was under a voyage charter at the time. Notwithstanding a voyage charter contract, this does not absolve the shipowner and operator of its due diligence responsibilities.

¹⁷⁹ Hurds Bank (35°54'50.3"N 14°53'57.0"E) and off Port Said (31°26'47.3"N 32°20'02.5"E); S/2024/914, annex 62, para. 8.

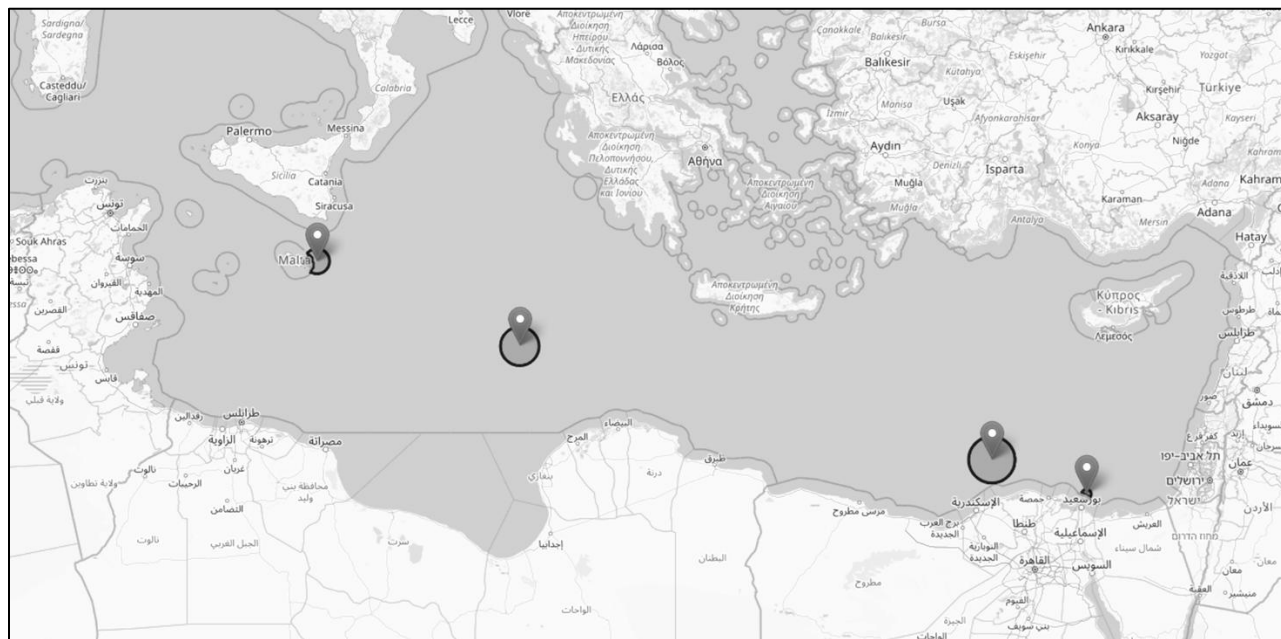
¹⁸⁰ S/2025/914, annex 62, para. 7 and annex 65, figure 65.2.

¹⁸¹ 34°20'06.0"N, 19°30'50.8"E.

¹⁸² 32°10'48.1"N, 30°15'35.5"E.

Figure 9.C.2

Primary ship-to-ship loading locations for illicitly exported diesel from Libya identified by the Panel



Developed by Panel of Experts

Source: OpenStreetMap accessed on 1 July 2025, annotated by Panel of Experts.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Sub-appendix 9.C.1 Updated list of unique tanker vessel visits to Benghazi old harbour since March 2022

Table 9.C.1

Tanker vessels identified by the Panel in Benghazi old harbour since March 2022 (as of 31 December 2025)

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
1	28-Mar-2022	Victory	1	7128227	2,007	Cameroon
2	13-Apr-2022	Maya 1	1	9046758	1,200	Cameroon
3	14-Apr-2022	Queen Majeda	1	9117806	2,547	Palau/Libya
4	22-Apr-2022	Aqua Marine	1	9179488	3,522	Türkiye
5	1-May-2022	Queen Majeda	2	9117806	2,547	Cameroon
6	8-May-2022	TSM Dubhe	1	9249594	19,924	Tuvalu
7	26-May-2022	TSM Dubhe	2	9249594	19,924	Tuvalu
8	8-Jun-2022	Victory	2	7128227	2,007	Cameroon
9	18-Jul-2022	Roschem-2	1	8862935	2,754	Russian Federation
10	16-Aug-2022	Queen Majeda	3	9117806	2,547	Cameroon
11	20-Aug-2022	Karima (later Beauty Queen)	1	9133393	3,710	Russian Federation
12	1-Sep-2022	Angelo 1	1	7946942	566	Cameroon
13	4-Sep-2022	Queen Majeda	4	9117806	2,547	Cameroon
14	9-Sep-2022	Sophia/Chios	1	7113375	3,184	Comoros
15	12-Sep-2022	Anna/Rina	1	9118159	4,972	Comoros
16	12-Sep-2022	Sea Fortune	1	9427275	13,023	Marshall Islands
17	13-Sep-2022	Uni Trader	1	9175169	6,623	Panama
18	19-Sep-2022	Efe	1	9558763	7,623	Vanuatu
19	4-Oct-2022	Beauty Queen (ex Karima)	2	9133393	3,710	Russian Federation
20	4-Oct-2022	Sea Fortune	2	9427275	13,023	Marshall Islands
21	3-Nov-2022	Roschem-2	2	8862935	2,754	Russian Federation
22	10-Nov-2022	Sidra (later Rowad A)	1	9057551	1,950	Tanzania
23	11-Nov-2022	Princess Noria	1	9196448	12,181	Panama
24	12-Nov-2022	Istra	1	9632088	4,500	Russian Federation
25	16-Nov-2022	Uni Trader	2	9175169	6,623	Panama
26	29-Nov-2022	Ses 1	1	9119464	2,684	Panama
27	6-Dec-2022	Istra	2	9632088	4,500	Russian Federation
28	18-Dec-2022	Ses 1	2	9119464	2,684	Panama
29	1-Jan-2023	Beauty Queen (ex Karima)	3	9133393	3,710	Cameroon
30	22-Jan-2023	Ses 1	3	9119464	2,684	Panama
31	31-Jan-2023	Almuntazah	1	8860834	4,056	Cameroon
32	31-Jan-2023	Kavkaz (later Tony)	1	8884476	3,742	Guinea-Bissau
33	31-Jan-2023	Jessica (later Juliet)	1	9140853	9,385	Comoros
34	8-Mar-2023	Tony (ex Kavkaz)	2	8884476	3,742	Guinea-Bissau
35	19-Mar-2023	Marisa N	1	8004090	1,714	Cameroon
36	27-Mar-2023	Marisa N	2	8004090	1,714	Cameroon
37	27-Mar-2023	Anna/Rina	2	9118159	4,972	Comoros
38	15-Apr-2023	Alma Marine	1	9438250	9,057	Barbados
39	27-Apr-2023	Marisa N	3	8004090	1,714	Cameroon
40	4-May-2023	Alisa	1	9113135	11,980	Comoros
41	17-May-2023	Saeed 5	1	8821759	7,030	Tanzania
42	27-May-2023	Juliet (ex Jessica)	1	9140853	9,359	Comoros
43	27-May-2023	Istra	3	9632088	4,500	Russian Federation
44	14-Jun-2023	Piero A	1	9010955	2,698	Palau
45	29-Jun-2023	Marisa N	4	8004090	1,714	Cameroon
46	29-Jun-2023	Alma Marine	2	9438250	9,057	Barbados
47	4-Jul-2023	Marisa N	5	8004090	1,714	Cameroon
48	4-Jul-2023	Saeed 5	2	8821759	7,030	Tanzania
49	1-Aug-2023	Marisa N	6	8004090	1,714	Cameroon
50	1-Aug-2023	Almuntazah	2	8860834	4,056	Cameroon
51	1-Aug-2023	Alisa	2	9113135	11,980	Comoros
52	1-Aug-2023	Alma Marine	3	9438250	9,057	Barbados
53	14-Aug-2023	Aristo	1	6501355	1,055	Cameroon
54	31-Aug-2023	Eliana	1	9327310	5,794	Malta

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
55	3-Sep-2023	Aristo	2	6501355	1,055	Cameroon
56	3-Sep-2023	Marisa N	7	8004090	1,714	Cameroon
57	3-Sep-2023	Sidra (later Rowad A)	3	9057551	1,950	Tanzania
58	3-Sep-2023	Anna/Rina	3	9118159	4,972	Comoros
59	3-Sep-2023	Ses 5	4	9119464	2,684	Panama
60	3-Sep-2023	Beauty Queen (ex Karima)	4	9133393	3,710	Cameroon
61	3-Sep-2023	Uni Trader	3	9175169	6,623	Panama
62	3-Sep-2023	Alma Marine	4	9438250	9,057	Barbados
63	24-Sep-2023	Blue Castor	1	6403424	n/a ¹⁸³	Albania
64	24-Sep-2023	Sophia/Chios	2	7113375	3,184	Comoros
65	24-Sep-2023	Marisa N	8	8004090	1,714	Cameroon
66	24-Sep-2023	Mardi	1	8853673	1,056	Cameroon
67	24-Sep-2023	Tony (ex Kavkaz)	3	8884476	3,742	Guinea-Bissau
68	24-Sep-2023	Alisa	3	9113135	11,980	Comoros
69	24-Sep-2023	Jessica (later Juliet)	2	9140853	9,385	Comoros
70	24-Sep-2023	Mistral	1	9177674	6,711	Tanzania
71	24-Sep-2023	MD Miranda	1	9198290	46,408	Tanzania
72	24-Sep-2023	Blue Chem	1	9519614	7,003	Panama
73	29-Sep-2023	New Spirit	1	9337872	8,499	Malta
74	22-Oct-2023	Mardi	2	8853673	1,056	Cameroon
75	27-Oct-2023	Sophia/Chios	3	7113375	3,184	Comoros
76	27-Oct-2023	Marisa N	9	8004090	1,714	Cameroon
77	27-Oct-2023	Saeed 5	3	8821759	7,030	Tanzania
78	27-Oct-2023	Mardi	2	8853673	1,056	Cameroon
79	27-Oct-2023	Almuntazah	3	8860834	4,056	Cameroon
80	27-Oct-2023	Nobel	1	9105114	46,144	Cameroon
81	27-Oct-2023	Bharat	1	9253595	40,128	Panama
82	30-Oct-2023	Sidra (later Rowad A)	2	9057551	1,950	Tanzania
83	28-Nov-2023	Marisa N	10	8004090	1,714	Cameroon
84	28-Nov-2023	Mardi	3	8853673	1,056	Cameroon
85	28-Nov-2023	Aris 1	1	9035371	12,776	Panama
86	28-Nov-2023	Rowad A	4	9057551	1,894	Tanzania
87	28-Nov-2023	Nobel	2	9105114	46,144	Cameroon
88	28-Nov-2023	Alisa	4	9113135	11,980	Comoros
89	2-Dec-2023	Princess Halima	1	9179347	30,031	Barbados
90	6-Dec-2023	Alisa	5	9113135	11,980	Comoros
91	6-Dec-2023	Juliet (ex Jessica)	2	9140853	9,359	Comoros
92	6-Dec-2023	Mistral	2	9177674	6,711	Tanzania
93	6-Dec-2023	Delonix	1	9298387	12,776	Liberia
94	6-Dec-2023	Alma Marine	5	9438250	9,057	Barbados
95	20-Dec-2023	Rowad A (ex-Sidra)	5	9057551	1,894	Tanzania
96	20-Dec-2023	Alisa	6	9113135	11,980	Comoros
97	20-Dec-2023	Juliet (ex Jessica)	3	9140853	9,359	Comoros
98	20-Dec-2023	Alma Marine	6	9438250	9,057	Barbados
99	4-Jan-2024	Nobel	3	9105114	46,144	Cameroon
100	4-Jan-2024	Angelo 2 (ex Karima/Beauty Queen)	5	9133393	4,282	Cameroon
101	4-Jan-2024	Mistral	3	9177674	6,711	Tanzania
102	12-Jan-2024	Tony (ex Kavkaz)	4	8884476	3,742	Guinea-Bissau
103	12-Jan-2024	Nobel	4	9105114	46,144	Cameroon
104	12-Jan-2024	Mistral	4	9177674	6,711	Tanzania
105	25-Jan-2024	Mardi	4	8853673	1,056	Cameroon
106	25-Jan-2024	Aris 1	2	9035371	12,776	Panama
107	25-Jan-2024	Nobel	5	9105114	46,144	Cameroon
108	25-Jan-2024	Angelo 2 (ex Karima/Beauty Queen)	6	9133393	4,282	Cameroon
109	25-Jan-2024	Alma Marine	7	9438250	9,057	Barbados
110	8-Feb-2024	Almuntazah	4	8860834	4,056	Cameroon
111	8-Feb-2024	Nobel	6	9105114	46,144	Cameroon

¹⁸³ Pollution control vessel.

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
112	8-Feb-2024	Ses 4	5	9119464	2,684	Panama
113	8-Feb-2024	Angelo 2 (ex Karima/Beauty Queen)	7	9133393	4,282	Cameroon
114	27-Feb-2024	Marisa N	11	8004090	1,714	Cameroon
115	27-Feb-2024	Florian	3	9046590	1,139	Saint Kitts and Nevis
116	27-Feb-2024	Kauthar/Sal Sabil	1	9166156	15,748	Palau
117	27-Feb-2024	Delonix	2	9298387	12,776	Liberia
118	3-Mar-2024	Rowad A (ex-Sidra)	6	9057551	1,894	Tanzania
119	3-Mar-2024	Nobel	7	9105114	46,144	Cameroon
120	3-Mar-2024	Angelo 2 (ex Karima/Beauty Queen)	8	9133393	4,282	Cameroon
121	11-Mar-2024	Mardi	5	8853673	1,056	Cameroon
122	11-Mar-2024	Florian	1	9046590	1,139	Saint Kitts and Nevis
123	11-Mar-2024	Nobel	8	9105114	46,144	Cameroon
124	11-Mar-2024	Juliet (ex Jessica)	4	9140853	9,359	Comoros
125	11-Mar-2024	Hamsi	1	9171735	8,941	Liberia
126	28-Mar-2024	Angelo 1	2	7946942	566	Cameroon
127	28-Mar-2024	Mardi	9	8853673	1,056	Cameroon
128	28-Mar-2024	Almuntazah	5	8860834	4,056	Cameroon
129	28-Mar-2024	Tony (ex Kavkaz)	5	8884476	3,742	Guinea-Bissau
130	28-Mar-2024	Florian	2	9046590	1,139	Saint Kitts and Nevis
131	28-Mar-2024	Nobel	9	9105114	46,144	Cameroon
132	28-Mar-2024	Victoria	1	9107708	6,491	Cameroon
133	28-Mar-2024	Judy	1	9157052	4,998	Tanzania
134	28-Mar-2024	Hamsi	2	9171735	8,941	Liberia
135	9-Apr-2024	Angelo 1	3	7946942	566	Cameroon
136	9-Apr-2024	Marisa N	12	8004090	1,714	Cameroon
137	17-Apr-2024	Chios	4	7113375	3,184	Comoros
138	17-Apr-2024	Malek (ex Sidra/Rowad A)	7	9057551	1,894	Tanzania
139	17-Apr-2024	Alisa	7	9113135	11,980	Comoros
140	21-Apr-2024	Angelo 2 (ex Karima/Beauty Queen)	9	9133393	4,282	Cameroon
141	21-Apr-2024	Sal Sabil (ex Kauthar)	2	9166156	15,748	Comoros
142	28-Apr-2024	Alma Marine	8	9438250	9,057	Barbados
143	6-May-2024	Chios	5	7113375	3,184	Comoros
144	6-May-2024	Angelo 1	4	7946942	566	Cameroon
145	6-May-2024	Florian	3	9046590	1,139	Saint Kitts and Nevis
146	6-May-2024	Alisa	8	9113135	11,980	Comoros
147	6-May-2024	Pearl 1	1	9166948	8,697	Saint Kitts and Nevis
148	13-May-2024	Juliet (ex Jessica)	5	9140853	9,359	Comoros
149	20-May-2024	Marisa N	13	8004090	1,714	Cameroon
150	20-May-2024	Avax	1	9058713	1,241	Cameroon
151	20-May-2024	Nobel	10	9105114	46,144	Cameroon
152	20-May-2024	Princess Halima	2	9179347	30,031	Barbados
153	27-May-2024	Malek (ex Siidra/Rowad A)	8	9057551	1,894	Tanzania
154	5-Jun-2024	Abacus	1	7427659	3,153	Cameroon
155	5-Jun-2024	Angelo 1	5	7946942	566	Cameroon
156	12-Jun-2024	Avax	2	9058713	1,241	Cameroon
157	26-Jun-2024	Oris Sofi	1	8920282	6,519	Panama
158	30-Jun-2024	Hamsi	3	9171735	8,941	Liberia
159	8-Jul-2024	Victoria	2	9107708	6,491	Cameroon
160	8-Jul-2024	Judy	2	9157052	4,998	Tanzania
161	11-Jul-2024	Almuntazah	6	8860834	4,056	Cameroon
162	11-Jul-2024	Angelo 2 (ex Karima/Beauty Queen)	10	9133393	4,282	Cameroon
163	13-Jul-2024	Angelo 1	6	7946942	566	Cameroon
164	19-Jul-2024	Mardi	10	8853673	1,056	Cameroon
165	19-Jul-2024	Sal Sabil (ex Kauthar)	3	9166156	15,748	Comoros
166	31-Jul-2024	Angelo 1	7	7946942	566	Cameroon
167	31-Jul-2024	Marisa N	14	8004090	1,714	Cameroon
168	31-Jul-2024	Nobel	11	9105114	46,144	Cameroon
169	6-Aug-2024	Abacus	2	7427659	3,153	Cameroon
170	12-Aug-2024	Hamsi	4	9171735	8,941	Liberia

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
171	21-Aug-2024	Angelo 1	8	7946942	566	Cameroon
172	21-Aug-2024	Mardi	11	8853673	1,056	Cameroon
173	21-Aug-2024	Florian	4	9046590	1,139	Saint Kitts and Nevis
174	21-Aug-2024	Avax	3	9058713	1,241	Cameroon
175	25-Aug-2024	Victoria	3	9107708	6,491	Cameroon
176	10-Sep-2024	Victoria	4	9107708	6,491	Cameroon
177	19-Sep-2024	Mardi	12	8853673	1,056	Cameroon
178	21-Sep-2024	Buraaq	1	8914829	14,972	Comoros
179	21-Sep-2024	Alisa	9	9113135	11,980	Comoros
180	21-Sep-2024	Angelo 2 (ex Karima/Beauty Queen)	11	9133393	4,282	Cameroon
181	23-Sep-2024	Marisa N	15	8004090	1,714	Cameroon
182	2-Oct-2024	Abacus	3	7427659	3,153	Cameroon
183	2-Oct-2024	Pearl 1	2	9166948	8,697	Saint Kitts and Nevis
184	13-Oct-2024	Angelo 1	9	7946942	566	Cameroon
185	13-Oct-2024	Mardi	12	8853673	1,056	Cameroon
186	13-Oct-2024	Sea Argos	1	9004815	4,059	Gambia
187	13-Oct-2024	Kiymet Ana	1	9669263	5,848	Liberia
188	16-Oct-2024	Sea Argos	3	9004815	4,059	Gambia
189	16-Oct-2024	Royal Majesty (ex Hamsi)	5	9171735	8,941	Liberia
190	21-Oct-2024	Victoria	5	9107708	6,491	Cameroon
191	21-Oct-2024	Mistral	4	9177674	6,711	Tanzania
192	29-Oct-2024	Marisa N	16	8004090	1,714	Cameroon
193	29-Oct-2024	Alma Marine	9	9438250	9,057	Barbados
194	3-Nov-2024	Angel K	1	9208473	35,820	Tanzania
195	9-Nov-2024	Almuntazah	7	8860834	4,056	Cameroon
196	9-Nov-2024	Avax	4	9058713	1,241	Cameroon
197	9-Nov-2024	Angelo 2 (ex Karima/Beauty Queen)	12	9133393	4,282	Cameroon
198	13-Nov-2024	Angelo 1	10	7946942	566	Cameroon
199	13-Nov-2024	Sea Argos	4	9004815	4,059	Gambia
200	13-Nov-2024	Mistral	5	9177674	6,711	Tanzania
201	15-Nov-2024	Florian	5	9046590	1,139	Saint Kitts and Nevis
202	15-Nov-2024	Avax	5	9058713	1,241	Cameroon
203	15-Nov-2024	Nobel	12	9105114	46,144	Cameroon
204	22-Nov-2024	Angel K	2	9208473	35,820	Tanzania
205	26-Nov-2024	Angelo 1	11	7946942	566	Cameroon
206	26-Nov-2024	Sea Argos	5	9004815	4,059	Gambia
207	26-Nov-2024	Victoria	6	9107708	6,491	Cameroon
208	27-Nov-2024	Sea Argos	6	9004815	4,059	Gambia
209	1-Dec-2024	Avax	6	9058713	1,241	Cameroon
210	1-Dec-2024	Alisa	10	9113135	11,980	Comoros
211	1-Dec-2024	Kauthar (sailing as Sal Sabil)	4	9166156	15,748	UID
212	8-Dec-2024	Abacus	4	7427659	3,153	Cameroon
213	8-Dec-2024	Bebek-E (sailing as Body)	1	7808401	3,600	Türkiye
214	8-Dec-2024	Mistral	6	9177674	6,711	Tanzania
215	12-Dec-2024	Buraaq	1	8914829	14,972	Comoros
216	15-Dec-2024	Bebek-E (sailing as Body)	2	7808401	3,600	Türkiye
217	15-Dec-2024	Mistral	7	9177674	6,711	Tanzania
218	17-Dec-2024	Angelo 1	12	7946942	566	Cameroon
219	17-Dec-2024	Mardi	13	8853673	1,056	Cameroon
220	20-Dec-2024	Marisa N	17	8004090	1,714	Cameroon
221	25-Dec-2024	Mistral	8	9177674	6,711	Tanzania
222	29-Dec-2024	Aegean	1	8027705	2,770	Mongolia
223	29-Dec-2024	Avax	7	9058713	1,241	Cameroon
224	29-Dec-2024	Pearl 1	3	9166948	8,697	Saint Kitts and Nevis
225	9-Jan-2025	Mardi	14	8853673	1,056	Cameroon
226	11-Jan-2025	Aegean	2	8027705	2,770	Mongolia
227	15-Jan-2025	Eni	1	9258674	46,349	UID
228	23-Jan-2025	Marisa N	18	8004090	1,714	Cameroon
229	23-Jan-2025	Mistral	9	9177674	6,711	Tanzania

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
230	1-Feb-2025	Alisa	11	9113135	11,980	Comoros
231	1-Feb-2025	Mistral	10	9177674	6,711	Tanzania
232	11-Feb-2025	Marisa N	19	8004090	1,714	Cameroon
233	11-Feb-2025	Mardi	15	8853673	1,056	Cameroon
234	17-Feb-2025	Bebek-E (sailing as Body)	3	7808401	3,600	Türkiye
235	17-Feb-2025	Nobel	13	9105114	46,144	Cameroon
236	17-Feb-2025	Silver Star 5 (ex Mistral)	11	9177674	6,711	Tanzania
237	23-Feb-2025	Chios (ex Sophia)	6	7113375	3,184	Comoros
238	3-Mar-2025	Rino	1	1031537	4,479	UID
239	3-Mar-2025	Eve	1	9020467	3,748	Tanzania
240	10-Mar-2025	Nour 1	1	8724810	3,389	Libya
241	10-Mar-2025	Silver Star 5 (ex Mistral)	12	9177674	6,711	Tanzania
242	17-Mar-2025	Marisa N	20	8004090	1,714	Cameroon
243	22-Mar-2025	Mardi	17	8853673	1,056	Cameroon
244	25-Mar-2025	Avax	8	9058713	1,241	Cameroon
245	25-Mar-2025	Alisa	12	9113135	11,980	Comoros
246	25-Mar-2025	Angelo 2 (ex Karima/Beauty Queen)	13	9133393	4,282	Cameroon
247	2-Apr-2025	Mardi	16	8853673	1,056	Cameroon
248	2-Apr-2025	Nobel	14	9105114	46,144	Cameroon
249	6-Apr-2025	Golroo	1	9167148	34,987	Iran
250	19-Apr-2025	Nour 1	2	8724810	3,389	Libya
251	19-Apr-2025	Avax	9	9058713	1,241	Cameroon
252	19-Apr-2025	Silver Star 5 (ex Mistral)	13	9177674	6,711	Tanzania
253	26-Apr-2025	Lady Jasmine (ex Rino)	2	1031537	4,479	Tanzania
254	26-Apr-2025	Mardi	10	8853673	1,056	Cameroon
255	13-May-2025	Nobel	15	9105114	46,144	Cameroon
256	18-May-2025	Victoria	7	9107708	6,491	Cameroon
257	22-May-2025	Silver Star 5 (ex Mistral)	14	9177674	6,711	Tanzania
258	31-May-2025	Angelo 1	13	7946942	566	Cameroon
259	5-Jun-2025	Royal Majesty (ex Hamsi)	6	9171735	8,941	Panama
260	6-Jun-2025	Avax	10	9058713	1,241	Cameroon
261	14-Jun-2025	Blue Castor	2	6403424	610	Albania
262	14-Jun-2025	Victoria	8	9107708	6,491	Cameroon
263	14-Jun-2025	Angel K	3	9208473	35,820	Tanzania
264	22-Jun-2025	Mardi	18	8853673	1,056	Cameroon
265	25-Jun-2025	Avax	11	9058713	1,241	Cameroon
266	29-Jun-2025	Lady Jasmine (ex Rino)	3	1031537	4,479	Tanzania
267	29-Jun-2025	Victoria	9	9107708	6,491	Cameroon
268	5-Jul-2025	Marisa N	21	8004090	1,714	Cameroon
269	13-Jul-2025	Bebek-E (sailing as Body)	4	7808401	3,600	Türkiye
270	13-Jul-2025	Mardi	19	8853673	1,056	Cameroon
271	20-Jul-2025	Abacus	5	7427659	3,153	Cameroon
272	20-Jul-2025	Marisa N	22	8004090	1,714	Cameroon
273	20-Jul-2025	Sea Argos	7	9004815	4,059	Gambia
274	20-Jul-2025	Golroo	2	9167148	34,987	Iran
275	31-Jul-2025	Mardi	20	8853673	1,056	Cameroon
276	31-Jul-2025	Rina (ex Anna)	4	9118159	4,972	UID
277	31-Jul-2025	Silver Star 5 (ex Mistral)	15	9177674	6,711	Tanzania
278	6-Aug-2025	Marisa N	23	8004090	1,714	Cameroon
279	6-Aug-2025	Royal Majesty (ex Hamsi)	7	9171735	8,941	Panama
280	6-Aug-2025	Angel K	4	9208473	35,820	Tanzania
281	10-Aug-2025	Piero A	2	9010955	2,698	Palau
282	11-Aug-2025	Mardi	21	8853673	1,056	Cameroon
283	11-Aug-2025	Angelo 2 (ex Karima/Beauty Queen)	14	9133393	4,282	Cameroon
284	18-Aug-2025	Victoria	10	9107708	6,491	Cameroon
285	23-Aug-2025	Angelo 1	14	7946942	566	Cameroon
286	30-Aug-2025	Angelo 1	15	7946942	566	Cameroon
287	30-Aug-2025	Madenli	1	9102356	2,689	Palau
288	30-Aug-2025	Diana 1	1	9211119	1,485	UID

<i>Visit</i>	<i>Date observed</i>	<i>Name of vessel</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>DWT</i>	<i>Flag State</i>
289	9-Sep-2025	Mardi	11	8853673	1,056	Cameroon
290	17-Sep-2025	Victoria	11	9107708	6,491	Cameroon
291	17-Sep-2025	Royal Majesty (ex Hamsi)	8	9171735	8,941	Panama
292	17-Sep-2025	Silver Star 5 (ex Mistral)	16	9177674	6,711	Tanzania
293	5-Oct-2025	Angel K	5	9208473	35,820	Tanzania
294	21-Oct-2025	Bebek-E (sailing as Body)	5	7808401	3,600	Türkiye
295	27-Dec-2025	Royal Majesty (ex Hamsi)	9	9171735	8,941	Panama
296	27-Dec-2025	Mardi	23	8853673	1,056	Cameroon

Sub-appendix 9.C.2 List of vessels identified by the Panel as operating under the Maeen Sharfeddin criminal network

Table 9.C.2.1

Vessels identified as operated by the Maeen Sharfeddin criminal network

No.	IMO	Vessel name	Flag State	DWT	Owner	Operator / Manager	Company representation by network member ^a
1	7427659	Abacus	Cameroon	3,153	Abacus Navigation SA (Marshall Islands)	Abacus Navigation SA (Marshall Islands)	Aleksandros Cenevezoz, Georgios Symeonidis
2	8027705	Aegean	Mongolia	2,770	Canary Navigation SA (Liberia)	Canary Navigation SA (Liberia)	
3	8860834	Almuntazah	Cameroon	4,056	Deepblue SH Shipping Ltd (Marshall Islands)	Deepblue SH Shipping Ltd (Marshall Islands)	
4	9208473	Angel K	Tanzania (Zanzibar)	35,820	NRK General Trading Ltd (Marshall Islands)	Sarisa Shipping SA (Marshall Islands) / Arvina Trade LLC (Marshall Islands)	Aleksandros Cenevezoz, Nurettin Kutlu, Mohanad Abubaker Albanghazi, Sinan Koroglu
5	7946942	Angelo 1 (ex Petrol 1)	Cameroon	566	Mystical Ventures Inc (Marshall Islands)	Mystical Ventures Inc (Marshall Islands)	Aleksandros Cenevezoz
6	9133393	Angelo 2 (ex Karima)	Cameroon	3,710	Isthar Ventures Co (Marshall Islands)	Isthar Ventures Co (Marshall Islands) / Arvina Trade LLC (Marshall Islands)	Aleksandros Cenevezoz, Nurettin Kutlu, Sinan Koroglu
7	8946822	Asel (ex Denizati)	Tanzania	1,500	Aradas Energy Shipping Inc (Liberia)	Aradas Energy Shipping Inc (Liberia)	Karim Mohamed Osman Hamed
8	9058713	Avax (ex Ngol Cubango)	Cameroon	1,241	Nazar Maritime SA (Marshall Islands)	Nazar Maritime SA (Marshall Islands)	Aleksandros Cenevezoz
9	7808401	Body (ex Bebek-E)	Türkiye	3,600	Alasonya Denizcilik Tic Ltd (Türkiye)	Alasonya Denizcilik Tic Ltd (Türkiye)	
10	7113375	Chios	Comoros	3,184	Aradas Energy LLC (Belize)	Aradas Energy LLC (Belize)	Karim Mohamed Osman Hamed
11	9057551	Emaar 1 (ex Sidra, Rowad A, Malek)	UID	1,950	Rec Petroleum Co (Liberia)	Rec Petroleum Co (Liberia)	
12	7128227	Fair A	Tanzania	2,007	Tawer Ltd (China)	Three Friends Shipping Ltd (Marshall Islands)	
13	9140853	Juliet	Comoros	9,750	Jessica Shipping Co SA (Belize)	Jessica Shipping Co SA (Belize)	

No.	IMO	Vessel name	Flag State	DWT	Owner	Operator / Manager	Company representation by network member ^a
14	1031537	Lady Jasmine (ex Rino)	Tanzania	4,479	Aura Shipping Inc (Marshall Islands)	Aura Shipping Inc (Marshall Islands)	Karim Mohamed Osman Hamed
15	8853673	Mardi (ex Densa Demet)	Cameroon	1,056	Atlantida Shipping Ltd (Marshall Islands)	Atlantida Shipping Ltd (Marshall Islands)	Aleksandros Cenevezoz
16	8004090	Marisa N	UID	1,714	Mohar Shipping & Trading Inc (Marshall Islands)	Mohar Shipping & Trading Inc (Marshall Islands)	Aleksandros Cenevezoz
17	9105114	Nobel	Cameroon	46,144	Fineas Marine inc. (Marshall Islands)	Fineas Marine inc. (Marshall Islands) / Arvina Trade LLC (Marshall Islands)	Maeen Sharfeddin, Aleksandros Cenevezoz, Nurettin Kutlu, Mohanad Abubaker Albanghazi, Sinan Koroglu
18	9010955	Piero A	Comoros	2,698	Piero Navigation Corp (Panama)	Piero Navigation Corp (Panama)	
19	9118159	Rina (ex Anna)	UID	4,972	Anna Maritime Co SA (Belize)	Anna Maritime Co SA (Belize)	
20	9171735	Royal Majesty (ex Hamsi)	Panama	8,941	Silver Shipping & Trading Co (Marshall Islands)	Silver Shipping & Trading Co (Marshall Islands)	Mohanad Abubaker Albanghazi
21	9004815	Sea Argos (ex Queen Maria IV)	Tanzania	2,920	QM Shipping Inc (Liberia)	QM Shipping Inc (Liberia)	Karim Mohamed Osman Hamed
22	9177674	Silver Star V (ex Mistral)	Tanzania	4,346	Starlight Seasways Co (Marshall Islands)	Starlight Seasways Co (Marshall Islands)	Mohanad Abubaker Albanghazi
23	8884476	Tony	UID	3,742	Delal Shipping Ltd (Marshall Islands)	Delal Shipping Ltd (Marshall Islands)	
24	9107708	Victoria	Cameroon	6,491	Mass Petrox Inc. (Marshall Islands)	Arvina Trade LLC (Marshall Islands)	Maeen Sharfeddin, Nurettin Kutlu, Sinan Koroglu

^a Selcuk Sencer Esenyel registered all Marshall Islands registered companies for the network.

Table 9.C.2.2

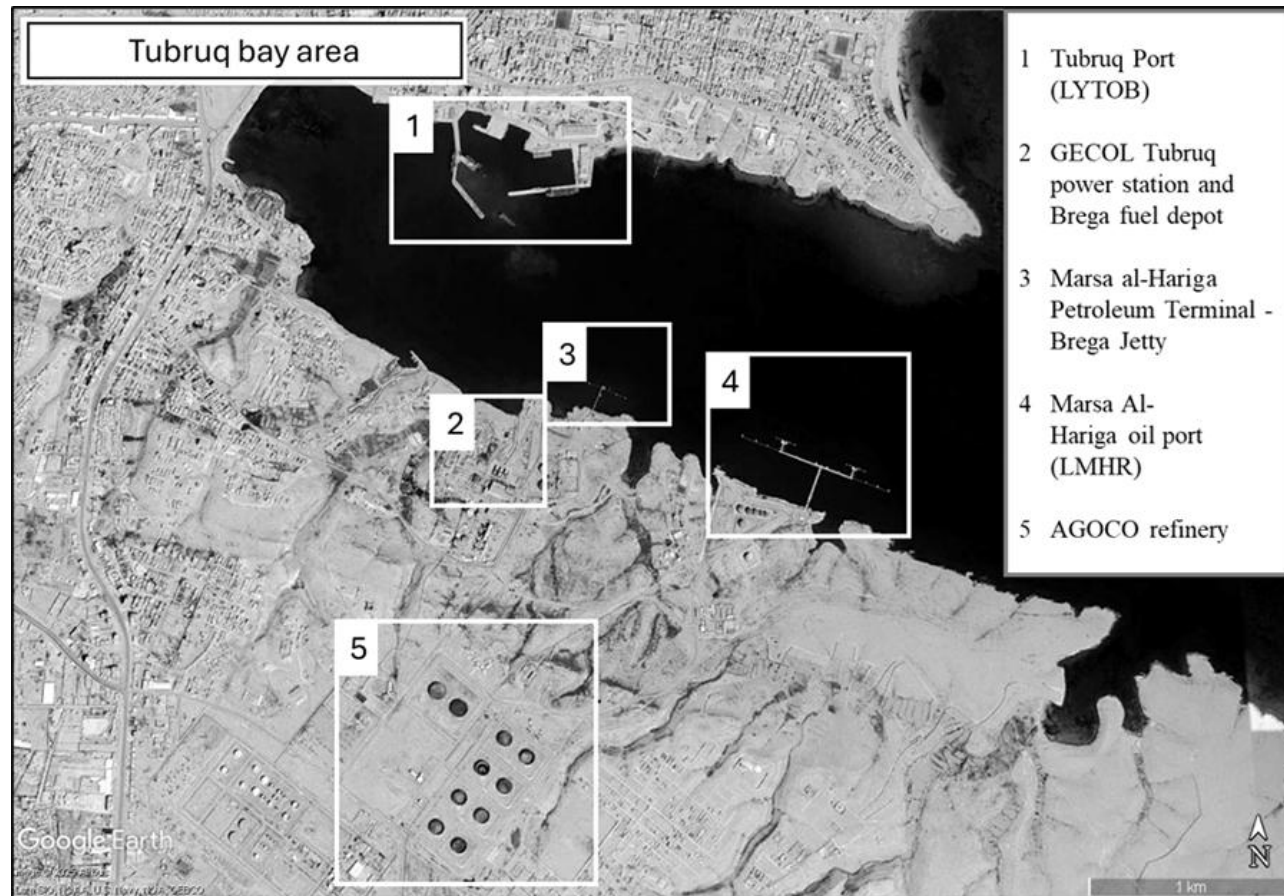
Vessels previously identified as operated by the Maeen Sharfeddin criminal network but no longer active

<i>No.</i>	<i>IMO</i>	<i>Vessel name</i>	<i>Flag State</i>	<i>DWT</i>	<i>Owner</i>	<i>Operator / Manager</i>	<i>Company representation by network member ^a</i>
1	9438250	Alma Marine	Barbados	9,057	Amka Marine Ltd	Sarisa Shipping SA / Arvina Trade LLC (Marshall Islands)	Aleksandros Cenevezoz, Nurettin Kutlu
2	6501355	Aristo	Cameroon	1,055	UID	UID	Aleksandros Cenevezoz
3	9046590	Florian ^a	Saint Kitts and Nevis	1,139	Florian Shipping SA	Galazio Shipping Co	n/a ^a
4	9046758	Maya 1	Cameroon	1,200	Redwings Shipping SA (Marshall Islands)	Redwings Shipping SA (Marshall Islands)	Aleksandros Cenevezoz
5	9327310	Eliana	Malta	5,794	Garanti Denizcilik AS (Türkiye)	Bilka Denizcilik Sanayi Ticaret AS (Türkiye)	Aleksandros Cenevezoz

^a Vessel was illegally appropriated by the network through an armed robbery against ships (see above section H); the Panel confirmed that she is no longer operated by the network.

Sub-appendix 9.C.3 Tubruq port

Figure 9.C.3.1
Overview of Tubruq bay with Tubruq port and Marsa Al-Hariga

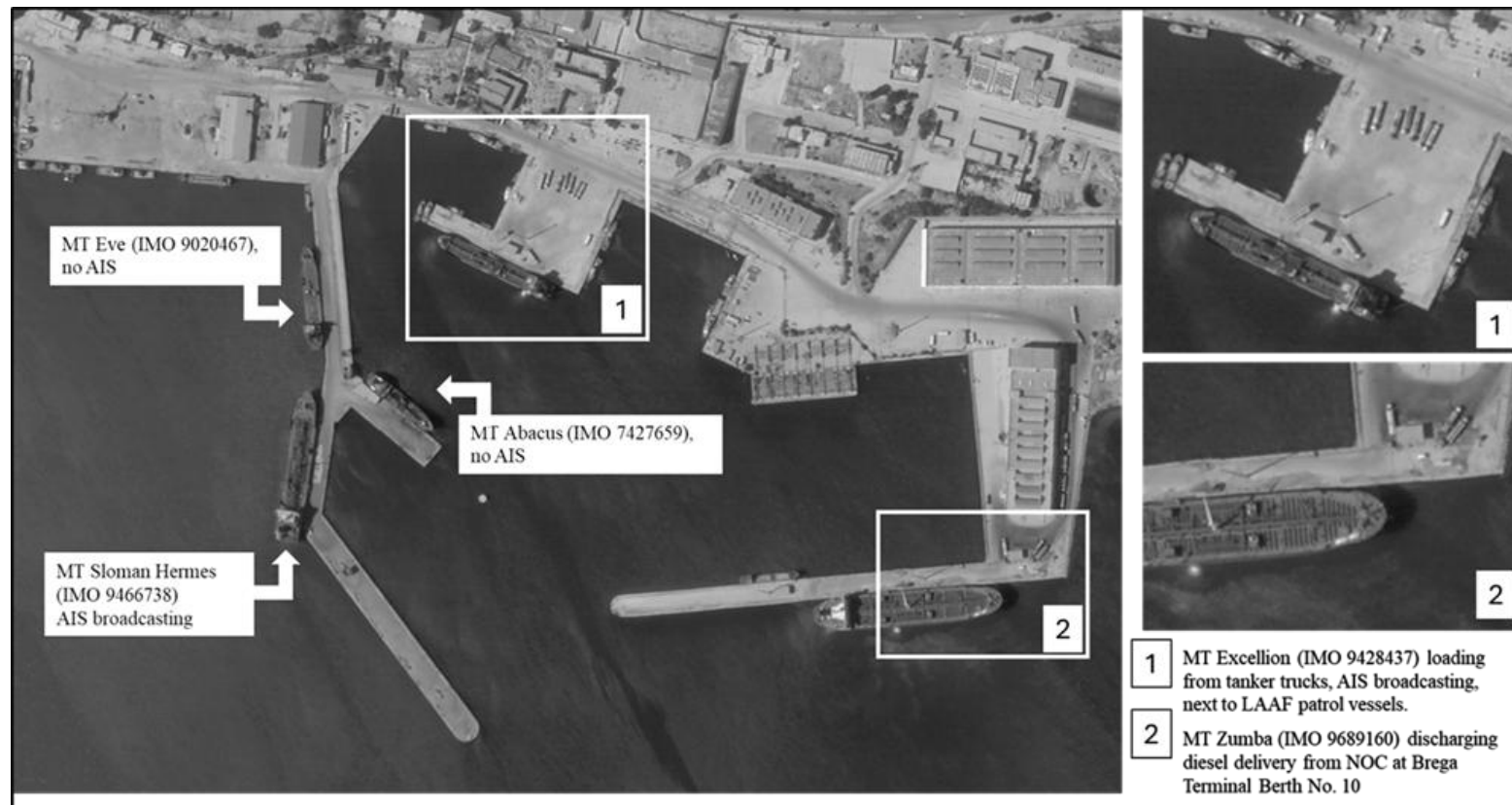


Developed by Panel of Experts

Source: Google Earth, 9 March 2025, @ 2025 Airbus.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 9.C.3.2
Sample image of tanker vessel activity at Tubruq port (12 April 2025)

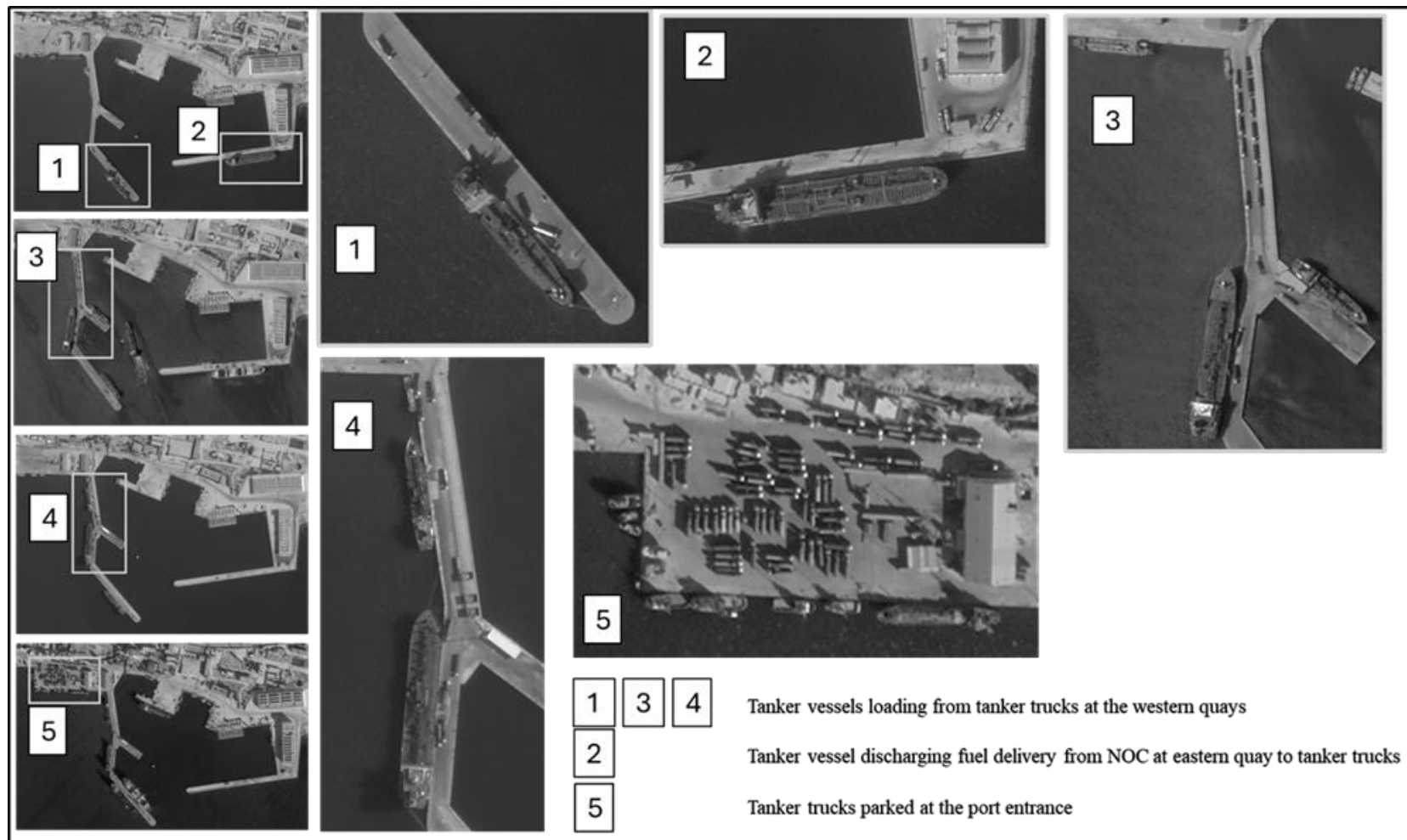


Developed by Panel of Experts

Source: Planet Labs, 12 April 2024; S&P Maritime Risk Intelligence Suite.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 9.C.3.3
Sample images of tanker vessels and tanker truck activity at Tubruq port (multiple dates)



Developed by Panel of Experts

Source: Planet Labs, 16 February 2025 (with markings [1] and [2]); 24 April 2025 (with marking [3]); 12 June 2025 (with marking [4]); 26 November 2025 (with marking [5]).

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Table 9.C.3.1

List of tanker vessels loading from tanker trucks in Tubruq port, western quays

<i>Visit</i>	<i>Name</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>Flag State</i>	<i>DWT</i>	<i>Arrival</i>	<i>Departure</i>
1	Aegean ^a	1	8027705	Mongolia	2,770	30-Nov-23	03-Dec-23
2	Sampatiki	1	9405772	Greece	6,436	10-Mar-24	14-Mar-24
3	Sampatiki	2	9405772	Greece	6,436	26-Mar-24	29-Mar-24
4	Sampatiki	3	9405772	Greece	6,436	25-May-24	30-May-24
5	Sampatiki	4	9405772	Greece	6,436	06-Jun-24	12-Jun-24
6	Sampatiki	5	9405772	Greece	6,436	22-Jun-24	24-Jun-24
7	Sampatiki	6	9405772	Greece	6,436	04-Jul-24	07-Jul-24
8	Sampatiki	7	9405772	Greece	6,436	14-Jul-24	17-Jul-24
9	Sampatiki	8	9405772	Greece	6,436	24-Jul-24	28-Jul-24
10	Scot Leipzig	1	9260847	Malta	8,230	18-Aug-24	21-Aug-24
11	Sampatiki	9	9405772	Greece	6,436	24-Aug-24	29-Aug-24
12	Scot Leipzig	2	9260847	Malta	8,230	27-Aug-24	02-Sept-24
13	Sampatiki	10	9405772	Greece	6,436	07-Sept-24	12-Sept-24
14	Sampatiki	11	9405772	Greece	6,436	26-Sept-24	02-Oct-24
15	Sampatiki	12	9405772	Greece	6,436	08-Oct-24	11-Oct-24
16	Sampatiki	13	9405772	Greece	6,436	16-Oct-24	23-Oct-24
17	Sampatiki	14	9405772	Greece	6,436	29-Oct-24	02-Nov-24
18	Sampatiki	15	9405772	Greece	6,436	07-Nov-24	11-Nov-24
19	Sampatiki	16	9405772	Greece	6,436	17-Nov-24	21-Nov-24
20	Accord	1	9507972	Portugal	5,897	21-Nov-24	22-Nov-24
21	Sampatiki	17	9405772	Greece	6,436	28-Nov-24	01-Dec-24
22	Trend	1	9477177	Togo	7,119	10-Dec-24	18-Dec-24
23	Royal Majesty ^a	1	9171735	Panama	8,941	11-Dec-24	19-Dec-24
24	Sampatiki	18	9405772	Greece	6,436	06-Jan-25	08-Jan-25
25	Sea Argos ^a	1	9004815	Gambia	4,059	10-Jan-25	14-Jan-25
26	Royal Majesty ^a	2	9171735	Panama	8,941	14-Jan-25	21-Jan-25
27	Sampatiki	19	9405772	Greece	6,436	14-Jan-25	18-Jan-25
28	Angelo 1 ^a	1	7946942	Cameroon	566	28-Jan-25	28-Jan-25 ^b
29	Professor Aziz Aliyev	1	9823821	Panama	7,002	31-Jan-25	04-Feb-25
30	Sampatiki	20	9405772	Greece	6,436	02-Feb-25	09-Feb-25
31	Rina ^a	1	9118159	Unknown	4,972	04-Feb-25	09-Feb-25
32	Eve	1	9020467	Tanzania	3,748	15-Feb-25	15-Feb-25 ^b
33	Angelo 2 ^a	1	9133393	Cameroon	4,282	15-Feb-25	21-Feb-25 ^b
34	Royal Majesty ^a	3	9171735	Panama	8,941	15-Feb-25	23-Feb-25
35	Sampatiki	21	9405772	Greece	6,436	17-Feb-25	20-Feb-25
36	Havva Ana	1	9997385	Liberia	8,864	25-Feb-25	04-Mar-25
37	Sampatiki	22	9405772	Greece	6,436	05-Mar-25	10-Mar-25
38	Sea Argos ^a	2	9004815	Gambia	4,059	13-Mar-25	19-Mar-25
39	Royal Majesty ^a	4	9171735	Panama	8,941	15-Mar-25	22-Mar-25
40	Sampatiki	23	9405772	Greece	6,436	19-Mar-25	23-Mar-25
41	Seaven Joy	1	9539949	Greece	4,753	21-Mar-25	26-Mar-25
42	Sampatiki	24	9405772	Greece	6,436	28-Mar-25	30-Mar-25
43	Sloman Hermes	1	9466738	Antigua & Barbuda	16,418	03-Apr-25	21-Apr-25
44	Excellion	1	9428437	Panama	7,842	09-Apr-25	16-Apr-25
45	Eve	2	9020467	Tanzania	3,748	12-Apr-25	20-Apr-25 ^b
46	Abacus ^a	1	7427659	Cameroon	3,153	12-Apr-25	20-Apr-25 ^b
47	Erin Schulte	1	9439814	Isle Of Man	16,716	21-Apr-25	20-May-25
48	Sea Argos ^a	3	9004815	Gambia	4,059	30-Apr-25	09-May-25
49	Aegean ^a	2	8027705	Mongolia	2,770	01-May-25	22-May-25
50	Abacus ^a	2	7427659	Cameroon	3,153	17-May-25	18-May-25
51	Sarajevo	1	9477490	Malta	11,320	20-May-25	31-May-25

<i>Visit</i>	<i>Name</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>Flag State</i>	<i>DWT</i>	<i>Arrival</i>	<i>Departure</i>
52	Marisa N ^a	1	8004090	Unknown	1,714	22-May-25	24-May-25
53	Global Eagle	1	9422847	Unknown	9,040	28-May-25	02-Jun-25
54	Marisa N ^a	2	8004090	Unknown	1,714	29-May-25	01-Jun-25
55	Songa Opal	1	9473913	Malta	17,588	07-Jun-25	16-Jun-25
56	Abacus ^a	3	7427659	Cameroon	3,153	11-Jun-25	18-Jun-25
57	Songa Crystal	1	9378321	Malta	12,927	20-Jun-25	01-Jul-25
58	Aegean ^a	3	8027705	Mongolia	2,770	23-Jun-25	26-Jun-25
59	Angelo 2 ^a	2	9133393	Cameroon	4,282	01-Jul-25	04-Jul-25 ^b
60	Sarajevo	2	9477490	Malta	11,320	07-Jul-25	14-Jul-25
61	Eve	3	9020467	Tanzania	3,748	15-Jul-25	18-Jul-25 ^b
62	Songa Opal	2	9473913	Malta	17,588	25-Jul-25	11-Aug-25
63	Mazu Xiao	1	9503940	Liberia	7,739	27-Jul-25	30-Sept-25
64	Emma	1	9321421	Guyana False	8,033	05-Aug-25	28-Aug-25
65	Songa Crystal	2	9378321	Malta	12,927	18-Aug-25	31-Aug-25
66	Abacus ^a	4	7427659	Cameroon	3,153	19-Aug-25	29-Aug-25
67	Aegean ^a	4	8027705	Mongolia	2,770	26-Aug-25	31-Aug-25
68	Songa Sapphire	1	9444467	Malta	17,596	11-Sept-25	22-Sept-25
69	Sarajevo	3	9477490	Malta	11,320	24-Sept-25	07-Oct-25
70	Aegean ^a	5	8027705	Mongolia	2,770	30-Sept-25	30-Sept-25 ^b
71	Silendi	1	9508720	Malta	19,964	03-Oct-25	20-Oct-25
72	Songa Sapphire	2	9444467	Malta	17,596	16-Oct-25	27-Oct-25
73	Owl 6	1	9340350	Marshall Islands	13,006	17-Oct-25	09-Dec-25
74	Sarajevo	4	9477490	Malta	11,320	27-Oct-25	12-Nov-25
75	Aegean ^a	6	8027705	Mongolia	2,770	28-Oct-25	30-Oct-25
76	Marisa N ^a	3	8004090	Unknown	1,714	10-Nov-25	19-Nov-25
77	Songa Ruby	1	9444479	Malta	17,604	10-Nov-25	04-Dec-25
78	Sarajevo	5	9477490	Malta	11,320	19-Nov-25	25-Nov-25
79	Songa Crystal	3	9378321	Malta	12,927	23-Nov-25	24-Nov-25
80	Royal Majesty ^a	5	9171735	Panama	8,941	26-Nov-25	29-Nov-25
81	Songa Opal	3	9473913	Malta	17,588	29-Nov-25	22-Dec-25
82	Angelo 1 ^a	2	7946942	Cameroon	566	02-Dec-25	02-Dec-25 ^b
83	Sarajevo	6	9477490	Malta	11,320	07-Dec-25	09-Dec-25
84	Sarajevo	7	9477490	Malta	11,320	17-Dec-25	22-Dec-25 ^b
85	Royal Majesty ^a	6	9171735	Panama	8,941	22-Dec-25	25-Dec-25
86	Yeni Yuzyl	1	9575929	Türkiye	13,477	22-Dec-25	29-Dec-25

^a Vessel identified as operating under the Maecen Sharfeddin criminal network

^b Operating without AIS; date of arrival is first date identified on satellite imagery, date of departure is last date identified on satellite imagery

Sub-appendix 9.C.4 Ras Lanuf harbour

Figure 9.C.4.1

Left and center: Ras Lanuf harbour cargo quay with three pumps (4 December 2025); Right top and bottom: Maeen Sharfeddin criminal network vessels MT Angelo 2 (IMO 9133393), MT Aegean (IMO 8027705) loading from four tanker trucks



Developed by Panel of Experts

Source: Planet Labs, 4 December 2025 (left, middle); 20 December 2025 (right).

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Table 9.C.4.1

Tanker vessels identified by the Panel in Ras Lanuf, October through December 2025 (all vessels operated by Maeen Sharfeddin criminal network)

<i>Visit</i>	<i>Name</i>	<i>Visit no.</i>	<i>IMO number</i>	<i>Flag State</i>	<i>DWT</i>	<i>Arrival</i>	<i>Departure</i>
1	Angel K ^a	1	9208473	Tanzania	35,820	23-Oct-25	30-Nov-25
2	Royal Majesty ^a	1	9171735	Panama	8,941	23-Oct-25	02-Nov-25
3	Angelo 2 ^a	1	9133393	Cameroon	3,710	15-Nov-25	16-Jan-26
4	Marisa N ^a	1	8004090	Unknown	1,714	09-Dec-25	18-Dec-25
5	Atlantis Antao	1	9316012	Malta	3,503	20-Dec-25 ^b	20-Dec-25 ^b
6	Aegean ^a	1	8027705	Mongolia	2,770	20-Dec-25	26-Dec-25

^a Vessel identified as operating under the Maeen Sharfeddin criminal network

^b Operating without AIS; date of arrival is first date identified on satellite imagery, date of departure is last date identified on satellite imagery

Sub-appendix 9.C.5 Visits of tanker vessels carrying illicitly exported petroleum from Libya at OPL Port Said, including port calls at Port Said and Alexandria, Egypt

Table 9.C.5.1

OPL Port Said calls and port calls at Port Said (EGPSD) between December 2024 and November 2025

<i>Ship Name</i>	<i>IMO/LR/IHS No.</i>	<i>Arrival</i>	<i>Departure</i>	<i>Call type</i>
Nobel ^a	9105114	25-Dec-24	29-Dec-24	OPL
Alisa	9113135	31-Dec-24	01-Jan-25	OPL
Golroo	9167148	01-Jan-25	04-Feb-25	OPL
Juliet ^a	9140853	10-Jan-25	11-Jan-25	OPL
Chios ^a	7113375	30-Jan-25	01-Feb-25	OPL
Marisa N ^a	8004090	30-Jan-25	30-Jan-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	05-Feb-25	07-Feb-25	OPL
Golroo	9167148	26-Feb-25	26-Feb-25	OPL
Chios ^a	7113375	01-Mar-25	16-Mar-25	OPL
Nobel ^a	9105114	11-Mar-25	15-Mar-25	OPL
Golroo	9167148	12-Mar-25	29-Mar-25	OPL
Chios ^a	7113375	23-Mar-25	31-Mar-25	OPL
Bebek-E (sailing as Body) ^a	7808401	30-Mar-25	05-Apr-25	OPL
Chios ^a	7113375	08-Apr-25	17-Apr-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	14-Apr-25	16-Apr-25	OPL
Chios ^a	7113375	19-Apr-25	29-Apr-25	OPL
Nobel ^a	9105114	20-Apr-25	25-Apr-25	OPL
Silver Star V (ex Mistral) ^a	9177674	27-Apr-25	02-May-25	OPL
Silver Star V (ex Mistral) ^a	9177674	03-May-25	03-May-25	OPL
Bebek-E (sailing as Body) ^a	7808401	07-May-25	10-May-25	OPL
Golroo	9167148	09-May-25	13-May-25	OPL
Royal Majesty (ex Hamsi) ^a	9171735	10-May-25	22-May-25	OPL
Royal Majesty (ex Hamsi) ^a	9171735	10-May-25	22-May-25	OPL
Alisa	9113135	15-May-25	15-May-25	OPL
Juliet ^a	9140853	23-May-25	24-May-25	OPL
Victoria ^a	9107708	24-May-25	27-May-25	OPL
Abacus ^a	7427659	25-May-25	26-May-25	OPL
Golroo	9167148	25-May-25	26-May-25	OPL
Nobel ^a	9105114	26-May-25	28-May-25	Port call (26-May-25)
Chios ^a	7113375	31-May-25	31-May-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	07-Jun-25	09-Jun-25	OPL
Juliet ^a	9140853	11-Jun-25	11-Jun-25	OPL
Silver Star V (ex Mistral) ^a	9177674	14-Jun-25	18-Jun-25	OPL
Bebek-E (sailing as Body) ^a	7808401	21-Jun-25	30-Jun-25	OPL
Royal Majesty (ex Hamsi) ^a	9171735	21-Jun-25	21-Jun-25	Port call
Silver Star V (ex Mistral) ^a	9177674	27-Jun-25	27-Jun-25	OPL
Chios ^a	7113375	28-Jun-25	04-Jul-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	02-Jul-25	03-Jul-25	OPL
Abacus ^a	7427659	05-Jul-25	06-Jul-25	OPL

<i>Ship Name</i>	<i>IMO/LR/IHS No.</i>	<i>Arrival</i>	<i>Departure</i>	<i>Call type</i>
Victoria ^a	9107708	10-Jul-25	10-Jul-25	OPL
Bebek-E (sailing as Body) ^a	7808401	21-Jul-25	26-Jul-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	07-Sep-25	07-Sep-25	OPL
Chios ^a	7113375	09-Sep-25	23-Sep-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	17-Sep-25	21-Sep-25	OPL
Golroo	9167148	24-Sep-25	25-Sep-25	OPL
Silver Star V (ex Mistral) ^a	9177674	27-Sep-25	29-Sep-25	OPL
Victoria ^a	9107708	10-Oct-25	10-Oct-25	OPL
Chios ^a	7113375	11-Oct-25	11-Oct-25	OPL
Bebek-E (sailing as Body) ^a	7808401	14-Oct-25	24-Oct-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	16-Oct-25	02-Nov-25	OPL
Marisa N ^a	8004090	24-Oct-25	01-Nov-25	OPL
Silver Star V (ex Mistral) ^a	9177674	24-Oct-25	25-Oct-25	OPL
Golroo	9167148	28-Oct-25	10-Nov-25	OPL
Silver Star V (ex Mistral) ^a	9177674	03-Nov-25	10-Nov-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	11-Nov-25	14-Nov-25	OPL
Sea Argos (ex Queen Maria IV) ^a	9004815	20-Nov-25	20-Nov-25	OPL

^a Vessel identified as operating under the Maeen Sharfeddin criminal network

Table 9.C.5.2

Port calls at Alexandria (EGALY)

<i>Ship Name</i>	<i>IMO/LR/IHS No.</i>	<i>Arrival</i>	<i>Departure</i>	<i>Call type</i>
Silver Star V (ex Mistral) ^a	9177674	02-Mar-25	04-Mar-25	Port call
Silver Star V (ex Mistral) ^a	9177674	05-Feb-25	08-Feb-25	Port call
Silver Star V (ex Mistral) ^a	9177674	14-Jan-25	16-Jan-25	Port call
Alisa	9113135	24-Feb-25	26-Feb-25	Port call
Angel K ^a	9208473	23-Jul-25	24-Jul-25	Port call
Fair A ^a	7128227	17-Apr-25	30-May-25	Port call

^a Vessel identified as operating under the Maeen Sharfeddin criminal network

Appendix 9.D: Sample certificate of origin for VLSFO exported from Tubruk

Figure 9.D.1

Sample certificate of origin for very low sulphur fuel oil (VLSFO) exported from Tubruk

State of Libya The General Union for Commerce, Industry & Agriculture Chambers Commerce, Industry and Agriculture Chamber Tobruk		دولة ليبيا الاتحاد العام لغرف التجارة والصناعة والزراعة غرفة التجارة والصناعة والزراعة طبرق
0000243		
شهادة منشأ CERTIFICATE OF ORIGIN		
Name : <u>MASAR AL FOUZ OIL SERVICES COMPANY</u> : الاسم :		
Residing at : <u>VENICE STREES - BENGHAZI - LIBYA</u> : مقيم :		
Has forwarded to : <u>WHITEWAY TEKNOLOJI DIS TICARET SIRKETI</u> : شحن إلى :		
<u>Kultur Mahallesi, Vinse Cikmazi Sokak No: 1/13, 34340 Ulus - Besiktas, TURKEY, on Behalf of : SOLID</u>		
<u>MADENSILIK SANYI VE TICARET LIMITED SIRKETI. Maslak Mahallesi Eski buyukdere Cad Iz Plaza No</u>		
<u>9/17 Sanyer ISTANBUL - TURKEY</u>		
Kind of goods & Quantity : <u>VLSFO</u> : نوع البضاعة وكميتها :		
<u>QUANTITY : 5718.886 IN VAC . ORIGIN : LIBYA. INVOICE NO : 2487 Dated :</u>		
<u>21/04/2024. Port of Loading : Tobruk. Port of Discharge : GREECE For Order</u>		
By M/T : <u>[REDACTED]</u> B/L NO: 2024/ 003		
يشهد بان البضاعة المذكورة اعلاه من اصل صادرات ليبيا		
It is certified that the above Mentioned goods are of Libyan origin		
Tobruk : 22/04/2024	طبرق : 22/04/2024	
The Authorized Signature :	المخول بالتوقيع :	
		
☎ 0911376763 - 0925999501 : هاتف Tobrukchamber.ly		
طبرق. ليبيا. عمارة التأمين info@tobrukchamber.ly		

Source: Confidential. Redaction applied by the Panel.

Order of reassignment of military personnel to a unit under Abdelsalam Zubi control, signed by Abdelsalam al-Zubi on 13 October 2024





على الإدارة العامة للحسابات العسكرية إدراج مرتبات المعنيين بالمادة الأولى من هذا القرار بدليل ركن حرس الحدود والأهداف الحيوية والعمل بموجب مخاطبة رسمية من الوحدات المنقولين إليها .

يعمل بهذا القرار من تاريخ صدوره وعلى الجهات المعنية تنفيذه كل فيما يخصه .

عبد السلام سالم الزوي
وكيل وزارة الدفاع
للمناطق والشؤون العسكرية



ي.م.ق / ا.م. أبو دبرس ::::::::::: □ القانونية .

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المدة: 13.10.2024 ميلادي

Annex 11 Terrorist threats

A. General threat environment

1. The Panel assessed the threat linked to Libya primarily through the persistence of enabling and facilitative ecosystems, rather than through immediate operational activity of terrorist groups and affiliated individuals. Structural drivers, including porous borders, limited State presence and the spillover effects of conflicts and political crises in neighbouring States, continued to render southern Libya a fostering environment in which entrenched smuggling economies and cross-border criminal corridors converged. Within this context, terrorist groups and affiliated individuals embedded themselves within broader illicit systems to generate revenue, particularly those linked to migrant smuggling and natural resource trafficking.
2. The Panel identified multiple instances in which individuals affiliated with terrorist entities leveraged these ecosystems to generate revenue and facilitate movement. In at least four newly documented cases, terrorist-affiliated individuals used hawala-based financial transfers to obtain funds from the families of migrants smuggled through Libyan territory. Such practices allowed these actors to access financing while minimizing exposure to any counter-terrorism efforts.
3. At the international level, the increasing scrutiny to identify suspicious financial transactions compelled terrorist groups and individuals linked to Libya to adapt their operating models of collecting and managing revenue. The Panel observed a shift towards low visibility operative models through: a) a diversification of revenue sources; b) an increased reliance on informal and digital financial tools; and c) an exploitation of online platforms for recruitment. The Panel found that terrorist groups based in Libya played the role of intermediary in the recruitment for other groups active in the region. While these adaptations reduced traceability, they preserved regional connectivity, reinforcing Libya's role as a logistical and facilitation hub within the wider North African and Sahelian terrorist and criminal networks.

B. Islamic State in Iraq and the Levant - Libya (ISIL-Libya) (QDe.165)

4. The Panel assessed that ISIL-linked activities connected to Libya continued to shift from operational planning towards a facilitative and enabling role within regional networks. Due to the limited ability to sustain territorial control in Libya, ISIL-Libya prioritized building resilience, force regeneration and cross-border connectivity over large-scale attacks.¹⁸⁴ As a result, Libya functioned less as a primary theatre of violence and more as a permissive environment supporting financing and logistical coordination for ISIL-aligned actors operating in Tunisia, Niger and Sudan.¹⁸⁵
5. ISIL-linked networks operating in and through Libya benefitted from their ability to embed themselves within existing criminal economies and migratory corridors, particularly in southern Libya. These environments provided access to revenue streams, established smuggling routes and vulnerable populations, while enabling ISIL-affiliated individuals to maintain a low profile and limit exposure to counter-terrorism measures. Concurrently, ISIL increasingly relied on digital tools, online platforms and emerging financial technologies to sustain recruitment, communication and coordination across borders.
6. In the Panel's assessment, these developments indicated that ISIL-linked activities connected to Libya during the reporting period were predominantly structural and facilitative, rather than dynamic or attack-oriented. The emphasis remained on maintaining presence, relevance and connectivity within regional criminal and terrorist ecosystems, rather than on projecting violence within Libyan territory.

C. Organization of Al-Qaida in the Islamic Maghreb (QDe.014)

7. The Panel documented that Al-Qaida affiliates, both Libyan and foreign terrorist fighters (FTFs), remained embedded within transnational criminal networks operating across southern Libya. These networks continued to provide their affiliates with protection, access, and logistical support. The Panel observed that such relationships are largely based on tribal and family ties, which allowed affiliates to avoid detection and sustain their presence in areas where security institutions remain weak.
8. The Panel further found that these affiliations facilitated the involvement of Al-Qaida-linked elements in multiple illicit activities, including the smuggling of subsidized Libyan fuel to Sahelian markets, arms trafficking across Libya's southern borders, and the smuggling of gold from artisanal mining sites in southern Libya and neighbouring countries. For

¹⁸⁴ S/2024/914, para. 25.

¹⁸⁵ Confidential sources (CS).

instance, in January 2025, the Panel determined that Al-Qaida-linked fighters were using tribal networks in the Murzuq and Sabha areas to secure their safe transit and protection during their movement.

9. In February 2025, the Panel found that Al-Qaida affiliates collaborated with local smugglers in Umm al-Aranib to move fuel along established illicit supply chains. Similarly, in March 2025, Nigerien security forces intercepted small arms shipments traced to Libya-based Al-Qaida facilitators operating along border routes.¹⁸⁶

10. The Panel found that in April 2025, Libyan-based gold traders collaborated with terrorist foreign fighters linked to Jama'a Nuṣrat ul-Islām wa al-Muslimīn (JNIM, QDe.159) to export gold from artisanal mining sites in the Sahel, through Libyan territory, to international markets. These findings indicate that, while the affiliates have limited capability to conduct large-scale attacks within Libya, they remain an integral part of regional transnational criminal and terrorist financing networks.

11. The Panel also found that tribal ties allowed AQIM (QDe.014) affiliates to evade counter-terrorism efforts in southern Libya. In several instances, security operations targeting Al-Qaida-linked individuals were unsuccessful as tribal connections provided them with shelter, advance warning, and facilitated their movement across porous borders.¹⁸⁷

Table 11.1

Sources of revenue of terrorist groups operating in Libya¹⁸⁸

<i>Activities</i>	<i>Comments</i>
Trafficking of illicit and unregulated goods	Mostly locally produced alcohol, hygiene products, food and medication.
Trafficking of arms and related materiel	Overall, terrorist groups facilitated the movement of traffickers along the routes they control. This facilitation was extended for financial gains and was brokered through tribal connections. - Cases in which the Panel identified the direct involvement of terrorist groups in the trafficking of arms and related materiel were mostly small scale and opportunistic. - The Panel newly identified a transnational network of narcotrafficking, transporting cocaine from the Sahel through Libya, to Europe and the Middle East.
Drug trafficking (increase in narcotraffic, mostly Tramadol and cocaine)	
Facilitation of human trafficking	
Gold smuggling	
Reselling foreign currency in the black market.	The Panel found that foreign currency, specifically USD, was purchased and resold on the black market by ISIL-Libya affiliated cells.
Online scams	The Panel found that these scams involved fictitious companies that gather money for charity.

¹⁸⁶ CS (local population).

¹⁸⁷ CS (local population).

¹⁸⁸ CS (official and non-official).

Annex 12 Support to the Rapid Support Forces by Libyan actors

1. Following the dismissal of Hassan al-Zadma, the logistical support system sustaining the Rapid Support Forces (RSF) through southern Libya underwent a significant reconfiguration. Between January 2025 and January 2026, with the tacit approval of the Libyan Arab armed forces (LAAF), the Subul Al-Salam battalion consolidated control over supply chains used to provide fighters and deliver arms and related materiel from Libya into Sudan in support of RSF-affiliated factions. The Panel found that the leader of Subul Al-Salam, Abdulrahman Hashim al-Kilani, leveraged his personal connections within the Tubu communities in southern Libya and strong network in Al-Al-Kufra area to ensure the continuity of the supply chain to RSF through Libya. This reconfiguration altered the regional power balance in southern Libya by concentrating cross-border logistical influence within a single armed actor. By allowing Subul Al-Salam to have a near-monopoly on the supply chains, rendering it easier for anti-RSF actors to identify and target them, increasing the vulnerability of Libya to spillover from the Sudan conflict. The Panel assessed that Subul Al-Salam assuming such a pivotal role could not have come about without – in the very least – the tacit consent of LAAF.

2. This consolidation relied on Subul Al-Salam's territorial presence, knowledge of desert routes and tribal connections, resulting in the use of multiple and adaptable corridors. In response to the evolving regional security dynamics, Subul Al-Salam and RSF alternated between routes, maintaining parallel logistical pathways to ensure the continuity and efficiency for the provision of fighters, and deliveries of fuel, arms and related materiel in an interconnected and centralised manner. Within Libya, this adaptability reinforced Subul Al-Salam's de facto control over southern transit corridors, in a security environment regulated by armed actors rather than the State.

3. On 13 November 2025, the LAAF and the Chadian National Army announced the establishment of a joint force to secure the Libya-Chad border, with the Libyan component drawn from Subul Al-Salam. The Panel assessed that this arrangement placed Subul Al-Salam in a position to further consolidate control over key routes used to supply the RSF through Libya and Chad, largely across territory under the effective control of Tubu communities.

4. The Panel found that in its newly assumed role, Subul Al-Salam exercised functional control across multiple stages of the RSF supply chain, encompassing key logistical, security and facilitation components required to sustain these flows. In early June 2025, Subul Al-Salam directly supported the RSF armed operations by deploying units on the ground, providing fighters to RSF-affiliated factions, escorting them across Libyan territory, and facilitating access to fuel and vehicle spare parts. These actions culminated in the RSF advancing into the Al-Aouinat area, where they consolidated control over key positions. This level of operational integration blurred the distinction between local Libyan armed actors and foreign conflict parties, particularly during armed clashes.

5. The Panel assessed that Subul Al-Salam's support to RSF had a direct impact on border security in southern Libya, including through the facilitation of cross-border illicit activities and the empowerment of non-State armed actors in the Fezzan region. As a result, southern Libya increasingly functioned as a fostering environment for terrorist groups and transnational criminal activities, amplifying insecurity across the Libya/Chad/Sudan tri-border area.

6. The continued flows generated a parallel market, resulting in the diversion of arms and related materiel initially destined for RSF towards markets in Libya, Niger and Chad, further entrenching a war economy along Libya's southern borders. The Panel documented one case in which ammunition, a type previously reported by the Panel¹⁸⁹ and later identified in Misrata, originally intended for RSF, was diverted and resold to individuals involved in gold trafficking in Niger and linked to ISIL (7.62×39 mm; packaging marked "7.62S 120PC 352", locally referred to as "malleable (lay-yina) bullets"). The Panel also found that Libyan and Chadian brokers periodically visited the Al-Al-Kufra area to secure a portion of consignments destined for RSF, which they subsequently resold to armed actors across the region. These diversion patterns illustrated the convergence of armed conflict, organized crime and terrorist financing across the Sahelian route, reinforcing mutually sustaining illicit ecosystems.

7. The RSF-affiliated fighters remained present in Libya during the reporting period, resulting in armed clashes between the Sudanese parties on Libyan territory, notably in June 2025 and November 2025. This presence went beyond tactical incursions. The Panel assessed that RSF benefited from a rear base operating under the auspices of LAAF, specifically through Subul Al-Salam, located approximately 75 km south-south-west of Al-Al-Kufra, which enabled RSF to: (a) coordinate logistical operations from Libyan territory; (b) access the Maateen al-Sarrah airbase; and (c) use facilities¹⁹⁰ near

¹⁸⁹ S/2013/99, para. 171.

¹⁹⁰ 24°14'38.9"N, 23°14'04.3"E.

Al-Al-Kufra airbase that served both as transit points for Colombian fighters and as sites for the modification of vehicles imported through Libya.

8. From these facilities, joint movements of militarised vehicles and Colombian fighters departed towards Sudan. These movements further diversified the conflict dynamics, linking Libya-based logistical infrastructure to international fighter recruitment and deployment patterns.

Table 12.1

Latest events involving Libyan armed actors, Rapid Support Forces (RSF) and Sudanese Armed Forces (SAF) in Libya-Sudan border area

<i>Period</i>	<i>Location</i>	<i>Meeting focus</i>
Since July 2024	Libya/Chad/Sudan tri-border area	SAF disrupting RSF access to arms, ammunition and logistical supplies entering Sudan from Libya through the tri-border area between Libya, Chad and Sudan. ¹⁹¹
10-12 June 2025	Al-Aouinat border triangle (Libya–Sudan–Egypt)	RSF shifted focus to the Al-Aouinat area to circumvent the blocks and re-establish the flow of materiel from Libya into RSF-held zones. Armed clashes broke out between SAF-affiliated forces and Subul Al-Salam battalion, resulting in casualties and the capture of prisoners and confiscation of materiel.
17-20 June 2025	Corridor between Al-Aouinat and Karb Al-Toum (Sudan)	RSF consolidated its newly opened supply corridor by capturing Karb Al-Toum military camp, expanding control over the Al-Aouinat corridor. ¹⁹²
November 2025	Libya-Sudan-Egypt tri border area	Multiple UAV airstrikes were conducted targeting RSF convoys moving through the desert corridor. ¹⁹³

¹⁹¹ S/2024/914, para. 30 and annex 12.

¹⁹² CS (local armed groups actors).

¹⁹³ CS (local armed groups actors).

Annex 13 5+5 Joint Military Commission and military reunification

1. During the reporting period, all activities of the 5+5 Joint Military Commission (JMC) remained focused on ceasefire-related matters, including the reaffirmation of existing principles, the definition of implementation frameworks and the advancement of confidence-building measures. Between November 2024 and December 2025, the JMC members participated in internationally sponsored capacity-building and technical engagements; explored proposals aimed at the creation of a joint military and security force; issued public statements calling for restraint against hate speech; and engaged in civil society fora, including outreach to youth on ceasefire implementation; and the development of a database on foreign fighters. These initiatives, however, remained limited to reinforcing the ceasefire and building confidence among members of the JMC.

2. The Panel observed growing interest among Libyan military actors in the establishment of joint military or security bodies. This was partially driven by expectations that progress towards joint structures could facilitate a gradual alleviation of arms embargo restrictions. The Panel found that alternative or parallel formulas were being explored to bring about military reunification outside the 5+5 JMC framework. However, the Panel assessed that in the absence of a unified command structure and effective oversight mechanisms, such initiatives risked remaining ad hoc and creating incentives for attempts to circumvent the arms embargo under the guise of coordination or cooperation.

3. Since the Panel's last report (S/2024/914), no progress was achieved toward the creation of a unified joint military unit. The Chiefs of General Staff in both the west and the east continued to play largely symbolic roles and lacked the authority or influence necessary to oversee or enforce concrete steps toward military reunification. The persistent fragmentation of command and the absence of political consensus on security sector governance made any progress on military reunification unlikely.

Table 13.1

Activities of the 5+5 Joint Military Commission between December 2024 and December 2025

<i>Period</i>	<i>Location</i>	<i>Activity focus</i>
19–20 December 2024	Rome, Italy (EU / Operation IRINI)	JMC members participated in capacity-building and technical engagements with EU, UNSMIL, EUBAM and Operation IRINI. ¹⁹⁴
28 November 2024	Ankara, Türkiye	JMC members participated in a meeting to review ceasefire confidence, elections, unified government efforts. ¹⁹⁵
12 February 2025	Cairo, Egypt	JMC members participated in a meeting to reinforce ceasefire stabilization, discuss foreign troop/mercenary withdrawal and security institution unification. ¹⁹⁶
24 February 2025	Tunis, Tunisia	JMC members participated in a two-day forum with UNSMIL and monitoring subcommittee on hate speech and ceasefire resilience. ¹⁹⁷
14 August 2025	Tunis, Tunisia	JMC members participated in a meeting with the Special Representative of the Secretary General and head of UNSMIL, to review ceasefire implementation/sustainability and related priorities. ¹⁹⁸
23 October 2025	N/A	JMC issued a statement reiterating its commitment to implementing the ceasefire agreement. ¹⁹⁹

¹⁹⁴ https://www.operationirini.eu/technical-meeting-of-eunavfor-med-irini-with-a-delegation-of-the-libyan-military-authorities-to-launch-capacity-building-and-trainings-opportunities/?utm_s.

¹⁹⁵ <https://libyaobserver.ly/news/joint-military-commission-55-confirms-ceasefire-still-place>.

¹⁹⁶ <https://libyaobserver.ly/inbrief/cairo-hosts-meetings-jmc-55?utm>.

¹⁹⁷ <https://unsmil.unmissions.org/unsmil-discusses-dangers-hate-speech-jmc-members-and-calls-end-it?utm>.

¹⁹⁸ <https://libyaobserver.ly/news/un-envoy-55-jmc-review-commitment-ceasefire-agreement-across-libya?utm>.

¹⁹⁹ <https://lana.gov.ly/post.php?id=343882&lang=en&>.

11 December 2025	Tripoli, Libya	JMC members participated in a workshop organized by UNSMIL, that reviewed progress made in implementing the ceasefire agreement, including the withdrawal of mercenaries, foreign fighters, and foreign forces. ²⁰⁰
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²⁰⁰ <https://lana.gov.ly/post.php?id=346844&lang=en&>.

Annex 14 Violations of International Human Rights Law in the context of deprivation of liberty

A. Overview

1. This annex presents evidence of serious violations of international human rights law committed in the context of deprivation of liberty: a) in the detention center under the control of the Deterrence Apparatus for Combating Organized Crime and Terrorism (DACOT) (section B); b) in detention settings under the control of the Internal Security Agency (ISA) in Tripoli (section C); and c) in detention settings under the control of the Libyan Arab armed forces (LAAF) (section D).

B. Violations of international human rights law committed in Mitiga detention facility under the control of DACOT

2. The Panel identified six cases of arbitrary and unlawful detention, enforced disappearance, torture and other ill-treatment, and serious violations of fair trial rights committed against detainees that took place between May 2024 and December 2025 in Mitiga detention facility in Tripoli under the effective control of DACOT.²⁰¹ Two of these six individuals died in custody, with one specifically as a combined result of torture and medical negligence.

3. Five out of six detainees were consistently detained for several years without any judicial review of their detention, unable to challenge the lawfulness of their detention. They were denied access to a fair and public hearing within a reasonable time by a competent, independent and impartial tribunal established by law in full accordance with international standards of fair trial. In four of the six cases documented, when they were belatedly presented before a judge and the court ordered their release as there were no grounds to keep detaining them, the detaining authority refused to implement these judicial orders in violation of detainees' rights to a fair trial and to liberty. None of those released were provided with release forms or discharge paperwork, rendering it difficult to prove that they were detained in the first place and subsequently without access to effective remedies and reparation for gross human rights violations that they had allegedly suffered.²⁰²

4. The Panel found that the consistent denial of *habeas corpus* to the detainees held in Mitiga detention facility and the development of a bespoke parallel quasi-legal system under DACOT²⁰³ have been part of a detention regime created to remove the protection of judicial oversight. In the absence of *habeas corpus*, detainees have been subjected to indefinite and incommunicado detention, enforced disappearance, torture or other ill-treatment, inadequate medical care and subpar conditions of detention, as well as death in custody.

5. All six detainees were subjected to torture or other ill-treatment, including physical and psychological, which fall under the categories of either treatment or material conditions:

- (a) Indefinite and prolonged systemic incommunicado detention, without contact with the outside world for years, including visits from family or lawyers. Victims spoke of how they were cut off from the outside world as punishment and how fleeting and intermittent visits from families were when they eventually did take place.
- (b) Deliberate denial of the necessary medical care for serious conditions or injuries, in some cases leading to the deterioration of the health of detainees and in one case, death. The Panel documented incidents where detainees went on hunger strike to protest their indefinite detention without judicial review or charges. Medical care was withheld in one case documented by the Panel as punishment for going on hunger strike. Another detainee on hunger strike was not brought before the court to hide his deteriorating health, even though the court session went ahead.
- (c) Systemic overcrowding due to inadequate physical conditions and insufficient space for each detainee. Victims described dire detention conditions where 80-120 detainees at a time shared a 25-meter square cell. Detainees had to take turns sleeping and using the toilet, with their turn only coming every second day.²⁰⁴

²⁰¹ Panel interviews with former detainees, family members and eyewitnesses. Articles 7, 9 and 14 of the International Covenant on Civil and Political Rights (ICCPR).

²⁰² Articles 2(3), 9(4) and 9(5) of the ICCPR.

²⁰³ S/2024/914, appendix A to annex 20.

²⁰⁴ The International Committee of the Red Cross (ICRC) recommends 5.4 square meters of minimum floor space per detainee to prevent conditions that may amount to cruel, inhumane, or degrading treatment. The recommended minimum floor space must be considered in conjunction with the length of time spent in the cell, sanitation and hygiene conditions, access to sunlight and ventilation, and the amount of time detainees can spend outside their cells.

- (d) Systemic denial of access to outdoors for prolonged periods of time. Victims reported not being out of their overcrowded cells for up to a year, depriving them of fresh air, sunlight and physical activity. This contributed to a deterioration in their health generally, including skin diseases, muscle atrophy and mental health issues.
- (e) The use of torture or ill-treatment, whether physical or psychological, is widespread and systematic. It is used during interrogations to extract confessions, including:
 - Being beaten while being hung from their wrists intermittently on a hoist using a machine, raising them for 4-5 minutes at a time, with one-minute breaks. In one case documented, this lasted for four hours.²⁰⁵
 - Being locked up in a coffin made of metal for up to a couple of hours at a time.
 - Being locked up inside a fridge for prolonged periods of time.
- (f) Torture and other forms of ill-treatment were also used for disciplinary reasons, including:
 - Psychological ill-treatment, including verbal abuse and watching other detainees being beaten up or dying.
 - Using shovels and plastic tubes (BBR) all over the body, including on genitalia.
 - Dismemberment of digits.

1. Recruitment of detainees and forced labour

6. The Panel found that DACOT continued to leverage its direct access to the penitentiary system to forcibly recruit detainees into their ranks and use them for labour.²⁰⁶ Under the orders of Osama Najim, specific individuals in senior positions, identified by the Panel, who supervise detainees in Mitiga detention facility pressured detainees to join their ranks in exchange for freedom or reduced sentences or minor benefits. These individuals are in turn promoted and rewarded for the number of detainees they recruit. In the latest rounds of recruitment, DACOT focused on detainees with specific skillsets in the areas of information technology, engineering or cybersecurity. These detainees were then made to run social media platforms on behalf of DACOT, including the production and dissemination of tailored content to whitewash the image of DACOT and discredit their adversaries. The recruitment focused on detainees who were from Tripoli to allow Osama Najim to pressure the families of these recruited detainees.

7. Detainees with specific skillsets, such as metalworkers, have also been used for construction work, specifically in the building of new sections of Mitiga detention facility throughout 2024 and 2025. Whilst some detainees engaged in this work willingly in exchange for some minor benefit, such as family contact or improved access to fresh produce such as fruits and vegetables, others were forced and beaten up if they dared to refuse. Most of these detainees are usually foreign detainees who are deemed to be a low-flight risk.

8. The prohibition of forced or compulsory labour in the context of detention is well established.²⁰⁷ The only exception that permits such labour is if it was stipulated as part of a sentence handed down by a competent court, which is not the case in the cases documented by the Panel.²⁰⁸ In fact, in cases documented by the Panel, the labour was neither voluntary nor compensated, benefiting the private interests of DACOT. Given the prevailing circumstances in places of detention, the voluntary nature of such labour should be called into question in many cases.

2. DACOT response to the findings of the Panel

9. In its opportunity to reply to the Panel, DACOT claimed that it had no responsibility for detention-related matters inside Mitiga detention facility as it is merely responsible for providing external security outside the premises.²⁰⁹ However, DACOT did not provide any supporting evidence to counter the Panel's findings backed up by extensive independent documentary and testimonial evidence.

²⁰⁵ Previously documented by the Panel: [S/2024/914](#), appendix A to annex 20, para. 4.

²⁰⁶ [S/2024/914](#), appendix A to annex 20, paras. 6-7.

²⁰⁷ Articles 8 and 10 of the ICCPR.

²⁰⁸ Article 8 (2)(b) of the ICCPR.

²⁰⁹ DACOT response to the Panel dated 21 January 2026.

C. Violations of international human rights law committed in places of detention under the control of the Internal Security Agency in Tripoli

10. The Panel identified one case of arbitrary and unlawful detention, enforced disappearance, torture and other ill-treatment, violations of fair trial rights and the prohibition of arbitrary deprivation of life,²¹⁰ specifically in the case of activist Abdel Mun'im al-Maryami, at the hands of the Internal Security Agency (ISA).²¹¹

11. Al-Maryami was initially abducted by a group of six armed individuals in civilian clothing from a shop in Sorman, west of Tripoli, on 30 June 2025. At the time of the abduction, he was only accompanied by his children, who were left alone in the car for hours late into the evening. The family of Al-Maryami only learned about the incident when locals contacted them to alert them about the unaccompanied children.

12. It was only on 3 July 2025 when the family of Al-Maryami officially discovered his fate; on that day, his family was informed that he was admitted to hospital after falling down the shaft of the stairwell in the office of the Attorney General. In a public statement on their official Facebook page dated 4 July 2025, the office of the Attorney General announced his death – under what the Panel assessed as suspicious circumstances – while the deceased was in the office of the Attorney General, after he was handed over by the ISA.²¹²

13. Confirming the account of the office of the Attorney General to a certain degree, in a public post on their official Facebook page dated 6 July 2025, the ISA in turn issued a statement retroactively admitting that they had detained Al-Maryami in line with the applicable framework in consultation with the office of the Attorney General, before they had handed him over to his office on 3 July 2025.²¹³ On that same day, the office of the Attorney General published a video footage of Al-Maryami, dated 3 July 2025, which shows his arrival to the office of the Attorney General and his subsequent fall. In its statements, the Office of the Attorney General labelled the arrest as an “abduction”.

14. The Panel examined documentary evidence including a police report opened following his disappearance, a preliminary forensic report, a death certificate and a burial permit. The preliminary forensic report stated that Al-Maryami died due to severe injuries sustained following a fall, including a brain bleed, a skull fracture, a broken spine and ribs, and damaged internal organs. Al-Maryami family had yet to receive the final forensic report and the outcomes of the investigation as of January 2026.

15. The nature and consistency of the evidence that the Panel gathered from independent sources, including authenticated video evidence, established the factual circumstance of the investigated incident and associated IHRL violations that rebut the information submitted by the GNU.

D. Violations of international human rights law committed in detention places under the control of LAAF units

16. The Panel identified eight cases of arbitrary and unlawful detention, enforced disappearance, and torture and other ill-treatment committed against detainees that took place throughout 2024 and 2025 in detention places under the effective control of the LAAF.²¹⁴ Three of these eight individuals died in custody throughout 2025, all as a combination of torture and medical negligence.

17. All documented cases concern individuals who were detained for months and years without any judicial review of their detention, unable to challenge the lawfulness of their detention. Most of them were unaware of their charges or the reason for their detention in the first place. Six out of eight cases were subjected to enforced disappearances, with the detaining authority concealing the fate and whereabouts of those detained from their family. Two out of the eight cases remain forcibly disappeared for the last two years, including one child.

18. At least two of the eight cases documented were detained under the effective control of Tariq Bin Ziyad (TBZ) brigade in Sidi Faraj, Benghazi. All those detained in Sidi Faraj were civilians, even though LAAF maintained in previous correspondences that the detention facilities at the TBZ brigade’s military base in Sidi Faraj are exclusively for its military

²¹⁰ Articles 6, 9, 10 and 14 of the ICCPR.

²¹¹ Panel interviews with confidential sources.

²¹² https://www.facebook.com/attorneygeneral.ly/videos/1083849760350676/?__tn__=%2CO, 6 July 2025

²¹³

<https://www.facebook.com/ISA00/posts/pfbid0QG1YytjP7qyqnXp7Qt5ze2AfrS95s5SP1GgAa9TwGDpU3GfMMhuB7uUKdzJS4cSv1>, 6 July 2025

²¹⁴ Panel interviews with former detainees, family members and eyewitnesses. Articles 7, 9 and 14 of the ICCPR.

personnel.²¹⁵ In fact, LAAF had maintained that there are no facilities within the base for holding or detaining civilians. However, based on cases documented by the Panel, the TBZ brigade military base in Sidi Faraj have at least two different detention facilities, all holding civilians: a detention facility for civilians who are deemed to be dissidents who challenged the status quo, activists or political opponents, and a detention facility called the “forgotten” where detainees have entered and never emerged.

19. All eight detainees were subjected to different forms of physical and psychological torture or other ill-treatment, including solitary confinement, hangings and beatings, waterboarding and watching other detainees being physically tortured. In the case of two of the deaths in custody, when the bodies of those were handed over to their families, fresh bruises, open wounds and broken bones were observed. One of those deaths in custody concerned an individual who was detained in Gernada detention facility²¹⁶ prior to his death.

20. In two of the eight cases, detainees were filmed by LAAF units when in custody to humiliate and degrade them. In one of those cases, the objective was explicitly to expose the detained person to public scrutiny as the video was published exposing the identity of the person detained. In such cases, the Panel found that the implicated LAAF units violated the right to privacy and human dignity, presumption of innocence, and protection from degrading treatment.²¹⁷

21. In its response regarding torture and ill-treatment, LAAF maintained that “any incidents of torture or ill-treatment do not represent a general policy or systemic practice” and such allegation are dealt with accordingly in line with the applicable laws.²¹⁸ LAAF further stated its “unwavering commitment” to and respect for international law, including the Torture Convention.²¹⁹ Meanwhile, in its response on Gernada detention facility, LAAF stated that while the facility and all its sections fall exclusively under the authority of the ministry of justice, there are in fact two sections inside the Gernada compound: a) a civilian detention facility under the effective control of the ministry of justice, the office of the attorney general and the military police; b) a military detention facility under the effective control of LAAF and the military prosecution. This directly contradicted previous statements by LAAF that the facility and all its sections fall exclusively under the authority of the ministry of justice, and that there is no separate detention wing under the command of LAAF and its units such as TBZ brigade.

22. In line with their legal obligation to address and investigate all documented violations of international human rights law in the context of detention, LAAF stated that it took a number of steps, including activating internal oversight mechanisms, launching investigations into alleged violations and guaranteeing the right of detainees to file complaints.

²¹⁵ S/2023/673, para. 49.

²¹⁶ S/2023/673, paras. 45-52.

²¹⁷ Articles 7, 10, 14 and 17 of the ICCPR.

²¹⁸ LAAF general command response to the Panel dated 31 December 2025.

²¹⁹ Ratified and acceded to by Libya on 16 May 1989.

Appendix 14.A: Preliminary forensic report of Abdel Mun'im al-Maryami dated 5 July 2025
[CONFIDENTIAL]

Annex 15 Acts that obstruct or undermine the successful completion of the political transition in Libya

A. Overview

1. Paragraph 11 of resolution 2571 (2021) provides the Panel with the mandate to identify individuals and entities engaging in or providing support for acts that obstruct or undermine the elections, as part of a wider mandate to identify acts that obstruct or undermine the successful completion of the political transition in Libya. The Panel has yet to determine if specific individuals or entities meet the designation criteria.

2. Several rounds of municipal council elections concluded during the reporting period; the first round of the municipal council elections took place in November 2024, as planned. Partially due to interruptions caused by the clashes in and around Tripoli in May 2025, the second round of municipal council elections was pushed to mid-August 2025. However, this August round was staggered across three stages in August, October and December 2025 due to several incidents that fell within the scope of paragraph 11 of resolution of 2571 (2021).

3. The Panel identified 16 incidents in the lead-up to the second round of municipal elections that partially took place in August 2025 that, considered together with other disruptions, obstructed or undermined the municipal council elections.²²⁰ All incidents identified involved perpetrators that were armed actors operating under the de facto authority of armed groups. The Panel found that armed groups were directly or heavily involved with the day-to-day running of local authorities, including by having their own candidates and lists, whilst playing a key role in the organization of the municipal council elections by providing security arrangements. Moreover, following attacks on the premises of the High National Electoral Commission (HNEC), armed groups positioned themselves afterwards to provide security for the HNEC premises. This showed that HNEC could not function independently and had to adapt to armed group dynamics to implement their mandate.

B. Disruptive political and legal decisions

4. In the lead-up to municipal elections and thereafter, disruptions were caused by continuous attempts of Libyan political figures and legal bodies to change municipal boundaries as currency to reward support of armed groups to gain and maintain control over the local governance, or to weaken opposing armed groups. By way of example, in an attempt to retain or consolidate power in key areas such as Zliten – one of Libya’s biggest business hubs – political actors across the divide utilized executive and legal decisions to stymie municipal elections. To that effect, on 14 August 2025, a Benghazi court issued an injunction to halt the elections in Zliten citing unspecified “challenges”. At the time, this solicited a public reaction by the High Council of State, which outright rejected the injunction.

C. Coordinated attacks on HNEC premises in the west

5. Immediately before this injunction, in the early hours of 12 August 2025, the office of the HNEC in Zliten was attacked. At least two cars carrying unknown armed individuals in civilian clothing fired a round of shots at the outer perimeter wall, the main door and the room of the present guards. The attackers also launched a grenade, which missed the HNEC office and landed 300 meters southwest of its location, resulting in damage to a civilian home but no casualties. Later that very morning, an improvised explosive device was also found adjacent to the gate of the Zliten HNEC office, forcing everyone to evacuate.

6. In a similar fashion, the HNEC offices in Zawiya and Al-Sahel al-Gharbi were attacked simultaneously on 15 August 2025, both suffering arson attacks. In Zawiya, eight unidentified armed men dressed in civilian clothing and balaclavas arrived at the Zawiya HNEC office in the early morning hours of 15 August 2025. After they imposed confinement on the two unarmed guards on duty, they proceeded towards the Zawiya warehouse adjacent to the office. The Panel assessed that the attack was calculated and planned in nature, taking a mere 10 minutes to execute; the attackers used a ladder that they brought to climb up to warehouse windows to break them all systematically, throwing fuel inside the building using jerrycans. The fire led to the burning of all election materials destined to be used in local elections in Sorman and Sabratha. Concurrently, the Sorman Security Directorate (20km west of Zawiya), an entity that is in charge of security during elections, was attacked with a launched grenade.

²²⁰ Panel interviews with twelve confidential sources including candidates, monitors, local electoral authorities and witnesses.

7. The office of the HNEC in Sahel al-Gharbi (45km west of Zawiya) suffered an arson attack at the exact same time on 15 August 2025. At the time, five unidentified armed men dressed in civilian and military clothing jumped the HNEC premises wall and beat up the guards. In a similar fashion to the Zawiya attack, they proceeded to break all the windows of the warehouse and set it on fire using fuel, leading to the burning of electoral materials.

8. The Panel found that the attacks on the HNEC premises in the west were coordinated and led to the temporary closure of the HNEC offices for a number of days and the postponement of elections in a number of impacted municipalities to 23 August 2025.

D. Threats against and arrest of electoral candidates and their families, and HNEC staff

9. The Panel identified at least six cases – four in the west and two in the east – of threats, judicial harassment, arbitrary and unlawful detention, enforced disappearances, and torture and other ill-treatment committed against electoral candidates and their families, forcing them to withdraw or relocate altogether. One electoral candidate in the east was detained for four days and interrogated after putting his name forward in the municipal elections. In one case, a female candidate in the west was forced to withdraw after she was threatened by an armed group, who was backing the opposing list, with the kidnapping of her daughter. Another male candidate in the west was forced to withdraw and relocate for six months after he and his family were directly threatened by an armed group, as they wanted their own local candidates to win. In one egregious case in the west, two of the candidate's family members were arbitrarily detained for several days and tortured to pressure the candidate to withdraw. In the east, the Internal Security Agency (ISA) forced any prospective candidates to go through another layer of security clearing even though they had already been cleared by the central authorities in Tripoli, by making them fill out a detailed and intrusive security clearance form. Separately, the Panel also identified three incidents of direct threats against the HNEC staff, two in the west and one in the east.

E. Halting of election centres in the east

10. In an organised, simultaneous and systematic manner, the ISA in the east prevented the distribution of voter cards, confiscated those already distributed cards, confiscated ballot boxes and closed election centres in Benghazi, Tobruq, Marj, Brak al-Shati, Sabha and Sirte days prior to the planned elections on 16 August 2025. In some instances, the ISA arrived at election centres the night before or the day-of, armed and threatening in demeanour, to enforce the closures.

Annex 16 Violations of international human rights law committed in the context of the May 2025 events

A. Overview

1. The following presents evidence of serious violations of international human rights law committed in the context of the May 2025 events, with a specific focus on the arbitrary deprivation of life of Abdelghani al-Kikli and seven of his guards.²²¹

B. Killing of Abdelghani al-Kikli

2. Abdelghani al-Kikli, former head of the Stability Support Apparatus (SSA), otherwise known as Ghneiwa, was killed in the early evening of 12 May 2025, alongside seven of his guards in Tekbali camp in Tripoli. Tekbali camp is under the effective control of 444 Brigade.

3. The operation involving the killing of Al-Kikli formed part of a broader campaign against the SSA, which included coordinated action by armed groups mobilized in support of Prime Minister Abdelhamid Dbeibah. In the weeks prior, Tripoli witnessed the arrival of reinforcements from Misrata, including the Joint Operations Force, and last-minute recruited ad hoc fighters (see paras. 13-14 of the main body of the report). Concurrently, in the weeks leading up to 12 May 2025, the outcomes of meetings that took place between Al-Kikli and other armed group leaders did not bode well for the heightened tensions. In fact, in the days immediately preceding his killing, Al-Kikli remained house-bound and steered clear of meeting with Prime Minister Abdelhamid Dbeibah and armed group actors. Therefore, the killing of Al-Kikli was neither fortuitous in nature nor did it happen in a vacuum.

4. On 12 May 2025, Al-Kikli eventually agreed to a meeting in Tekbali camp amidst the rising tensions. Even though he was warned against attending the meeting in Tekbali camp by close advisors, he arrived with twelve of his guards – all on motorbikes.²²² At approximately 07:30PM local time on 12 May 2025, coinciding with sunset prayers, locals living opposite Tekbali camp reported hearing gunfire which continued for several minutes before it subsided.

5. Within the hour, footage of the killed individuals emerged on social media. One specific scene inside Tekbali camp was filmed from three varying angles in three different videos corroborated by the Panel. Two of those videos showed 444 Brigade elements kicking the dead bodies; one of those two videos showed at least 19 elements of the 444 Brigade in military uniform inside Tekbali camp milling around the bodies. In the third video, one 444 Brigade individual can be heard saying “let him die”. Later that evening, to confirm his death, a photo of Al-Kikli was also shared on social media, showing his body riddled with at least seven bullets, including one that had led to bleeding at the back of his head. Most of those who died alongside Al-Kikli exhibited multiple gunshot wounds, one with more than a dozen. Five of his guards who survived were treated for similarly sustained injuries, specifically multiple gunshot wounds, in two different clinics opposite Tekbali camp. The video and photo materials were hastily taken down in the hours and days that followed.

6. Following the 12 May 2025 events, Prime Minister Abdelhamid Dbeibah and General Mahmoud Hamza both released public statements describing the killing of Al-Kikli as a “law enforcement operation”. In a near-ten minute speech on 18 May 2025, Mahmoud Hamza spoke in front of a room full of 444 Brigade officers. He congratulated them on the “victory” they had achieved by “overthrowing the Ghneiwa empire” that had been in place since 2011 and encompassed the biggest geographical area in Tripoli.²²³ He stated that “every tyrant has an end”,²²⁴ adding that “through our operation as the Libyan army... oppression fell within the hour”.²²⁵ In the same vein, in a televised speech on 18 May 2025, Abdelhamid Dbeibah justified the operation against Abu Salim and Al-Kikli because he had amassed a “militia” whose activities did not

²²¹ Panel interviews with 27 different confidential sources including victims and eyewitnesses. The Panel reviewed 23 documents including death certificates, burial certificates and forensic reports. Moreover, it analysed and corroborated videos and photographs of the victims.

²²² Video of Al-Kikli and his guards arriving on motorbikes to Tekbali on record with the Panel.

²²³ <https://www.youtube.com/watch?v=JYHE9tXwdIQ> at 00:40, 18 May 2025

²²⁴ Ibid at 02:00, 18 May 2025

²²⁵ Ibid at 02:20, 18 May 2025.

come under the effective control of the state.²²⁶ He said that these activities had “surpassed” their limits²²⁷ and he could no longer put up with this “farical” situation.²²⁸ He concluded by stating that the operation was successful by all measures.²²⁹

7. The right to life is deemed as fundamental and non-derogable.²³⁰ While the right to life is not absolute, an end to life cannot be brought about in an arbitrary manner.²³¹ Any deprivation of life that is not anchored in a legal basis or came about due to acts or omissions is deemed arbitrary in nature.²³² The use of force must be exceptional and strictly necessary, and proportionate and incrementally used depending on the demands of the situation, to achieve a legitimate law enforcement objective.²³³ The objective of the use of force must be to protect any person from unlawful violence or effect a lawful arrest or prevent escape of an arrested person. In all cases, the objective must always be to arrest rather than kill, even if the individuals are deemed to be violent or belligerent. The use of force must also respect the principle of precaution, which dictates that such operations must be well planned and carried out in a way that reduces the risk of casualties.²³⁴

8. The Panel assessed that Abdelhamid Dbeibah and Mahmoud Hamza should have known that a planned law enforcement operation such as this one would result in casualties, given the nature and location of the meeting, coupled with the security status of those attending. Mahmoud Hamza, acting in an official capacity as head of the 444 Brigade, carried out a law enforcement operation – on his own turf – that resulted in eight deaths. The Panel assessed that it would be impossible for Mahmoud Hamza to carry out such an operation without the consent/acquiescence of or direct order by his Minister of Defence, Abdelhamid Dbeibah. In fact, in his televised speech on 18 May 2025, Abdelhamid Dbeibah directly implied that the operation had his approval. Given the build-up of tension in and around Tripoli in the days and weeks prior, and amongst the involved actors themselves, the intention to kill rather than arrest Al-Kikli and his guards can be inferred from the set-up of the meeting in Tekbali camp, coupled with forensic and circumstantial evidence; all of those who had been killed were shot numerous times. The mistreatment of the remains further implies an intent to degrade and humiliate, constituting a violation of the dignity of the deceased. In the hours that followed, armed elements – including those belonging to 444 Brigade – targeted anyone deemed to be aligned with Al-Kikli and proceeded to burn, ransack and destroy their private property, forcing many to flee the area and permanently relocate. This was followed by an immediate issuance of a decision to dismantle the SSA and stop their salaries overnight.

9. Given the preponderance of evidence, the Panel found that the killing of Al-Kikli and his guards amounted to violations of, amongst others, the prohibition of arbitrary deprivation of life, the right to privacy, and the prohibition of cruel, inhuman and degrading treatment.

1. Response of the Government of National Unity to the Panel’s findings

10. In response to the Panel’s findings, the Government of National Unity (GNU) confirmed the killing of Al-Kikli alongside other SSA elements who accompanied him on 12 May 2025 inside Tekbali camp.²³⁵ According to the reply, despite being permitted into Tekbali camp after he presented himself at the gate alongside his men, Al-Kikli was killed on the grounds of armed and impermissible entry into Tekbali. A verbal altercation between Al-Kikli and a number of 444 Brigade elements led to an exchange of fire, resulting in casualties on both sides. The Panel found the explanation contradictory and inconsistent with its findings. The GNU also stated that an investigation was still ongoing by the Military Prosecution.

²²⁶ https://www.youtube.com/watch?v=2C_CHspvgEo at 05:49, 18 May 2025.

²²⁷ Ibid at 09:10.

²²⁸ Ibid at 09:20.

²²⁹ Ibid at 10:44.

²³⁰ Article 6(1) of the International Covenant on Civil and Political Rights; UN Human Rights Committee, *General Comment No. 36*, CCPR/C/GC/36, 3 September 2019, para. 2.

²³¹ UN Human Rights Committee, *General Comment No. 36*, CCPR/C/GC/36, 3 September 2019, para. 10.

²³² Ibid, para. 11.

²³³ UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, 1990.

²³⁴ Ibid.

²³⁵ Response of the Government of National Unity to the Panel dated 2 February 2026.

Annex 17 UAV ground control stations at Mitiga, Misrata and Al Khadim airbases

1. The Panel identified identical uncrewed aerial vehicle (UAV) ground control stations (GCS) which were being constructed at Mitiga,²³⁶ Misrata²³⁷ and Al Khadim²³⁸ airbases. The Panel found that the planned use of these infrastructures included stationing and launching of Turkish Bayraktar UAVs. These stations would have the capacity for stationing 12-13 UAVs of different sizes. One Turkish Songar and three smaller UAVs had already been stationed at Misrata airbase.²³⁹
2. With varying starting times of construction (see figures 17.1 to 17.9), these infrastructures were identical both in shape and size (see figures 17.10 to 17.12). In the shape of the English letter “E”, the UAV GCS consisted of a main structure and three extensions on one side. The size of the base of the GCS was about 110x50 metres, with each extension approximately 30 metres long. The height of the underground section at the Misrata UAV GCS was about 9 to 10.5 metres. The reinforced structure with underground section suggested that their use may include UAV ammunition storage, in addition to UAV stationing and controlling.
3. The construction of the UAV GCS at Mitiga airbase began on 24 July 2023. As at the time of writing of this report, the concreting for the underground section was completed and the construction of ground structure was ongoing. Situated at the south-western side of Mitiga airbase, the UAV GCS is about 570 metres away from the two hardened shelters used for Bayraktar TB-2 UAV operations (figure 17.13 and 17.14).
4. The construction of the UAV GCS at Misrata airbase began in early March 2024. The concreting of the underground base was completed. Situated at the south-eastern part of Misrata airport, the UAV GCS was about 250 metres away from and of similar size of the Akinci uncrewed combat aerial vehicle (UCAV) hangar, which was reported in S/2024/914, annex 37 (see figure 17.15).
5. As at the time of writing of this report, the ground excavation of the UAV GCS at Al Khadim airbase, which began on 4 October 2025, was still ongoing.

Figure 17.1

GCS site before construction, Mitiga



Figure 17.2

Start of GCS construction, Mitiga

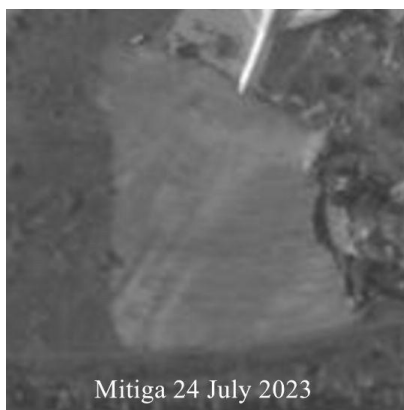


Figure 17.3

Status of GCS construction, Mitiga



²³⁶ 32.89200° N, 13.27348° E

²³⁷ 32.31023° N, 15.06749° E

²³⁸ 32.01153° N, 21.19035° E

²³⁹ Confidential source.

Figure 17.4
GCS site before construction, Misrata

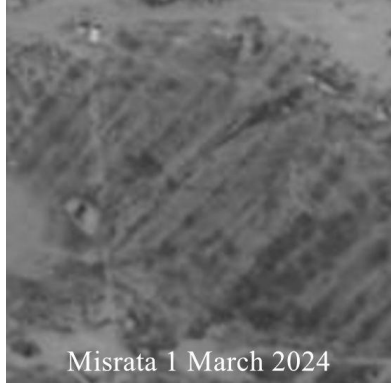


Figure 17.5
Start of GCS construction, Misrata



Figure 17.6
Status of GCS construction, Misrata



Figure 17.7
GCS site before construction, Al Khadim

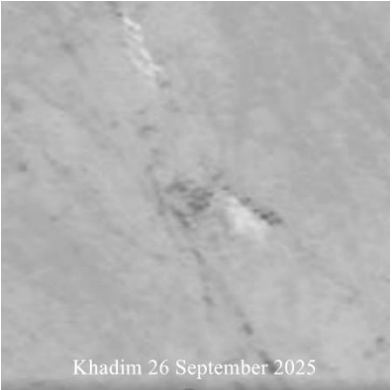


Figure 17.8
Start of GCS construction, Al Khadim



Figure 17.9
Status of GCS construction, Al Khadim



Figure 17.10
Measurement of GCS, Mitiga



Figure 17.11
Measurement of GCS, Misrata



Figure 17.12
Measurement of GCS, Al Khadim



Source: Planet Labs.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 17.13
GCS and TB-2 UAV shelters at Mitiga airbase



Developed by Panel of Experts

Source: Planet Labs.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 17.14
Hardened Shelters for Bayraktar TB-2 UAV
at Mitiga airbase



Developed by Panel of Experts

Source: Google Earth Pro, image date 30 November 2022.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 17.15
GCS and Akinci UCAV hangar at Misrata airbase



Developed by Panel of Experts

Source: Planet Labs.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 18 Civilian aircraft

1. Violations of paragraph 9 of resolution 1970 (2011) in relation to civilian aircraft are reflected in appendices A through I to this annex.

Appendix 18.A: Civilian cargo flights on UAE-eastern Libya airbridge

1. In its previous reports,²⁴⁰ the Panel reported on the various air routes used on the airbridge from the United Arab Emirates (UAE) to areas under Libyan Arab armed forces (LAAF) control and the activities of Kyrgyzstan-registered operator Sapsan Airlines LLC (Sapsan), operating on these routes. In the last reporting period,²⁴¹ the Panel identified that Sapsan conducted 221 flights on the airbridge by its two aircraft.

2. The Panel identified that during the current reporting period, in addition to Sapsan Airlines, three additional Kyrgyzstan-registered operators, Flysky Airlines, New Way Cargo Airlines and Skyline Airlines, operated on the airbridge. The Panel identified that these airlines conducted 458 flights from late October 2024 to the end of 2025, using 11 Ilyushin-76TD (IL-76TD) cargo aircraft (see appendices 18.B to 18.E to this annex). During this period, more flights were conducted between May and October 2025 than the previous reporting period (see tables 18.A.1 and 18.A.2).

3. These aircraft operated on the airbridge via multiple flight paths, including some between Bossaso, Somalia, and Benghazi and Al-Kufra, Libya. Cargo flight arrivals identified at the Al-Kufra airbase, which had been seldomly used for such flights before February 2025, increased tenfold from 24 in 2024 to 239 in 2025.²⁴² In line with the pattern of monthly flight numbers on the UAE-eastern Libya airbridge, more flights to the Al-Kufra airbase were conducted between May and October 2025 (see table 18.A.3) than other time of the reporting period. During the same period, a hangar at the north end of the airbase was being reconstructed as at the time of writing (see figures 18.A.1 to 18.A.4).

4. IL-76TD, with a volume of 253 m³ and maximum payload of 50 tons, is a four-engine strategic multirole transport aircraft.²⁴³ The maximum delivery capacity of 455 flights could reach a volume of 115,115 m³ and maximum payload of 22,750 tons. With an estimated 50% of the capacities, a total of 57,557.5 m³ and 11,375 tons of cargo could have been delivered in the period between October 2024 to the end of 2025.

Table 18.A.1

Flights conducted on the UAE-eastern Libya airbridge

Airlines	Number of Aircraft	Aircraft type	Registration	Flights
Flysky	5	IL-76TD	EX-76003	38
		IL-76TD	EX-76006	2
		IL-76TD	EX-76017	67
		IL-76TD	EX-76018	98
		IL-76TD	EX-76022	43
New Way Cargo	1	IL-76TD	EX-76026	15
Sapsan	4	IL-76TD	EX-76005	22
		IL-76TD	EX-76008	46
		IL-76TD	EX-76025	21
		IL-76TD	EX-76030	47
Skyline	1	IL-76TD	EX-76012	59
Total				458

Sources: flightradar24.com, globe.adsbexchange.com, ch-aviation.com, and aerotransport.org.

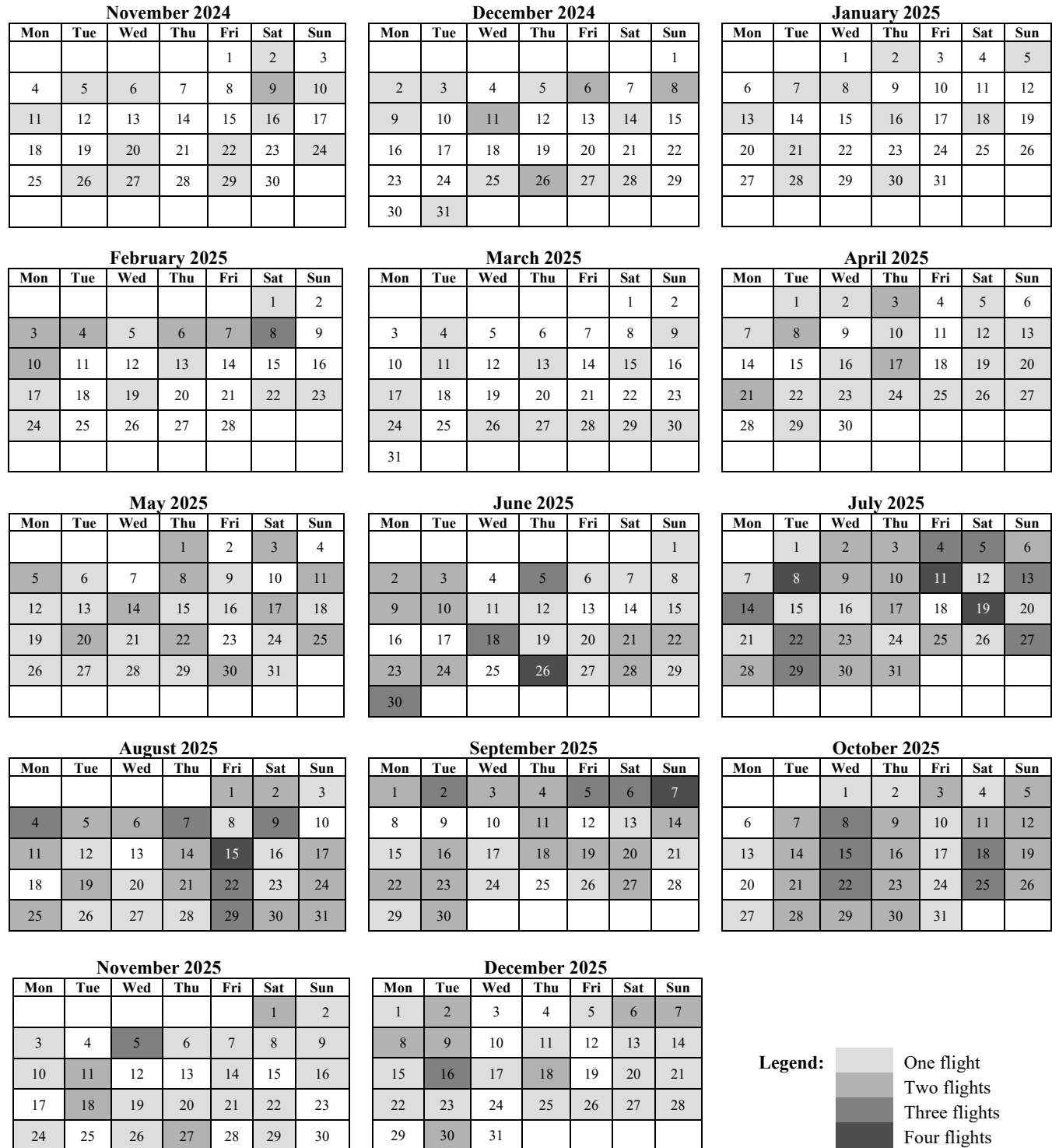
²⁴⁰ Annex 55 of S/2021/229, Annex 96 of S/2022/427, Annex 61 of S/2023/673, and Annex 39 of S/2024/914.

²⁴¹ Annex 39 of S/2024/914.

²⁴² Planet Labs.

²⁴³ Janes Defense.

Table 18.A.2

Heatmap of flights on the UAE-east Libya airbridge from November 2024 to October 2025

Developed by Panel of Experts.

Sources: flightradar24.com and globe.adsbexchange.com

Table 18.A.3

Identified cargo flight activities at Al-Kufra airbase

Month	Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024
Satellite image available days	27	21	22	16	19	17
Cargo flights observed	1	0	0	2	2	0
Month	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
Satellite image available days	13	17	19	18	23	21
Cargo flights observed	1	5	5	16	32	33
Month	Jul 2025	Aug 2025	Sep 2025	Oct 2025	Nov 2025	Dec 2025
Satellite image available days	20	23	23	29	20	24
Cargo flights observed	23	19	27	41	18	19

Source: Planet Labs.

Figure 18.A.1

Example of flight activities at Al-Kufra airbase on 14 April 2025

Figure 18.A.2

Example of flight activities at Al-Kufra airbase on 1 June 2025

Figure 18.A.3

Start of hangar reconstruction on 28 July 2025

Figure 18.A.4

Hangar reconstruction status on 17 December 2025

Source: Planet Labs.

Appendix 18.B: Flysky Airlines

1. In previous Panel reports,²⁴⁴ the Panel reported on the various air flight paths being used on the airbridge from the United Arab Emirates (UAE) to east Libya in support of Libyan Arab armed forces (LAAF). The Panel identified that one Kyrgyzstan-registered operator, Flysky Airlines conducted 259 flights by its five Ilyushin 76 (IL-76) cargo aircraft (EX-76003, EX-76006, EX-76017, EX-76018 and EX-76022) to and from Libya from October 2024 to the end of 2025. The Panel further identified that Flysky's aircraft conducted flights between Bossaso, Somalia and eastern Libya, and between Istanbul, Türkiye and Benghazi, Libya (tables 18.B.1-18.B.5).

2. In response to the Panel's inquiry, Flysky confirmed the performance of certain flights, but did not confirm other flights or claimed that the flights did not occur.²⁴⁵ Flysky claimed that among the flights from different airports of UAE to Benghazi, Libya: a) aircraft EX-76003 conducted a flight on 8 February 2025; b) EX-76006 conducted flights on 26 October and 1 November 2024; c) EX-76017 conducted flights on 16 March 2025, "04/09/2025" (the Panel understands Flysky refers to 9 April 2025), 15 April, 2, 12, and 27 May 2025; (d) EX-76018 conducted flights on 4 and 17 February 2025.

3. In addition to the flights confirmed by Flysky, the Panel identified that: a) the flight paths of the flights conducted by EX-76003 on 28 January and 1, 3, 4 and 6 February 2025, were identical to the flight conducted by the same aircraft on 8 February 2025, with all flight paths having ended off the Libyan coast near Benghazi with flight status showing as "landed" (examples of flight data are provided in figures 18.B.1 and 18.B.2); b) although not confirmed by Flysky, the displayed arrival airports for the flight by EX-76003 on 4 March 2025 was "Benghazi" (figure 18.B.3); c) the displayed departure airport of the flight by EX-76017 on 16 March 2025 was "Istanbul", Türkiye, instead of Al Ain, UAE (figure 18.B.4); and d) the rest of the flights conducted by Flysky as in tables 18.B.1 to 18.B.5 of this annex are listed as examples in figures 18.B.5 to 18.B.8. The Panel found that the information provided by Flysky lacked credibility and was inconsistent with the Panel's findings.

4. Flights conducted by Flysky to Libya have met several air delivery profile indicators, including: a) significant number of flights over a period of time; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; and e) limited, inaccurate or no information provided to requests for information. Thus, the Panel assessed that flights conducted by Flysky Airlines constituted violations of paragraph 9 of resolutions 1970 (2011).

Table 18.B.1
Flight activities aircraft EX-76003 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status
26 Nov 2024	Al Ain, UAE	Location near Benghazi*	FSU4946/FSQ4946	Unknown
28 Jan 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 16:44 (UTC)
1 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 22:25 (UTC)
3 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Landed 16:08 (UTC)
4 Feb 2025	Location near UAE*	Location near Benghazi *	FSQ4936	Landed 16:22 (UTC)
6 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Landed 8:35 (UTC)
7 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Landed 17:16 (UTC)
8 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Landed 18:41 (UTC)
22 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 6:01 (UTC)
4 Mar 2025	Location in Libya*	Benghazi, Libya	FSQ4942	Landed 2:49 (local)
24 Apr 2025	Al Ain, UAE	Location near Benghazi*	FSQ4936	Landed 18:11 (UTC)

²⁴⁴ Annex 55 of S/2021/229, Annex 96 of S/2022/427, Annex 61 of S/2023/673, and Annex 39 of S/2024/914.

²⁴⁵ Letters received by the Panel on 1 July and 12 August 2025.

26 Apr 2025	Abu Dhabi, UAE	Location near Benghazi*	FSQ4934	Unknown
1 May 2025	Al Ain, UAE	Location near Benghazi*	FSQ4934	Unknown
8 May 2025	Al Ain, UAE	Location near Cairo (via same path)*	FSQ4936	Unknown
11 May 2025	Al Ain, UAE	Location near Cairo (via same path)*	FSQ4936	Unknown
13 May 2025	Location near UAE*	Location near Cairo (via same path)*	FSQ4936	Unknown
8 Oct 2025	Al Ain, UAE	Location in western Saudi Arabia* (via same path as above)	FY4936/FSQ4936	Unknown
9 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
11 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
12 Oct 2025	Abu Dhabi, UAE	Same as above	FY4936/FSQ4936	Unknown
14 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
15 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
17 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
18 Oct 2025	Abu Dhabi, UAE	Same as above	FY4936/FSQ4936	Unknown
19 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
22 Oct 2025	Al Ain, UAE	Same as above	FY4936/FSQ4936	Unknown
23 Oct 2025	Location near UAE	Same as above	FY4942/FSQ4942	Unknown
25 Oct 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
26 Oct 2025	Abu Dhabi, UAE	Location in western Saudi Arabia* (via same flight path)	FY4936/FSQ4936	Unknown
30 Oct 2025	Abu Dhabi, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
1 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
21 Nov 2025	Location in UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
8 Dec 2025	Location near Benghazi*	Location in UAE	FY4933/FSQ4932	Unknown
13 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
15 Dec 2025	Location in UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
26 Dec 2025	Location in UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
27 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
30 Dec 2025	Fujairah, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.B.2

Flight activities aircraft EX-76006 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status
26 Oct 2024	Sharjah, UAE	Location near Benghazi*	FSQ4933	Unknown
2 Nov 2024	Location near UAE*	Location near Benghazi*	FSQ4948	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.B.3

Flight activities aircraft EX-76017 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status (local)
9 Nov 2024	Location near UAE*	Location near Benghazi*	FSU4934/FSQ4934	Unknown
10 Nov 2024	Location near UAE*	Location near Benghazi*	FSU4931/FSQ4931	Unknown
8 Dec 2024	Location near UAE *	Benghazi, Libya	FSQ4934	Landed 23:14
26 Dec 2024	Location near UAE*	Location in eastern Egypt* (via same flight path as above)	FSU4936/FSQ4936	Unknown
28 Dec 2024	Location near UAE*	Location in eastern Egypt* (via same path)	FSU4939/FSQ4939	Unknown
11 Mar 2025	Location near UAE*	Location near Benghazi*	FSQ4935	Unknown
12 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 10:38
13 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 2:10
15 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 6:35
16 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 6:32
18 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 6:55
19 Mar 2025	Istanbul, Türkiye	Benghazi, Libya	FSQ4934	Landed 6:47
8 Apr 2025	Fujairah, UAE	Location near Benghazi *	FSQ4934	Unknown
12 Apr 2025	Al Ain, UAE	Location near Benghazi *	FSQ4934	Unknown
16 Apr 2025	Location near UAE *	Location east of Cairo (via same path) *	FSQ4934	Unknown
17 Apr 2025	Location near UAE *	Location south of Cairo (via same path) *	FSQ4934	Unknown
19 Apr 2025	Location near UAE *	Location near Benghazi *	FSQ4934	Unknown
21 Apr 2025	Location near UAE *	Location near Benghazi *	FSQ4934	Unknown
22 Apr 2025	Location near UAE *	Location near Benghazi *	FSQ4936	Unknown
3 May 2025	Location near UAE *	Location near Benghazi *	FSQ4936	Unknown
5 May 2025	Dubai, UAE	Location near Benghazi *	FSQ4936	Unknown
12 May 2025	Fujairah, UAE	Location east of Cairo (via same path) *	FSQ4936	Unknown
14 May 2025	Fujairah, UAE	Location east of Cairo (via same path) *	FSQ4936	Unknown
16 May 2025	Location near UAE *	Location east of Cairo (via same path) *	FSQ4936	Unknown
17 May 2025	Location in UAE *	Location east of Cairo (via same path) *	FSQ4936	Unknown
19 May 2025	Location near UAE *	Location near Benghazi *	FSQ4936	Unknown
21 May 2025	Fajairah, UAE	Location near Benghazi *	FSQ4936	Unknown
25 May 2025	Location near UAE *	Location near Benghazi *	FSQ4936	Unknown
29 May 2025	Location near UAE*	Location near Benghazi*	FSQ4937	Unknown
31 May 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Unknown
3 Jun 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Unknown
5 Jun 2025	Location near UAE*	Location near Benghazi*	FSQ4938	Unknown
6 Jun 2025	Location near UAE*	Location in northern Egypt* (via same path)	FSQ4936	Unknown
8 Jun 2025	Location near UAE*	Location in northern Egypt* (via same path)	FSQ4936	Unknown
24 Jun 2025	Location near UAE*	Location in northern Egypt* (via same path)	FSQ4936	Unknown

26 Jun 2025	Location near UAE*	Location in northern Egypt* (via same path)	FSQ4936	Unknown
30 Jun 2025	Location near UAE*	Location in northern Egypt* (via same path)	FSQ4936	Unknown
1 Jul 2025	Location near UAE*	Location near Benghazi*	FSQ4936	Unknown
3 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
4 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
6 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
11 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
19 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
24 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
27 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
29 Jul 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
1 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
2 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
5 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
16 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
17 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
31 Aug 2025	Dubai, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
2 Sep 2025	Dubai, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
3 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
5 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
7 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
13 Sep 2025	Abu Dhabi, UAE	Benghazi, Libya	FY4936/FSQ4936	Landed 7:01
13 Sep 2025	Benghazi, Libya	Al-Kufra, Libya	FY4936/FSQ4936	Landed 10:55
5 Nov 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
7 Nov 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
10 Nov 2025	Benghazi, Libya	Location near Bossaso	FY4933/FSQ4932	
11 Nov 2025	Benghazi, Libya	Location near Bossaso	FY4932/FSQ4933	
2 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
6 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
9 Dec 2025	Location in UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
16 Dec 2025	Location near Benghazi*	Location near UAE*	FY4940/FSQ4940	
16 Dec 2025	Location in UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
18 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
21 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
23 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
25 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown

28 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
30 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.B.4

Flight activities aircraft EX-76018 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status (UTC)
27 Nov 2024	Location near UAE*	Location near Benghazi*	FSQ4935	Unknown
29 Nov 2024	Location near UAE*	Location near Benghazi*	FSQ4935	Unknown
2 Dec 2024	Location near UAE*	Location near Benghazi*	FSQ4935	Unknown
11 Dec 2024	Ra'sal-khaymah, UAE	Location near Benghazi*	FSQ4935	Unknown
30 Jan 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 17:58
3 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 17:05
4 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 22:09
5 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4934	Landed 19:14
10 Feb 2025	Location near UAE*	Location near Benghazi*	FSQ4935	Unknown
13 Feb 2025	Location in north Saudi Arabia (via same flight path)*	Location near Benghazi*	FSQ4934	Landed 18:27
17 Feb 2025	Location in north Saudi Arabia (via same flight path)*	Location near Benghazi*	FSQ4934	Landed 17:50
19 Feb 2025	Location south of Cairo (via same flight path)*	Location near Benghazi*	FSQ4935	Landed 19:46
23 Feb 2025	Location in north Saudi Arabia (via same flight path)*	Location near Benghazi*	FSQ4934	Landed 19:51
24 Feb 2025	Location in north Saudi Arabia (via same flight path)*	Location near Benghazi*	FSQ4935	Landed 17:06
2 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
5 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
7 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
9 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
10 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
15 Jun 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FSQ4935	Unknown
18 Jun 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FSQ4935	Unknown
21 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
23 Jun 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FSQ4935	Unknown
26 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
28 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
29 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
30 Jun 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FSQ4935	Unknown
2 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
3 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
5 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
6 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown

8 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
9 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
11 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
13 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4934/FSQ4934	Unknown
14 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
16 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4934/FSQ4934	Unknown
17 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
19 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
20 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
22 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
23 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
26 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
27 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
28 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
30 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
31 Jul 2025	Location in eastern Egypt*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
2 Aug 2025	Benghazi, Libya	Istanbul, Türkiye	FY4921/FSQ4921	Landed 12:22
24 Aug 2025	Location near UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
26 Aug 2025	Location near UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
29 Aug 2025	Location near UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
1 Sep 2025	Location off Egyptian east coast*	Location off Somali coast * ²⁴⁶	FY4933/FSQ4933	Unknown
2 Sep 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4933/FSQ4933	Unknown
4 Sep 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4933/FSQ4933	Unknown
6 Sep 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4933/FSQ4933	Unknown
7 Sep 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4933/FSQ4933	Unknown
12 Sep 2025	Izmir, Türkiye	Location near Benghazi*	FY4939/FSQ4939	Unknown
13 Sep 2025	Izmir, Türkiye	Location near Benghazi*	FY4939/FSQ4939	Unknown
14 Sep 2025	Izmir, Türkiye	Location off Egyptian coast* (via same path)	FY4939/FSQ4939	Unknown
15 Sep 2025	Izmir, Türkiye	Location off Egyptian coast* (via same path)	FY4939/FSQ4939	Unknown
16 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
18 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4933	Unknown
20 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown

²⁴⁶ As displayed on flight tracking platform flightradar24.com, the flight path of the flight FY4933/FSQ4933 on 1 September 2025, as the subsequent flight of FY4938/FSQ4938 on 29 August 2025 whose flight path ended near Benghazi, Libya, started from a location off Egyptian east coast and ended off Somali Coast. These flights, together with the aircraft's flights on 30 September/1 October 2025 (see below), aircraft EX-76022's flights on 25 July/4 August 2025, and aircraft EX-76008's multiple flights on 7, 8, 10 and 11 July 2025, provided evidence and strongly suggested a pattern that these flights departed from Benghazi or other places in Libya and destined for Bossaso, Somalia.

22 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
23 Sep 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
30 Sep 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
1 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4932/FSQ4932	Unknown
3 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
4 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
5 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
7 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
8 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
9 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
11 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
13 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
14 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
15 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
16 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
18 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4934/FSQ4934	Unknown
19 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
22 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
23 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
25 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
26 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
28 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
29 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
30 Oct 2025	Location off Egyptian east coast*	Location off Somali coast* (via same path)	FY4935/FSQ4935	Unknown
18 Nov 2025	Location near Benghazi*	Location in UAE*	FY4935/FSQ4935	Unknown
26 Nov 2025	Location near Benghazi*	Location near UAE*	FY4938/FSQ4939	Unknown
27 Nov 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
29 Nov 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
2 Dec 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
5 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
7 Dec 2025	Ankara, Türkiye	Benghazi	FY4938/FSQ4938	Unknown
8 Dec 2025	Ankara, Türkiye	Benghazi	FY4938/FSQ4938	Unknown
9 Dec 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
11 Dec 2025	Abu Dhabi	Location near Benghazi*	FY4938/FSQ4938	Unknown
14 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
16 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
17 Dec 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
18 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown

20 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
22 Dec 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.B.5

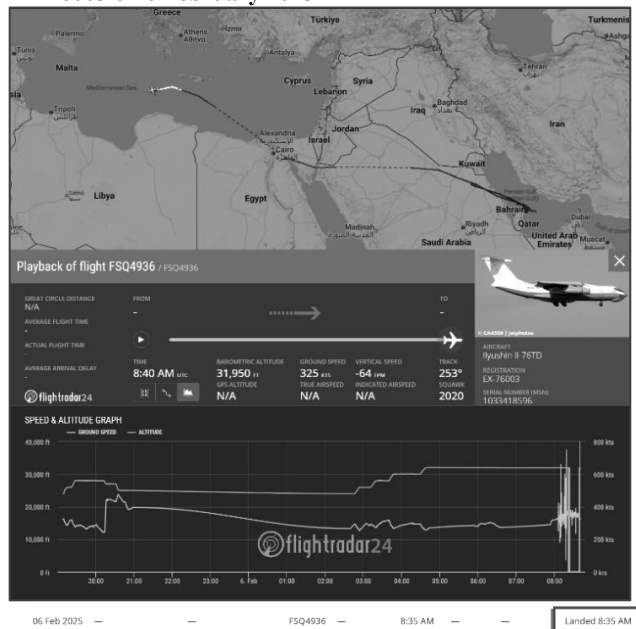
Flight activities aircraft EX-76022 to and from Libya

Date	Start of Flight path	End of Flight path	Flight Number	Status
8 Jul 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
14 Jul 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
19 Jul 2025	Dubai, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
21 Jul 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
22 Jul 2025	Location near UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
25 Jul 2025	Location in UAE*	Location near Benghazi*	FY4938/FSQ4938	Unknown
4 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
5 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
6 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
8 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
9 Aug 2025	Location in eastern Egypt*	Location off Somali coast*	FY4935/FSQ4935	Unknown
12 Aug 2025	Location near UAE*	Location near Benghazi*	FY4936/FSQ4936	Unknown
14 Aug 2025	Location in eastern Egypt*	Location off Somali coast*	FY4935/FSQ4935	Unknown
15 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
19 Aug 2025	Location in eastern Egypt*	Location off Somali coast*	FY4935/FSQ4935	Unknown
21 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
22 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
24 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
25 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
29 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
30 Aug 2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
3 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
5 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
6 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
11 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
16 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
18 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
19 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4935/FSQ4935	Unknown
21 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
22 Sep2025	Location off Egyptian east coast*	Location off Somali coast*	FY4934/FSQ4934	Unknown
10 Oct 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown

21 Oct 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
2 Nov 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown
5 Nov 2025	Abu Dhabi, UAE	Location near Egypt-Libya border*	FY4938/FSQ4938	Unknown
9 Nov 2025	Al Ain, UAE	Location in central Egypt*	FY4938/FSQ4938	Unknown
14 Nov 2025	Al Ain, UAE	Location in central Egypt*	FY4938/FSQ4938	Unknown
16 Nov 2025	Abu Dhabi, UAE	Location in central Egypt*	FY4938/FSQ4938	Unknown
22 Nov 2025	Al Ain, UAE	Location in central Egypt*	FY4936/FSQ4936	Unknown
24 Nov 2025	Al Ain, UAE	Location in central Egypt*	FY4936/FSQ4936	Unknown
27 Nov 2025	Abu Dhabi, UAE	Location in central Egypt*	FY4936/FSQ4936	Unknown
1 Dec 2025	Location near Egypt-Libya border*	Fujairah, UAE	FY4937/FSQ4937	Unknown
6 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4936/FSQ4936	Unknown
7 Dec 2025	Al Ain, UAE	Location near Benghazi*	FY4938/FSQ4938	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.
Sources: flightradar24.com and globe.adsbexchange.com.

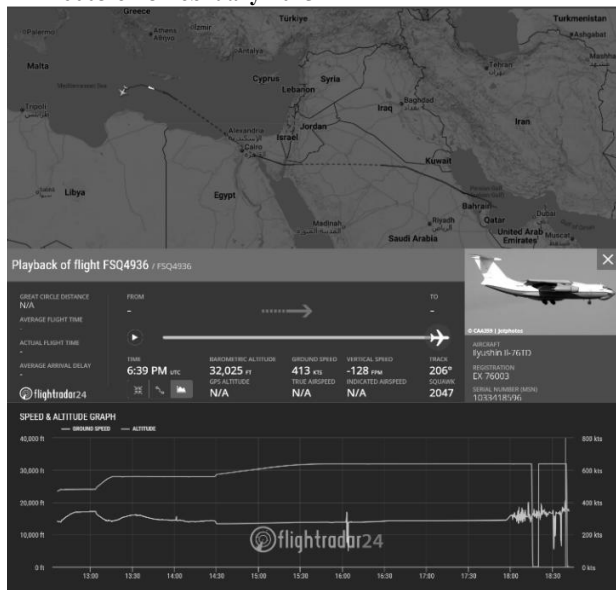
Figure 18.B.1
EX-76003 on 6 February 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

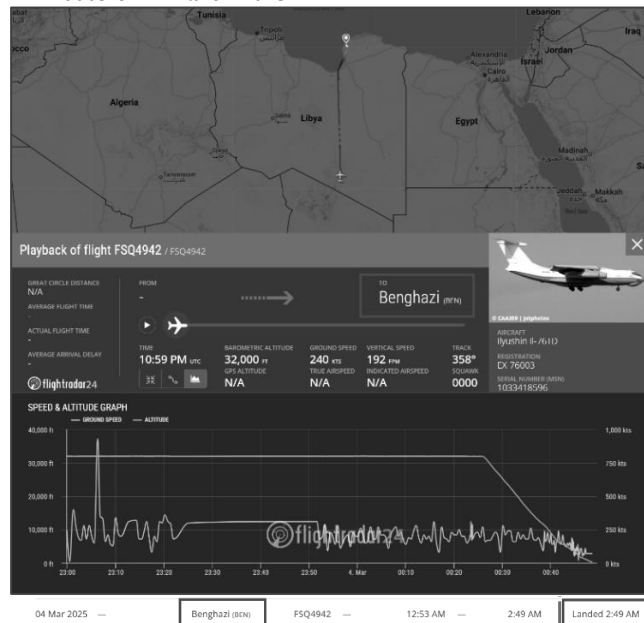
Figure 18.B.2
EX-76003 on 8 February 2025



Source: flightradar24.com

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Figure 18.B.3
EX-76003 on 4 March 2025



Source: flightradar24.com

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Figure 18.B.4
EX-76017 on 16 March 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.B.5
EX-76017 on 13 September 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

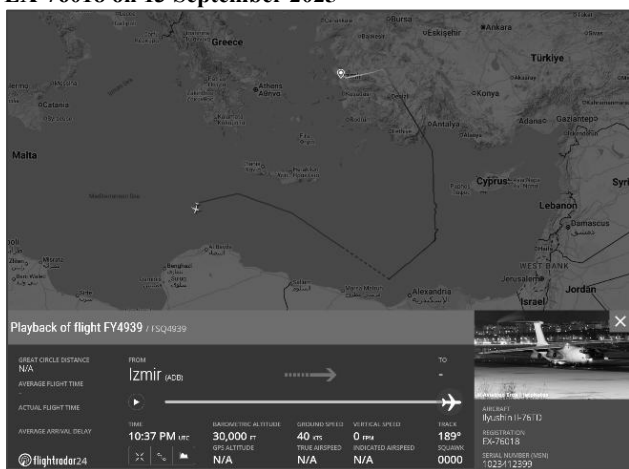
Figure 18.B.6
EX-76017 on 13 September 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

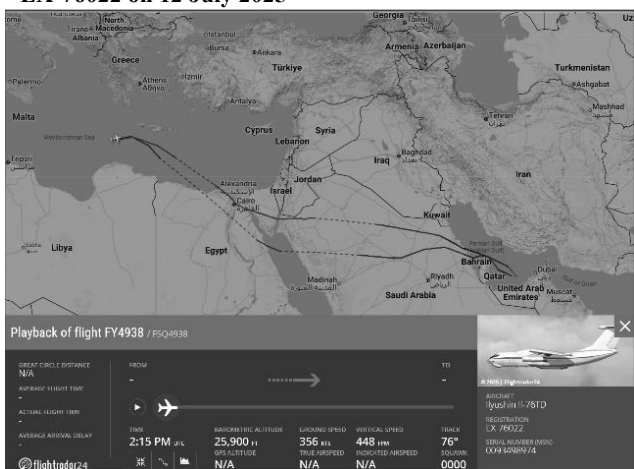
Figure 18.B.7
EX-76018 on 13 September 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.B.8
EX-76022 on 12 July 2025



Source: flightradar24.com

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Appendix 18.C: New Way Cargo Airlines

1. In previous Panel reports,²⁴⁷ the Panel reported on the various air routes being used on the airbridge from the United Arab Emirates (UAE) in support of the Libyan Arab armed forces (LAAF). The Panel identified that a Kyrgyzstan-registered operator, New Way Cargo Airlines conducted 15 flights by its Ilyushin 76 (IL-76) cargo aircraft (EX-76026) on the same airbridge and between Bossaso, Somalia and east Libya from July to September 2025 (see table 18.C.1). Examples of these flights are provided in figures 18.C.1 to 18.C.3.
2. The Panel requested further information from New Way Cargo Airlines.²⁴⁸ No response was received.
3. Flights conducted by New Way Cargo Airlines to Libya have met several air delivery profile indicators,²⁴⁹ including: a) significant number of flights over a period of time; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; and e) limited, inaccurate or no information provided to requests for information. Thus, the Panel assessed that flights conducted by New Way Cargo Airlines constituted violations of paragraph 9 of resolution 1970 (2011).

Table 18.C.1
Flight activities of aircraft EX-76026 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status
28 July 2025	Al Ain, UAE	Location in central Egypt *	NU9111/NWY9111	Unknown
30 Jul 2025	Bossaso, Somalia	Location near Al-Kufra, Libya*	NU9111/NWY9111	Unknown
1 Aug 2025	Bossaso, Somalia	Location near Ethiopia-South Sudan border* (via same flight path as above)	NU9111/NWY9111	Unknown
3 Aug 2025	Bossaso, Somalia	Location in northern Sudan* (via same path)	NU9111/NWY9111	Unknown
4 Aug 2025	Bossaso, Somalia	Location in northern Sudan* (via same path)	NU9111/NWY9111	Unknown
6 Aug 2025	Bossaso, Somalia	Location in northern Sudan* (via same path)	NU9111/NWY9111	Unknown
7 Aug 2025	Bossaso, Somalia	Location in northern Sudan* (via same path)	NU9111/NWY9111	Unknown
21 Aug 2025	Abu Dhabi, UAE	Location in central Egypt*	NU9111/NWY9111	Unknown
22 Aug 2025	Benghazi, Libya	Abu Dhabi, UAE	NU9112/NWY9112	Unknown
23 Aug 2025	Al Ain, UAE	Benghazi, Libya	NU9111/NWY9111	Unknown
27 Aug 2025	Al Ain, UAE	Location in central Egypt*	NU9111/NWY9111	Unknown
29 Aug 2025	Al Ain, UAE	Location in central Egypt*	NU9111/NWY9111	Unknown
5 Sep 2025	Al Ain, UAE	Location Egypt-Libya border*	NU9111/NWY9111	Unknown
7 Sep 2025	Al Ain, UAE	Location in central Egypt*	NU9111/NWY9111	Unknown
27 Sep 2025	Bossaso, Somalia	Location in northern Sudan* (via same path)	NU9111/NWY9111	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Sources: flightradar24.com and globe.adsbexchange.com.

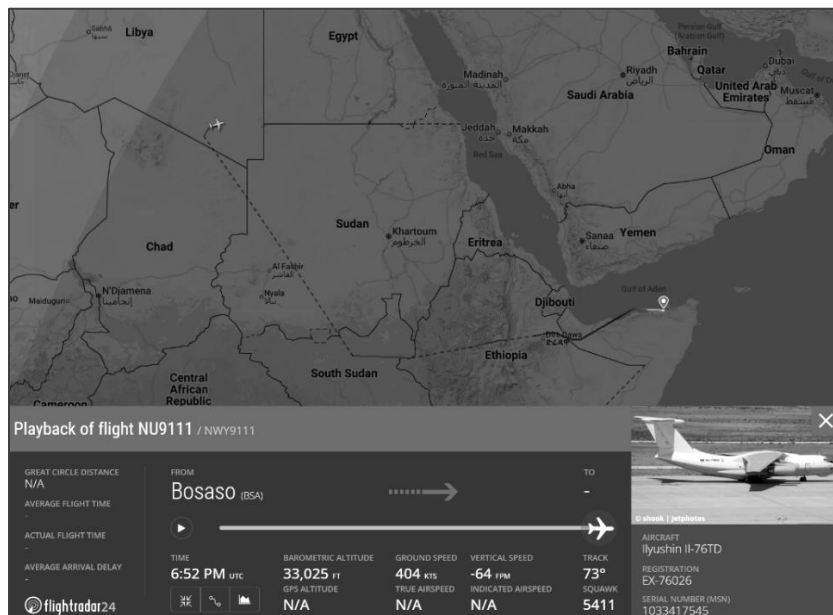
²⁴⁷ Annex 55 of [S/2021/229](#), Annex 96 of [S/2022/427](#), Annex 61 of [S/2023/673](#), and Annex 39 of [S/2024/914](#).

²⁴⁸ Panel's letter on 19 December 2025.

²⁴⁹ Annex 3 of this report.

Figure 18.C.1

Flight by EX-76026 from Bossaso to Al-Kufra on 30 July 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.C.2

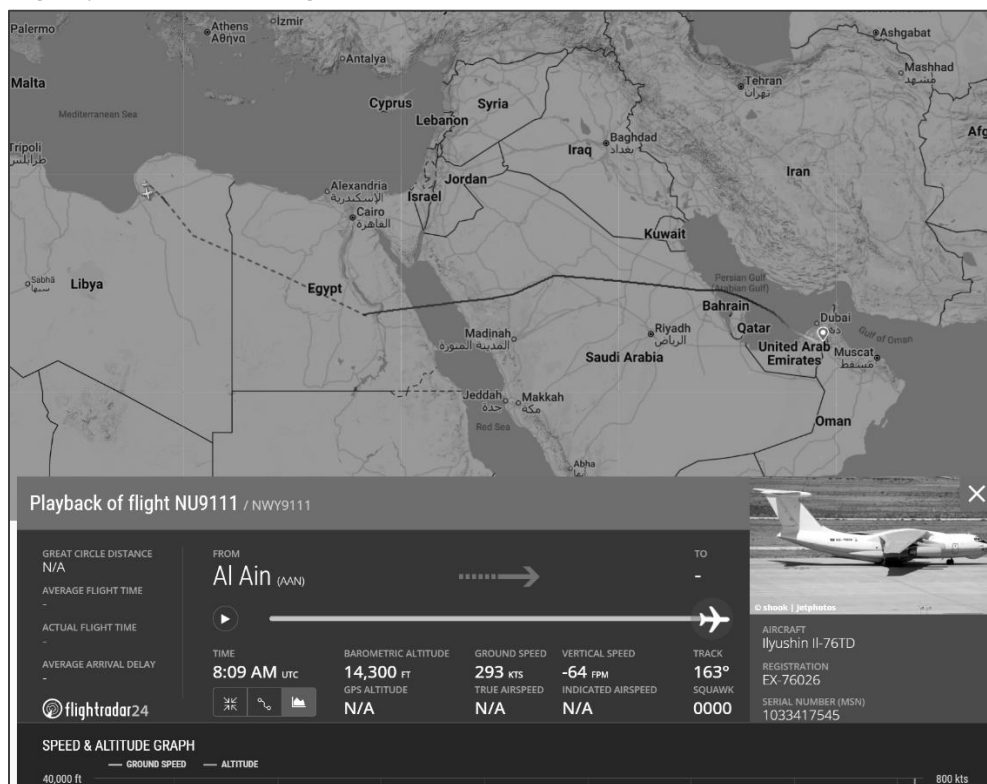
Flight by EX-76026 from Bossaso to east Libya on 6 Aug 2025



Source: globe.adsbexchange.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.C.3
Flight by EX-76025 on 13 August 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.D: Sapsan Airlines

1. In previous Panel reports,²⁵⁰ the Panel reported on the various air flight paths being used on the airbridge from the United Arab Emirates (UAE) to east Libya in support of the Libyan Arab armed forces (LAAF) and the activities of a Kyrgyzstan-registered operator Sapsan Airline LLC operating on these flight paths. During this reporting period, the Panel identified that Sapsan continued to operate flights to Libya, mostly on the same airbridge, by its four Ilyushin 76 (IL-76) cargo aircraft (EX-76005, EX-76008, EX-76025 and EX-76030), including flights between Bossaso, Somalia and eastern Libya. The Panel further identified that Sapsan's aircraft conducted flights between Türkiye and Benghazi (tables 18.D.1-18.D.4).

2. In response to the Panel's inquiry, Sapsan confirmed the performance of certain flights, but did not confirm other flights or claimed that the flights did not occur.²⁵¹ Sapsan claimed that among the flights from Al Ain, United Arab Emirates to Benghazi, Libya: a) aircraft EX-76005 conducted flights on 25 November 2024, 23, 25, 27 and 29 April and 14 May 2025; b) EX-76008 conducted flights on 25 March, 1 and 16 April, 11 and 24 May 2025; c) EX-76008 conducted flights on flight paths other than to Libya on 22 and 24 November, 6, 8, 9, 11 and 12 December 2024; d) EX-76025 conducted flights on 6 February, 27 March and 13 April 2025; e) EX-76025 conducted a flight on flight path from Al Ain, United Arab Emirates to Luxor, Egypt instead of to Libya on 21 January 2025; f) EX-76005 was deregistered on 20 May 2025 (Certificate of Deregistration No. 0522) and EX-76025 was deregistered on 13 May 2025 (Certificate of Deregistration No. 0521).

3. The Panel further identified that, in addition to the flights confirmed by Sapsan: a) the flight paths of the flights conducted by EX-76005 on 27 and 31 December 2024 were identical to the flight conducted by the same aircraft on 25 April 2025, with all flight paths having ended at locations near Benghazi, Libya with flight status as "landed" (figures 18.D.1 and 18.D.2); b) although not confirmed by Sapsan, the displayed arrival airports for the flight by EX-76008 on 17 March 2025 was "Benghazi", Libya (figure 18.D.3); c) the flights on 22 and 24 November, 6, 8, 9, 11 and 12 December 2024 were conducted by EX-76005 and the previous identification of these flights that were conducted by EX-76008 was a result that Flightradar24.com registered EX-76008's MSN number of 1033416515 under EX-76005; d) flight data indicated that on 21 January 2025, EX-76025 conducted a flight from a location near UAE to a location near Benghazi with a status of "landed" (figure 18.D.4); and e) examples of other flights conducted by aircraft of Sapsan taking different flight paths of the airbridge as in tables 18.D.1 to 18.D.4 of this annex are provided in figures 18.D.5 to 18.D.10. The Panel found that the information provided by Sapsan lacked credibility and was inconsistent with the Panel's findings.

4. Flights conducted by Sapsan Airline to Libya have met several air delivery profile indicators, including: a) significant number of flights over a short period; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; e) current or previous listings of owner, operator, or aircraft; and f) limited, inaccurate or no information provided to requests for information. Thus, the Panel assessed that flights conducted by Sapsan Airline to Libya constituted violations of paragraph 9 of resolution 1970 (2011).

Table 18.D.1

Flight activities of aircraft EX-76005 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status
16 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
22 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
24 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
6 Dec 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
8 Dec 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
9 Dec 2024	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown

²⁵⁰ Annex 55 of S/2021/229, Annex 96 of S/2022/427, Annex 61 of S/2023/673, and Annex 39 of S/2024/914.

²⁵¹ Letters received by the Panel on 1 July and 12 August 2025.

11 Dec 2024	Location near UAE*	Location near Al Khadim*	Unknown	Unknown
14 Dec 2024	Location in UAE*	Location near Al Khadim *	Unknown	Unknown
27 Dec 2024	Al Ain, UAE	Location near Al Khadim *	Unknown	Landed 6:17 (UTC)
31 Dec 2024	Al Ain, UAE	Location near Al Khadim *	Unknown	Landed 13:25 (UTC)
20 Apr 2025	Abu Dhabi, UAE	Location near Benghazi *	S24815/KGB4815	Unknown
21 Apr 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
23 Apr 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
25 Apr 2025	Location near UAE*	Location near Benghazi *	Unknown	Unknown
27 Apr 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
29 Apr 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
1 May 2025	Location near UAE*	Location south of Benghazi (via same flight path)*	Unknown	Unknown
3 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
5 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
6 May 2025	Location near UAE*	Unknown (via same flight path)	Unknown	Unknown
8 May 2025	Location near UAE*	Unknown (via same flight path)	Unknown	Unknown
14 May 2025	Location near UAE*	Unknown (via same flight path)	Unknown	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.D.2

Flight activities of aircraft EX-76008 to and from Libya

Date	Start of Flight path	End of Flight path	Flight Number	Status
20 Nov 2024	Location near UAE*	Benghazi, Libya	S24805/KGB4805	Landed 19:39 (local)
25 Dec 2024	Al Ain, UAE	Benghazi, Libya	S24812/KGB4812	Landed 0:20 (local)
26 Dec 2024	Al Ain, UAE	Location near Al Khadim *	Unknown	Landed 23:43 (UTC)
2 Jan 2025	Location near UAE*	Location near Al Khadim *	S24811/KGB4811	Unknown
5 Jan 2025	Location in UAE*	Location east of Cairo (via same flight path)*	Unknown	Unknown
7 Jan 2025	Al Ain, UAE	Location near Al Khadim*	Unknown	Landed 1:39 (UTC)
8 Jan 2025	Al Ain, UAE	Location near Al Khadim *	Unknown	Landed 13:20 (UTC)
13 Jan 2025	Location near UAE*	Location near Al Khadim *	Unknown	Landed 9:14 (UTC)
16 Jan 2025	Dubai, UAE	Location near Al Khadim *	Unknown	Landed 6:01 (UTC)
18 Jan 2025	Location near UAE*	Location near Al Khadim *	Unknown	Unknown
15 Mar 2025	Abu Dhabi, UAE	Location near Benghazi *	Unknown	Unknown
17 Mar 2025	Al Ain, UAE	Benghazi, Libya	Unknown	Landed 16:50 (local)
29 Mar 2025	Location in UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
1 Apr 2025	Al Ain, UAE	Location near Benghazi *	Unknown	Landed 1:10 (UTC)
2 Apr 2025	Al Ain, UAE	Location near Benghazi *	Unknown	Unknown

3 Apr 2025	Al Ain, UAE	Location near Benghazi *	Unknown	Unknown
5 Apr 2025	Al Ain, UAE	Location near Al Khadim *	Unknown	Unknown
8 Apr 2025	Al Ain, UAE	Location near Benghazi *	Unknown	Unknown
17 Apr 2025	Location near Benghazi*	Location near UAE*	NA	Unknown
9 May 2025	Location near UAE*	Location north of Cairo (via same flight path)*	Unknown	Unknown
11 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
15 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
17 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
20 May 2025	Location near UAE*	Location north of Cairo (via same flight path) *	Unknown	Unknown
22 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
24 May 2025	Location near UAE*	Location east of Cairo (via same flight path) *	Unknown	Unknown
25 May 2025	Location near UAE*	Location east of Benghazi (via same path) *	Unknown	Unknown
27 May 2025	Location near UAE*	Location near Cairo (via same path as above)*	NA	Unknown
28 May 2025	Benghazi, Libya	Location near UAE*	NA	Unknown
29 May 2025	Location near UAE*	Location near Cairo (via same flight path)*	NA	Unknown
2 Jun 2025	Location near Benghazi *	Location near UAE*	NA	Unknown
5 Jun 2025	Dubai, UAE	Al-Kufra, Libya (via Somalia)	S24810/KGB24810	Landed 14:08 (local)
9 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	NA	Unknown
11 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	NA	Unknown
12 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	NA	Unknown
17 Jun 2025	Location near Izmir, Türkiye*	Location off Egyptian north coast in direction to Libya*	NA	Unknown
18 Jun 2025	Izmir, Türkiye	Location near Benghazi*	S24721/KGB4721	Unknown
19 Jun 2025	Location near Izmir, Türkiye*	Location off Egyptian north coast to Libya*	NA	Unknown
20 Jun 2025	Izmir, Türkiye	Benghazi, Libya	NA	Unknown
25 Jun 2025	Ankara, Türkiye	Location off Egyptian north coast to Libya*	NA	Unknown
26 Jun 2025	Benghazi, Libya	Ankara, Türkiye	NA	Unknown
28 Jun 2025	Location near Izmir, Türkiye*	Location near Benghazi*	S24721/KGB4721	Unknown
29 Jun 2025	Location near Izmir, Türkiye*	Location off Egyptian north coast to Libya*	S24721/KGB4721	Unknown
4 Jul 2025	Location in eastern Egypt*	Location off Somali coast*	NA	Unknown
5 Jul 2025	Location in eastern Egypt*	Bossaso, Somalia	S24809/KGB4809	Landed 14:47 (local)

7 Jul 2025	Benghazi, Liya	Location off Somali coast*	S24810/KGB4810	Unknown
8 Jul 2025	Benghazi, Libya	Location off Somali coast*	NA	Unknown
10 Jul 2025	Benghazi, Libya	Bossaso, Somalia	S24809/KGB4809	Landed 15:04 (local)
11 Jul 2025	Benghazi, Libya	Bossaso, Somalia	S24809/KGB4809	Landed 11:25 (local)
12 Jul 2025	Bossaso, Somalia	Al-Kufra, Libya	NA	Landed 21:53 (local)
13 Jul 2025	Location in central Egypt*	Bossaso, Somalia	S24809/KGB4809	Landed 14:56 (local)
14 Jul 2025	Bossaso, Somalia	Benghazi, Libya	S24810/KGB4810	Landed 14:03 (local)
17 Jul 2025	Location near UAE*	Location near Benghazi*	NA	Unknown
19 Jul 2025	Location near Izmir, Türkiye*	Location near Benghazi*	S24721/KGB4721	Unknown
20 Jul 2025	Location near Izmir, Türkiye*	Location near Benghazi*	NA	Unknown
21 Jul 2025	Location near Izmir, Türkiye*	Location off Egyptian north to Libya*	S24721/KGB4721	Unknown
22 Jul 2025	Location near Izmir, Türkiye*	Benghazi	S24721/KGB4721	Landed 20:50 (local)
24 Jul 2025	Location near Izmir, Türkiye*	Location near Benghazi*	NA	Unknown
25 Jul 2025	Location near Izmir, Türkiye*	Location near Benghazi*	NA	Unknown
26 Jul 2025	Location near Izmir, Türkiye*	Location near Benghazi*	NA	Unknown
27 Jul 2025	Location near Izmir, Türkiye*	Benghazi	S24721	Landed 20:12 (local)
29 Oct 2025	Al Ain, UAE	Benghazi	S24815	Landed 20:35 (local)

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.D.3

Flight activities of aircraft EX-76025 to and from Libya

Date	Start of Flight path	End of Flight path	Flight Number	Status
5 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24805/KGB4805	Unknown
6 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24805/KGB4805	Unknown
9 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24805/KGB4805	Unknown
11 Nov 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24805/KGB4805	Unknown
3 Dec 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24812/KGB4812	Unknown
5 Dec 2024	Location near UAE*	Location east of Cairo (via same flight path) *	S24812/KGB4812	Landed 11:01 (UTC)
6 Dec 2024	Location in UAE*	Location east of Cairo (via same flight path) *	S24812/KGB4812	Unknown
21 Jan 2025	Location near UAE*	Location near Al Khadim*	S24801/KGB4801	Landed 13:28 (UTC)

1 Feb 2025	Location in eastern Libya*	Location near Al Khadim*	S24801/KGB4801	Landed 4:02 (UTC)
6 Feb 2025	Location near UAE*	Location near Al Khadim*	S24811/KGB4811	Landed 9:47 (UTC)
7 Feb 2025	Location in UAE*	Location near Al Khadim*	S24811/KGB4811	Landed 10:39 (UTC)
8 Feb 2025	Location near UAE*	Location near Al Khadim*	KGB4811	Unknown
10 Feb 2025	Location near UAE*	Location east of Cairo (via same flight path) *	S24811/KGB4811	Unknown
9 Mar 2025	Location near UAE*	Location near Benghazi *	S24811/KGB4811	Unknown
13 Mar 2025	Location in UAE*	Location east of Cairo (via same flight path) *	S24811/KGB4811	Unknown
27 Mar 2025	Al Ain, UAE	Location in Libya*	S24811/KGB4811	Unknown
28 Mar 2025	Location south of Benghazi *	Al-Kufra, Libya	S24811/KGB4811	Landed 17:31 (local)
30 Mar 2025	Al Ain, UAE	Location near eastern Egypt (via same flight path)*	S24811/KGB4811	Unknown
7 Apr 2025	Al Ain, UAE	Location north of Cairo (via same flight path) *	S24811/KGB4811	Unknown
10 Apr 2025	Al Ain, UAE	Location east of Cairo (via same flight path) *	S24811/KGB4811	Unknown
13 Apr 2025	Al Ain, UAE	Location near Al Khadim*	S24811/KGB4811	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.D.4

Flight activities of aircraft EX-76030 to and from Libya

Date	Start of Flight path	End of Flight path	Flight Number	Status (local)
30 May 2025	Al Ain, UAE	Location near Egypt-Libya border*	S24811	Unknown
1 Jun 2025	Al Ain, UAE	Benghazi	S24811	Landed 7:17
3 Jun 2025	Al Ain, UAE	Location in central Egypt* (via same flight path as above)	S24811	Unknown
18 Jun 2025	Location near Tubruq*	Al Ain, UAE	S24812	Landed 5:50
19 Jun 2025	Al Ain, UAE	Benghazi	S24815	Landed 7:17
22 Jun 2025	Al Ain, UAE	Benghazi	S2481	Landed 5:01
22 Jun 2025	Location near Al-Kufra *	Location near Al-Kufra*	S24815	Unknown
22 Jun 2025	Location near Benghazi*	Location near Benghazi*	S24816	Unknown
24 Jun 2025	Al Ain, UAE	Benghazi	S24815	Landed 6:47
24 Jun 2025	Location near Benghazi*	Benghazi	S24815	Landed 16:11
26 Jun 2025	Al Ain, UAE	Location near Benghazi*	S24815	Unknown
28 Jun 2025	Location in UAE*	Location off Egyptian north coast* (via same path)	S24815	Unknown
30 Jun 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
2 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
4 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown

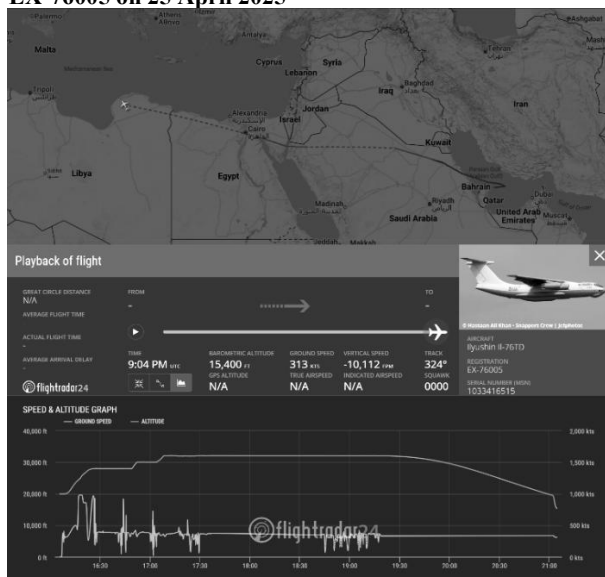
5 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
7 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
9 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
11 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
13 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
15 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
17 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
19 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
22 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
23 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
25 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
27 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
29 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
31 Jul 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
2 Aug 2025	Al Ain, UAE	Location in eastern Libya*	S24815	Unknown
4 Aug 2025	Al Ain, UAE	Location in eastern Libya*	S24815	Unknown
7 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
9 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
11 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
14 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
15 Aug 2025	Izmir, Türkiye	Location near Egypt-Libya border*	S24721	Unknown
16 Aug 2025	Izmir, Türkiye	Location near Egypt-Libya border*	S24721	Unknown
17 Aug 2025	Izmir, Türkiye	Location near Egypt-Libya border*	S24721	Unknown
19 Aug 2025	Izmir, Türkiye	Location near Egypt-Libya border*	S24816	Unknown
20 Aug 2025	Al Ain, UAE	Location near Egypt-Libya border*	S24815	Unknown
22 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
25 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
28 Aug 2025	Al Ain, UAE	Location near Egypt-Libya border*	S24815	Unknown
30 Aug 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown

1 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
3 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
4 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
6 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
7 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown
11 Sep 2025	Al Ain, UAE	Location near Egypt-Libya border*	S24815	Unknown
14 Sep 2025	Al Ain, UAE	Location off Egyptian north coast* (via same path)	S24815	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Sources: flightradar24.com and globe.adsbexchange.com.

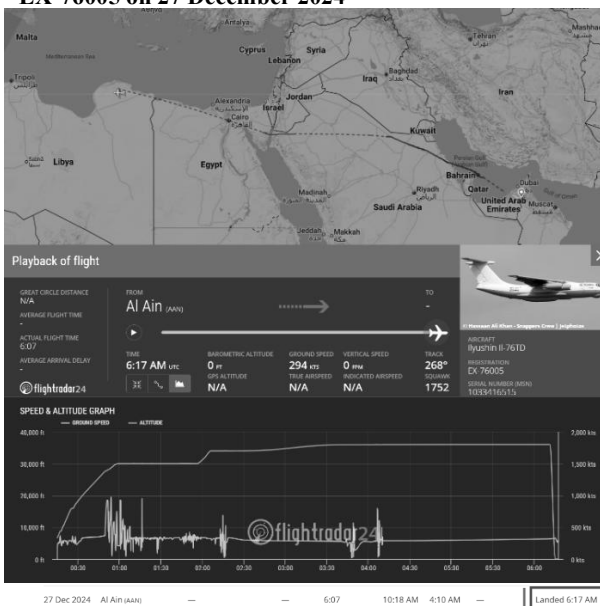
Figure 18.D.1
EX-76005 on 25 April 2025



Source: flightradar24.com

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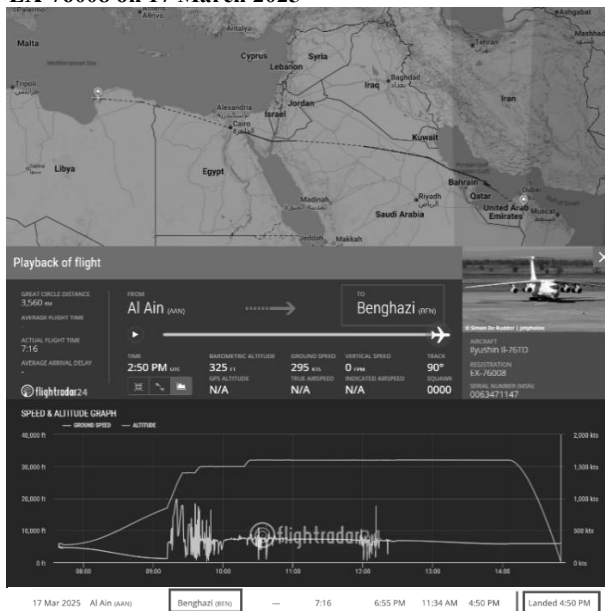
Figure 18.D.2
EX-76005 on 27 December 2024



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

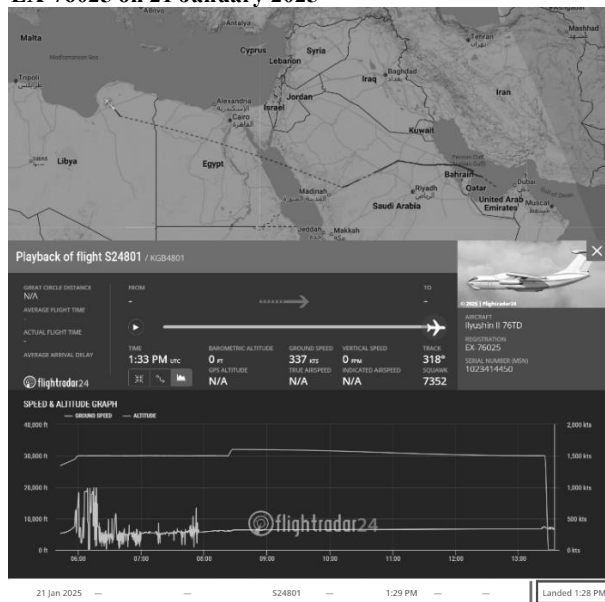
Figure 18.D.3
EX-76008 on 17 March 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

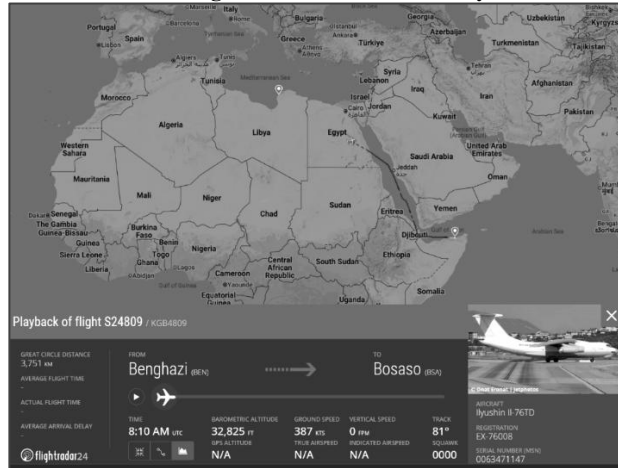
Figure 18.D.4
EX-76025 on 21 January 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.D.5
EX-76008 from Benghazi to Bossaso on 10 July 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations

Figure 18.D.6
EX-76008 from Al Ain to Benghazi 29 October 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations

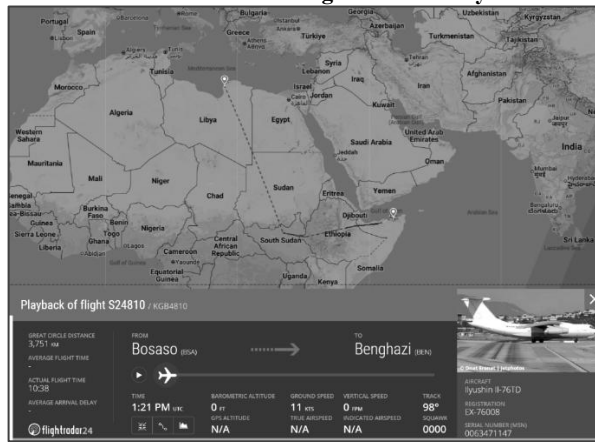
Figure 18.D.7
EX-76008 from Bossaso to Al-Kufra on 12 July 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.D.8
EX-76008 from Bossaso to Benghazi on 14 July



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.D.9

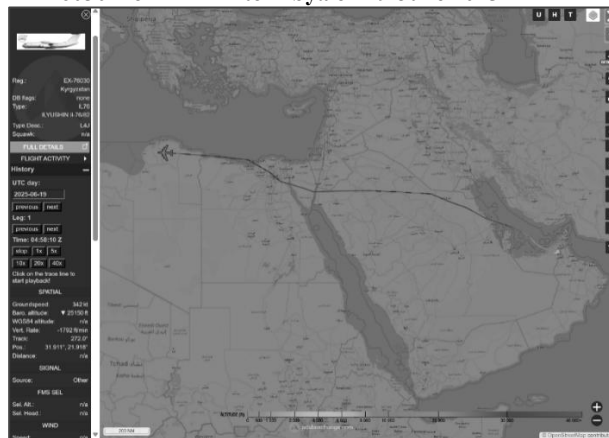
EX-76030 from Al Ain to Benghazi on 1 June 2025

Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.D.10

EX-76030 from Al Ain to Libya on 19 June 2025

Source: globe.adsbexchange.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.E: Skyline Airlines

1. In previous Panel reports,²⁵² the Panel reported on the various air flight paths being used on the airbridge from United Arab Emirates (UAE) to east Libya in support of the Libyan Arab armed forces (LAAF). The Panel identified that one Kyrgyzstan-registered operator, Skyline Airlines, conducted 59 flights using its Ilyushin 76 (IL-76) cargo aircraft EX-76012 on the same airbridge and between Bossaso, Somalia and eastern Libya from February 2025 to the end of 2025 (table 18.E.1).
2. In response to the Panel's inquiry, Skyline a) confirmed that it conducted flights to Benghazi, Libya by aircraft EX-76012 on 18, 20 and 22 May 2025; and b) stated it had no information about flights on 8 February, 24 and 26 March and 26 May 2025.²⁵³
3. The Panel has further identified that, in addition to the flights confirmed by Skyline: a) the flight paths of the flights conducted by EX-76012 on 8 February and 26 March 2025 were identical to the flight conducted by the same aircraft on 18 May 2025, with all flight paths having ended at locations off the Libyan coast near Benghazi with flight status as "landed" (see figures 18.E.1 and 18.E.2); and b) examples of other flights conducted by aircraft of Skyline on the abovementioned airbridge are listed in figures 18.E.3 and 18.E.4. The Panel found that the information provided by Skyline lacked credibility and was inconsistent with the Panel's findings.
4. Flights conducted by Skyline to Libya have met several air delivery profile indicators, including: a) significant number of flights over a period of time; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; and e) limited, inaccurate or no information provided to requests for information. Thus, the Panel assessed that flights conducted by Skyline Airlines constituted violations of paragraph 9 of resolution 1970 (2011).

Table 18.E.1
Flight activities of aircraft EX-76012 to and from Libya

Date	Start of flight path	End of flight path	Flight Number	Status (UTC)
8 Feb 2025	Fujairah, UAE	Location near Benghazi *	SLF4503	Landed 3:29
24 Mar 2025	Abu Dhabi, UAE	Location near Benghazi *	SLF4502	Unknown
26 Mar 2025	Sharjah, UAE	Location near Benghazi *	SLF4503	Landed 9:13
18 May 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
20 May 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
22 May 2025	Fujairah, UAE	Location near Benghazi *	SLF4511	Unknown
26 May 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
30 May 2025	Fujairah, UAE	Location near Benghazi *	SLF4511	Unknown
10 Jun 2025	Fujairah, UAE	Location near Benghazi *	SLF4511	Unknown
18 Jun 2025	Location near UAE*	Location near Benghazi *	SLF4511	Unknown
20 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	SLF4512	Unknown
21 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	SLF4512	Unknown
22 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	SLF4512	Unknown
23 Jun 2025	Location in central Egypt *	Location off Somali coast*	SLF4512	Unknown
26 Jun 2025	Location in central Egypt *	Location off Somali coast*	SLF4512	Unknown
27 Jun 2025	Location off Egyptian east coast*	Location off Somali coast*	SLF4512	Unknown
7 Aug 2025	Fujairah, UAE	Location near Benghazi *	SLF4511	Unknown
9 Aug 2025	Location near UAE*	Location near Benghazi *	SLF4511	Unknown
11 Aug 2025	Location near UAE*	Location near Benghazi *	SLF4511	Unknown

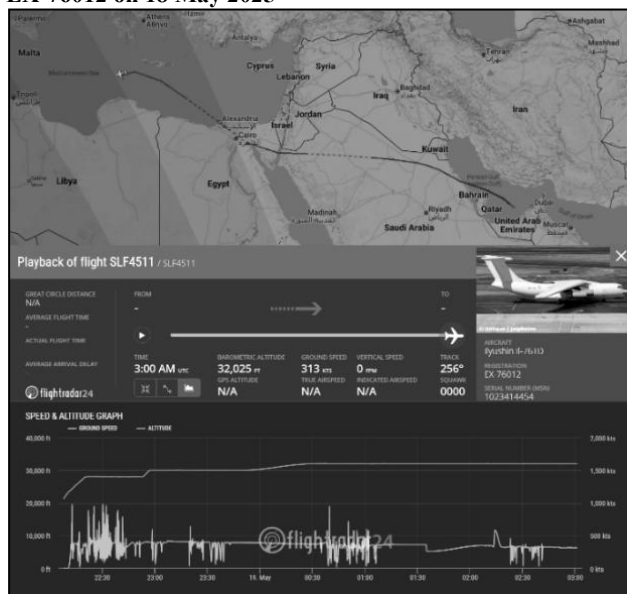
²⁵² Annex 55 of S/2021/229, Annex 96 of S/2022/427, Annex 61 of S/2023/673, and Annex 39 of S/2024/914.

²⁵³ Letters received by the Panel on 1 July and 12 August 2025.

15 Aug 2025	Dubai, UAE	Location near Benghazi *	SLF4511	Unknown
17 Aug 2025	Location near UAE*	Location near Benghazi *	SLF4511	Unknown
14 Sep 2025	Location near UAE*	Location near Benghazi *	SLF4511	Unknown
15 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
17 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
19 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
20 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
23 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
24 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
26 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
27 Sep 2025	Location near UAE *	Location near Benghazi *	SLF4511	Unknown
29 Sep 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
30 Sep 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
2 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
3 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
5 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
7 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
8 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
12 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
15 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
16 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
18 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
21 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
22 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
24 Oct 2025	Al Ain, UAE	Location near Benghazi*	SLF4511	Unknown
25 Oct 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
27 Oct 2025	Dubai, UAE	Location near Benghazi*	SLF4511	Unknown
28 Oct 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
28 Oct 2025	Beida, Libya	Location near UAE*	SLF4511	Unknown
29 Oct 2025	Beida, Libya	Location near UAE*	SLF4511	Unknown
31 Oct 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
1 Nov 2025	Location near UAE*	Location near Benghazi*	SLF4511	Unknown
3 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
5 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
6 Nov 2025	Dubai, UAE	Location near Benghazi*	SLF4511	Unknown
8 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
11 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
18 Nov 2025	Al Ain, UAE	Location near Benghazi*	SLF4511	Unknown
19 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown
20 Nov 2025	Abu Dhabi, UAE	Location near Benghazi*	SLF4511	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.
Sources: flightradar24.com and globe.adsbexchange.com.

Figure 18.E.1
EX-76012 on 18 May 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

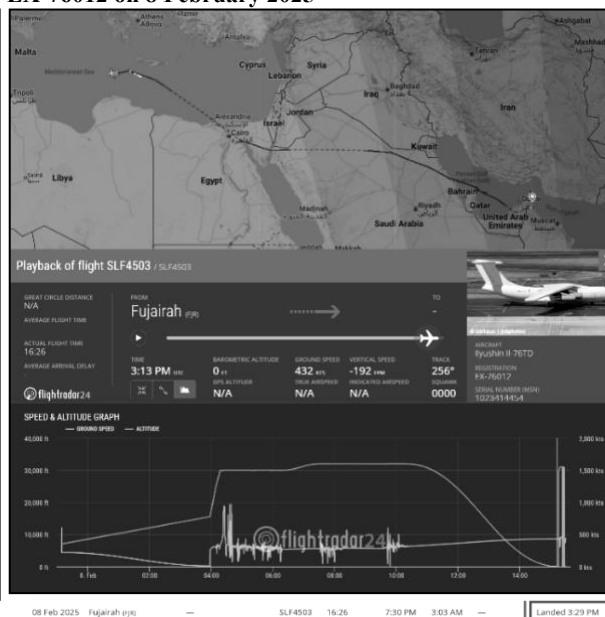
Figure 18.E.3
Flight by EX-76012 on 7 August 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

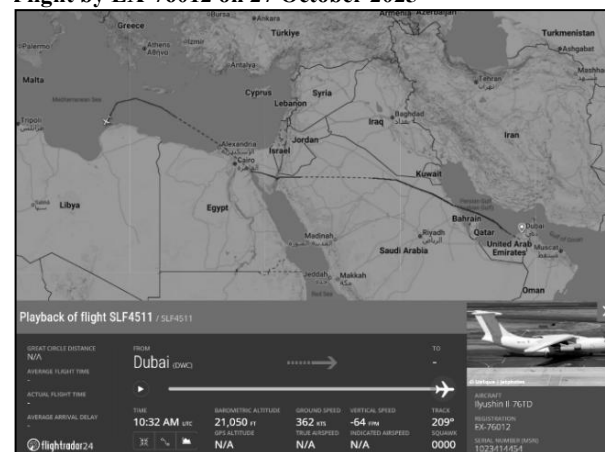
Figure 18.E.2
EX-76012 on 8 February 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.E.4
Flight by EX-76012 on 27 October 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.F: RADA Airlines

1. The Panel identified²⁵⁴ that an Ilyushin IL-62M transport aircraft (registration: EW-450TR, MSN: 4546257), operated by RADA Airlines, conducted eight flights from locations near Orsha, Belarus, to Benghazi, Libya between 12 November 2024 to 11 February 2025. The aircraft also conducted a flight from a location near Benghazi, Libya, to a location near Orsha, Belarus on 19 March 2025 without information of a preceding flight to Benghazi (table 18.F.1).

Table 18.F.1

Flights conducted by aircraft EW-450TR

Date	Start of Route	End of Route	Flight Number	Status (local)
12 Nov 2024	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 5:29 PM
14 Nov 2024	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 10:17 PM
18 Nov 2024	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 1:07 AM
25 Nov 2024	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 11:57 PM
27 Nov 2024	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 8:25 PM
4 Dec 2024	Near Aerodrome Orsha *	Benghazi	RDA3349	Landed 5:36 PM
18 Dec 2024	Near Aerodrome Orsha *	Benghazi	RDA3520	Landed 9:09 PM
11 Feb 2025	Near Aerodrome Orsha *	Benghazi	RDA3910	Landed 3:37 AM
19 Mar 2025	Off the coast of Benghazi*	Near Aerodrome Orsha *	RDA5136	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Source: Flightradar24.com

2. These flights have met several air delivery profile indicators, including: a) significant number of flights over a period on a previously little used route; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; and e) limited, inaccurate or no information provided to requests for information.

3. In response to the Panel's request for further information, RADA Airlines: a) confirmed that it operated flights to Libya for commercial and technical landing and refuelling (purposes); b) stated that, in accordance with the documents provided by the senders, all transported cargo were "general cargo", including food products, perishable goods, clothing items, personal hygiene items, medicine, etc. and excluding military or dual-use cargo; c) stated that the documentation requested by the Panel could not be provided due to (obligations under) national legislation; and d) informed the Panel that the temporary absence of flight data was not a result of the ADS-B transponders onboard of the two aircraft being switched off, but was due to the "specifics of the navigation equipment on Soviet-made aircraft (e.g. IL-62) and its interaction with ADS-B ground stations, as well as insufficient coverage of these stations in some countries, especially on the African continent."²⁵⁵

4. Of the eight flights to Benghazi, Libya conducted by aircraft EW-450TR from November 2024 to February 2025, the flight routes started from locations close to Aerodrome Orsha (IATA code: TXC, ICAO code: UMIO), Belarus. Despite the lack of information about the departure airport of these flights on flight tracking platform flightradar24.com (example of five flights to Benghazi, Libya in November 2024 in figure 18.F.1), speed and altitude of the aircraft during these flights indicated that the departure airport was indeed Aerodrome Orsha (figure 18.F.2). Aerodrome Orsha was also not displayed as the arrival airport for the preceding flights (figure 18.F.3). However, the Panel found that Aerodrome Orsha was displayed as the arrival airport for flight RDA1977, conducted by the same aircraft EW-450TR, from Minsk, Belarus on 2 June 2025

²⁵⁴ flightradar24.com and ch-aviation.com, accessed on 24 June 2025.

²⁵⁵ RADA letter of 28 May 2025.

and the departure airport for flight RDA1975 to Dubai, United Arab Emirates on 12 June 2025 (figure 18.F.4). This is a strong indicator that this aircraft operates from/to Aerodrome Orsha.

5. The Panel requested clarification in relation to the response of RADA Airlines on 28 May 2025, including the technicality of the ADS-B transponders onboard the two aircraft, relevant national legal obligation preventing RADA Airlines sharing commercial cargo information, and the fact that Aerodrome Orsha was not displayed as departure and arrival airport for the eight flights to Libya, but was displayed for other flights. RADA airlines responded²⁵⁶ by asking the Panel to address further inquiries about the type of air navigation equipment of RADA airlines' aircraft and Belarusian legislation of protection of commercial secrets to the Permanent Mission of the Republic of Belarus to the United Nations. RADA Airlines further noted that the service of flightradar24.com is "more of an entertainment nature due to the lack of obligations or guarantees from the developer", and it did not know the reason for the discrepancy of Aerodrome Orsha not being displayed as departure and arrival airport for the eight flights to Libya but being displayed as arrival and departure airports for other flights.

6. In the absence of cargo documentation, technicality of the aircraft equipment, and Belarussian legislation, although requested, the Panel assessed that the clarification provided by RADA Airlines lacked credibility. Based on the assessment of the abovementioned factors, in addition to RADA Airlines' flights having met five air delivery profile indicators, the Panel found RADA Airlines in violation of paragraph 9 of resolution 1970 (2011) and non-compliant with paragraphs 24 and 25 of resolution 2769 (2025).

²⁵⁶ RADA letter of 15 July 2025.

Figure 18.F.1
Examples of Aerodrome Orsha not being displayed as the departure airport

28 Nov 2024	Benghazi (BEN)	—	(RDA3350)	—	2:10 PM	2:09 PM	—	Unknown	KML	CSV	Play
27 Nov 2024	—	Benghazi (BEN)	(RDA3910)	8:29	6:25 PM	9:57 AM	8:25 PM	Landed 8:25 PM	KML	CSV	Play
26 Nov 2024	Benghazi (BEN)	—	(RDA3911)	—	12:06 PM	12:06 PM	—	Unknown	KML	CSV	Play
25 Nov 2024	—	Benghazi (BEN)	(RDA3910)	8:15	9:57 PM	1:42 PM	11:57 PM	Landed 11:57 PM	KML	CSV	Play
20 Nov 2024	Minsk (MSQ)	—	(RDA3912)	—	5:31 PM	5:30 PM	—	Unknown	KML	CSV	Play
19 Nov 2024	Benghazi (BEN)	—	(RDA3911)	—	2:33 PM	2:32 PM	—	Unknown	KML	CSV	Play
18 Nov 2024	—	Benghazi (BEN)	(RDA3910)	7:58	11:07 PM	3:08 PM	1:07 AM	Landed 1:07 AM	KML	CSV	Play
17 Nov 2024	Vitebsk (VTB)	—	(RDA1450)	—	1:03 PM	1:00 PM	—	Unknown	KML	CSV	Play
15 Nov 2024	Benghazi (BEN)	—	(RDA6716)	—	12:42 PM	12:41 PM	—	Unknown	KML	CSV	Play
14 Nov 2024	—	Benghazi (BEN)	(RDA3910)	8:26	8:17 PM	11:51 AM	10:17 PM	Landed 10:17 PM	KML	CSV	Play
13 Nov 2024	Benghazi (BEN)	—	(RDA3911)	—	10:08 AM	10:08 AM	—	Unknown	KML	CSV	Play
12 Nov 2024	—	Benghazi (BEN)	(RDA3910)	8:07	3:29 PM	7:21 AM	5:29 PM	Landed 5:29 PM	KML	CSV	Play
11 Nov 2024	Vitebsk (VTB)	—	(RDA1450)	—	10:51 AM	10:49 AM	—	Unknown	KML	CSV	Play

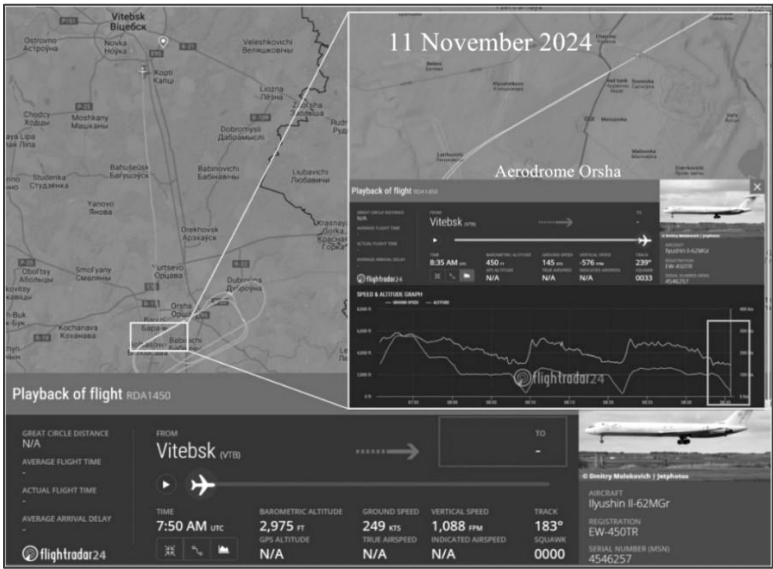
Figure 18.F.2
Aerodrome Orsha not displayed as departure airport for flight to Benghazi on 12 November 2024



Source: globe.adsbexchange.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

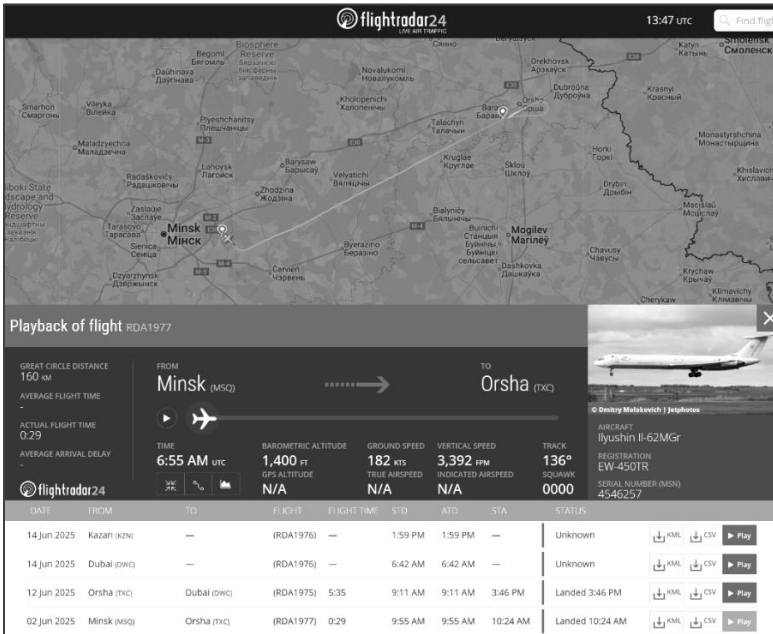
Figure 18.F.3
Aerodrome Orsha not being displayed as the arrival airport for preceding flight on 11 November 2024



Source: globe.adsbexchange.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.F.4
Aerodrome Orsha being displayed as arrival airport for flights from Minsk and departure airport for flight to Dubai



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.G: Rubystar Airways

1. The Panel identified²⁵⁷ that an Ilyushin IL-76TD cargo aircraft (registration: EW-383TH, MSN: 1013405177), operated by Rubystar Airways (Rubystar) conducted flights on route from Minsk, Belarus to locations close to Benghazi on 8 and 12 December 2024 (see table 18.G.1 and figure 18.G.1). The Panel also identified that another Ilyushin IL-76TD cargo aircraft (registration: EW-567TH, MSN: 0083485554) of Rubystar conducted a flight to Benghazi on 14 December 2024 with the status of “landed” (see table 18.G.2 and figure 18.G.2).

Table 18.G.1

Flights of aircraft IL-76TD EW-383TH

Date	Start of Route	End of Route	Flight Number	Status
8 Dec 2024	Near Minsk Airport *	Off the coast of Benghazi *	RSB7682	Unknown
12 Dec 2024	Minsk	Off the coast of Benghazi *	RSB7681	Unknown

Table 18.G.2

Flights of aircraft IL-76TD EW-567TH

Date	Start of Route	End of Route	Flight Number	Status
14 Dec 2024	Minsk	Benghazi	RSB7681	Landed 6:22 AM (local)

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

2. The Panel requested further information from Rubystar Airways. The Permanent Mission of the Republic of Belarus to the United Nations transmitted a response from the “competent authorities” of the Republic of Belarus which stated that: a) the flights of Rubystar Airways on the route from Minsk to Benghazi were carried out for the purpose of supplying assembly units for buses, fully assembled tractors and other agricultural machinery, as well as a wide range of consumer goods, including food products (milk powder and baby food), clothing, medical equipment and medicines; b) these supplies were delivered as part of support to the Libyan people in food security and other humanitarian areas, and under commercial contracts concluded on the basis of requests from Libyan representatives, including local authorities.²⁵⁸

3. These flights have met several air delivery profile indicators, including: a) signals from aircraft ADS-B transponders not being available until sometime after taking-off to conceal departure airports; b) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; c) lack of corporate website or very limited contact information on website; d) limited, inaccurate or no information provided to requests for information; and e) utilising a “blocking” service provided by open-source ADS-B monitoring providers. In the absence of cargo documentation, although requested, the Panel was unable to assess the veracity of the claimed transported cargo. Based on the assessment of Rubystar’s flights having met five air delivery profile indicators and the failure to provide commercial cargo documentation, the Panel found Rubystar Airways in violation of paragraph 9 of resolution 1970 (2011), and non-compliant with paragraphs 24 and 25 of resolution 2769 (2025).

²⁵⁷ Sources: flightradas24.com, ch-aviation.com and globe.adsbexchange.com, accessed on 1 July 2025.

²⁵⁸ Letter from Belarus dated 4 June 2025.

Figure 18.G.1

EW-383TH on 12 Dec 2024

Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.G.2

EW-567TH on 14 Dec 2024

Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.H: Transaviaexport Airlines

1. The Panel identified that the cargo aircraft Ilyushin IL-76TD (MSN: 0093495883, registration: EW-355TH), operated by Transaviaexport Airlines (TAE), a state-owned company of the Republic of Belarus, conducted flights from Belarus to locations near Benghazi, Libya from December 2024 to October 2025 (see table 18.H.1).²⁵⁹ The Panel also identified that the cargo aircraft B747-329(SF) (MSN: 28734, registration: EW-465TQ) of the TAE conducted a flight on same route on 24 March 2025 (see table 18.H.2). Examples of these flights are listed in figures 18.H.1 to 18.H.4 of this annex.

Table 18.H.1
Flights of aircraft IL-76TD EW-355TH

Date	Start of Route	End of Route	Flight Number	Flight Status
20 Dec 2024	Minsk, Belarus	Off the coast of Benghazi *	TXC2114	Unknown
24 Dec 2024	Near Minsk Airport *	Off the coast of Benghazi *	TXC2114	Landed at 3:00 PM (UTC)
27 Dec 2024	Minsk, Belarus	Off the coast of Benghazi *	TXC2114	Unknown
30 Dec 2024	Minsk, Belarus	Off the coast of Benghazi *	TXC2114	Landed at 2:58 PM (UTC)
25 Jan 2025	Minsk, Belarus	Off the coast of Benghazi *	TXC1553	Unknown
29 Jan 2025	Minsk, Belarus	Off the coast of Benghazi *	TXC1824	Landed at 1:45 PM (UTC)
31 Jan 2025	Near Minsk Airport *	Off the coast of Benghazi *	TXC1824	Landed at 5:14 PM (UTC)
4 Feb 2025	Minsk, Belarus	Off the coast of Benghazi *	TXC1824	Landed at 5:43 PM (UTC)
25 Feb 2025	Minsk,, Belarus	Off the coast of Benghazi *	TXC1824	Landed at 4:58 PM (UTC)
27 Feb 2025	Near Aerodrome Orsha *	Off the coast of Benghazi *	TXC1824	Unknown
5 Mar 2025	Near Aerodrome Orsha *	Off the coast of Benghazi *	TXC1824	Unknown
8 Mar 2025	Mogilev, Belarus	Off the coast of Benghazi *	TXC1824	Unknown
20 Mar 2025	Minsk, Belarus	Off the coast of Benghazi *	TXC1824	Unknown
25 Mar 2025	Minsk, Belarus	Off the coast of Benghazi *	TXC1824	Unknown
23 Apr 2025	Orsha, Belarus	Off the coast of Benghazi *	TXC1824	Unknown
25 Apr 2025	Orsha, Belarus	Off the coast of Benghazi *	TXC1824	Unknown
8 May 2025	Orsha, Belarus	Location near Benghazi*	TXC1824	Unknown
10 May 2025	Minsk, Belarus	Location near Benghazi*	TXC1824	Unknown
30 May 2025	Minsk, Belarus	Location near Benghazi*	TXC1824	Unknown
13 Aug 2025	Minsk, Belarus	Location near Benghazi*	TXC1824	Unknown
6 Sep 2025	Minsk, Belarus	Location near Benghazi*	TXC1824	Unknown
7 Sep 2025	Benghazi, Libya	Minsk, Belarus	TXC1825	Landed 17:01
17 Sep 2025	Minsk, Belarus	Location near Benghazi*	TXC1824	Unknown
20 Sep 2025	Benghazi, Libya	Minsk, Belarus	TXC1825	Landed 5:36+1
28 Sep 2025	Orsha, Belarus	Location near Benghazi*	TXC1824	Unknown
29 Sep 2025	Benghazi, Libya	Minsk, Belarus	TXC1825	Landed 15:03

²⁵⁹ Sources: flightradas24.com and ch-aviation.com.

21 Oct 2025	Minsk, Belarus	Location near Benghazi*	TXC1827	Unknown
24 Oct 2025	Orsha, Belarus	Location near Benghazi*	TXC1824	Unknown
31 Oct 2025	Orsha, Belarus	Location near Benghazi*	TXC1824	Unknown

* Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 18.H.2

Flights of aircraft B747-329 EW-465TQ

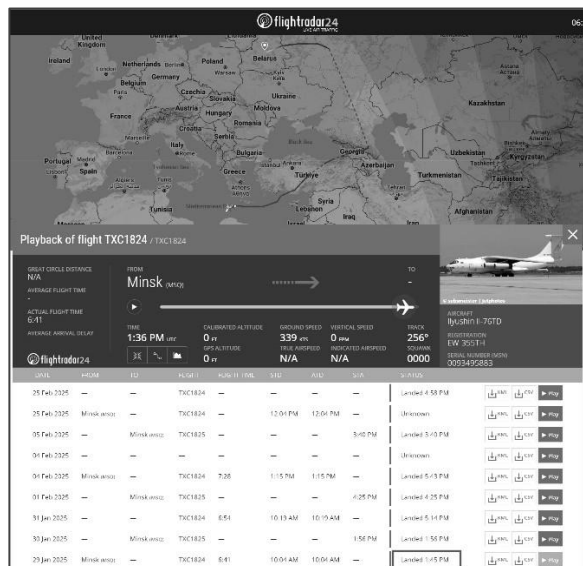
Date	Start of Route	End of Route	Flight Number	Flight Status
24 Mar 2025	Minsk, Belarus	Locations near Benghazi, Libya	TXC9731	Unknown

2. The Panel requested further information from the Republic of Belarus. The Permanent Mission of the Republic of Belarus to the United Nations transmitted a response from the “competent authorities” of the Republic of Belarus which stated that: a) the flights of TAE on the route from Minsk to Benghazi were carried out for the purpose of supplying assembly units for buses, fully assembled tractors and other agricultural machinery, as well as a wide range of consumer goods, including food products (milk powder and baby food), clothing, medical equipment and medicines; b) these supplies were delivered as part of support to the Libyan people in food security and other humanitarian areas, and under commercial contracts concluded on the basis of requests from Libyan representatives, including local authorities.²⁶⁰

3. These flights have met several air delivery profile indicators, including: a) significant number of flights on a previously little used route; b) signals from aircraft ADS-B transponders not being available until sometime after take-off to conceal departure airports; c) signals from aircraft ADS-B transponders not being available before landing to conceal arrival airports; d) lack of corporate website or very limited contact information on website; and e) limited, inaccurate or no information provided to requests for information. In the absence of cargo documentation, although requested, the Panel was unable to assess the veracity of the claimed transported cargo. Based on the assessment of TAE’s flights having met five air delivery profile indicators and the failure to provide commercial cargo documentation, the Panel found Transaviaexport Airlines in violation of paragraph 9 of resolution 1970 (2011), and non-compliant with paragraphs 24 and 25 of resolution 2769 (2025).

²⁶⁰ Letter from Belarus on 4 June 2025.

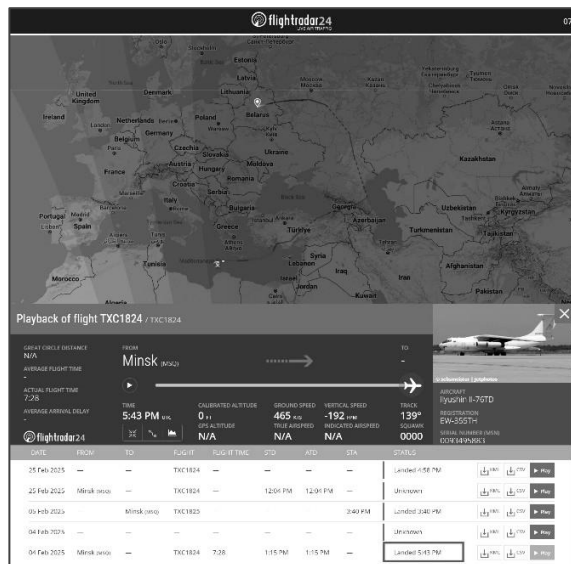
Figure 18.H.1
EW-355TH on 29 Jan 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

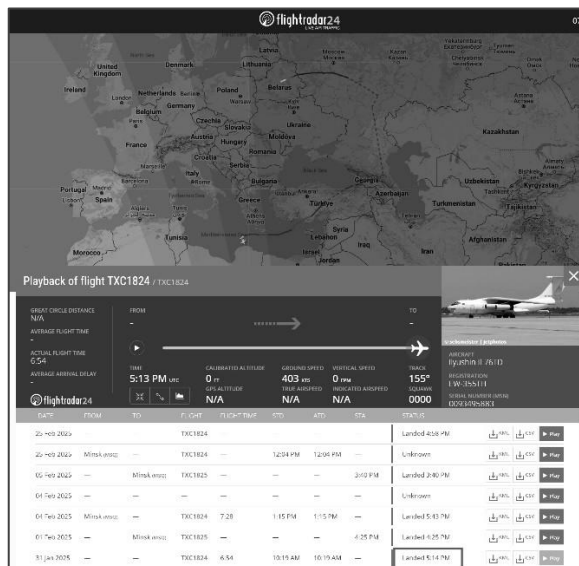
Figure 18.H.3
EW-355TH on 4 Feb 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

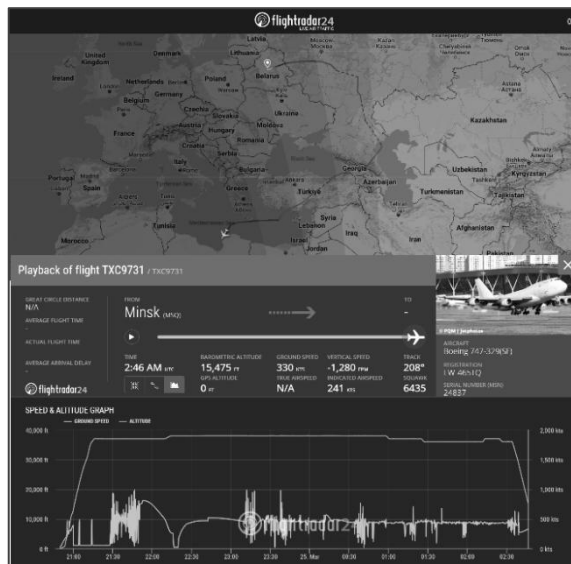
Figure 18.H.2
EW-355TH on 31 Jan 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 18.H.4
EW-465TQ on 24 Mar 2025



Source: flightradar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Appendix 18.I: Civilian aviation violations and instances of non-compliance

1. The Panel identified that during the current reporting period, four Kyrgyzstan-registered airlines, Flysky Airlines, New Way Cargo Airlines, Sapsan Airline, and Skyline Airlines, operated on the United Arab Emirates (UAE)-eastern Libya airbridge. The Panel identified that these airlines conducted 458 flights between late October 2024 and end of 2025 by 11 Ilyushin-76TD (IL-76TD) cargo aircraft.
2. The Panel also identified the operation of six cargo aircraft by three Belarussian-registered airlines, RADA Airlines, Rubystar Airways and Transaviaexport Airlines, on the air route from the Republic of Belarus to eastern Libya. One Belarussian commercial airline, Belavia Airlines, provided flights for the Libyan Arab armed forces (LAAF).
3. The Panel assessed that the actions of these airlines constituted violations of paragraph 9 of resolution 1970 (2011), as summarized in table 18.I.1 below.

Table 18.I.1
Aviation violations and instances of non-compliance

<i>Date identified</i>	<i>End User</i>	<i>Aircraft</i>	<i>Details</i>	<i>Responsible party</i>	<i>Remarks / Source</i>
28 Jan 2025	LAAF	IL-76TD [EX-76003] [1033418596]	Met at least five air delivery profile indicators. Identified as operating on the UAE - eastern Libya airbridge. Concealed flights to Libya.	Flysky Airlines	Appendix B to this annex.
26 Oct 2024	LAAF	IL-76TD [EX-76006] [1033411368]	Same as above.	Flysky Airlines	Appendix B to this annex.
8 Dec 2024	LAAF	IL-76TD [EX-76017] [1003403075]	Same as above.	Flysky Airlines	Appendix B to this annex.
27 Nov 2024	LAAF	IL-76TD [EX-76018] [1023412399]	Same as above.	Flysky Airlines	Appendix B to this annex.
8 Jul 2025	LAAF	IL-76TD EX-76022 [0093498974]	Same as above.	Flysky Airlines	Appendix B to this annex.
28 Jul 2025	LAAF	IL-76TD EX-76026 [1033417545]	Same as above.	New Way Cargo Airlines	Appendix C to this annex.
20 Nov 2024	LAAF	IL-76TD [EX-76005] ^a [0063471147] ^b	Met at least six air delivery profile indicators. Identified as operating on the UAE - eastern Libya airbridge. Concealed flights to Libya.	Sapsan Airline	Annex 96 of S/2022/427 ; Annex 61 of S/2023/673 ; Annex 39 of S/2024/914 . Appendix D to this annex.

<i>Date identified</i>	<i>End User</i>	<i>Aircraft</i>	<i>Details</i>	<i>Responsible party</i>	<i>Remarks / Source</i>
16 Nov 2024	LAAF	IL-76TD [EX-76008] [1033416515]	Same as above.	Sapsan Airline	Same as above.
5 Nov 2024	LAAF	IL-76TD [EX-76025] [1023414450]	Same as above.	Sapsan Airline	Appendix D to this annex.
30 May 2025	LAAF	IL-76TD EX-76030 [1013409295]	Same as above.	Sapsan Airline	Appendix D to this annex.
8 Feb 2025	LAAF	IL-76TD [EX-76012] [1023414454]	Met at least five air delivery profile indicators. Identified as operating on the UAE - eastern Libya airbridge. Concealed flights to Libya.	Skyline Airlines	Appendix E to this annex.
12 Nov 2024	LAAF	IL-62M [EW-450TR] [4546257]	Same as above.	RADA Airlines	Appendix F to this annex.
20 Aug 2024	LAAF	IL-62M [EW-505TR] [4154535]	Same as above.	RADA Airlines	Appendix F to this annex.
8 Dec 2024	LAAF	IL-76TD [EW-383TH] [1013405177]	Same as above.	Rubystar Airways	Appendix G to this annex.
14 Dec 2024	LAAF	IL-76TD [EW-567TH] [0083485554]	Same as above.	Rubystar Airways	Appendix G to this annex.
20 Dec 2024	LAAF	IL-76TD [EW-355 TH] [0093495883]	Same as above.	TAE Airlines	Appendix H to this annex.
24 Mar 2025	LAAF	B747-300 [EW-465TQ] [24837]	Same as above.	TAE Airlines	Appendix H to this annex.
28 Feb 2025	LAAF	B737-800 [EW-457PA] [61423]	Provided flight for LAAF elements after training in Belarus.	Belavia Airlines	Annex 28 to this report.

<i>Date identified</i>	<i>End User</i>	<i>Aircraft</i>	<i>Details</i>	<i>Responsible party</i>	<i>Remarks / Source</i>
15 Sep 2025	LAAF	A330-200 EW-588PD [509]	Same as above.	Belavia Airlines	Annex 29 to this report.

^a Aircraft Registration.

^b Manufacturers Serial Number.

Source: ch-aviation.com

Annex 19 Implementation of paragraph 6 of resolution 2769 (2025)

1. In paragraph 6 of resolution [2769 \(2025\)](#), the Security Council introduced a new exemption measure to the arms embargo, stipulating that, *at the request of the President of the Presidential Council, the measure imposed by paragraph 9 of resolution [1970 \(2011\)](#) shall not apply to any technical assistance or training [...] intended solely to promote the process of reunification of Libyan military and security institutions [...] as notified in advance to the Committee.*

2. Panel's engagement with relevant stakeholders revealed that the reason for the infrequent reliance on paragraph 6 was twofold: a) disagreements amongst the Libyan parties on who should participate; and b) to a lower degree, the unclear role of the Presidential Council in the process. Both the Government of National Unity (GNU) and the Libyan Arab armed forces (LAAF) stated that trainings had already been conducted.

3. As of the time of writing, the United States submitted two notifications pursuant to paragraph 6 of resolution 2769 (2025) to the Committee. In one case, the United States notified²⁶¹ the Committee that, the United States military, at the request of Libyan authorities, would provide training on military air traffic control in Sirte, Libya, involving one United States aircraft.

4. The Panel identified, from multiple open-source platform, including the official website of the United States Africa Command (AFRICOM),²⁶² AFRICOM's social media accounts²⁶³ and the "Libyan army media division",²⁶⁴ that such training, involved two United States B-52 Stratofortress aircraft (registrations of 61-0006 and 61-0012, figures 19.1 to 19.3) transiting Libyan airspace.

Figure 19.1

Two B-52 aircraft in the training

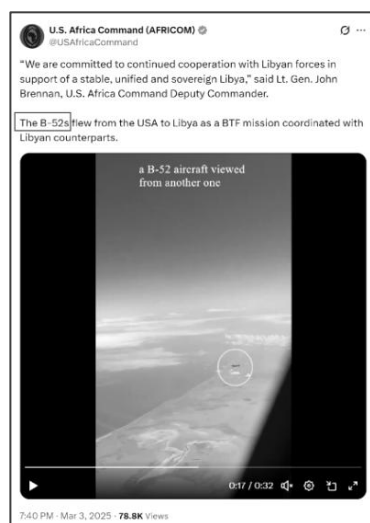


Figure 19.2

Aircraft 61-0006



Figure 19.3

Aircraft 61-0012



Developed by Panel of Experts

Sources:

- <https://x.com/USAFricaCommand/status/1896526095958364352>, at 0:17, 3 March 2025.
- <https://x.com/USAFricaCommand/status/1896525643611029818>, at 0:05 and 0:06, 3 March 2025.
- <https://www.africom.mil/pressrelease/35728/military-flight-supports-partner-training-projects-global-power>, 3 March 2025.

²⁶¹ On 26 February 2025.

²⁶² <https://www.africom.mil/pressrelease/35728/military-flight-supports-partner-training-projects-global-power>, 3 March 2025.

²⁶³ <https://x.com/USAFricaCommand/status/1896526095958364352>, 3 March 2025; and

<https://x.com/USAFricaCommand/status/1896525643611029818>, 3 March 2025.

²⁶⁴ <https://www.facebook.com/Libya.WID/videos/1161082612090526/>, 4 March 2025; and

<https://www.facebook.com/Libya.WID/posts/pfbid0SSLSzMgiRorhC9SzVL7GBtyfRHuicRnoGBpQqqHbUnKs29j4WGEZUYC WKQn5DvLhl>, 4 March 2025.

4. <https://www.dvidshub.net/image/8890732/us-and-libya-partner-jtac-training-during-bomber-task-force>, 25 February 2025.

5. The Panel requested further information from the United States, the GNU and LAAF, including clarification about the discrepancies in the number of participating military aircraft. The United States responded without clarifying the discrepancy.²⁶⁵ GNU and LAAF did not respond.

6. The Panel determined that the notification by the United States was not comprehensive due to the discrepancy in the number of participating military aircraft. Thus, the Panel found the United States in non-compliance with paragraph 6 of resolution 2769 (2025).

²⁶⁵ Communication from the United States on 7 November 2025.

Annex 20 Military transport aircraft

1. The provision set forth in paragraph 7 of resolution 2769 (2025) stipulates that the arms embargo is not to be applied to military aircraft and naval vessels temporarily introduced into the territory of Libya, solely to deliver items or facilitate activities otherwise exempted or not covered by the arms embargo.
2. The Panel continued to investigate such temporary entries by military aircraft based on profile indicators (annex 3) to assess the compliance with paragraph 7 of resolution 2769 (2025), including by submitting enquiries to relevant Member States. The Panel identified 124 flights of military cargo aircraft based on these profile indicators, undertaken by Italy, the Russian Federation, Türkiye, the United Kingdom and the United States, using Libyan airfields during the reporting period. These flights are detailed in tables 20.1 through 20.5 of this annex. The Panel requested further information on the purposes of these flights and items delivered from these Member States, to establish whether the temporary entries had been undertaken under the exception of paragraph 7 of resolution 2769 (2025).
3. The Russian Federation responded that: a) it carried out military-technical cooperation with other countries in strict compliance with the provisions of international law and the requirements of the Security Council; and b) the Russian Armed Forces air vessels did not transport cargoes falling under the arms embargo.²⁶⁶
4. Türkiye responded that: a) it had been undertaking assistance and advisory efforts in Libya in the fields of training, demining and disposal of improvised explosive devices (IEDs) as well as humanitarian aid and assistance in the health sector; b) these activities were being conducted in line with the requests received from the official Libyan authorities, based on the legitimate Memoranda of Understanding which have been duly signed and implemented in accordance with international law; c) the support and consultancy activities were designed to assist the formation of a unified regular army and to help increase the capacity of the Libyan Armed Forces to combat terrorist organizations, especially Da'esh, and to prevent irregular migration; and 4) the flights were organized to meet the logistical needs of its Armed Forces military advisers that were in Libya to provide training, assistance and consultancy services to the Libyan Armed Forces within the established legal framework.²⁶⁷
5. The United Kingdom confirmed that flight number RRR4100 on 25 August 2025, 24 September 2025, 28 July 2025, and 19 May 2025, and flight number RRR6162 on 2 November 2025, were conducted and stated that the flights were compliant with resolution 1970 (2011).²⁶⁸
6. Italy and the United States did not respond.
7. Owing to the insufficient information provided by the Russian Federation, Türkiye, and the United Kingdom, and the non-responsiveness of Italy and the United States, the Panel found these five Member States to be non-compliant with paragraphs 24 and 25 of resolution 2769 (2025).

Table 20.1
Military flights conducted by Italy

Registration	Date	Start of Route	End of Route	Flight Number	Status (local)
MM62177	16 Apr 2025	Pisa, Italy	Misrata, Libya	IAM4632	Landed 20:59
	17 Apr 2025	Pisa, Italy	Misrata, Libya	IAM4665	Landed 13:29
MM62177	22 Jul 2025	Pisa, Italy	Misrata, Libya	IAM4632	Landed 21:34
MM62178	28 Oct 2024	Pisa, Italy	Misrata, Libya	IAM4663	Landed 13:36
	5 Nov 2024	Pisa, Italy	Misrata, Libya	IAM4667	Landed 14:47
MM62180	21 Jun 2025	Pisa, Italy	Tripoli, Libya	IAM4660	Landed 12:05
	23 Jun 2025	Pisa, Italy	Misrata, Libya	IAM4617	Landed 14:45
	25 Jun 2025	Pisa, Italy	Misrata, Libya	IAM4661	Landed 14:41

²⁶⁶ Letter from the Russian Federation on 15 July 2025.

²⁶⁷ Letter from Türkiye dated 12 January 2026.

²⁶⁸ Letter from the United Kingdom on 19 December 2025.

MM62181	19 Dec 2024	Pisa, Italy	Misrata, Libya	IAM4665	Landed 14:36
	6 May 2025	Pisa, Italy	Misrata, Libya	IAM4660	Landed 12:54
	7 Aug 2025	Pisa, Italy	Misrata, Libya	IAM4612	Landed 13:52
	25 Oct 2025	Pisa, Italy	Misrata, Libya	IAM4662	Landed 14:29
MM62191	23 Jan 2025	Pisa, Italy	Misrata, Libya	IAM4660	Landed 14:48
MM62193	13 Mar 2025	Pisa, Italy	Misrata, Libya	IAM4615	Landed 14:47
	27 Mar 2025	Pisa, Italy	Misrata, Libya	IAM4661	Landed 14:33
	8 Apr 2025	Pisa, Italy	Misrata, Libya	IAM4668	Landed 18:24
	21 Aug 2025	Pisa, Italy	Misrata, Libya	IAM4665	Landed 14:26
	9 Sep 2025	Pisa, Italy	Misrata, Libya	IAM4664	Landed 13:57
	24 Sep 2025	Pisa, Italy	Misrata, Libya	IAM4669	Landed 14:28
	30 Sep 2025	Pisa, Italy	Tripoli, Libya	IAM4663	Landed 14:50
	7 Oct 2025	Pisa, Italy	Misrata, Libya	IAM4667	Landed 13:34
MM62194	4 Dec 2024	Pisa, Italy	Misrata, Libya	IAM4663	Landed 14:49
MM62195	9 Jan 2025	Pisa, Italy	Benghazi, Libya	IAM4669	Landed 14:49
	12 Feb 2025	Pisa, Italy	Misrata, Libya	IAM4665	Landed 14:55
	25 Feb 2025	Pisa, Italy	Benghazi, Libya	IAM4663	Landed 15:50
	26 Feb 2025	Pisa, Italy	Misrata, Libya	IAM4668	Landed 14:49
	20 Mar 2025	Pisa, Italy	Benghazi, Libya	IAM4633	Landed 19:04
	24 Apr 2025	Pisa, Italy	Misrata, Libya	IAM4663	Landed 13:37
MM62196	22 May 2025	Pisa, Italy	Misrata, Libya	IAM4662	Landed 15:04
	4 Jun 2025	Pisa, Italy	Misrata, Libya	IAM4614	Landed 14:59
	9 Jul 2025	Pisa, Italy	Misrata, Libya	IAM4669	Landed 14:18
	24 Jul 2025	Pisa, Italy	Misrata, Libya	IAM4664	Landed 13:43
	30 Jul 2025	Pisa, Italy	Misrata, Libya	IAM4634	Landed 13:51
MM62223	27 Nov 2024	Pisa, Italy	Misrata, Libya	IAM4637	Landed 14:52
	28 Nov 2024	Pisa, Italy	Tripoli, Libya	IAM4638	Landed 14:40
	2 Dec 2024	Pisa, Italy	Misrata, Libya	IAM4632	Landed 16:12
	10 Mar 2025	Pisa, Italy	Misrata, Libya	IAM4632	Landed 17:40
	26 Mar 2025	Pisa, Italy	Misrata, Libya	IAM4636	Landed 15:19

Table 20.2

Military flights conducted by the Russian Federation

Registration	Date	Start of Route	End of Route	Flight Number	Status (UTC)
RA-76841	12 Dec 2024	Anapa, RF	Al Khadim, Libya	SUM9625	Unknown
	13 Dec 2024	Anapa, RF	Al Khadim, Libya	SUM9625	Unknown
	15 Dec 2024	Anapa, RF	Al Khadim, Libya	SUM9625	Unknown
	17 Dec 2024	Bamako, Mali	Moscow, RF	SUM9626	Transiting Libya
RA-76845	13 Dec 2024	Moscow, RF	Al Khadim, Libya	SUM9627	Unknown

	16 Dec 2024	Bamako, Mali	Al Khadim, Libya	SUM9627	Unknown
	16 Dec 2024	Anapa, RF	Al Khadim, Libya	SUM9627	Unknown
	17 Dec 2024	Bamako, Mali	Al Khadim, Libya	SUM9628	Unknown
	24 Dec 2024	Moscow, RF	Al Khadim, Libya	SUM9627	Unknown
	25 Dec 2024	Bamako, Mali	Al Khadim, Libya	SUM9628	Unknown
RA-78835	6 Jan 2025	Off Syrian coast*	Al Khadim, Libya	RFF402	Unknown
	7 Jan 2025	Off Syrian coast*	Al Khadim, Libya	RFF403	Unknown
	8 Jan 2025	Off Syrian coast*	Mediterranean Sea to direction to Libya* (via same route)	RFF401	Unknown
	15 Jan 2025	Off Syrian coast*	Al Khadim, Libya	RFF401	Unknown
	18 Jan 2025	Off Syrian coast*	Al Khadim, Libya	RFF405	Landed 21:50
	19 Jan 2025	Off Syrian coast*	Al Khadim, Libya	RFF405	Landed 22:38
RA-78840	13 Mar 2025	Latakia, Syria	Location near Tubruq*	RFF408	Unknown
RA-78847	24 Jul 2025	Near Latakia*	Near Al Khadim*	RFF401	Unknown
RA-82030	4 May 2025	Latakia, Syria	Al Khadim, Libya	RFF401	Unknown
	16 May 2025	Off Syrian coast*	Off Egyptian coast* (via same route)	RFF401	Unknown
	13 Sep 2025	Latakia, Syria	Off Egyptian coast* (via same route as above)	RFF401	Unknown
	17 Sep 2025	Near Tubruq*	Latakia, Syria	RFF406	Landed 7:21
	19 Sep 2025	Latakia, Syria	Off Egyptian coast* (via same route)	RFF403	Unknown
	24 Sep 2025	Off Egyptian coast*	Latakia (via same route)	RFF402	Landed 8:02
	2 Oct 2025	Off Egyptian coast*	Near Latakia* (via same route)	RFF406	Unknown
	17 Oct 2025	Near Latakia*	Off Egyptian coast* (via same route)	RFF403	Unknown
	23 Oct 2025	Near Al Khadim*	Latakia, Syria	RFF404	Landed 8:07
	24 Oct 2025	Latakia, Syria	Near Tubruq* (via same route)	RFF403	Unknown
	25 Oct 2025	Near Tubruq*	Latakia, Syria	RFF404	Landed 12:14
	29 Oct 2025	Latakia, Syria	Off Egyptian coast* (via same route)	TTF403	Unknown
RA-82037	29 Dec 2024	Off Syrian coast*	Al Khadim, Libya	RFF401	Unknown
RA-82038	26 Dec 2024	Off Syrian coast*	Al Khadim, Libya	RFF401	Unknown
	27 Dec 2024	Off Syrian coast*	Mediterranean Sea to direction to Libya* (via same route)	RFF401	Unknown
RA-86539	10 Nov 2025	Latakia, Syria	Near Al Khadim*	NA	Unknown
RA-86559	23 Oct 2025	Latakia, Syria	Location near Al Khadim*	RFF401	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 20.3

Military flights conducted by Türkiye

Registration	Date	Start of Route	End of Route	Flight Number	Status (local)
16-0055	2 Nov 2024	Ankara, Türkiye	Misrata, Libya	TUAF849	Landed 11:40
17-0078	16 Dec 2024	Ankara, Türkiye	Al Watiya, Libya	TUAF863	Unknown
	30 Apr 2025	Ankara, Türkiye	Al Watiya, Libya	TUAF812	Unknown
	12 Jun 2025	Ankara, Türkiye	Misrata, Libya	TUAF824	Landed 13:49
	2 Jul 2025	Ankara, Türkiye	Misrata, Libya	TUAF827	Landed 11:51
	17 Sep 2025	Ankara, Türkiye	Misrata, Libya	TUAF836	Landed 13:38
17-0080	22 May 2025	Ankara, Türkiye	Misrata, Libya	TUAF815	Landed 14:35
	2 Jun 2025	Isparta, Türkiye	Misrata, Libya	TUAF817	Landed 12:54
18-0093	13 Nov 2024	Ankara, Türkiye	Misrata, Libya	HVK51	Landed 13:46
	30 Nov 2024	Kayseri, Türkiye	Al Watiya, Libya	TUAF859	Unknown
	9 Jan 2025	Ankara, Türkiye	Al Watiya, Libya	F800	Unknown
	23 Jan 2025	Ankara, Türkiye	Al Watiya, Libya	TUAF801	Unknown
18-0094	2 Nov 2024	Ankara, Türkiye	Misrata, Libya	TUAF850	Landed 13:58
	30 Nov 2024	Kayseri, Türkiye	Misrata, Libya	TUAF860	Landed 14:50
	11 Dec 2024	Ankara, Türkiye	Misrata, Libya	TUAF861	Landed 12:10
21-0118	3 Jun 2025	Isparta, Türkiye	Misrata, Libya	TUAF820	Landed 13:14
63-13188	26 Nov 2024	Kayseri, Türkiye	Al Watiya, Libya	TUAF856	Unknown
	11 Dec 2024	Kayseri, Türkiye	Al Watiya, Libya	TUAF862	Landed 18:34
	16 Sep 2025	Ankara, Türkiye	Al Watiya, Libya	TUAF835	Unknown
68-01606	26 Mar 2025	Ankara, Türkiye	Misrata, Libya	TUAF808	Landed 14:19
68-01608	26 Nov 2024	Kayseri, Türkiye	Al Watiya, Libya	TUAF855	Unknown
	26 Mar 2025	Kayseri, Türkiye	Misrata, Libya	TUAF809	Landed 6:14
68-01609	26 Nov 2024	Kayseri, Türkiye	Misrata, Libya	TUAF857	Landed 14:44
	26 Jun 2025	Ankara, Türkiye	Misrata, Libya	TUAF826	Landed 16:09
	28 Jun 2025	Ankara, Türkiye	Misrata, Libya	TUAF829	Landed 11:18
73-00991	3 Jun 2025	Ankara, Türkiye	Misrata, Libya	TUAF822	Landed 14:24

Table 20.4

Military flights conducted by the United Kingdom

Registration	Date	Start of Route	End of Route	Flight Number	Status (local)
ZM402	16 Dec 2024	Mediterranean Sea south of Cyprus*	Benghazi, Libya	RRR4100	Unknown
	24 Feb 2024	Akrotiri, Cyprus	Benghazi, Libya	RRR4100	Landed 14:16
ZM405	29 Jan 2025	Akrotiri, Cyprus	Misrata, Libya	RRR4100	Landed 16:33
ZM408	19 Nov 2024	Akrotiri, Cyprus	Misrata, Libya	RRR4100	Landed 13:45

ZM409	25 Oct 2024	Akrotiri, Cyprus	Benghazi, Libya	RRR4100	Landed 17:03
	25 Aug 2025	Akrotiri, Cyprus	Misrata, Libya	RRR4100	Landed 16:34
	24 Sep 2025	Akrotiri, Cyprus	Near Misrata*	RRR4100	Unknown
ZM411	18 Apr 2025	Akrotiri, Cyprus	Benghazi, Libya	RRR4100	Landed 20:29
	28 Jul 2025	Akrotiri, Cyprus	Near Misrata*	RRR4100	Unknown
ZM412	19 May 2025	Akrotiri, Cyprus	Misrata, Libya	RRR4100	Landed 18:21
ZZ174	2 Nov 2025	Brize Norton, UK	Misrata, Libya	RRR6162	Landed 13:23

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Table 20.5

Military flights conducted by the United States

Registration	Date	Start of Route	End of Route	Flight Number	Status (local)
06-4631	7 May 2025	Sigonella, Italy	Misrata, Libya	LION451	Landed 11:20
	28 May 2025	Sigonella, Italy	Misrata, Libya	LION456	Landed 12:33
	2 Aug 2025	Sigonella, Italy	Misrata, Libya	LION471	Landed 12:06
07-8609	15 Dec 2024	Sigonella, Italy	Benghazi, Libya	LION428	Landed 14:02
	22 Mar 2025	Sigonella, Italy	Misrata, Libya	LION446	Unknown
	7 Apr 2025	Sigonella, Italy	Misrata, Libya	LION469	Unknown
07-8614	13 Nov 2024	Ramstein, Germany	Misrata, Libya	LION418	Unknown
	15 Jun 2025	Chania, Greece	Misrata, Libya	LION463	Landed 11:06
10-0215	31 May 2025	Algiers, Algeria	Misrata, Libya	RCH696	Landed 14:29
11-5740	3 Feb 2025	Sigonella, Italy	Benghazi, Libya	LION437	Landed 13:13
	2 Apr 2025	Sigonella, Italy	Near Misrata*	LION447	Unknown
	16 May 2025	Sigonella, Italy	Near Misrata*	LION459	Unknown
15-5822	20 Jun 2025	Sigonella, Italy	Misrata, Libya	LION465	Landed 8:28
	7 Jul 2025	Sigonella, Italy	Benghazi, Libya	LION467	Unknown

*Signal from the aircraft transponder unavailable to allow the display of departure and destination airports on flight tracking platform.

Source: Flightradar24.com, globe.adsbexchange.com.

Annex 21 Vessel transfers to Benghazi

A. Overview

1. The Panel identified transfers of 23 vessels to Benghazi between September 2024 and October 2025. Of these, 21 had been transferred from the United Arab Emirates (UAE) and 2 from Singapore. The vessels had been transported to Benghazi by commercial heavy-lift vessels. The Panel classified five of the transferred vessels as naval-type vessels, and thus military equipment, and one vessel as dual-use vessel whose transfers to Benghazi constituted violations of paragraph 9 of resolution 1970 (2011) (table 21.1). The Panel was unable to obtain sufficient information on the remaining 17 vessels to make a determination as to their classification under the arms embargo (table 21.2). All transfers had been organized by two UAE-based individuals, one of whom the Panel previously identified as having violated the arms embargo.²⁶⁹ The Panel assessed that the end-user for all vessels was LAAF, specifically Tareq Bin Zeyad (TBZ) brigade.

Table 21.1

Naval-type vessels transferred to Benghazi between September 2024 and December 2025 in violation of the arms embargo

Name	IMO/MMSI number	Length	Vessel type	Producer, point of origin	Delivered to Benghazi by (vessel), date of delivery, consignee
Al Karama 1	MMSI 341627001	17m	Fast interceptor craft	Grandweld Shipyards, UAE	MV BBC Rheiderland (IMO 9614696), 30 September 2024,
Al Karama 2	MMSI 341628001	17m			Sabre Yaching [<i>sic</i>] Limited (Isle of Man, UK) ^a
TBZ11	IMO 1032244	40m	Fast patrol vessel	Penguin International Limited, Singapore	MV St Maria (IMO 9467134), 6 January 2025, Danube Shipping Co. (Benghazi) ^b
TBZ13	IMO 1089106	38m		Grandweld Shipyards, UAE	MV Bahri Diriyah (IMO 9498482), 22 June 2025 Danube Shipping Co. (Benghazi) ^b
TBZ14	IMO 1089118	38m			
TBZ15	IMO 1089120	38m			
TBZ16	IMO 1089132	38m			

^a No company by that or similar names exists in the Isle of Man business registry.

^b Company repeatedly appearing as consignee for military equipment destined to Benghazi.

Table 21.2

Vessels of unclear type and classification transferred to Benghazi between September 2024 and October 2025

Name	IMO/MMSI number	Length	Producer, point of origin	Delivered to Benghazi by (vessel), date of delivery, consignee
TBZ2	IMO 1044883	42m	Grandweld Shipyards, UAE	MV Nordic Kylie (IMO 935799), 3 October 2024, UID
TBZ3	IMO 1044895	42m		
TBZ4	MMSI 341556001	22m		MV BBC Rheiderland (IMO 9614696), 30 September 2024, Sabre Yaching [<i>sic</i>] Limited (Isle of Man, UK) ^a
TBZ5	MMSI 341557001	22m		
TBZ6	MMSI 341558001	22m		
TBZ7	MMSI 341559001	22m		
TBZ8	MMSI 341735001	22m		
TBZ9	MMSI 341736001	22m		
TBZ10	MMSI 341737001	22m		
4 UID "Boats central console" ^b	UID	14m ^b		MV Bahri Diriyah (IMO 9498482), 22 June 2025 Danube Shipping Co. (Benghazi) ^b
2 UID Landing Craft	UID	14m ^b		

^a No company by that or similar names exists in the Isle of Man business registry.

^b As per cargo manifest. Of note is that 15m FICs and 17m FLCs marketed by 2020 Volume Boats had been declared with identical dimensions in a different cargo document in the case of the intercepted MV Lila Mumbai (annex 33).

²⁶⁹ S/2024/914, paras. 67-69.

B. Grandweld vessels

1. Overview

2. Of the 21 vessels that had originated from the UAE, 15 had been built by Dubai-based Grandweld Shipyards (a branch of Atos International LLC) in Dubai Maritime City (UAE),²⁷⁰ Port Rashid Mubarak Group Shipyard (AEPR). All 15 Grandweld vessels had initially been registered under the Saint Kitts and Nevis flag; registrations were terminated between July and December 2025.

3. Grandweld Shipyards was also the producer of the first 42-metres vessel named after TBZ brigade, the MV Tareq Bin Zeyad (IMO 9889930), which was transferred to Benghazi in 2023.²⁷¹ The company did not respond to the Panel's letter dated 9 January 2024 in relation to the transfer of that vessel. Appendix 21.A contains sample images of one of the 42-metres vessels MV TBZ3 (IMO 1044895).

4. With all circumstantial evidence considered, the Panel found that Grandweld Shipyards was wilfully negligent in its due diligence obligations vis-a-vis the end-user and the intended destination of the 15 vessels.

2. Involvement of network of Amro Ibrahim and Omar Mustafa

5. The Panel identified an additional member and additional companies being part of the previously reported²⁷² network of Amro Salem Ismael Ibrahim.²⁷³ The newly identified individual is a Jordanian national named Omar Mahmoud Hasan Mustafa.²⁷⁴ The Panel found the network responsible for the commissioning and registration of the vessels, and their transfers to Benghazi. These individuals, based out of UAE, utilized a set of shell companies, in an attempt to disguise their involvement.

6. Omar Mustafa utilized the company Multham International Limited (Hong Kong, China) to commission the construction of at least six of the Grandweld TBZ vessels. The company was the owner, manager and operator of all Grandweld TBZ vessels. Before their transfer to Multham, TBZ15 and TBZ16 were briefly owned, managed and operated by 2020 Volume Boats Maintenance & Repairing FZE (UAE), a company controlled by Amro Ibrahim. Before their onwards transfer to Benghazi, the two Grandweld Al Karama fast interceptor craft (FIC) were owned by Aerotel FZCO (UAE), one of Amro Ibrahim's shell companies.

7. Multham International Limited, 2020 Volume Boats and II Solution FZE (UAE) served as shippers on cargo manifests.²⁷⁵ II Solution FZE had the same business address as a company called 2020 Research & Development Centre by Volume UAE,²⁷⁶ demonstrating that it operated under the same network. Due to Amro Ibrahim's repeated utilization of the number 2020 and the term "volume" across his corporate registration, the Panel identified this company as being under his control.²⁷⁷

8. The same network was also responsible for an attempted transfer of vessels from the UAE to Benghazi that was intercepted by Spain in August 2025 (annex 33).

9. In reply to the Panel's opportunity to respond, Amro Ibrahim a) minimized the extent of his involvement with the abovementioned companies; b) denied any role in sales and customer interactions regarding the transfers; c) asserted the civilian nature of the Al Karama vessels. The Panel found the statements made and documentation provided to be contradictory. Owing to the large amount of evidence the Panel gathered, coupled with all circumstantial evidence, it found Amro Ibrahim's statements not credible.

²⁷⁰ 25°15'55.9"N, 55°15'47.0"E.

²⁷¹ See also S/2024/914, paragraphs 51 and 64.

²⁷² S/2024/914, paras. 67-69.

²⁷³ DOB 1 June 1986; nationality: Jordan; Jordanian passport no. Q221984 (Expiration: 20 Oct 2025); aka Amro Asha.

²⁷⁴ DOB 28 May 1991; nationality: Jordan; Jordanian passport no. R734621 (Expiration: 4 March 2028).

²⁷⁵ In other cases investigated by the Panel spelled as II Solutions FZE.

²⁷⁶ Warehouse 402, Dubai Maritime City, 25°16'07.1", N 55°15'50.2"E.

²⁷⁷ Paragraph 35, annex 24 and S/2024/914, paragraphs 67-70, table 1 and annex 32.

3. Shipment by MV BBC Rheiderland (IMO 9614696)

10. MV BBC Rheiderland (IMO 9614696)²⁷⁸ transported, as per cargo manifest, seven 22-metres Grandweld TBZ vessels, and two 17-metres Al Karama vessels, from Port Rashid, UAE (25 August 2024) to Benghazi, Libya (30 September 2024). The Panel classified the two Al Karama vessels as naval-type fast interceptor craft (FIC), and thus military equipment, whose transfer to Benghazi constituted a violation of paragraph 9 of resolution 1970 (2011). Panel classification of the 22-metres TBZ vessels is pending.

Involved parties

11. Omar Mustafa's Multham International Limited (Hong Kong, China) was the shipper indicated on the cargo manifest for the Grandweld TBZ vessels. The shipper for the Grandweld Al Karama FICs was a different company, owned and controlled by Amro Ibrahim.²⁷⁹ All Grandweld vessels destined to Benghazi were declared as "crew boats" on the cargo manifest, including the two FICs. The vessel names "TBZ#" and "Al Karama#" were included in the cargo description.

12. A fictitious company, Sabre Yachting [*sic*] Limited (Isle of Man, UK) was indicated as consignee in Benghazi for all Grandweld vessels. Multham International Limited and the shipper of the Al Karama vessels, respectively, were indicated as notify parties. The Panel identified Cigisped Middle East LLC (UAE) as the deck space charterer.

13. BBC Chartering GmbH & Co. KG (Germany),²⁸⁰ the operator of the MV BBC Rheiderland, responded to the Panel that: a) the signing of carriage contracts had been concluded with a reputable freight forwarder, Cigisped Middle East LLC, with whom BBC Chartering had years-long experience; b) the contract contained "warranties of the freight forwarder that the cargo is and will remain non-military, lawful and not violating sanctions"; c) Cigisped Middle East LLC had chartered the full deck space; and d) details of the cargo had only been obtained once the cargo had been custom cleared, and that the export procedure had been the freight forwarder's responsibility.

14. The Panel assessed that none of the above justifications absolve the carrier BBC Chartering from the collective responsibility and enhanced due diligence obligations deriving from the context of a transfer of cargo to a country under a United Nations arms embargo: a) neither reputation nor longstanding business relationships guarantee sanctions compliance by these partners; b) contractual warranties or indemnity clauses only regulate the contractual relationship and eventual civil liabilities between the parties; c) deck space chartering differs from bareboat chartering in that the carrier retains operational control of the vessel, and thus bears collective responsibility; and d) export clearances may be based on misdeclarations.

15. BBC Chartering further held that based on the information available to them, they were unable to identify whether the vessels fell under the arms embargo. The Panel did not concur with this assessment, for the following reasons: a) on 9 July 2024, the Panel sent a correspondence to BBC Chartering relating to the previously reported transfer in March 2024 of naval-type vessels from Port Rashid to Benghazi by the MV BBC Alaska (IMO 9453793)²⁸¹ – another vessel operated by the company – in violation of paragraph 9 of resolution 1970 (2011).²⁸² b) immediately after delivery to Benghazi, the MV BBC Alaska was inspected by authorities of a Member State in relation to the transfer; c) the vessels' names starting with "TBZ" and "Al Karama" are clear indicators for military end-users in the context of Libya, referring to LAAF's TBZ brigade and the Libyan national army's 2014 Al-Karama operation; and d) the consignee being a non-existing company in a foreign jurisdiction is a red flag indicating illicit transfers. Despite its request, the Panel was not provided with the photographic documentation taken during cargo loading and offloading activities, as customary for transfers of this type.

16. Consequently, the Panel assessed that a) when the MV BBC Rheiderland left Port Rashid in August 2024, BBC Chartering was aware that the previous transfer to Benghazi by the BBC Alaska in March 2024 was scrutinized not only by the Panel but also by Member States; b) given the circumstances, BBC Chartering would have had to be aware of the vessels that the MV BBC Alaska had transported to Benghazi in March 2024, which had been marked with "police" and "coast guard", making their official use by armed groups irrefutable. The Panel therefore assessed that, *prima facie*, BBC Chartering was wilfully negligent when undertaking the transfer by MV BBC Rheiderland in September 2024.

²⁷⁸ Flag State: Antigua and Barbuda.

²⁷⁹ Company details identified at a stage in the drafting process that did not allow adequate time for an opportunity to reply. The company is therefore not identified here.

²⁸⁰ Previously found in violation of paragraph 9 of resolution 1970 (2011) for the transfer of naval-type vessels to Benghazi, S/2024/914, para. 69 and table 4.

²⁸¹ Flag State: Liberia.

²⁸² S/2024/914, para. 69 and annex 32.

17. Cigisped Middle East FZE, without providing any supporting documentation, informed the Panel that: a) they acted as freight forwarder procuring the deck space for a(n unnamed) client; b) they had not “had sight” of the cargo documentation at the time of shipment; c) in hindsight and in light of the Panel’s findings, they “recognised that certain vessel characteristics may warrant enhanced scrutiny when Libya is the destination”; and d) they had taken concrete steps to improve their due diligence.²⁸³

18. The Panel assessed that Cigisped Middle East FZE bears collective responsibility for the transfer for which it arranged the deck space. Deck space charterers can request cargo documentation anytime; the freight contract itself must rely on underlying documentation. Wilful blindness is no justification for due diligence shortcomings. Post-factual compliance improvements, while laudable, do not change the underlying responsibility for an occurred violation.

Voyage irregularities

19. MV BBC Rheiderland sailed around the African continent on its voyage from Port Rashid to Benghazi. BBC Chartering informed the Panel that initially, the vessel should have discharged some cargo at Gibraltar (United Kingdom) and then sailed onwards to discharge the Grandweld vessels in Benghazi; that order had then been inversed, upon request by the deck space charterer, Cigisped Middle East.

20. The Panel observed²⁸⁴ that as the MV BBC Rheiderland approached Gibraltar from the south-west, its automatic identification system (AIS), for a brief period, changed from Gibraltar to Benghazi as the vessel’s next port of call but subsequently switched back to Gibraltar. The vessel then crossed the Gibraltar Strait, still broadcasting Gibraltar as its next port of call. This broadcast was maintained during the port call in Benghazi and the return voyage, until the vessel reached the Gibraltar Strait.

21. BBC Chartering held that there was no intention to obfuscate the MV BBC Rheiderland’s real destination but did not provide an explanation as to the reasons for the omitted port declaration. Given BBC Chartering’s previous involvement in a transfer of naval-type vessels to Benghazi by MV BBC Alaska, and the circumstances surrounding that transfer,²⁸⁵ the Panel found BBC Chartering’s statement not credible.

Grandweld Al Karama FICs

22. The Panel identified the two FICs named Al Karama 1 and Al Karama 2 as GrandSwift Interceptor vessels produced by Grandweld Shipyards, marketed for official use.²⁸⁶ The Panel assessed that the two Al Karama vessels were prototypes as presented on Grandweld’s website, including in a promotional video.²⁸⁷ A model of the same vessel type was also exhibited, with gun mount, at the Grandweld stand at the 2025 naval defence exhibition (NAVDEX) held from 17 to 21 February 2025 in Abu Dhabi (appendix 21.B).²⁸⁸ Owing to their design, structure and designation, the Panel assessed these vessels as naval-type vessels, and thus military equipment, whose transfer to Benghazi constituted a violation of paragraph 9 of resolution 1970 (2011).

23. The Panel found the following entities in violation of paragraph 9 of resolution 1970 (2011) for the transfer of the two Al Karama FICs to Benghazi:

- a) BBC Chartering GmbH & Co. KG (Germany) as the carrier;
- b) Cigisped Middle East FZE (UAE) as the deck space charterer;
- c) Grandweld Shipyards (UAE) as the producer;
- d) Aerotel FZCO (UAE) as the registrar;
- e) Amro Salem Ismael Ibrahim²⁸⁹ as representative Aerotel FZCO and the shipper;
- f) LAAF as the end-user.

24. The Panel found the UAE in non-compliance with paragraph 19 of resolution 2213 (2015), for failing to inspect the vessel despite indicators of prohibited items.

²⁸³ Communication from Cigisped Middle East, 20 January 2026.

²⁸⁴ S&P Maritime Intelligence Risk Suite.

²⁸⁵ S/2024/914, para. 69 and annex 32; annex 36 of this report.

²⁸⁶ <https://www.grandweld.com/grandswift-interceptor-series-the-latest-addition-to-grandwelds-high-performance-fleet/>.

²⁸⁷ Ibid.

²⁸⁸ <https://www.grandweld.com/grandweld-shipyards-makes-landmark-debut-at-navdex-2025/>, 21 April 2025.

²⁸⁹ National of Jordan; DOB: 1 June 1986.

4. Shipment by MV Bahri Diriyah (IMO 9498482)

25. MV Bahri Diriyah (IMO 9498482)²⁹⁰ transported, as per cargo manifest, four 35-metres Grandweld TBZ “work boats”, four 14-metres “central console boats” and two 14-metres “landing craft” from Port Rashid, UAE (30 May 2025) to Benghazi, Libya (22 June 2025). The Panel found that the TBZ vessels’ dimensions had been misrepresented in the cargo manifest, which in fact were 38 metres long. The Panel classified the four Grandweld TBZ vessels as 38-metres naval-type fast patrol vessels (FPV), and thus military equipment, whose transfer to Benghazi constituted a violation of paragraph 9 of resolution 1970 (2011).

26. The remaining two undefined “central console boats” and “landing craft” had the same dimensions indicated in the cargo manifest as vessels indicated in the cargo manifest of the cargo onboard the MV Lila Mumbai (IMO 9253143),²⁹¹ which had been intercepted by Spain and inspected by the Panel. In that case, the dimensions had also been misrepresented on the cargo manifest and corresponded to 15-metres FICs and 17-metres fast landing craft (FLC) marketed by Amro Ibrahim’s 2020 Volume Boats, both types of which the Panel classified as military materiel under paragraph 9 of resolution 1970 (2011) (annex 33).

Involved parties

27. The shipper was Omar Mustafa’s II Solution FZE (UAE). The vessel names TBZ13 through TBZ16 were included in the cargo description.²⁹²

28. The consignee was Danube Shipping Company (Benghazi), a company that repeatedly appeared as consignee in Benghazi for transfers and attempted transfers of arms and related materiel whenever Amro Ibrahim’s network was involved.²⁹³ The company had no online presence and did not respond to the Panel’s letter offering an opportunity to reply. On the occasion of the attempted transfer of UAV components to Benghazi that were seized by Italy in 2024 (annex 35), Omar Mustafa’s phone number and II Solution FZE email address was provided on the bill of lading as contact details for Danube Shipping Company as consignee.

Transit through Türkiye

29. On its way from Port Rashid to Benghazi, the MV Bahri Diriyah made a port call in Izmir, Türkiye on 15 June 2025. When leaving Izmir on 17 June 2025, the vessel declared Benghazi as the next port of call and sailed onwards. Türkiye did not respond to the Panel regarding this transit.

30. While documentary review of cargo documentation is the standard procedure for port authority clearances, the Panel assessed that owing to the TBZ vessels’ design and size, their destination being Benghazi, and the name indicating a military end-user, there would have been “reasonable grounds” for an inspection under paragraph 19 of resolution 2213 (2015).

Grandweld TBZ FPVs

31. A model of one of the 38-metres TBZ vessels transferred to Benghazi by the MV Bahri Diriya, MV TBZ13 (IMO 1089106), was exhibited at the Grandweld stand at the 2025 naval defence exhibition (NAVDEX) held from 17 to 21 February 2025 in Abu Dhabi (UAE).²⁹⁴ The model was navy grey, clearly indicated “TBZ13” and “IMO 1089106”, and had a bow-mounted machine gun (appendix 21.C). In November 2025, the Panel inspected two TBZ vessels of the same make and model as the ones transferred to Benghazi by MV Bahri Diriya. Spain had intercepted these vessels in transit to Benghazi in 2025 (annex 33). Owing to their design, structure and designation, the Panel assessed the 38-metres TBZ vessels as naval-type vessels, and thus military equipment, whose transfer to Benghazi was a violation of paragraph 9 of resolution 1970 (2011).

32. The Panel found the following entities in violation of paragraph 9 of resolution 1970 (2011) for the transfer of the four 38-metres TBZ FPVs to Benghazi:

- a) II Solution FZE (UAE) as the shipper;
- b) Danube Shipping Company (Libya) as the consignee;

²⁹⁰ Flag State: Saudi Arabia.

²⁹¹ Flag State: Liberia.

²⁹² TBZ13 (IMO 1089106); TBZ14 (IMO 1089118), TBZ15 (IMO 1089120) and TBZ 16 (IMO 1089132).

²⁹³ Para. 37 of this annex, annex 33 and annex 35 of this report; and S/2024/914, para. 69 and annex 32, Section C.

²⁹⁴ <https://www.grandweld.com/grandweld-shipyards-makes-landmark-debut-at-navdex-2025/>, 21 April 2025.

- c) National Shipping Company of Saudi Arabia (Saudi Arabia) as the carrier;
- d) Grandweld Shipyards (UAE) as producer;
- e) Multham International Ltd (Hong Kong, China) as the registrar;
- f) 2020 Volume Boats Maintenance & Repairing FZE (UAE) as the registrar;
- g) Omar Mahmoud Hasan Mustafa²⁹⁵ as representative of II Solution and Multham International;
- h) Amro Salem Ismael Ibrahim²⁹⁶ as representative of 2020 Volume Boats;
- i) LAAF as the end-user.

33. The Panel found both the UAE and Türkiye in non-compliance with paragraph 19 of resolution 2213 (2015), for failing to inspect the vessel, including during transit, despite indicators of prohibited items.

C. Shipment by MV St Maria (IMO 9467134)

34. MV St Maria (IMO 9467134)²⁹⁷ transported the 40-metres Penguin Flex Fighter Max MV TBZ11 (IMO 1032244) and the 55-metres Penguin landing craft MV TBZ12 (IMO 9709908), both produced by Penguin International Limited (Singapore), from Singapore (14 December 2024) to Benghazi (6 January 2025). The Panel classified TBZ11 as naval-type fast patrol vessel (FPV), and thus military equipment, whose transfer to Benghazi constituted a violation of paragraph 9 of resolution 1970 (2011). The Panel classified the MV Penguin Transporter as dual-use vessel also subject to paragraph 9 of resolution 1970 (2011).

1. Involved Parties

35. The producer and seller of the two Penguin vessels was Penguin International Limited (Singapore). The Panel identified that 2020 Volume Boats Maintenance & Repairing FZE (UAE), and its representative Amro Salem Ismael Ibrahim, had commissioned the construction of the Flex Fighter Max TBZ11 vessel, and was the buyer of both Penguin vessels. Penguin International Limited informed the Panel that the vessels' destination was Libya, and that the end-user of the vessels was the "Libyan Coast Guard". No end-user certificates were issued. The sales contracts included a condition that "the buyers shall not utilise the vessel for military purposes" and that the vessels were "meant for civilian use only".²⁹⁸ The contract between Penguin International Limited and 2020 Volume Boats was for delivery in Singapore, rendering 2020 Volume Boats responsible for organizing onwards transport. Penguin Shipyard Asia PTE Ltd (Singapore) was the shipper indicated on the cargo manifest.

36. The transporting vessel, MV St Maria, is owned by Alicem Shipping Ltd (Liberia) and operated and managed by HGF Denizcilik Ltd Sti (Türkiye).²⁹⁹ The deck space charterer was Cigisped Middle East (UAE). The Panel also identified the parties who were responsible for loading the vessels onboard the MV St Maria.³⁰⁰

37. The Panel found that Multham International Limited (Hong Kong, China) was involved in the export procedure, and that the agent in Benghazi handling the unloading of the two Penguin vessels in Benghazi was Danube Shipping Company (Benghazi). Both companies are linked to Omar Mustafa.

2. Documentation inconsistencies

38. The cargo manifest showed Penguin Shipyard Asia PTE Ltd (Singapore) as shipper and Benghazi as destination, but left consignee and notify party fields blank (appendix 21.D figure 21.D.1). Penguin International Limited claimed that for practical reasons and as standard practice, their company had been indicated as shipper on the cargo manifest (which stated Benghazi as destination), but that they had not been "privy to the shipping documents".³⁰¹ The cargo manifest was stamped

²⁹⁵ DOB 28 May 1991; nationality: Jordan; Jordanian passport no. R734621 (Expiration: 4 March 2028).

²⁹⁶ National of Jordan; date of birth: 1 June 1986.

²⁹⁷ Flag State: Liberia.

²⁹⁸ Communication from Penguin International Limited, 5 May 2025.

²⁹⁹ Both companies share the same address in Istanbul, Türkiye; S&P Maritime Intelligence Risk Suite and communication from Alicem Shipping Ltd, 15 January 2025.

³⁰⁰ The Panel found no responsibility for a violation, nor non-compliance, and therefore does not name these companies.

³⁰¹ Communication from Penguin International Limited, 5 May 2025.

by Elara Shipping Co Ltd (Liberia),³⁰² Alicem Shipping's previous company name,³⁰³ and signed by the MV St Maria's master.

39. The Panel notes that usually, if no consignee or notify party is indicated in a cargo manifest, the bill of lading becomes a negotiable document of title for the cargo. In international shipping, this can occur if the cargo remains unsold at the time of lading or if there is no transfer of ownership. In the present case, however, the transport followed a sales contract. In such cases, the absence of a bill of lading is unusual. Ordinarily, the carrier issues the bill of lading upon receipt of the cargo, and it becomes a legal title for the cargo that impacts aspects related to its transport, such as liability. The cargo manifest is merely a summary of all bills of lading relating to the cargo loaded on a vessel.

40. The shipowner, Alicem Shipping, responding to a Panel email addressed to HGF Denizcilik (the shipmanager and operator) from an email address of Elara Shipping (the legal predecessor of Alicem), informed that no bill of lading had been issued, and confirmed that Penguin Shipyard had been both shipper and consignee.³⁰⁴ Asked by the Panel for an explanation for the absence of a bill of lading, Alicem Shipping stated that "shipping by cargo manifest is a common practice for sea transportation, and the presence of a bill of lading is not necessary."³⁰⁵

41. The Panel notes that when shipping by cargo manifest, the absence of a bill of lading must be contractually agreed (contract of carriage). The chartering agreement shared by Alicem with the Panel, however, did not include such agreement; conversely, it included general terms for bills of lading, suggesting that there had been an intention to issue one.

42. In most Member States, a bill of lading is a legal requirement for the export and import of goods – this is also the case for Singapore.³⁰⁶ While Libya's Customs Law No.10³⁰⁷ does not explicitly require a bill of lading, it speaks of a "general ship's manifest" in its article 61, also requiring that such document include the name of the consignee. In the present case, the cargo manifest left the consignee blank.

43. The Panel found that the export clearance for both Penguin TBZ vessels had been obtained by Penguin Shipyard Asia Pte. Ltd. on behalf of Multham International Limited. To obtain the clearance, the port of Marmaris, Türkiye, had fraudulently been declared as final destination of the cargo, thus avoiding implementation of paragraph 19 of resolution 2213 (2015) by Singapore.

44. The Panel assessed that the cargo documentation was inaccurate, misleading and incomplete, as: a) the cargo manifest indicated Penguin Shipyard as the shipper, although the real shipper was 2020 Volume Boats; b) the cargo manifest indicated no consignee and/or notify party in Benghazi, which concealed the real consignee; and c) by lack of a bill of lading, the cargo documentation provided to the Panel did not fulfil the legal requirements for export from Singapore and import to Libya.

3. Transit through Türkiye

45. The two Penguin vessels were loaded on the MV St Maria at Singapore port (SGSIN) between 12 and 13 December 2024. They were transported visibly on the MV St Maria's weather deck, without any tarpaulin cover,³⁰⁸ together with seven smaller, civilian vessels, with destinations Marmaris, Türkiye, and Genoa, Italy.

46. The MV St Maria sailed on 14 December 2024 for a westwards journey taking her through the Suez Canal on 31 December 2024. She then proceeded northwards and called at the port of Marmaris (Türkiye, TRMRM) on 2 January 2025. There, she discharged four of the seven civilian vessels. The port clearance application submitted to the Turkish authorities by the MV St Maria indicated Benghazi as the vessel's next port of call. She declared her cargo as "yacht, ship, ferry or

³⁰² The company shares the same address in Istanbul, Türkiye as the owner, manager and operating companies of the MV St Maria.

³⁰³ Communication from Alicem Shipping, 7 July 2025. Elara shares the same address in Istanbul, Türkiye as the owner, manager and operating companies of the MV St Maria.

³⁰⁴ Communication from Alicem Shipping, 14 January 2025.

³⁰⁵ Communication from Alicem Shipping, 2 July 2025.

³⁰⁶ <https://ask.gov.sg/customs/questions/clz9bs3ya02gqf9661j05n76k> (undated).

³⁰⁷ Law No. (10) of 1378 FDP (2010 AD), <https://lawsociety.ly/en/legislation/law-no-10-of-2010-regarding-customs/>; English translation at <https://security-legislation.ly/latest-laws/law-no-10-of-2010-on-customs/>.

³⁰⁸ Confidential Member State source.

boat”, with no reference to any military and/or dual-use nature. The port authority authorized the vessel’s clearance to depart.³⁰⁹

47. While documentary review of cargo documentation is the standard procedure for port authority clearances, the Panel assesses that the absence of a consignee and notify party in Benghazi, as well as the name of the vessel, “Flex Fighter”, would have provided “reasonable grounds” for an inspection under paragraph 19 of resolution 2213 (2015).

4. Voyage irregularities

48. After leaving Türkiye, and having indicated Benghazi as the next port of call to the Turkish authorities, the MV St Maria’s automated identification system (AIS), however, did not indicate Benghazi as destination. Rather, the AIS indicated Genoa, Italy, as the next port of call, at a time when she was evidently already en route to Benghazi.

49. When EUNAVFOR MED Operation IRINI, only having an aerial asset in the vicinity at the time, conducted a hailing of the MV St Maria by an aerial asset on 5 January 2025, she informed the Operation that Benghazi was her next port of call, despite her AIS still indicating Genoa. In the evening of the same day, the MV St Maria’s AIS signal disappeared about 90 nautical miles northeast of Benghazi and only reappeared close to midnight on 8 January 2025, about 9 nautical miles northwest of Benghazi. The Panel found that during that timeframe, she visited Benghazi port without registering a port call and unloaded the two Penguin vessels there, between 11:00 UTC on 6 January and 16:30 UTC on 8 January 2025. Alicem Shipping Ltd (Liberia), the owner of MV St Maria, explained to the Panel that the vessel’s AIS had been “probably blocked at the moment due to military operations in this territory”.³¹⁰ The Panel found this explanation not to be credible, as: a) electronic signal jamming does not cause a total blackout of an AIS signal but rather erratic data points; b) nine other vessels in the area at the same time encountered no AIS outages and also registered port calls in Benghazi; and c) Panel sources confirmed that no perceivable military operations had taken place in that area during that time frame. The Panel thus assesses that the AIS was deliberately disabled by the crew of the MV St Maria.

50. Following the MV St Maria’s departure from Benghazi, EUNAVFOR MED Operation IRINI undertook an inspection of the MV St Maria. The master provided the boarding team the cargo manifest and claimed that while no bill of lading was available, he had been authorized to sign such and that he would receive the bill of lading at his next port of call (Genoa, Italy).³¹¹

51. The Panel assessed that the crew on the MV St Maria attempted to conceal the vessel’s location and port visit to Benghazi, based on: a) the discrepancy between the next port of call, as declared to authorities and as registered in the vessel’s AIS; b) the gap on AIS coverage during the vessel’s port call to Benghazi; and c) the lack of a bill of lading and the unusual explanation that such could be obtained post-facto.

5. Penguin TBZ vessels

52. The MV TBZ11 (IMO 1032244) is an a 40-metres monohull aluminium vessel, model Flex Fighter Max, marketed by Penguin as “multi-role security vessel”³¹² and as “crew boat/security boat”.³¹³ The vessel was navy grey at the time of transfer to Libya. It was built in 2024 under the name of Pelican Bold,³¹⁴ with hull no. 496, upon order from Amro Ibrahim. It was renamed “TBZ11” in May 2024. The vessel was painted in navy grey, outfitted with STANAG L1 all-round wheelhouse ballistic protection, two gun mounts with ballistic shields and a concealed utility room with arms locker. The Panel classified the MV TBZ11 as a naval-type fast patrol vessel and thus military equipment, and its transfer to Benghazi a violation of paragraph 9 of resolution 1970 (2011) (appendix 21.D, figure 21.D.2).

53. The MV TBZ12 (IMO 9709908) landing craft, previously named “Penguin Transporter”, with hull no. 219, was built in 2014 and is a 55-metres steel-hull dual-ramp landing craft. The vessel was initially white³¹⁵ but was painted navy grey before its delivery to Libya.

³⁰⁹ Reply from Türkiye, 20 June 2025.

³¹⁰ S&P Maritime Intelligence Risk Suite; EUNAVFOR MED Operation IRINI dated 23 January 2025; exchanges with owner of MV St Maria and deck space charterer.

³¹¹ Report by EUNAVFOR MED Operation IRINI dated 23 January 2025.

³¹² Communication from Penguin International Limited, 15 January 2025.

³¹³ <http://www.penguin.com.sg/vessel-specs/flex-fighter/>.

³¹⁴ Flag State: Panama.

³¹⁵ Image provided by Penguin International Limited, 5 May 2025.

54. The Panel identified both the FPV TBZ11 (IMO 1032244) and the MV TBZ12 (IMO 9709908) moored at a military section of Benghazi port, berthed on the same pier (pier 09) as certain rigid-hulled inflatable boats (RHIBs) and smaller patrol vessels in use by LAAF (appendix 21.D figure 21.D.3).³¹⁶ Periodic satellite imagery reviewed by the Panel showed that the vessel remained stationed there.

55. Accordingly, despite its previous civilian use, the Panel classified the MV TBZ12 as a dual-use vessel whose transfer fell under the category of paramilitary equipment in paragraph 9 of resolution 1970 (2011), owing to its end-user being LAAF and it being employed for military use.³¹⁷

6. Party justifications

56. Penguin International Limited told the Panel that: a) “both vessels are essentially civilian vessels and generally have only regular marine equipment;”³¹⁸ b) the Flex Fighter Max has ballistic protection in its standard configuration and had been sold mainly to “private companies for oilfield security and merchant vessel escorts, essentially [for] civilian use;”³¹⁹ c) it was aware that the vessels’ intended destination was Libya, and that the end-user of the vessels was the “Libyan Coast Guard”, but no end-user certificates had been issued; and d) the sales contracts included a condition that “the buyers shall not utilise the vessel for military purposes” and that the vessels were “meant for civilian use only”.³²⁰

57. The Panel assessed the following: a) the Flex Fighter Max TBZ11 has wheelhouse ballistic protection, two gun mounts with ballistic shields and a concealed utility room with arms locker; this is neither customary for civilian vessels nor regular equipment. The foreseeable end-user and end-use have to be taken into consideration when considering export to a country under a UN arms embargo, in particular in the present case when the export destination is not under control of the Libyan Government. b) Standard configurations and customers in non-embargoed environments are irrelevant in the context of the Libya arms embargo. The Panel found that the Flex Fighter Max had also been supplied to at least one navy.³²¹ c) Any Libyan coast guard in Benghazi is not under the control of the Libyan Government. d) The end-user supposedly being the Libyan Coast Guard is in direct contradiction with the alleged civilian use.

58. Alicem Shipping told the Panel that they had not had any direct communication “with the manufacturer, shipper or consignee” of the transported vessels, as agents had taken care of this. The Panel assessed that a lack of communication and oversight does not excuse the carrier from due diligence obligations.

59. Cigisped Middle East FZE, without providing any supporting documentation, claimed that: a) their role had been limited to procuring deck space onboard the MV St Maria; b) they had merely been acting as a broker and not otherwise involved in other aspects of the transport, in particular not the export procedure;³²² c) they had not been provided with technical drawings that would have allowed them to identify the FlexFighter Max as military equipment; d) in hindsight and in light of the Panel’s findings, they “recognised that certain vessel characteristics may warrant enhanced scrutiny when Libya is the destination”; and e) they had taken concrete steps to improve their due diligence.³²³

60. The Panel assessed that: a) a deck space charterer bears responsibility for the transported cargo that goes beyond ensuring safe cargo transportation and includes sanctions compliance; b) export clearances bear no relevance on individual due diligence by each concerned party; and c) the relevant cargo documentation clearly identified the type of vessel and Libya as its destination; a vessel with the name “fighter” that is destined to Benghazi is a clear indicator for military end-users in the context of Libya. Post-factual compliance improvements, while laudable, do not change the underlying responsibility for an occurred violation.

61. The Panel assessed that the enhanced due diligence responsibilities emanating from transports into a country under a United Nations arms embargo apply collectively to all parties that have operational control, even if only about a section of the transfer. This applies equally to the charterer and the carrier, in particular in cases where the operational control

³¹⁶ TBZ11: 32°06'13.2"N 20°02'52.5"E; Penguin Transporter 32°06'04.9"N 20°02'48.6"E.

³¹⁷ S/2024/914, paragraph 69 and annex 32.

³¹⁸ Communication from Penguin International Limited, 5 May 2025.

³¹⁹ Communication from Penguin International Limited, 15 January and 5 May 2025.

³²⁰ Communication from Penguin International Limited, 5 May 2025.

³²¹ <https://www.janes.com/osint-insights/defence-news/sea/ghana-to-receive-flex-fighter-security-vessels>, 6 January 2022.

³²² Communication from Cigisped Middle East, 1 May 2025

³²³ Communications from Alicem Shipping, 7 July 2025; Cigisped Middle East, 20 January 2026.

remains with the latter. Together with other parties involved in maritime transport, such as deck space charterers or freight loaders, all parties carry collective responsibility for ensuring sanctions compliance.

7. Panel assessment

62. The Panel found the following in violation of paragraph 9 of resolution 1970 (2011) for the transfer of the two Penguin TBZ vessels to Benghazi:

- a) Penguin International Limited (Singapore) as producer and seller;
- b) Penguin Shipyard Asia PTE Ltd (Singapore) as shipper;
- c) 2020 Volume Boats Maintenance & Repairing LLC (United Arab Emirates) as buyer and responsible for organizing the transfer to Libya;
- d) Amro Salem Ismael Ibrahim³²⁴ as representative of 2020 Volume Boats;
- e) Multham International Limited (Hong Kong, China) as party involved in fraudulent export declaration;
- f) Omar Mahmoud Hasan Mustafa³²⁵ as representative of Multham International;
- g) Cigisped Middle East FZE (UAE) as deck space charterer;
- h) Alicem Shipping Ltd (Liberia) as owner of the MV St Maria (IMO 9467134);
- i) HGF Denizcilik Ltd Sti (Türkiye) as operator and manager of the MV St Maria (IMO 9467134);
- j) Danube Shipping Company as representative of LAAF handling the Penguin TBZ upon arrival in Benghazi;
- k) LAAF as the end-user.

63. The Panel further finds Türkiye in non-compliance with paragraph 19 of resolution 2213 (2015).

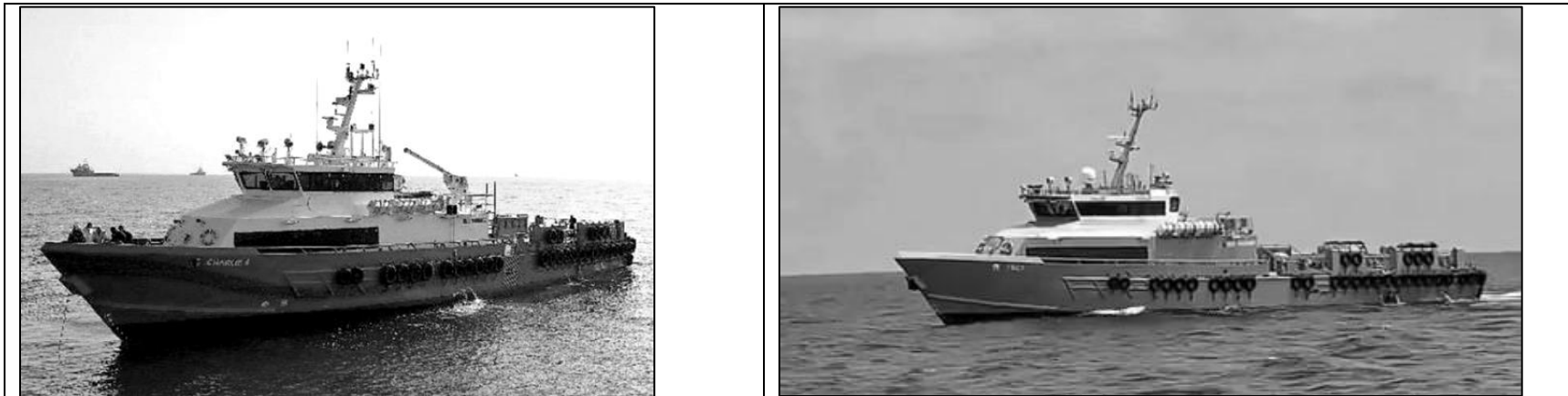
³²⁴ National of Jordan; DOB: 1 June 1986.

³²⁵ DOB 28 May 1991; nationality: Jordan; Jordanian passport no. R734621 (Expiration: 4 March 2028).

Appendix 21.A: Grandweld 42-metres TBZ vessel example

Figure 21.A.1

Left: MV Tareq Bin Zeyad (IMO 9889930) under its previous name “Charlie 4”; right: 42-metres vessel MV TBZ3 (IMO 1044895) operated by Libyan armed actors

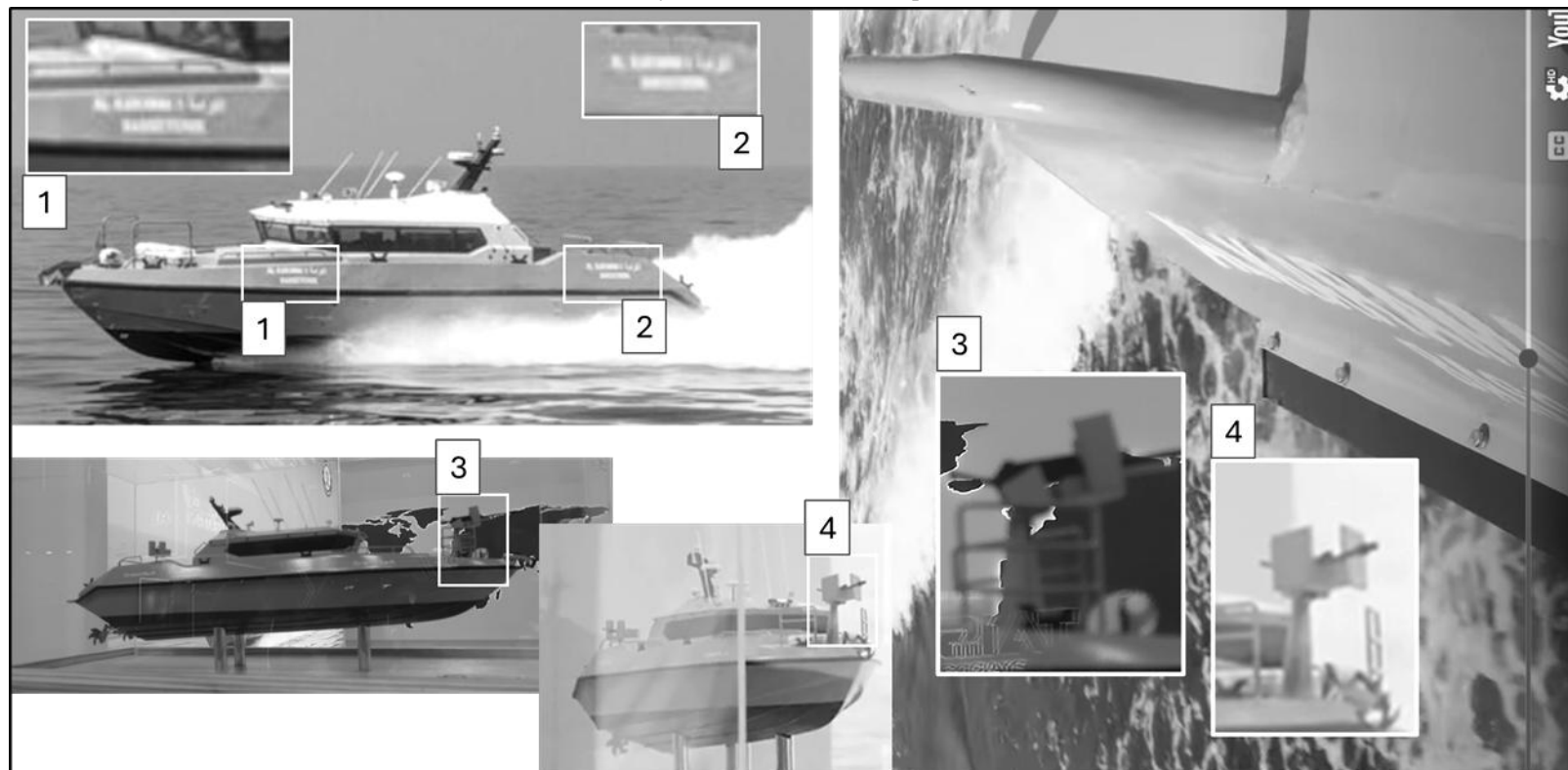


Source: left: <https://almouj.ae/wp-content/uploads/2022/07/Charlie-4-Almouj.pdf> (undated), last accessed 16 April 2024 and since taken offline; right: https://x.com/seawatch_intl/status/1930581793926738099?s=46, 5 June 2025.

Appendix 21.B: Grandweld 17-metres Al-Karama FIC

Figure 21.B.1

Top left: Grandweld GrandSwift Al Karama 1 FIC on Grandweld's website; right: Al Karama hull name visible in promotional video on Grandweld website; bottom left: model of GrandSwift FIC exhibited at NAVDEX Dubai, February 2025 with mounted weapon



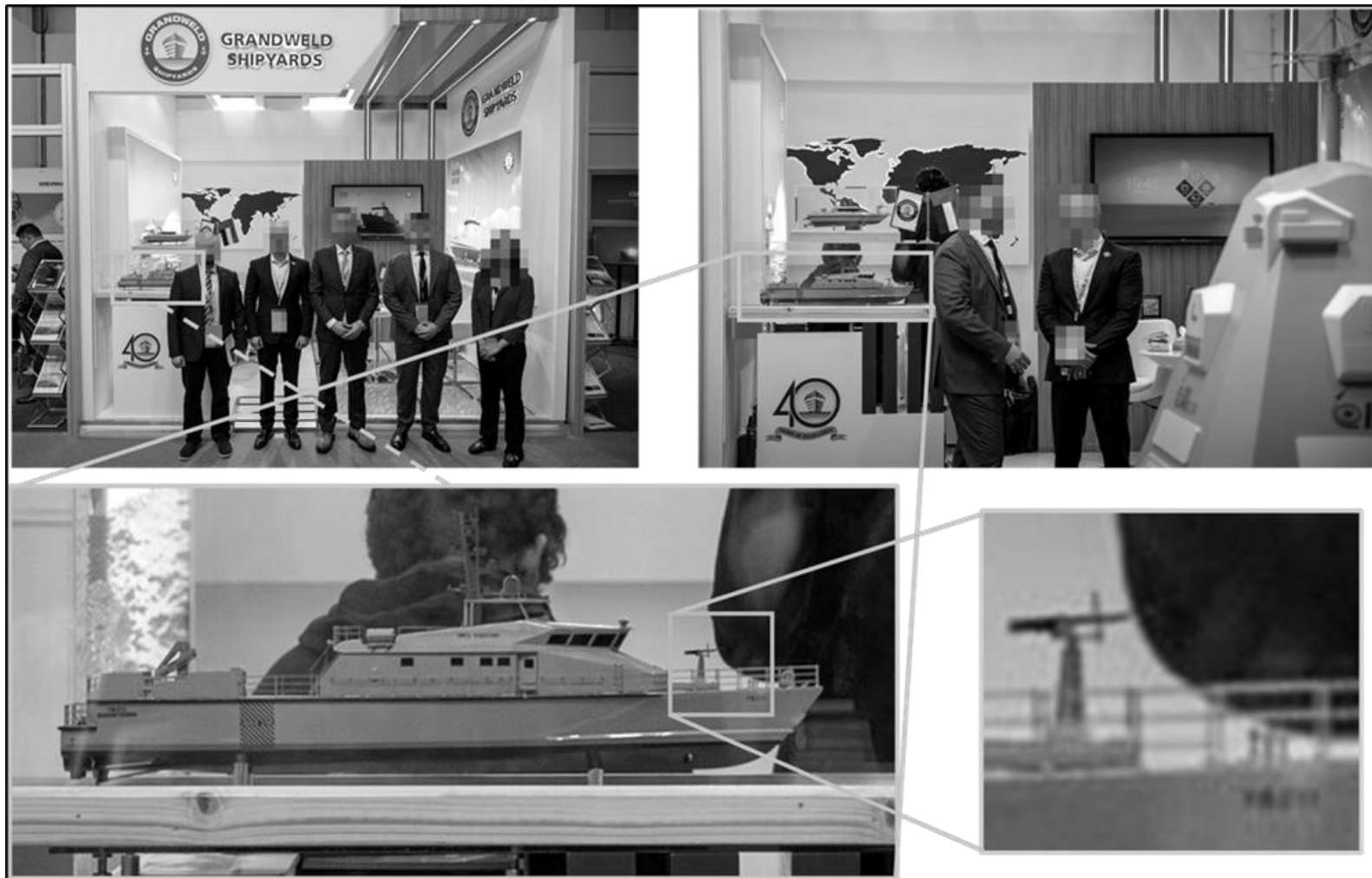
Developed by Panel of Experts.

Source: Top left: <https://www.grandweld.com/grandswift-interceptor-series-the-latest-addition-to-grandwelds-high-performance-fleet/> (undated); right: <https://www.youtube.com/watch?v=e1n0ad-1twI&t=17s>, 18 November 2024, at 0:39min.; bottom left: confidential; bottom center: https://www.linkedin.com/posts/grandweld-shipyards_grandweldshipyards-navdex2025-maritimeinnovation-activity-7300038176281157632-48mB/, 25 February 2025 (last accessed 15 August 2025, unavailable since).

Appendix 21.C: Grandweld 38-metres TBZ FPV

Figure 21.C.1

Model of armed 38-metres vessel MV TBZ13 (IMO 1089106) displayed at Grandweld stand at NAVDEX Dubai, February 2025

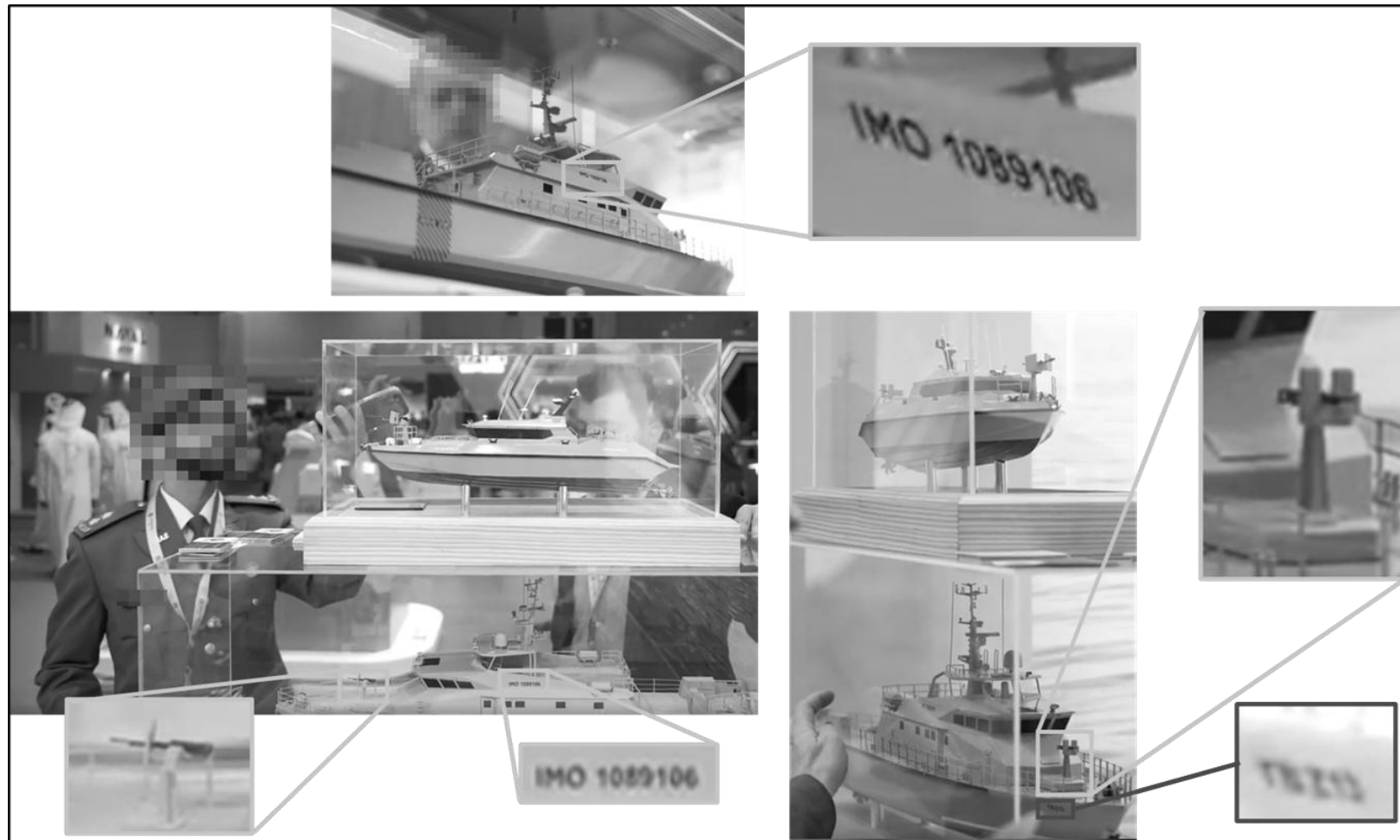


Developed by Panel of Experts.

Source: <https://www.grandweld.com/grandweld-shipyards-makes-landmark-debut-at-navdex-2025/>, 21 April 2025.

Figure 21.C.2

Model of armed 38-metres vessel MV TBZ13 (IMO 1089106) displayed at Grandweld stand at NAVDEX Dubai, February 2025



Developed by Panel of Experts.

Source: https://www.linkedin.com/posts/grandweld-shipyards_grandweldshipyards-navdex2025-maritimeinnovation-activity-7300038176281157632-48mB/, 25 February 2025 (last accessed 15 August 2025, unavailable since).

Appendix 21.D: Penguin vessels

Figure 21.D.1
Cargo manifest for Penguin Flex Fighter Max vessel (MV TBZ11 (IMO 1032244))


VertonCory
CARGO MANIFEST

SHEET No.: 1
DATE: 13.12.2024
FROM: SINGAPORE
TO: BENGHAZI
FLAG: LIBERIA

FOR THE SHIP: ST MARIA CAPTAIN: ALEKSANDR REVA

B/L No.	SHIPPER/CONSIGNEE/ NOTIFY PARTY	MARKS & NUMBER	DESCRIPTION OF GOODS	WEIGHT / MEASUREMENT	
				KGS	M3
SIN-003	Shipper PENGUIN SHIPYARD ASIA PTE LTD 21 TUAS ROAD SINGAPORE 638469 Consignee Notify Party		1 X PENGUIN FLEX FLIGHTER 40.00 X 7.00 X 6.95 M @ 36,500.00 KGS	160,000.00 KGS	2,598.20 M3



Source: Confidential

Figure 21.D.2

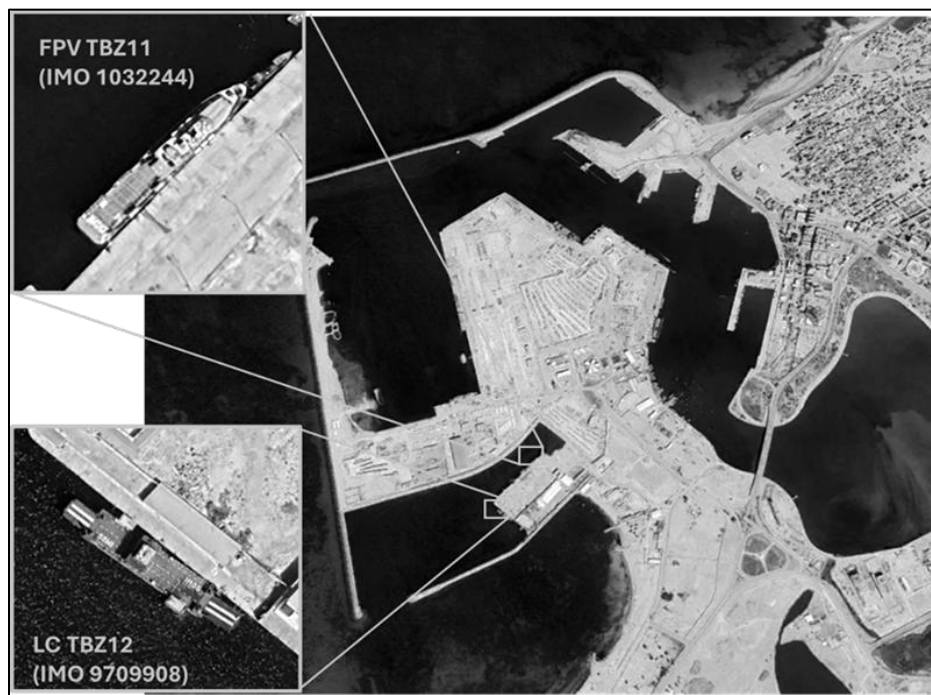
Penguin Flex Fighter Max stock image (top) and MV TBZ11 (IMO 1032244) (bottom)



Source: Penguin International Limited

Figure 21.D.3

FPV TBZ11 (IMO 1032244) and LC TBZ12 (IMO 9709908) at Benghazi port



Developed by Panel of Experts

Source: Google Earth Pro, Airbus, 10 March 2025.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 22 Transfer of armoured vehicles onboard the MV Aya-1 (IMO 9293557)

A. Overview

1. In July 2025, the vessel MV Aya-1 (IMO 9293557)³²⁶ carried a shipment of vehicles from the United Arab Emirates (UAE). The vessel was intercepted by EUNAVFOR MED Operation IRINI but was subsequently released and continued to Libya. The cargo contained a shipment of 154 vehicles referenced in an end-user certificate issued by the Libyan Ministry of Defence (MoD), as well as more than 86 additional vehicles of relevance to the arms embargo that were not part of the certificate. The vehicles were delivered to Misrata and Benghazi.

B. Transfer to Libya onboard the MV Aya-1 (IMO 9293557)

2. The vehicles were part of a containerized cargo onboard the MV Aya-1, loaded in Jebel Ali (UAE, AEJEA) between 30 June and 1 July 2025. The vessel sailed on 1 July 2025, declaring first Fujairah (UAE) and then Suez (Egypt) as next port of call. After transiting the Suez Canal between 14 and 16 July 2025, the vessel declared Benghazi (LYBEN) as next port of call.

3. On 18 July 2025, around 25 nautical miles north of Derna, the vessel was approached by EUNAVFOR MED Operation IRINI, which subsequently undertook an inspection at sea, identified missing cargo documentation and discovered 12 militarized vehicles in some of the containers.

4. Operation IRINI inspected six containers, each of which held two armoured vehicles adding up to 12 armoured vehicles. Based on the documentary information that was made available to the Panel at a later stage, the Panel assessed that these 12 vehicles fell into the category of military equipment, as they consisted of: a) four Toyota Land Cruiser (LC) 70-series-based armoured personnel carriers (APCs); and b) four Toyota LC70-series armoured pickup trucks with gun ports. As the Panel was not granted the possibility to undertake its own inspection of the cargo, it was not in a position to determine the make and model of the vehicles beyond the fact that they had been militarized after their exports by Toyota in civilian configurations to several Member States in the Persian Gulf region. This style of post-export militarization was consistent with militarized vehicles seized and previously reported on by the Panel, which had been militarized in the UAE.³²⁷

5. According to Operation IRINI, the vessel was held for several days at sea, awaiting the assignment of a port of diversion for a full inspection. The vessel then requested provisioning and servicing, and was ordered to sail to the port of Astakos, Greece (GRAS). The vessel remained in Astakos port (GRAS) between 27 and 31 July 2025.

6. Immediately after the vessel's detention, exchanges took place between Operation IRINI and the Libyan Government of National Unity (GNU). As a follow-up to these discussions, Operation IRINI received on 31 July 2025 an end-user certificate for 154 vehicles dated 6 May 2025, signed by Abdelhamid Dbeibah, in his capacity as Minister of Defence, and by the MoD director of military procurement. Subsequently, on 1 August 2025, Operation IRINI released the MV Aya 1 after having requested from the vessel's owner, UDS Shipping Services LLC (UAE), that the vessel call at Tripoli port (LYTIP) to deliver the vehicles there under the supervision of the GNU. Concurrently, Operation IRINI wrote to the Libyan MoD encouraging the GNU to ensure that all military vehicles listed in the end-user certificate were properly unloaded and placed under its control.

7. The MV Aya-1 then proceeded towards Tripoli until 3 August 2025 when it changed course around eight nautical miles north-north-east of Tripoli, and called at Misrata (Qasr Ahmed) port (LYMRA) on 4 August 2025. On 5 August 2025, the vessel left and made subsequent port calls to Benghazi (LYBEN), from 7 to 10 August 2025, and Tubruq (LYTOB), from 14 to 15 August 2025 (vessel voyage at appendix 22.A).

C. Vehicles onboard the MV Aya-1

1. Vehicles that were part of the end-user certificate

8. The abovementioned end-user certificate for 154 vehicles did not contain information beyond the generic make and/or base model and vehicle identification numbers (VINs). Some VINs contained minor transcription errors. The Panel assessed that the VINs referred to: a) 109 Toyota Land Cruiser (LC) 70-series pickup trucks; b) 13 Toyota LC70-series vans;

³²⁶ Flag: Panama.

³²⁷ S/2023/673, paragraphs 103 to 105 and annex 71 and S/2024/914, annex 52.

c) 10 LC200-series vans; d) 10 Toyota LC300-series SUVs; and e) 12 Ford F-550 Super Duty with incomplete chassis cab. The end-user certificates do not indicate any type of armouring or militarization.

9. The cargo manifest contained a total of 359 VINs, including a) 155 Toyota LC 70-series pickup trucks; b) 47 Toyota LC70-series vans; c) 10 LC200-series vans; d) 28 Toyota LC300-series SUVs; e) 12 Ford F-550 Super Duty with incomplete chassis cab; f) one Dodge Ram with incomplete chassis cab; g) five GMC Yukon SUVs; and h) 101 SUVs, pickup trucks, passenger cars and motorcycles of different makes.

10. All 154 VINs indicated in the end-user certificate were also contained in the cargo manifest, taking into consideration some minor transcription errors (likeness over 90 per cent). The Panel thus assessed that the vehicles contained in the end-user certificate were those onboard the MV Aya-1. None of the vehicles on the cargo manifest were represented with weights that would indicate armouring. The Panel assessed that this could not be accurate, because: a) the Libyan MoD informed the Panel that the cargo was a mix of armoured and unarmoured vehicles;³²⁸ and b) of the 12 vehicles documented by Operation IRINI, and which the Panel classified as military equipment, only the VINs of six vehicles were part of the end-user certificate. The weight of these six vehicles on the end-user certificate was misdeclared, as the stock curb weight was provided as opposed to the up-armoured weight, to give the impression of a civilian configuration. The weight of the six vehicles that were not listed in the end-user certificate had been correctly declared.

2. Additional armoured vehicles identified by cargo weight

11. Based on the weight information contained in the cargo manifest, the Panel identified 86 vehicles whose indicated cargo weight significantly exceeded the heaviest curb weight of that respective vehicle type. The Panel assessed this as indicating after-market armouring. As per the cargo manifest, these vehicles included: a) 41 Toyota LC70-series pickup trucks; b) 31 Toyota LC70-series vans; c) 8 Toyota LC300-series SUVs; d) 1 Dodge Ram with incomplete chassis cab; and e) 5 GMC Yukon SUVs.

12. None of the VINs of these armoured vehicles were reflected in the end-user certificate. Given the preponderance of evidence, the Panel assessed that these vehicles were intended for military end-use.

D. Destinations and involved companies

1. 154 vehicles contained in EUC

13. The cargo manifest indicated that 93 of the 154 vehicles contained in the end-user certificate were supposed to be delivered to Misrata (LYMRA) and 61 to Benghazi (LYBEN), both batches coming from the same shipper in the UAE and destined to the same consignee with address in Misrata. After the vessel's interception by Operation IRINI, 123 vehicles were delivered to Misrata and 31 to Benghazi (table 22.1).

³²⁸ Meeting with Libyan MoD, 16 September 2025

Table 22.1

Destinations of vehicles contained in end-user certificate as reflected in cargo manifest and actual destinations

<i>Port of delivery and number of vehicles as per cargo manifest</i>	<i>Actual port of delivery and actual number of vehicles delivered</i>	<i>Shipper as per cargo manifest</i>	<i>Consignee as per cargo manifest</i>
Misrata: 93	Misrata: 93	Noor Al Arab Cargo LLC (UAE)	Libomar Shipping Agencies (Libya)
Benghazi: 61	Misrata: 30 Benghazi: 31		

14. The shipper, Noor Al Arab Cargo LLC (UAE) told the Panel that a) they had checked cargo documentation and had not identified any type of armoured vehicles loaded in the containers; b) all containers contained “normal Toyota” vehicles; and c) their clients loaded the containers, and they received them in loaded condition.³²⁹

15. The consignee, Libomar Shipping Agencies (Misrata), informed the Panel³³⁰ that a) the unloading in Misrata of the containers with the 30 vehicles intended for delivery to Benghazi was done upon instruction from the Libyan authorities; b) the 30 vehicles had been handed over to a company in Misrata;³³¹ and c) the 31 vehicles that were delivered to Benghazi had been handed over to two companies in Benghazi.³³²

16. The importer, and thus the buyer, was indicated in the end-user certificate as Zuhail Aadida for Importing Various Means of Transporting (Tripoli), based on a contract dated 4 May 2025. The Libyan MoD explained to the Panel that private companies were used for import of materiel to avoid identification of the MoD as a consignee. The MoD further clarified that it would face challenges in completing business transactions if it was identified as the recipient of the cargo, due to a higher level of due diligence applied by the banking sector to them as opposed to private companies.³³³

17. The email address and the phone number provided for Zuhail Aadida on the end-user certificate were invalid. The Panel found that a) the email address indicated, “zohil@yahoo.com”, had been deactivated due to inactivity,³³⁴ suggesting that it had not been used since at least October 2024; and b) the company received letters of credit from the Central Bank of Libya in 2022 (USD 243,188), 2023 (USD 149,337) and 2024 (USD 1,193,558).³³⁵ While 2025 numbers have not yet been released, the purchase of 154 vehicles would have required a significantly larger sum.

18. The Panel assessed that Noor Al Arab Cargo LLC and Libomar Shipping Agencies did not fail in their due diligence assessments of the cargo since: a) the transfer was a containerized transfer; b) cargo weights were misdeclared to fraudulently represent civilian-type vehicles; c) both companies were cargo handlers; and d) the containers were delivered to private companies. Due to these specific circumstances, the Panel further assessed that the three private companies that received the vehicles in Misrata and Benghazi, and Zuhail Aadida, were either unaware of their name being used or compelled to act as fronts for armed groups, and thus not responsible for their actions.

19. The Panel assessed the type of transport of the 154 vehicles to Libya as a case of smuggling, owing to misdeclared cargo and nominal shippers and consignees.

2. Armoured vehicles inspected by Operation IRINI and not part of the EUC

20. As mentioned above, of the 12 vehicles inspected by Operation IRINI, 6 were included in the end-user certificate. The remaining six vehicles were four APC-type vehicles, supposed to be delivered to Tripoli, and two armoured pick-up

³²⁹ Noor Al Arab Cargo LLC communication dated 6 January 2026.

³³⁰ Libomar Shipping Agencies, communication dated 30 December 2025.

³³¹ Al Baariq Company for Importing Transportation and its Accessories.

³³² Sharikat Benghazi Al'uwlaa Cars and Spare Parts Import Company; Sharikat Durub Alandlas Liaistirad Alsayaarat W Qite Ghiariha.

³³³ Meeting with the Ministry of Defence, Tripoli, 22 November 2025.

³³⁴

<https://login.yahoo.com/account/challenge/fail?done=https%3A%2F%2Fwww.yahoo.com%2F&authMechanism=secondary&e=true&pcn=username&eid=4401&acumb=sEdzBX2S>

³³⁵ Source: Central Bank of Libya.

trucks, supposed to be delivered to Misrata. After the vessel's interception by Operation IRINI, all vehicles were delivered to Misrata (table 22.2).

Table 22.2

Six vehicles inspected by Operation IRINI whose VINs were not contained in the end-user certificate

<i>Port of delivery and number of vehicles as per cargo manifest</i>	<i>Actual port of delivery and actual number of vehicles delivered</i>	<i>Shipper as per cargo manifest</i>	<i>Consignee as per cargo manifest</i>
Tripoli: 4	Misrata: 4	FDZ Logistics LLC (UAE)	Al Katiba 55 Mushat, Tripoli Libya
Misrata: 2	Misrata: 2	See below table 22.3	See below table 22.3

3. 86 armoured vehicles not part of the EUC

21. As mentioned above, the Panel identified 86 armoured vehicles that were not included in the end-user certificate, which included the six vehicles in above table 22.2. The Panel identified discrepancies between the cargo manifest and the bill of lading in terms of shippers and consignees; for 49 vehicles, the Panel identified the consignees as the Libyan MoD (26 vehicles) and the Libyan Ministry of Interior (MoI) (23 vehicles) (table 22.3).

Table 22.3

86 vehicles identified by the Panel as armoured and not part of the end-user certificate, including six of the vehicles inspected by Operation IRINI

<i>Number of vehicles</i>	<i>Port of delivery as per cargo manifest</i>	<i>Shipper as per cargo manifest</i>	<i>Consignee as per cargo manifest</i>
	<i>Actual port of delivery (if different)</i>	<i>Shipper as per bill of lading (if different)</i>	<i>Consignee as per bill of lading (if different)</i>
8	Tripoli (0 vehicles)	FDZ Logistics LLC (UAE)	Al Katiba 55 Mushat, Tripoli
	Misrata (8 vehicles)		
18	Misrata		
33	Misrata	P2P Motors International FZE (UAE) (0 vehicle)	Alraqi Importing Transportation Means and Accessories, Misrata (0 vehicle)
		Sincere Car Trading FZCO (UAE) (33 vehicles)	Ministry of Interior (23 vehicles) Ministry of Defence (10 vehicles)
10	Misrata	Mujaf Middle East FZE	Atqan Company to Import Motors and Transportation, Misrata
6	Misrata	Africa Auto FZE	Al Baariq Company for Importing Transportation and its Accessories, Misrata
4	Misrata	Africa Auto FZE	
6	Misrata	P2P Motors International FZE (UAE) (0 vehicle)	Acacus Almathalia for Import Means of transportation, Misrata (0 vehicle)
		Sincere Car Trading FZCO (UAE) (6 vehicles)	Ministry of Defence (6 vehicles)
1	Misrata	Al Bahar Motors (UAE)	Etehad Libya to Import Cars and Parts Company, Misrata

22. FDZ Logistics LLC (UAE) informed the Panel that: a) it was only a freight forwarding company acting as a shipping agent; b) it was not the owner of the vehicles; c) it did not verify contents of containers; and d) that it did not have any clients in Libya and only followed instructions by clients in the UAE.³³⁶

23. The Panel assessed that FDZ Logistics LLC was responsible for serious due diligence failures in respect of the transfer, given that a) cargo weight clearly indicated a significantly higher weight than the curb weight for the vehicles and b) Katiba 55 was the consignee. The justifications provided were not valid, as a freight forwarder carries collective responsibility in the enhanced due diligence environment emanating from a transfer to a country under a United Nations

³³⁶ Communication from FDZ Logistics LLC (UAE) dated 2 January 2026.

arms embargo; in particular, cargo documentation verification would have immediately identified the cargo weights and the consignee as a red flag. When FDZ Logistics LLC agreed to take on the role as shipper in the transaction, this company bore the full responsibility in terms of sanctions compliance. The same applied for all companies named in table 22.3 that acted as shippers for these transfers.

24. The Panel assessed that Sincere Car Trading FZCO (UAE) was the real shipper for the vehicles consigned to the MoD and the MoI. In the Panel's assessment, the two companies indicated on the cargo manifest as shipper and consignee were only nominal consignees.

25. One of the consignees was Katiba 55, otherwise known as 55 Brigade, which is an armed group based in Warshefana, which was found in violation of international human rights law in the Al Maya detention centre.³³⁷ The Panel confirmed that Katiba 55 received the 26 vehicles, including the six vehicles inspected by Operation IRINI and found by the Panel to have been APC-type vehicles.

4. Carrier of the vehicles

26. The MV Aya 1 (IMO 9293557, now Zulfa 1) is owned by UDS Shipping Services LLC (UAE) and operated by Al Fooz Al Qadem Shipping Ltd (Marshall Islands). The Panel found that both companies are controlled by Ahmed Alushibe (aka Ahmed Gadalla or Ahmed Jadallah) through Alushibe Group.

27. UDS Shipping and Al Fooz Al Qadem showed the capacity to provide end-to-end logistics for UAE-Libya container transport. UDS Shipping owns a small fleet of cargo vessels and exclusively used shipper-owned-containers on these transits, which allowed Alushibe to counteract eventual due diligence efforts by involved trade actors. UDS Shipping could offer its containers to actors that intended to transport embargoed goods to Libya and guarantee safe passage. The interception by Operation IRINI demonstrated the advantages of containerized transport for such activities: sea-side inspections can only reveal the contents of accessible containers, while a full inspection is a significant logistical challenge. Al Fooz Al Qadem also has dependencies at Libyan ports (Al Fooz Shipping), who act as agents in Libya for the receipt of the containers, enabling a system of cargo documentation using nominal consignees in Libya.

28. The Panel found Ahmed Alushibe as responsible for this transfer.

5. End-users

29. The end-user certificate dated 6 May 2025 identified the end-user of the 154 vehicles as the Border Guard and Critical Facilities Directorate, for exclusive use by the Libyan MoD. The Panel found that this unit is under the effective control of Abdelsalam al-Zobi (para 16 of the report).

30. The 86 additional armoured vehicles identified by the Panel were divided up as follows: a) 26 for Katiba 55; b) 23 for the Libyan MoI; c) 16 for the Libyan MoD; and d) the remaining 21 vehicles were unaccounted for (table 22.3).

E. Panel assessment in relation to the arms embargo

31. The MoD contended³³⁸ that the Committee had approved a related arms embargo exemption request; the Panel identified that request as having been contained in a note verbale dated 29 July 2025, thus three days before the release of the vessel by Operation IRINI. The note verbale referred to paragraphs 2(d) and 2(e) of resolution [2769 \(2025\)](#), thus simultaneously invoking an exception and submitting a request for approval. The note verbale included the abovementioned end-user certificate.

32. The intended end-user as per note verbale and the end-user certificate – the Border Guard and Critical Facilities Directorate under the Ministry of Defence, and any units under its command – was not included among the forces notified to the Committee as being under the control of the Libyan Government. The three security forces declared by letter dated 27 May 2017 to be under the control of the Libyan Government are the Libyan Coast Guard, Explosive Ordnance Disposal units, and the Presidential Guard.³³⁹ Of the 154 vehicles in the end-user certificate, 31 were delivered to Benghazi.

33. The two sets of stamp and signature on the end-user certificate were those of Abdelhamid Dbeibah, in his capacity as Minister of Defence, and that of the Director of the Military Procurement Department of the Libyan MoD. However, the

³³⁷ S/2023/673, paras. 64-65.

³³⁸ Meeting with Libyan MoD, 16 September 2025

³³⁹ See also S/2023/673, para. 76 and annex 24.

name and signature of the latter individual were not those that had been provided to the Committee by the Libyan Government. The update reflecting the name and signature of the individual on the end-user certificate was eventually done in December 2025.

34. Paragraph 2 of resolution 2769 (2025) provides that the measures imposed by paragraph 9 of resolution 1970 (2011), do not apply to the sale, supply or transfer to Libya of: ... (d) non-lethal military equipment, and the provision of any technical assistance, training or financial assistance, when intended solely for security or disarmament assistance to the Libyan Government; and (e) arms and related materiel of all types, including technical assistance or personnel, training, financial and other assistance, as approved in advance by the Committee.

35. Based on the general type of vehicles, and in particular their intended end-user, the Panel assessed the 154 vehicles to be military equipment. Given that the intended end-user is not among the forces declared under the control of the Libyan government, and given that one signatory of the end-user certificate was not the one notified to the Committee, the Panel assessed that the transfer in question, did not meet the technical requirements for the exception to the arms embargo under paragraph 2 (d) of resolution 2769 (2025). As of the time of writing of this report, no arms embargo exemption request under paragraph 2 (e) of the same resolution had been approved by the Committee in advance of the transfer. Thus, the transfer was in violation with paragraph 9 of resolution 1970 (2011).

36. The Panel assessed the transfer of the 86 additional armoured vehicles not contained in the end-user certificate as a violation of paragraph 9 of resolution 1970 (2011), as none of the recipients was among the forces declared to the Committee to be under the control of the Libyan Government. Out of the 86 vehicles, 39 were consigned to the GNU MoD and the MoI. The Panel assessed the transfer of these 39 vehicles to Libya as a case of smuggling, owing to misdeclared cargo and nominal shippers and consignees.

37. The Panel found that, in relation to this transfer, Operation IRINI failed to implement its mandate under paragraph 5 of resolution 2292 (2016), as amended by paragraph 2 of resolution 2733 (2024). Operation IRINI did not take the appropriate steps after the identification of 12 vehicles it assessed as military equipment. After receiving the end-user certificate, Operation IRINI failed to identify that the forces listed in the end-user certificate were not among the forces declared under the control of the Libyan Government. Additionally, it failed to identify that six of these vehicles had not been included in the end-user certificate, and that their intended recipient had been an armed group, Katiba 55, previously reported by the Panel in violation of international human rights law. Further, Operation IRINI failed to undertake a thorough review of the cargo documentation, which would have revealed inconsistencies in terms of consignees and the cargo weights, and allowed the identification of the additional 86 armoured vehicles.

1. Violation of paragraph 9 of resolution 1970 (2011)

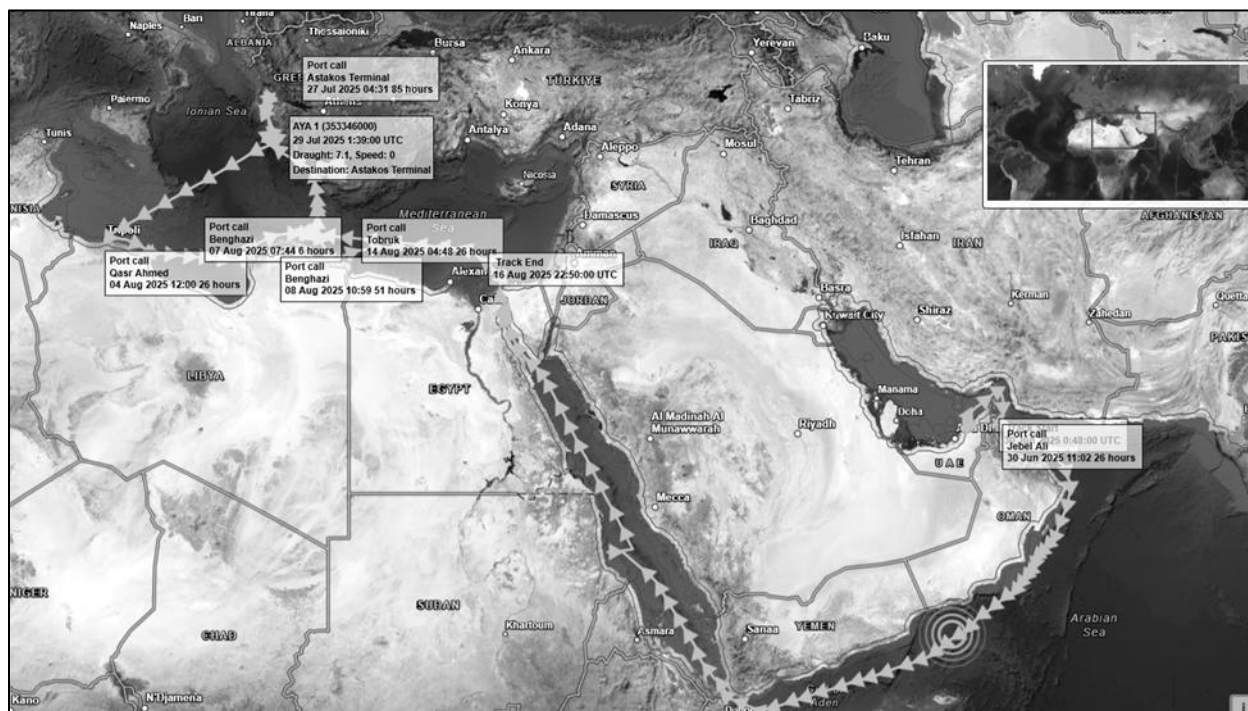
38. The Panel found the following in violation of paragraph 9 of resolution 1970 (2011) for the transfer of the 240 vehicles onboard the MV Aya 1 (IMO 9293557) to Misrata and Benghazi:

- a) UDS Shipping Services LLC (UAE) as owner of the MV Aya 1 (IMO 9293557);
- b) Al Fooz Al Qadem Shipping Ltd (Marshall Islands) as operator of the MV Aya 1 (IMO 9293557);
- c) Ahmed Alushibe (aka Ahmed Gaddalla) as the responsible party? for the transfer;
- d) FDZ Logistics LLC (UAE) as shipper;
- e) Sincere Car Trading FZCO (UAE) as shipper;
- f) Mujaf Middle East FZE (UAE) as shipper;
- g) Africa Auto FZE (UAE) as shipper;
- h) Al Bahar Motors (UAE) as shipper;
- i) Atqan Company to Import Motors and Transportation (Libya) as consignee;
- j) Al Baariq Company for Importing Transportation and its Accessories (Libya) as consignee;
- k) Etehad Libya to Import Cars and Parts Company (Libya) as consignee;
- l) Al Katiba 55 Mushat (Libya) as consignee;
- m) The GNU as the end-user of the 193 vehicles delivered to Misrata for the MoD and the MoI;
- n) LAAF as the end-user of the 31 vehicles delivered to Benghazi.

Appendix 22.A: Voyage of MV Aya 1 (IMO 9293557)

Figure 22.A.1

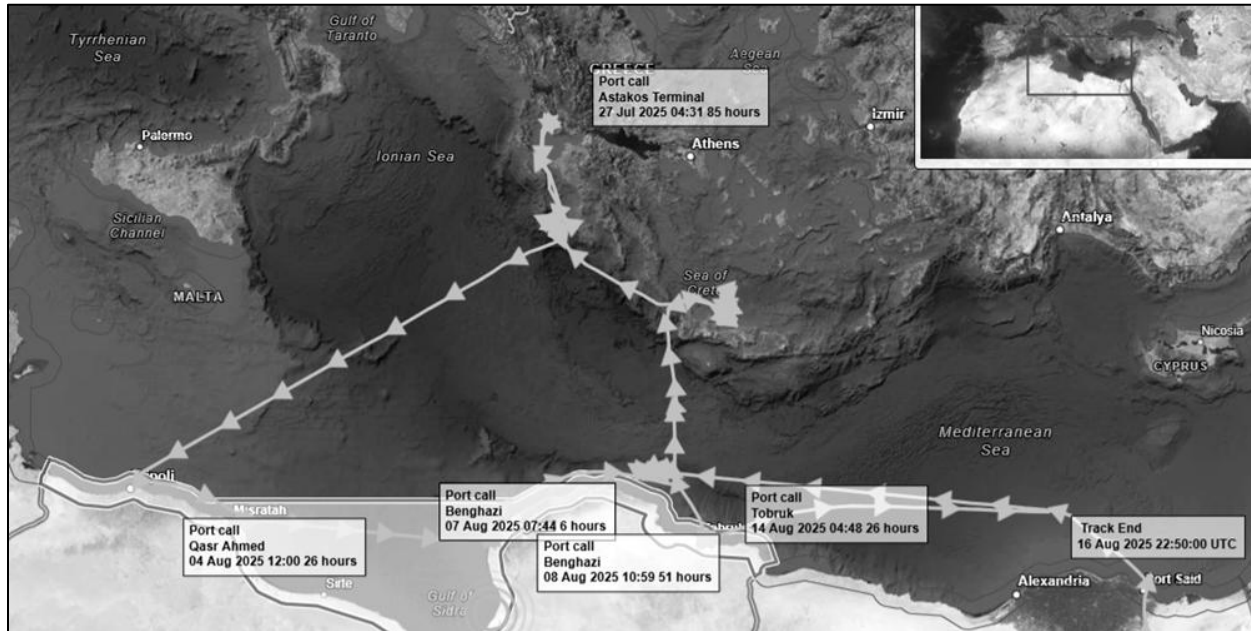
Voyage of the MV Aya-1 (IMO 9293557) between 30 June and 16 August 2025



Source: S&P Maritime Intelligence Risk Suite

Disclaimer: The designations employed and the presentation of material on this map do not imply the expression of any opinion whatsoever on the part of the Secretariat of the United Nations concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries.

Figure 22.A.2

Voyage of the MV Aya-1 (IMO 9293557) between 17 July and 16 August 2025

Source: S&P Maritime Intelligence Risk Suite

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 23 Summary of newly identified arms embargo violations and instances of non-compliance in relation to equipment transfer and training

1. Sources for tables 23.1 and 23.2, which are shown in the appropriate annexes, are primarily from a combination of: a) Member States' responses to Panel enquiries; b) entity responses to Panel enquiries; c) official social media of national armed forces; d) official social media of armed groups; e) other social media; f) authoritative specialist military and transport databases; g) imagery supported by geo-location; h) imagery supported by technical analysis; and/or i) confidential sources.

Table 23.1
Summary of equipment transfer violations

<i>Annex</i>	<i>Date identified in Libya or by Panel</i>	<i>End User</i>	<i>Equipment nomenclature</i>	<i>Responsible</i>	<i>Cross-references</i>
Annex 21	30 Sep 2024	LAAF	2020 Volume Boats 17m Fast Interceptor Vessels Al Karama 1 and 2	See table 3 and annex 21, section B.	
Annex 21	6 Jan 2025	LAAF	Penguin 40m "Flex Fighter Max" Fast Patrol Vessel TBZ11	See table 3 and annex 21, section 3	
Annex 24, appendix A	26 May 2025	LAAF	9K331 Tor-M1-2U surface-to-air defence system	UID ^a	
Annex 24, appendix B	26 May 2025	LAAF	BMP-2M IFV	UID ^a	
Annex 24, appendix C	26 May 2025	LAAF	BTR-82AT IFV	UID ^a	
Annex 24, appendix D	26 May 2025	LAAF	33GT-34039B armoured carrier	UID ^a	
Annex 24, appendix E	26 May 2025	LAAF	Spartak/VPK-Ural APC	UID ^a	
Annex 24, appendix F	26 May 2025	LAAF	Tigr-M APC	UID ^a	5-door version with protruding door handles
Annex 24, appendix G	26 May 2025	LAAF	Buran APC 10	UID ^a	
Annex 24, appendix H	26 May 2025	LAAF	Z-STs "Akhmat" APC	UID ^a	
Annex 24, appendix I	26 May 2025	LAAF	Verba MANPADS	UID ^a	
Annex 24, appendix J	26 May 2025	LAAF	Konung military tricycle	UID ^a	
Annex 21	22 Jun 2025	LAAF	Grandweld 38m Fast Patrol Vessel TBZ13 through TBZ16	See table 3 and annex 21, section B.	
Annex 25	18 Dec 2025	LAAF	Weapons equipped with Eye System	Pakistan	

^a Unidentified as yet.

^b International arms sales are virtually always widely reported by the manufacturer in authoritative defence media as it is their major means, other than conflict, of attracting publicity for future sales. Authoritative media includes: Janes Defence Weekly (<https://www.janes.com/defence-news/>); Janes Intara (<https://www.janes.com/intara-interconnected-intelligence/defence-industry>); Defence Procurement International (<https://www.defenceprocurementinternational.com/magazine>); Military Systems and Technology (<https://www.militarysystems-tech.com/>); and Army Technology (<https://www.army-technology.com/>). Covert arms transfers go unreported until identified by investigation.

Table 23.2
Summary of training violations

<i>Annex</i>	<i>Date identified in Libya or by Panel</i>	<i>End User</i>	<i>Type of training support</i>	<i>Responsible</i>	<i>Cross-references</i>
Annex 28	28 Feb 2025	LAAF	Special operations training	Belarus	
Annex 29	8 Sep 2025	LAAF	Special operations, parachuting	Belarus	
Annex 30	26 Dec 2024	GNU-AF	Military combat method	Italy	

Annex 24 LAAF's Military Parade

1. On 15 May 2024, Libyan Arab armed forces (LAAF) announced the construction of a “military city” for “training on all classes, weapons and security sciences” with an area of up to 5,467 hectares, including a seaport and a military airport.³⁴⁰ Located at about 60 kilometres to the southwest of Benghazi,³⁴¹ the construction of the “military city” began around mid-June 2023. To date, the construction of shooting ranges, a parade ground, training and several other facilities are completed. There is no sign of the construction of the seaport or the military airport so far. The development of the construction work of the military city can be found in figures 24.1 through 24.8.

Figure 24.1
Military city, 15 Jun 2023

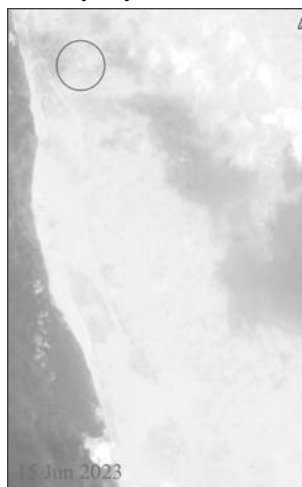


Figure 24.2
Military city, 14 Sep 2023

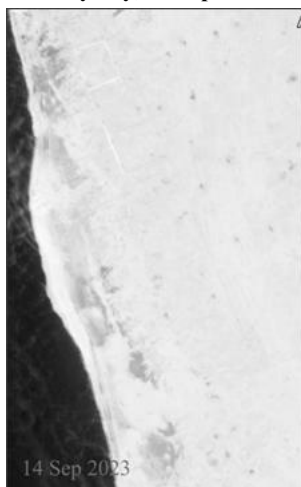


Figure 24.3
Military city, 20 Dec 2023

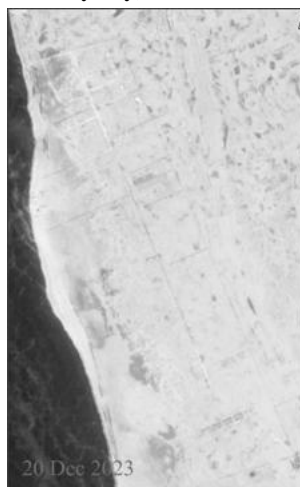


Figure 24.4
Military city, 15 May 2024



Figure 24.5
Military city, 17 Oct 2024

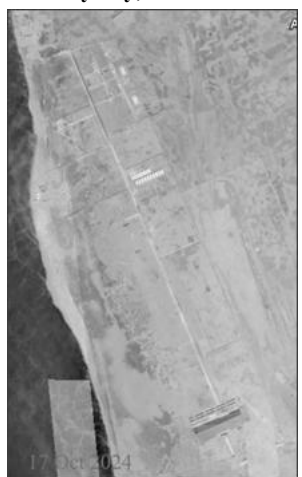


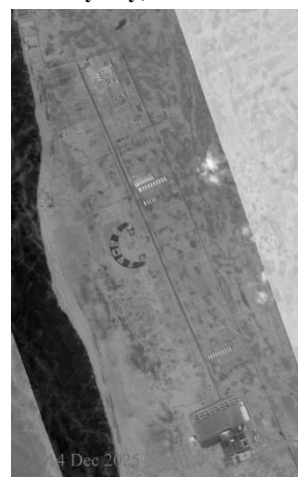
Figure 24.6
Military city, 12 Feb 2025



Figure 24.7
Military city, 16 Jul 2025



Figure 24.8
Military city, 14 Dec 2025



Developed by Panel of Experts

Source: Planet Labs

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

³⁴⁰ <https://www.facebook.com/General.official.leadership/posts/pfbid0QhoANTBTCRppxFGZcdvxk3ZYcr2on5oLLsCevVG2WSTLsaMDmJohPk8cxXgELLqdl>, 15 May 2024.

³⁴¹ Geocoordinates: 31°32'37.3560"N, 20°00'43.2720"E.

2. On 26 May 2025, LAAF held a military parade at this newly constructed “military city”³⁴² to mark the 11th anniversary of Operation Al-Karama (Dignity). The event showcased an extensive arsenal of arms and related materiel, much of which were previously unseen in Libya (see appendices A to J to this annex). Examples of showcased arms and related materiel are provided in figures 24.9 through 24.15 of this annex.

3. A prominent feature of the parade was the display of large quantities of Russian-made or Russian-designed equipment, most notably two advanced 9K331 Tor-M1-2U surface-to-air defence systems. These systems, capable of engaging targets at ranges from 1.5km to 12 km and at altitudes from 10m to 6km,³⁴³ reinforced LAAF’s air defence capability. The systems complemented LAAF’s existing Pantsir-S1 air defence systems,³⁴⁴ which were also showcased in the parade. Other equipment included approximately 120 Spartak/VPK-Ural armoured personnel carriers (APCs) and 80 Tigr-M APCs, three BTR-82AT infantry fighting vehicles (IFVs) fitted with Berezhoz turret with improved electro-optics and fire-control systems, four BMP-2M IFVs, four 33GT-34039B all-terrain armoured carriers and two BM-30 Smerch multiple rocket systems.

4. The parade further highlighted the growing role of uncrewed aerial vehicles (UAVs) and electronic warfare (EW) equipment with a large and diverse array of such systems on display. This included approximately 120 quadcopters with vertical tubes in the payload bay and 21 vertical take-off and landing (VTOL) UAVs, largely bearing design features of UAVs manufactured by Chinese companies. Additionally, approximately 225 sets of portable anti-UAV equipment, including detectors and jammers, and EW equipment mounted on eight Chevrolet Suburban SUVs were showcased. This underscored LAAF’s adaptation to the role of UAVs and EW equipment in the Libyan context, its evolving capabilities in these domains, and its option to repurpose civilian products for military use (see appendices K to Q to this annex).

5. The LAAF also demonstrated its enhanced air transport capability. The previously unseen heavy-duty Mil Mi-26 helicopter, with a capability of 20-tons payload, was first identified at Benina Airport on 2 May 2025 via satellite imagery. The Antonov An-12A cargo aircraft (owned by Space Cargo Inc FZE, UAE), which flew to Benghazi on 31 January 2021³⁴⁵ and has been based there ever since, was publicly displayed for the first time (appendix R to this annex).

6. The Panel found that Egypt provided military assistance to LAAF during the parade. Four Egyptian military transport aircraft provided flight assistance for LAAF’s paratroopers (annex 32).

7. In response to the Panel’s inquiry,³⁴⁶ LAAF informed the Panel that: a) the majority of the materiel on display had been previously in LAAF’s arsenal; b) some had been refurbished in “national factories”, without adding combat improvements and without imports of spare parts; c) some were civilian vehicles militarized within Libya; d) some had been locally manufactured replicas mimicking Turkish armoured vehicles; and e) some of the materiel had been borrowed from “friendly and allied” countries and returned upon conclusion of the parade; hence, no purchase nor transfer had taken place. Specifically regarding the UAVs, LAAF informed the Panel that they had been domestically sourced and manufactured and were intended solely for “defence and reconnaissance purposes”.³⁴⁷

8. The Panel assessed that: for point a) much of the materiel was previously unseen in Libya; for points b) and c) refurbishments of armoured vehicles or militarization of civilian vehicles are near-impossible without the imports of spare parts, which would also fall under paragraph 9 of resolution 1970 (2011); for point d) the Panel did not identify any vehicles with Turkish design features displayed at the parade; and for point e) even temporary transfers – unless excepted under paragraph 7 of resolution 2769 (2025) – are double violations of paragraphs 9 and 10 of resolution 1970 (2011) for transfers to and export from Libya. Regarding the UAVs, the Panel notes that their military purpose and the end-user being LAAF makes those subject to the arms embargo as paramilitary equipment.

³⁴² <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTsS8atBaJDjepLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025; <https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

³⁴³ Janes Defense.

³⁴⁴ Reported by the Panel in its report S/2021/229.

³⁴⁵ Reported by the Panel in Annex 97 of S/2022/427 and Annex 58 of S/2023/673.

³⁴⁶ Panel’s letter of 27 June 2025.

³⁴⁷ Undated letter from LAAF to the Panel received in September 2025.

9. LAAF further noted that the objective of the parade was to a) boost morale; b) portray LAAF as guarantor for Libyan unity; c) reflect regional military integration; and d) assert LAAF's defensive capability despite the arms embargo.

Figure 24.9

9K331 Tor-M1-2U surface-to-air defence system



Figure 24.10

BM-30 Smerch multiple rocket system



Figure 24.11

Spartak/VPK-Ural APCs



Figure 24.12

Tigr-M APCs



Figure 24.13

DS-220 UAV

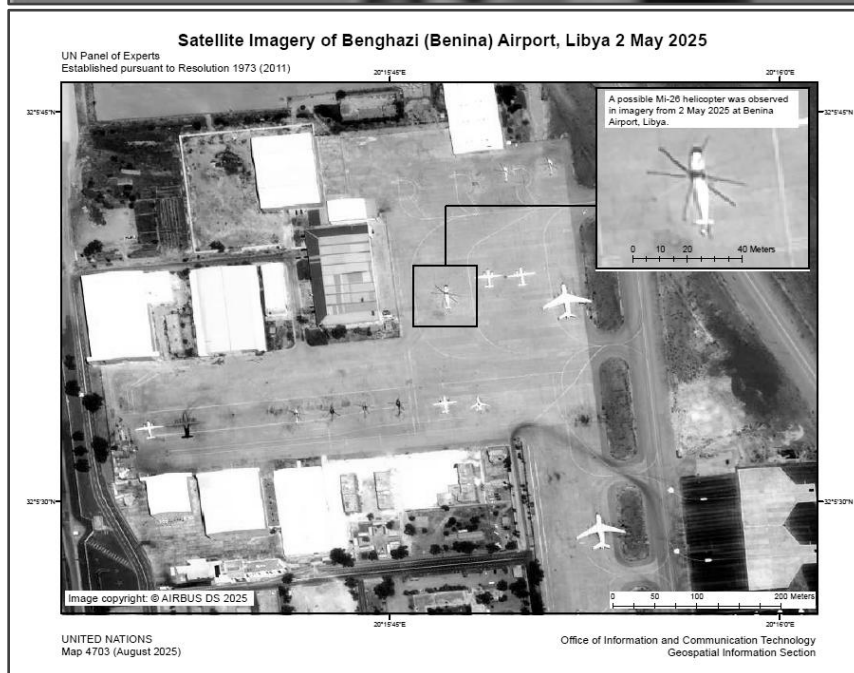


Figure 24.14

Chevrolet Suburban SUV with EW equipment



Figure 24.15

Mi-26 helicopter**Sources:**

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:32:28, 26 May 2025.
2. <https://www.facebook.com/AlMasarTV/videos/689997933845540>, at 0:54, 26 May 2025.
3. <https://www.facebook.com/photo.php?fbid=701867939667570&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
4. <https://www.facebook.com/photo/?fbid=701894699664894&set=pcb.701895026331528>, 26 May 2025.
5. <https://www.facebook.com/photo/?fbid=701894519664912&set=pcb.701895026331528>, 26 May 2025.
6. <https://www.facebook.com/photo.php?fbid=701861819668182&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
7. <https://www.facebook.com/photo.php?fbid=701881436332887&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
8. UNGIS.

Appendix 24.A: 9K331 Tor-M1-2U surface-to-air defence systems

9K331 Tor-M1-2U surface-to-air defence systems (LAAF) (26 May 2025)

The Panel identified, including from open sources,³⁴⁸ the presence of two vehicles with design features identical to 9K331 Tor-M1-2U surface-to-air defence systems, during the military parade. The 9K331 Tor-M1-2U surface-to-air defence system was developed in 2012 and jointly manufactured by Izhevsk Electromechanical Plant, Vyatsky Machine-Building Enterprise Avitek and Mytishchi Machine-building Plant located in the Russian Federation.³⁴⁹

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Transfer of 9K331 Tor-M1-2U surface-to-air defence systems to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:33:59, 26 May 2025.
2. <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
3. Janes Defense.

³⁴⁸ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTzS8atBaJDjcpLfk1huNQPp4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.
<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁴⁹ Janes Defense.

Appendix 24.B: BMP-2M IFVs

BMP-2M IFVs **(LAAF)** **(26 May 2025)**

The Panel identified, including from open sources,³⁵⁰ the presence of four vehicles with design features identical to BMP-2M infantry fighting vehicles (IFVs) fitted with Berezhok turret during the military parade. The BMP-2M IFV is manufactured by Kurganmashzavod JSC located in the Russian Federation and upgraded by being fitted with Berezhok turret with improved electro-optics and fire-control systems, as well as launchers for Kornet anti-tank missiles in 2019.³⁵¹

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Transfer of BMP-2M IFVs to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:30:08, 26 May 2025.
2. Janes Defense.

³⁵⁰<https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTSS8atBaJDjcpLfk1huNQPp4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUl>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁵¹ Janes Defense.

Appendix 24.C: BTR-82AT IFVs

BTR-82AT IFVs

(LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁵² the presence of three vehicles with design features identical to BTR-82AT infantry fighting vehicles (IFVs) during the military parade. The BTR-82AT IFV, developed in 2019, is manufactured by Military Industrial Company (VPK) located in the Russian Federation.³⁵³

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Transfer of BTR-82AT IFVs to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:28:50, 26 May 2025.
2. Janes Defense.

³⁵²<https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTSS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUl>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁵³ Janes Defense.

Appendix 24.D: 33GT-34039B armoured carrier

33GT-34039B armoured carrier

(LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁵⁴ the presence of four vehicles with design features identical to 33GT-34039B armoured carriers during the military parade. The 33GT-34039B armoured carrier, unveiled at ARMY-2023 International Military and Technical Forum,³⁵⁵ is manufactured by ZAO Zavolzhsy Plant of Tracked Tractors located in the Russian Federation.³⁵⁶

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

33GT-34039B armoured carrier vehicles are military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/photo.php?fbid=701880706332960&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. <https://www.facebook.com/photo.php?fbid=701882506332780&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
3. https://vpk.name/en/765373_the-new-model-of-the-armored-snowmobile-is-ready-for-any-off-road.html, 30 August 2023

³⁵⁴ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeig9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTts8atBaJDjcpLfk1huNQPp4uBgA54a9LX8QJpb9zBFmb9AwQicTveLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁵⁵ Held from 14 to 20 August 2023 in Kubinka, the Russian Federation.

³⁵⁶ Janes Defense.

Appendix 24.E: Spartak/VPK-Ural APC

Spartak/VPK-Ural APC

(LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁵⁷ the presence of vehicles with design features identical to Spartak APCs during the military parade. The Spartak APC, also known as VPK-Ural, was developed by Military Industrial Company (VPK) located in the Russian Federation in 2019.³⁵⁸

Compared to the 15 Spartak APCs in a double-cab configuration displayed in last year's parade,³⁵⁹ LAAF showcased approximately 120 Spartak APCs, including around 12 double-cab pickup configurations in this year's parade. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Spartak APCs are military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/photo.php?fbid=672103392262102&set=pb.100083873424472.-2207520000&type=3>, 26 May 2025.
2. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:56:08, 26 May 2025.
3. Janes Defense.

³⁵⁷ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeig9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTts8atBaJDjcpLfk1huNQPp4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁵⁸ Janes Defense; and <https://en.topwar.ru/234028-broneavtomobili-spartak.html>, 12 January 2024.

³⁵⁹ Janes Defense.

Appendix 24.F: Tigr-M APCs

1. The Panel identified, including from open sources,³⁶⁰ the presence of approximately 80 vehicles with design features identical to Tigr-M armoured personnel carriers (APCs) during the military parade.
2. This Tigr-M APC type bears similar characteristics as the Tigr SBM VPK-233136 (five-door version), which is manufactured by JSC Arzamas Machinery Plant located in the Russian Federation.³⁶¹ Unlike the Tigr vehicles operated during a military parade held by LAAF on 19 October 2022 in Sabha and showcased during a military exercise on 30 March 2024 in Waddan, the current Tigr-M vehicles have protruding door handles, as opposed to handles in a trapezoidal housing, suggesting a different variant of the vehicle.
3. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.
4. Tigr-M APC is a military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).

Figure 24.F.1

Tigr-M APC present during the parade



Figure 24.F.2

Tigr-M APC present during the parade



³⁶⁰<https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTts8atBaJDjcpLfk1huNQpp4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.
<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁶¹ Janes Defense.

Figure 24.F.3

Tigr VPK-233136 APC (3-door version)



Figure 24.F.4

Tigr-M and Tigr SBM VPK-233136 (five-door version)



Developed by Panel of Experts

Sources:

1. <https://www.facebook.com/photo/?fbid=1040776934901598&set=pcb.1040783404900951>, 26 May 2025.
2. <https://www.facebook.com/photo.php?fbid=672105128928595&set=pb.100083873424472.-2207520000&type=3>, 26 May 2025.
3. <https://www.facebook.com/photo.php?fbid=701843356336695&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
4. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:57:46, 26 May 2025.
5. <https://t.me/milinfoLive/119415>, 30 March 2024.
6. <https://www.facebook.com/photo/?fbid=666132068183310&set=pcb.666158491514001>, 19 October 2022.
7. Janes Defense.

Appendix 24.G: Buran APC 10 armoured personnel carrier

Buran APC 10 armoured personnel carrier (LAAF) (26 May 2025)

The Panel identified, including from open sources,³⁶² the presence of one vehicle with design features identical to Buran APC 10 armoured personnel carrier during the military parade. Buran APC 10, unveiled at ARMY-2019 International Military and Technical Forum,³⁶³ is manufactured by RIDA holdings located in the Russian Federation.³⁶⁴

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

The Panel assesses that this type of vehicle is a military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 3:01:29, 26 May 2025.
2. <https://ridacars.com/vehicles/special-cars/buran-apc10.html>.

³⁶² <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTsS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

³⁶³ <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

Held from 25 to 30 June 2019 in Kubinka, the Russian Federation;
<https://www.recomonkey.com/Newsfeed/Army-2019-Static-2/i-7W3pbnh>.

³⁶⁴ <https://ridacars.com/vehicles/special-cars/buran-apc10.html>.

Appendix 24.H: Z-STS “Akhmat” APC

Z-STS “Akhmat” APC

(LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁶⁵ the presence of one vehicle with design features identical to Z-STS “Akhmat” armoured personnel carrier (APC) during the military parade. Z-STS “Akhmat” APC was developed in 2022 and manufactured by JSC Remdizel located in the Russian Federation.³⁶⁶

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF’s response was reflected in paragraphs 7 and 9 of this annex.

This type of APC is military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 2:00:34, 26 May 2025.
2. <https://www.facebook.com/AlMasarTV/videos/9972159692900456/>, at 2:01:33, 26 May 2025.
3. Janes Defense.

³⁶⁵ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JT8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁶⁶ <https://en.topwar.ru/201108-broneavtomobil-z-sts-ahmat-bystro-i-prosto.html>, 1 September 2022; and

Janes Defense.

Appendix 24.I: Verba MANPADS

Verba MANPADS (LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁶⁷ the presence of eight man-portable air defence systems (MANPADS) with design features identical to Verba MANPADS during the military parade. Verba MANPADS, officially unveiled at the ARMY-2015 International Military and Technical Forum,³⁶⁸ are manufactured by Degtyarev Plant located in the Russian Federation.³⁶⁹

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Transfer of Verba MANPADS to Libya is a violation of paragraph 9 of resolution 1970 (2011).



Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 2:17:30, 26 May 2025.
2. Janes Defense.

³⁶⁷ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JT8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

³⁶⁸ <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁶⁹ Held from 16 to 19 June 2015 in Kubinka, the Russian Federation.

³⁶⁹ Janes Defense.

Appendix 24.J: Konung Military Tricycles

1. The Panel identified, including from open sources,³⁷⁰ the presence of seven vehicles with design features identical to Konung military tricycles during the military parade. Konung military tricycle was first unveiled at the 2019 International Exhibition of Arms and Military Machinery (MILEX)³⁷¹ and broadcasted as “new Belarusian weapon” by VoenTV of Belarus on 21 August 2020.³⁷²
2. This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from Belarus and LAAF. Belarus responded that a) The Konung tricycle is not manufactured by enterprises in the Republic of Belarus; and b) Belarus did not deliver these products to Libya. LAAF’s response was reflected in paragraphs 7 and 9 of this annex.
3. In its subsequent correspondence with Belarus, the Panel further referred a news report of the State Military-Industrial Committee of the Republic of Belarus, that the Konung military tricycle was “developed in Belarus”³⁷³ and requested further information. No response was received.
4. Konung military tricycles are military equipment. Thus, transfer of this vehicle type to Libya is a violation of paragraph 9 of resolution 1970 (2011).

Figure 24.J.1

Konung military tricycle present during the parade



³⁷⁰ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDl>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTsS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUl>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁷¹ Held from 15 to 18 May 2019 in Minsk, Belarus, and https://milex.belexpo.by/upload/iblock/b29/MILEX_2019_365.jpg.

³⁷² https://www.youtube.com/watch?v=2VmHTy17_mQ&t=309s, at 4:42, 21 August 2020.

³⁷³ <https://vpk.gov.by/news/media/bayk-ubiysa-ispytaniya-belorusskogo-voennogo-tritsikla-otsenili-v-ssha.html>, 17 September 2020.

Figure 24.J.2
Konung unveiled at the 2019 MILEX



Figure 24.J.3
Konung broadcasted as “new Belarusian weapon”



Sources:

1. <https://www.facebook.com/photo.php?fbid=701830029671361&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. https://milex.belexpo.by/upload/iblock/b29/MILEX_2019_365.jpg.
3. https://www.youtube.com/watch?v=2VmHTy17_mQ&t=309s, at 4:42, 21 August 2020.

Figure 24.J.4
News report about Konung military tricycle on the website of the State Military-Industrial Committee of the Republic of Belarus

Государственный военно-промышленный комитет Республики Беларусь

ВПК. БЕЛАРУСЬ. № 2 - 2025

О комитете ▾ Новости ▾ Деятельность ▾ Одно окно ▾ Полезная информация ▾

Главная > Новости > СМИ о нас

Мероприятия Новости комитета Новости сайта Официально Пресс-релизы Публикации СМИ о нас

17.09.2020

«Байк-убийца»: испытания белорусского военного трицикла оценили в США

Разработанный в Беларуси трицикл «Конунг» - это настоящий «байк-убийца» (murdercycle). Таким эпитетом в духе компьютерных игр наградили разработку авторы американского портала Task & Purpose, оценившие видео с демонстрацией возможностей «Конунга».

Эта боевая машина с тремя массивными колесами была впервые представлена в мае 2019 года на выставке военной техники MILEX в Минске. Ее экипаж состоит из водителя и стрелка, в распоряжении которого имеется пулемет Калашникова калибра 7,62 миллиметра.

Трицикл разработан для выполнения специальных операций в тылу врага, доставки оборудования и боеприпасов, эвакуации раненых. Для последнего в комплектации машины имеются надувные носилки. Также отмечается, что «Конунг» может преодолевать водные преграды, а его максимальная скорость - 30 километров в час.

Source: <https://vpk.gov.by/news/media/bayk-ubiytsa-ispytaniya-belorusskogo-voennogo-tritsikla-otsenili-v-ssha.html>, 17 September 2020.

Appendix 24.K: Tigr Buggy mobility tactical vehicle

Tigr Buggy mobility tactical vehicle (LAAF) (26 May 2025)

The Panel identified, including from open sources,³⁷⁴ the presence of one vehicle with design features identical to the Tigr Buggy mobility tactical vehicle during the military parade. The Tigr Buggy mobility tactical vehicle, a variant of Tigr SBM VPK-233136 and developed in 2020, is manufactured by Military Industrial Company located in the Russian Federation.³⁷⁵

This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from the Russian Federation and LAAF. The Russian Federation did not respond. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

The Panel assesses that this type of vehicle is a dual-use item. The arms embargo applies to this type of vehicle when used by LAAF for military purposes.



Sources:

1. <https://www.facebook.com/photo.php?fbid=701854053002292&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. <https://www.recomonkey.com/Newsfeed/Army-2020-Static-2/i-jFBVgCP/A>.
3. Janes Defense.

³⁷⁴<https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDl>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTtsS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUl>, 26 May 2025;

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<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁷⁵ Janes Defense.

Appendix 24.L: DS-220 UAVs

DS-220 UAVs (LAAF) (26 May 2025)

The Panel identified, including from open sources,³⁷⁶ the presence of approximately 120 quadcopters uncrewed aerial vehicles (UAVs), of which at least some with two vertical tubes in the payload bay during the military parade. These UAVs bore design features identical to DS-220 quadcopters UAVs, which are manufactured by DSTECHUAS located in China.

DS-220 UAV has a maximum payload of 30 kg, and its flight time ranges from 40 minutes with a 20 kg payload to 60 minutes without payload. It can be used in security, agriculture, mapping, reconnaissance, inspection and other scenarios. The vertical tubes in the payload bay of the UAVs can be used for military purpose by installing motor shells and grenades.³⁷⁷ The Panel requested further information from China and LAAF. China responded that a) it had found no records indicating the export of the relevant UAVs to Libya; b) it was difficult to determine, solely on the basis of images, whether the UAVs were produced by Chinese companies.³⁷⁸ LAAF's response was reflected in paragraphs 7 and 9 of this annex.

The Panel assesses that the DS-220 UAV is a dual-use item. The arms embargo applies to this type of UAVs in the configuration observed in Libya and used by LAAF for military purpose.



Sources:

1. <https://www.facebook.com/photo.php?fbid=701861819668182&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. <https://www.dstechuas.com/DS-220-p5778954.html>.

³⁷⁶ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrX6RShYQFipMjUXat3hC8doCtKLDl>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JT5S8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

³⁷⁷ <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
³⁷⁸ DSTechUAS describes this UAV model can be mounted with “various modular weapons depending on operational requirements”. <https://www.dstechuas.com/DS-220-p5778954.html>.

³⁷⁸ Letter from China on 30 December 2025.

Appendix 24.M: QP537/VT370 VTOL UAVs

QP537/VT370 VTOL UAVs

(LAAF)

(26 May 2025)

The Panel identified, including from open sources,³⁷⁹ the presence of 21 vertical take-off and landing (VTOL) uncrewed aerial vehicles (UAVs) during the military parade. These UAVs bore design features identical to a) QP537 VTOL, manufactured by AheadX Tech (Beijing) Co., Ltd.; b) Raefly VT370 VTOL, manufactured by Raefly (Guangzhou) Technology Co., Ltd; and c) Volitation VT370 VTOL, manufactured by Xiamen Airmobi Technology Co., Ltd. located in China.

VTOL UAVs can be used in security, agriculture, mapping, inspection and intelligence, surveillance, target acquisition and reconnaissance (ISTAR). AheadX QP537 VTOL has a maximum payload of 13 kg (including fuel) and flight time of six hours.³⁸⁰ Raefly VT370 VTOL has a maximum payload of 15kg (including fuel) and a flight time up to 10 hours.³⁸¹ Airmobi Volitation VT370 VTOL has a payload capacity of up to 18 kg (including fuel) and a flight time of 15 hours (with a 5 kg payload).³⁸² The Panel requested further information from China and LAAF. China stated a) it had found no records indicating the export of the relevant UAVs to Libya; b) it was difficult to determine, solely on the basis of images, whether the UAVs were produced by Chinese companies.³⁸³ LAAF's response was reflected in paragraphs 7 and 9 of this annex.

The Panel assesses that this type of UAVs is a dual-use item. The arms embargo applies to this type of UAVs when used by LAAF for military purposes.



³⁷⁹ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDl>, 26 May 2025; https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTsS8atBaJDjcpLfk1huNQpp4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025; <https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025; <https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025. <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁸⁰ <https://aheadx.com/en/product/qp537>.

³⁸¹ <https://store.euav.net/product-brochure/>, accessed on 8 June 2025.

³⁸² Volitation VT370 VTOL UAV Platform - 15kg@5 hours - Airmobi UAV.

³⁸³ Letter from China on 30 December 2025.

Appendix 24.N: Anti-UAV equipment

1. The Panel identified, including from open sources,³⁸⁴ the presence of approximately 225 anti-uncrewed aerial vehicles (UAV) equipment during the military parade. The anti-UAV equipment bore design features identical to GW-UAV80P and GW-UAV-BP15D jammers, manufactured by Shenzhen Greetwin Technology Co. Ltd located in China.³⁸⁵
2. Anti-UAV equipment is electronic counter measures used to block UAV control, GPS and video signals, or force UAVs to land.³⁸⁶ These types of devices can be used for security and protection of public events and key infrastructures, i.e. airports, border, and military bases against unauthorised or hostile UAV activities.
3. The Panel requested further information from China and the LAAF. In response, China stated a) it had found no records indicating the export of the relevant UAVs to Libya; b) it was difficult to determine, solely on the basis of images, whether the UAVs were produced by Chinese companies.³⁸⁷ LAAF's response was reflected in paragraphs 7 and 9 of this annex.
4. The Panel assesses that these types of anti-UAV equipment are dual-use items. The arms embargo applies to these types of anti-UAV equipment when used by LAAF for military purposes.

Figure 24.N.1

Anti-UAV equipment present during the parade



Source: <https://www.facebook.com/photo.php?fbid=1040772834902008&set=pb.100069079034812.-2207520000&type=3>, 26 May 2025.

³⁸⁴ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025; https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTzS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025; <https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025; <https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025. <https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

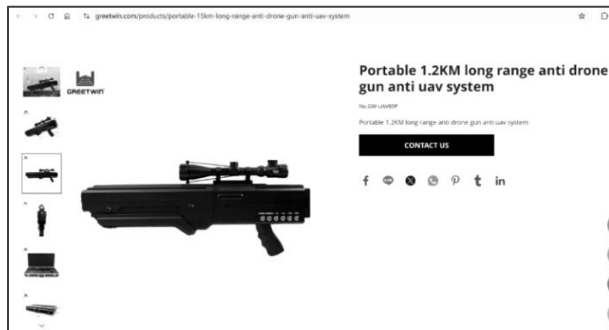
³⁸⁵ <https://greetwin.com/products/portable-15km-long-range-anti-drone-gun-anti-uav-system>; and

<https://www.phonesignaljammer.com/2km-Backpack-Uav-Jammer-Directional-Antenna-Gps1112-2-4G-5-8g-Drone-Jammer-pd48309580.html>, accessed on 18 June 2025.

³⁸⁶ Ibid.

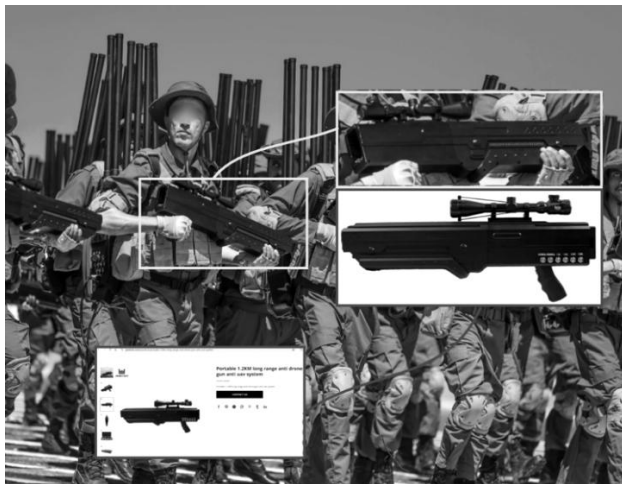
³⁸⁷ Letter from China on 30 December 2025.

Figure 24.N.2
GW-UAV80P anti-UAV equipment



Source: <https://greetwin.com/products/portable-15km-long-range-anti-drone-gun-anti-uav-system>, accessed on 8 June 2025.

Figure 24.N.3
Comparison between the anti-UAV equipment present during the parade and GW-UAV80P



Developed by Panel of Experts

Sources:

1. <https://www.facebook.com/photo.php?fbid=1040772834902008&set=pb.100069079034812.-2207520000&type=3>, 26 May 2025.
2. <https://greetwin.com/products/portable-15km-long-range-anti-drone-gun-anti-uav-system>, accessed on 8 June 2025.

Figure 24.N.4
Anti-UAV equipment present during the parade



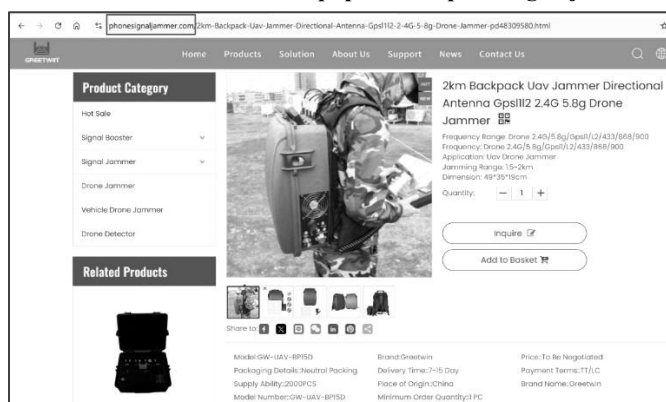
Source: <https://www.facebook.com/photo.php?fbid=672106335595141&set=pb.100083873424472.-2207520000&type=3>, 26 May 2025.

Figure 24.N.5
Contact information for the purchase of radio frequency jammer on Shenzhen Greetwin Technology Co. Ltd.'s website



Source: <https://greetwin.com/pages/contact-2>, accessed on 8 June 2025.

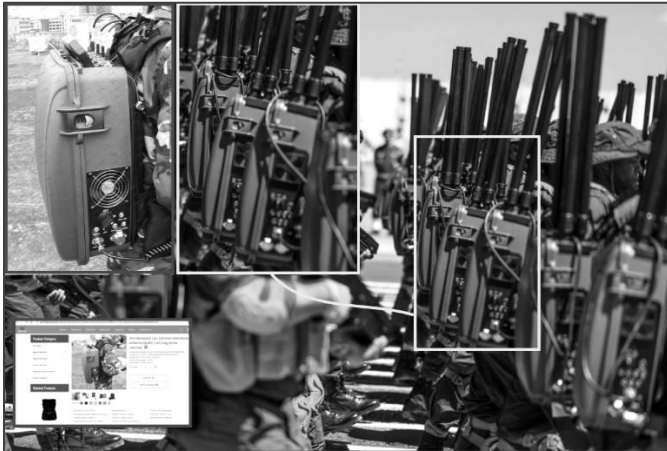
Figure 24.N.6
GW-UAV-BP15D anti-UAV equipment on phonesignaljammer.com



Source: <https://www.phonesignaljammer.com/2km-Backpack-Uav-Jammer-Directional-Antenna-Gps112-2-4G-5-8g-Drone-Jammer-pd48309580.html>, accessed on 8 June 2025.

Figure 24.N.7

Comparison between the anti-UAV equipment present during the parade and GW-UAV-BP15D



Developed by Panel of Experts

Sources:

1. <https://www.facebook.com/photo.php?fbid=672106335595141&set=pb.100083873424472.-2207520000&type=3>, 26 May 2025.
2. <https://www.phonesignaljammer.com/2km-Backpack-Uav-Jammer-Directional-Antenna-Gps1112-2-4G-5-8g-Drone-Jammer-pd48309580.html>, accessed on 8 June 2025.

Appendix 24.O: Tomcar all-terrain vehicles

1. The Panel identified, including from open sources,³⁸⁸ the presence of 25 vehicles bearing design features identical to Tomcar all-terrain vehicles (ATVs) during the military parade. Tomcar ATVs are products of Tomcar LLC, located in the United States.
2. The Panel requested further information from Tomcar and LAAF. In response, Tomcar stated that a) their internal investigations found no evidence demonstrating that the company sold, supplied, or otherwise transferred any ATVs to LAAF; b) Tomcar engaged in only one transaction involving parties outside North America of a sale of 25 ATVs, one service repair parts package, and two service tool packages to Gulf Mobility System Limited, a company based in the United Arab Emirates (UAE); and c) Tomcar's ATVs were commercial-grade products and eligible for sale to most foreign jurisdictions, including the UAE, without an export license or prior governmental authorization.³⁸⁹ LAAF's response was reflected in paragraphs 7 and 9 of this annex.
3. Information available to the Panel indicated that a possible diversion took place after the shipment to Gulf Mobility System Ltd. Although advertising itself as "a master distributor for Tomcar", Gulf Mobility System Ltd was not affiliated to Tomcar.³⁹⁰ Gulf Mobility System Ltd. was registered at Masdar Free Zone, UAE. The company's website is no longer accessible.³⁹¹
4. The Panel assesses that this type of vehicle is a dual-use item to which the arms embargo applies when used by LAAF for military purposes.

Figure 24.O.1

Tomcar ATVs present during the parade



³⁸⁸ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;
https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTzS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;
<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and
<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.
<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁸⁹ Letter from Tomcar on 16 October 2025.

³⁹⁰ Confidential Source.

³⁹¹ <http://www.gulfms.co>.

Figure 24.O.2
Tomcar ATVs present during the parade



Figure 24.O.3
Tomcar ATV displayed on Tomcar's website



Sources:

1. <https://www.facebook.com/photo.php?fbid=701830146338016&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 1:18:30, 26 May 2025.
3. <https://tomcar.com/pages/gallery>.

Appendix 24.P: Chevrolet Suburban SUVs

Chevrolet Suburban SUVs (LAAF) (26 May 2025)

The Panel identified, including from open sources,³⁹² the presence of eight vehicles with design features identical to the 12th generation Chevrolet Suburban sport utility vehicles (SUVs) during the military parade. These vehicles, assigned to an EW unit, were mounted with electronic warfare equipment. Chevrolet Suburban SUVs are manufactured by General Motors Company (GM) located in the United States.³⁹³

The Panel requested further information from GM and LAAF. In response, GM stated that: a) these SUVs were 2021–2024 model; b) GM has not identified any authorized sales of Suburban model to Libya in recent years, and its dealer confirmed it had not sold Suburban SUVs to Libya since 2020.³⁹⁴ LAAF's response was reflected in paragraphs 7 and 9 of this annex.

The Panel assesses that this type of vehicle is a dual-use item to which the arms embargo applies when used by LAAF for military purposes.



Sources:

1. <https://www.facebook.com/photo.php?fbid=701881436332887&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.
2. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 2:13:31, 26 May 2025.

³⁹² <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTtsS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁹³ <https://www.chevrolet.com/suvs/suburban>.

³⁹⁴ Letter from GM on 25 July 2025.

Appendix 24.Q: Ford F250 Super Duty trucks

1. The Panel identified, including from open sources,³⁹⁵ the presence of 34 vehicles with design features identical Ford F250 Super Duty trucks during the military parade. These vehicles were used to carry man-portable air-defense systems (MANPADS) and tow armed rigid-hulled inflatable boats Ford F250 Super Duty pickup trucks are manufactured by Ford Motor Company located in the United States.³⁹⁶

2. The Panel requested further information from Ford Motor Company and LAAF. In its response,³⁹⁷ Ford stated that: a) Ford discerned the vehicles were P558 generation (Model Years 2020 to 2022) and current generation (Model Years 2023 to present) F-250 trucks; b) Ford and its distributors did not identify any sales of F-250s to Libya; c) Ford believed that the vehicles likely were acquired on the open market through third-party resellers; d) Ford F-250 Super Duty trucks are designated as “EAR99” under the United States Export Administration Regulations, so they are not controlled items and are not subject to export restrictions to Libya; and e) The vehicles appearing to be carrying or towing other equipment, Ford is unable to identify any military modifications made to the pickup trucks themselves. LAAF’s response was reflected in paragraphs 7 and 9 of this annex.

3. The Panel assesses that this type of vehicle is a dual-use item to which the arms embargo applies when used by LAAF for military purposes.

Figure 24.Q.1

F250 Heavy Duty trucks carrying MANPADS



³⁹⁵ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeig9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JT8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

<https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUI>, 26 May 2025;

<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

<https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

<https://www.facebook.com/photo.php?fbid=701879779666386&set=pb.100095331095690.-2207520000&type=3>, 26 May 2025.

³⁹⁶ <https://www.ford.com/trucks/super-duty/models/>, accessed on 8 June 2025.

³⁹⁷ Letter from Ford Motor Company on 19 August 2025.

Figure 24.Q.2
F250 Heavy Duty trucks towing armed rigid-hulled inflatable boats



Appendix 24.R: Update on Antonov An-12A aircraft (msn: 2340608)

1. The Panel reported on the illicit activities of the Antonov An-12A aircraft (msn:2340608) with fake Burundi registration 9U-BBD in Annex 97 of S/2022/427 owned by Space Cargo LLC (United Arab Emirates). This aircraft flew to Benina Airport (HLLB) of Benghazi, Libya on 31 January 2025.
2. The Panel identified that this aircraft, bearing the same unique blue and red colour scheme, was publicly showcased during the military parade (see figure 24.R.1).³⁹⁸ The Panel further identified that this aircraft had been based at Benina Airport since it flew there in January 2021 (see figure 24.R.2).
3. The Panel requested further information from Space Cargo LLC and LAAF regarding the change of ownership or operator of this aircraft. No response was received from Space Cargo LLC. LAAF's response was reflected in paragraphs 7 and 9 of this annex.

Figure 24.R.1

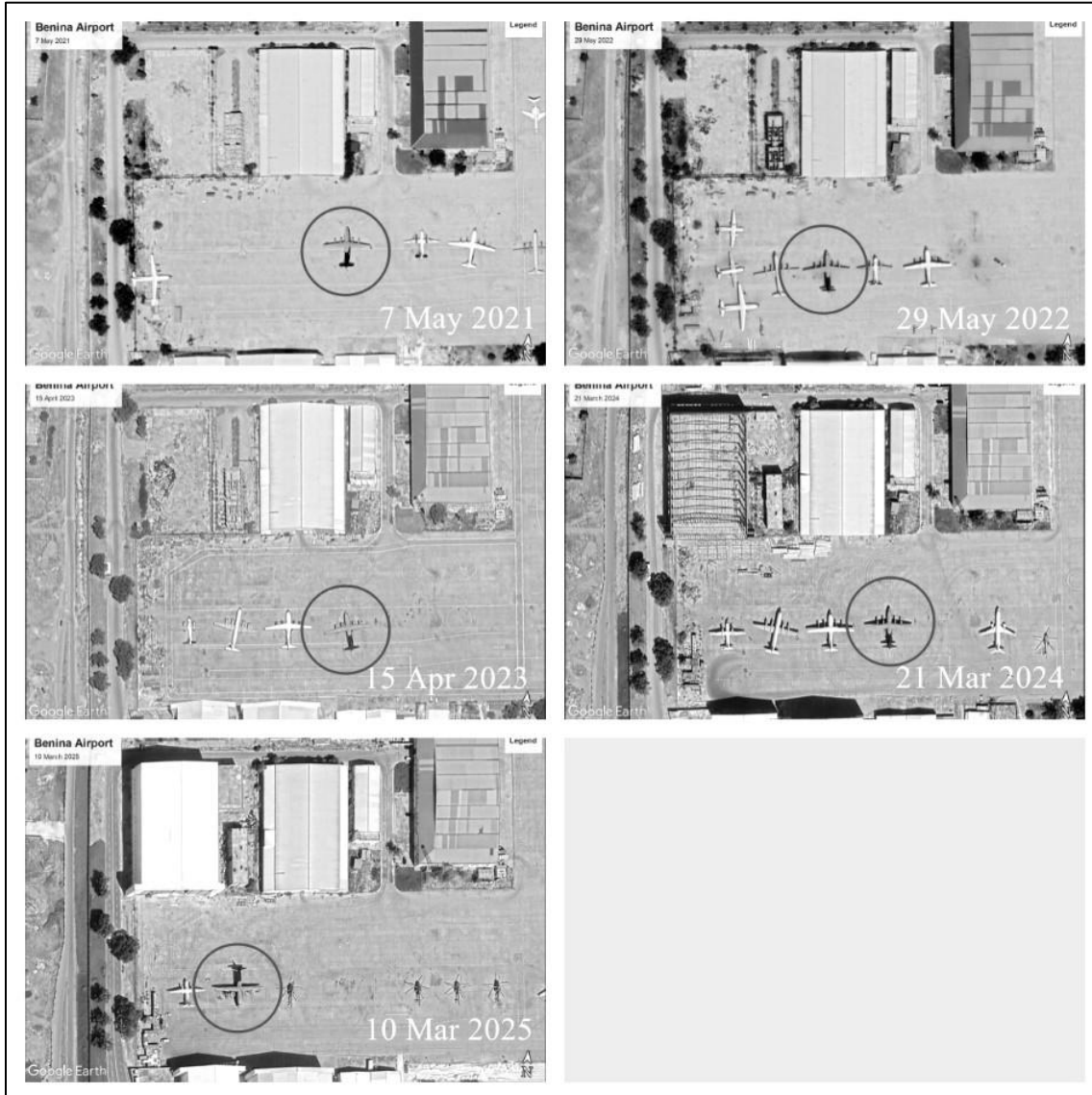
Aircraft An-12A (msn: 2340608) present during the parade



Source: <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 2:01:49, 26 May 2025.

³⁹⁸ <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, at 2:01:49, 26 May 2025.

Figure 24.R.2
An-12A aircraft (msn: 2340608) based at Benina Airport



Developed by Panel of Experts

Source: Google Earth Pro. © 2025 Airbus. Imagery dates: 7 May 2021, 29 May 2022, 15 April 2023, 21 March 2024 and 10 March 2025.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 25 Weapons equipped with Eye systems

1. During his visit to Benghazi, Libya on 18 December 2025, a government representative of Pakistan presented at least two weapons equipped with Eye systems to commander-in-chief and deputy commander-in-chief of LAAF.³⁹⁹
2. The Eye system, fitted with a camera and a fold-out screen to the unit side, provides the capability of enabling the front portion of the unit to pivot 90 degrees to the left or right, allowing the user to fire around corners. The Eye system can be mounted to a side arm, small grenade launcher or other compact weapons.⁴⁰⁰ Developed and produced by Pakistan Ordnance Factories (POF),⁴⁰¹ Eye system was unveiled at the 11th International Defense Industry Fair (IDEF) between 10-13 May 2011 in Istanbul, Türkiye.⁴⁰²
3. The Panel requested further information from Pakistan and LAAF. Replies were not received. The Eye system is military equipment. Thus, the transfer of both, the Eye system and the weapon, constituted violations of paragraph 9 of resolution 1970 (2011) by Pakistan.

Figure 25.1

Weapon equipped with Eye system presented by Pakistan



³⁹⁹<https://www.facebook.com/photo/?fbid=1204665431846080&set=pcb.1204665935179363>, 18 December 2025, and <https://www.facebook.com/photo/?fbid=1205439601768663&set=pcb.1205447768434513>, 18 December 2025.

⁴⁰⁰ Janes Defense, accessed on 22 December 2025.

⁴⁰¹<https://pof.gov.pk/>, <https://www.youtube.com/watch?v=kmzYqR2IfJs>, at 3:14, 8 December 2022; and <https://www.facebook.com/reel/463992504967199>, at 4:23, 1 March 2021.

⁴⁰² Janes Defense, and <https://www.ktb.gov.tr/TR-151620/idef-2011-10uncu-uluslararası-savunma-sanayii-fuarı.html>, both accessed on 22 December 2025.

Figure 25.2
Weapon equipped with Eye system presented by Pakistan



Figure 25.3
Eye system produced by POF

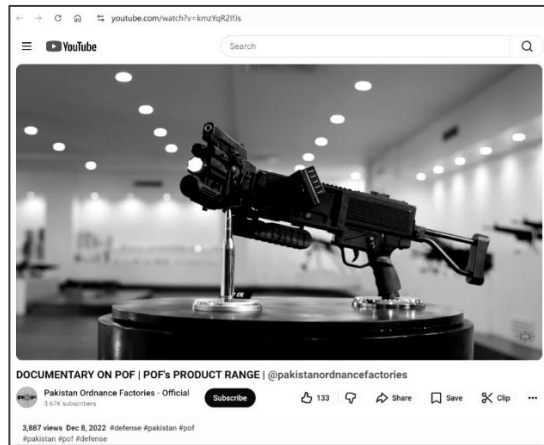


Figure 25.4
Eye system produced by POF



Developed by Panel of Experts

Sources:

1. <https://www.facebook.com/General.official.leadership/posts/pfbid02WV9jMC5BjrQNVozZMrQ4kj3yunqFnF8UuGHRQkY7djK1VG7XQyoK8cAzaMYjcrxrLl>, 18 December 2025.
2. <https://www.facebook.com/General.official.leadership/posts/pfbid0AQY2bAUj3Ek4SKpZtx4zmJ2edxU9xi7tVCQZBWFo59CM7z2Hgkmnc77DDpoM2yWkl>, 18 December 2025.
3. <https://www.youtube.com/watch?v=kmzYqR2IfJs>, at 3:14, 8 December 2022, and
4. <https://www.facebook.com/reel/463992504967199>, at 4:23, 1 March 2021.

Annex 26 Baseline summary of arms embargo equipment violations (26 February 2011 – 14 February 2026)

1. Tables 26.1 and 26.2 summarise confirmed arms and military materiel transferred into Libya in violation of paragraph 9 of resolution [1970 \(2011\)](#), as modified by subsequent resolutions.⁴⁰³ It does not include arms and military materiel transferred to Libya for which exemptions were provided for by the Committee.

Table 26.1

Confirmed arms and related materiel transferred to Libya (26 February 2011 – 14 February 2026) (weapon systems and equipment)⁴⁰⁴

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
Aircraft (FGA) ⁴⁰⁵	IOMAX AT-802i	S/2017/466	UAE	
	Dassault <i>Mirage 2000/9</i>	S/2021/229	UAE	- Operated from Sidi Barani airbase in Egypt. - Overflight.
	General Dynamics F-16	S/2021/229	Türkiye ⁴⁰⁶	
	** MiG-21MF	S/2015/128 S/2016/209	Egypt	
	MiG-23ML(D)	S/2022/427 ⁴⁰⁷	UID ⁴⁰⁸	- Identification from 2017 imagery and unreported by Panel. - Other aircraft restored to flight status by cannibalization.⁴⁰⁹
	MiG-29	S/2021/229	Russian Federation	
	Su-24	S/2021/229	Russian Federation	
Aircraft (ISR) ⁴¹⁰	<i>Pilatus PC-6</i>	S/2021/229	Lancaster6	Project Opus.
Aircraft (Rotary Wing)	** AS332L <i>Super Puma</i> Medium Utility	S/2021/229	Lancaster6	Project Opus.
	Mi-8	S/2015/128 S/2016/209	Egypt	
	Mi-24	S/2016/209	Sudan	
	Mi-24V	S/2016/209	UID	
	Mi-24P	S/2017/466	UAE	
	SA341 <i>Gazelle</i> Light Utility	S/2021/229	Lancaster6	Project Opus.
	UH-60M <i>Blackhawk</i>	S/2017/466	UAE	
Aircraft (Transport)	Airbus A400B <i>Atlas</i>	S/2021/229	Türkiye	For transfer of military materiel into Libya.
	Antonov AN-12A [#2340806] ⁴¹¹	S/2022/427	Space Cargo Inc	Operating in Libya in direct support of HAF.
	Antonov AN-12BP [#5342908]	S/2022/427	Space Cargo Inc	Operating in Libya in direct support of HAF.
	Antonov AN-12BP [#5343005]	S/2021/229	Space Cargo Inc	Operating in Libya in direct support of HAF.

⁴⁰³ This annex updates and clarifies information within the previous original work at

<https://www.oryxspioenkop.com/2020/06/types-of-arms-and-equipment-supplied-to.html>, 23 March 2021.

⁴⁰⁴ Items marked ** appeared in the 29 May 2021 7th Anniversary of Operation Dignity parade in Benghazi.

<https://www.youtube.com/watch?v=mbIDXxITPa0>.

⁴⁰⁵ Fighter Ground Attack.

⁴⁰⁶ On 4 December 2021 the President announced that his country's name would subsequently be referred to as Türkiye. Thus all events in this report post 4 December 2021 will use Türkiye.

⁴⁰⁷ <https://medium.com/war-is-boring/it-looks-like-russia-gave-a-fighter-jet-to-libyas-warlord-1a564098b223>, 1 March 2017.

Although the imagery shows the MiG-23 in Libya the Panel does not endorse the supply chain in the article.

⁴⁰⁸ UID, in all uses, means unidentified, or low evidential levels, and responsibility has yet to be attributed by the Panel.

⁴⁰⁹ <https://www.africanmilitaryblog.com/2019/08/libya-frankenstein-mig-23-flogger-fighter-jet-take-flight>, 3 August 2019.

⁴¹⁰ Intelligence, Surveillance and Reconnaissance.

⁴¹¹ These are the manufacturer's serial numbers (MSN).

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	Antonov AN-26 [#503]	S/2017/466 S/2019/914	Space Cargo Inc	▪ Operating in Libya in direct support of HAF.
	Antonov AN-32B [#2009]	S/2021/229	Space Cargo Inc	▪ Operating in Libya in direct support of HAF.
	C-17A <i>Globemaster</i>	S/2021/229	UAE	▪ For transfer of military materiel into Libya.
	C-130E <i>Hercules</i>	S/2015/128 S/2016/209	Sudan	▪ For transfer of military materiel into Libya.
	C-130E <i>Hercules</i>	S/2021/229	Türkiye	▪ For transfer of military materiel into Libya.
	Ilyushin IL-18D [#172001401]	S/2021/229	Space Cargo Inc	▪ Operating in Libya in direct support of HAF
	Ilyushin IL-18D [#187009903]	S/2017/466	Space Cargo Inc	▪ Operating in Libya in direct support of HAF
	Ilyushin IL-76TD [#73479367]	S/2021/229	Space Cargo Inc	▪ Operating in Libya in direct support of HAF
	Ilyushin IL-76TD [#1013405167]	S/2021/229	Space Cargo Inc	▪ Operating in Libya in direct support of HAF
	Ilyushin IL-76TD [#1013409282]	S/2021/229	Green Flag Aviation	▪ Operating in Libya in direct support of HAF
	Ilyushin IL-76TD [#1023411378]	S/2021/229	Space Cargo Inc	▪ Operating in Libya in direct support of HAF
	** Ilyushin IL-76TD [5A-ILA]	S/2022/427	UID	
	Ilyushin IL-76TD Various	S/2021/229	Russian Federation	▪ For transfer of military materiel into Libya.
Air Defence (Guns)	** 23mm ZSU-23-2CP	S/2022/427	UID	
	35mm <i>Korkut</i> Cannon	S/2021/229	Türkiye	
Air Defence (Missiles)	9K331 <i>Tor-M1-2U</i>	New	UID	
	MIM-23 <i>Hawk</i>	S/2021/229	Türkiye	
	MIM-104 <i>Patriot</i>	S/2022/427 ⁴¹²	UAE	
	<i>Pantsir</i> S1	S/2021/229	Russian Federation	▪ On KaMAZ platform.
	<i>Pantsir</i> S1	S/2021/229	UAE	▪ On MAN platform.
	<i>Verba</i> MANPADS	New	UID	
Anti-Tank (ATGW) ⁴¹³	9K115-2 <i>Metis-M</i>	S/2019/914	UID	▪ With GNU-AF.
	9M133 <i>Kornet</i>	S/2019/914	UID	▪ With GNU-AF.
	<i>Dehlavieh</i>	S/2021/229	UID	▪ With GNU-AF.
Armoured Vehicles (APC) ⁴¹⁴	33GT-34039B armoured carrier	New	UID	
	AMN 233114 <i>Tigr-M</i>	S/2022/427	Likely Russian PMC	
	<i>Buran APC 10</i>	New	UID	
	<i>Irigiri</i> 4x4	S/2019/914	UID	▪ First seen 2015.
	Inkas <i>Titan-DS</i> 4x4	S/2021/229	UAE	▪ With LAAF
	Inkas <i>Titan-S</i> 4x4	S/2024/914	UID	▪ With LAAF
	Inkas <i>Titan-S</i> 6x6	S/2022/427	UID	
	** KADDB <i>Al Wahsh</i> 4x4	S/2016/209	Jordan	
	KADDB <i>Al Wahsh</i> 4x4	S/2018/812	Jordan	▪ "Snake Head" Turret fitted.
	Katmerciler <i>Kirac</i>	S/2022/427	Türkiye	
	LC79 <i>SH Fighter-2</i> 4x4	S/2023/673	UID	

⁴¹² In a single open-source report in <https://www.oryxspioenkop.com/2020/06/types-of-arms-and-equipment-supplied-to.html>, 23 March 2021. A confidential source informed the Panel that the system was only very briefly deployed to Libya and soon withdrawn.

⁴¹³ Anti-Tank Guided Weapon.

⁴¹⁴ Armoured Personnel Carriers. Sometimes also referred to as Protected Patrol Vehicles (PPV).

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	Lenco <i>Bearcat G3</i> 4x4	S/2021/229	UID	▪ With GNU-AF.
	Mezcal <i>Tygra</i> 4x4	S/2017/466	UAE	
	MIC VPK <i>Tigr-M</i>	S/2021/229	Russian PMC	
	** MSPV <i>Panthera T6</i> 4x4	S/2016/209 S/2017/466 S/2018/812 S/2021/229	UAE	▪ From different shipments.
	MSPV <i>Panthera T8</i> 4x4	S/2023/673	UID	
	MSPV <i>Panthera F9</i> 4x4	S/2018/812	UAE	
	<i>Spartak/VPK-Ural</i> 4x4	New	UID	
	** Streit <i>Cobra</i> 4x4	S/2016/209	UAE	▪ Transferred in 2012.
	Streit <i>Cougar</i> 4x4	S/2016/209	UAE	▪ Transferred in 2012.
	** Streit <i>Cougar</i> 4x4	S/2019/914	Jordan	▪ "Snake Head" Turret fitted.
	Streit <i>Spartan</i> 4x4	S/2016/209 S/2018/812 S/2021/229 S/2023/673	UAE	▪ From different shipments.
	TAG BATT APC	S/2022/427	UID	
	TAG BATT UMG Armoured Truck	S/2024/914	UID	
	** TAG <i>Terrier LT-79</i> 4x4	S/2021/229	UAE	
	<i>Tigr-M</i>	New	UID	▪ 5-door version with protruding door handles
	<i>Tundra</i> Variant	S/2021/229	UID	
	Z-STS "Akhmat" APC	New	UID	
Armoured Vehicles (IAFV) ⁴¹⁵	BMP-2M IFV	New	UID	
	BTR-82AT IFV	New	UID	
	FNSS <i>ACV-15</i>	S/2021/229	Türkiye	
	KADDB <i>Mared</i> 8x8	S/2019/914	Jordan	
	** KADDB <i>Mared</i> 8x8	S/2021/229	Jordan	▪ "Snake Head" Turret fitted.
	Paramount <i>Mbombe</i> 6x6	S/2019/914	UID	▪ With HAF.
	<i>Ratel-60</i>	S/2019/914	UID	▪ With HAF.
Armoured Vehicles (MRAP) ⁴¹⁶	BAe <i>Cayman</i>	S/2016/209	UID	▪ First seen 2012.
	BMC <i>Kirpi</i> 4x4	S/2019/914	Türkiye	
	BMC <i>Kirpi II</i> 4x4	S/2024/914	UID	▪
	BMC <i>Vuran</i> 4x4	S/2023/673	Türkiye	
	Evro-Polis <i>Valkyrie</i> 4x4	S/2021/229	ChvK Wagner	▪ Based on a Ural-432007 platform. ▪ New attribution.
	NIMR <i>Jais</i> 4x4	S/2016/209	UAE	▪ First seen 2013.
	Streit <i>Condor SUT</i>	S/2024/914	UID	
	Streit <i>Gladiator</i>	S/2024/914	UID	
	Streit <i>Typhoon</i> 4x4	S/2022/427	UID	

⁴¹⁵ Infantry Armoured Fighting Vehicles.

⁴¹⁶ Mine Resistant Armoured Protected.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
Artillery (Towed)	** 122mm M1938 M-30 Howitzer	S/2022/427	UID	▪ This weapon system was NOT reported in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo.⁴¹⁷ ▪ Identified with HAF 106 brigade.
	** 155mm G5 Howitzer	S/2021/229	UID	▪ With HAF.⁴¹⁸
Artillery (Self-Propelled)	155mm <i>Firtina</i> T-155	S/2021/229	Türkiye	
Artillery (MLRS)	** 128mm LSRVM <i>Morava</i>	S/2021/229	UID	▪ Now confirmed from imagery.⁴¹⁹
	Rocketsan 122mm <i>Sakarya</i> T-122	S/2021/229	Türkiye	
	** 128mm LSRVM <i>Morava</i>	S/2021/229	UID	
	122mm Hybrid Version	S/2022/427	UAE	
Logistic Vehicles	** CFORCE All-Terrain Vehicle	S/2022/427	UID	
	** Jeep Gladiator	S/2022/427	UID	▪ Militarised.
	KamAZ 6x6 Truck	S/2022/427	UID	▪ Identification from 2018 and unreported by Panel. ▪ Also delivered to Libya on <i>MV Fehn Calypso</i> in 2020.⁴²⁰
	KamAZ 8x8 Truck	S/2021/229	Russian PMC	▪ Identified as the mobility platform for the ChVK Wagner operated Pantsir-1.
	<i>Konung</i> military tricycle	New	UID	
	Militarised Toyota Land Cruiser 79 4x4	S/2022/427	UID	
	** Toyota 6x6 Light Utility Vehicle	S/2022/427	UID	
	UAZ-469 Light Communications Vehicle	S/2022/427	UID	
	Ural-4320 Truck	S/2022/427	UID	▪ Some identified on deck of <i>MV Fehn Calypso</i> on 25 April 2020 during transit of Bosphorus, but these offloaded in Alexandria according to shipping company.
	Ural-4320 Truck (Armoured)	S/2022/427	UID	
Mortars (Field)	120mm 120-PM-43 M1943	S/2022/427	UID	
	120mm M-74	S/2022/427	UID	▪ With HAF Tariq bin Ziyad brigade.
Naval Vessels	2020 <i>Volume</i> interceptor boat	S/2024/914	2020 Volume Boats LLC / Asha Co FZE / BBC Chartering GmbH & Co. KG / Jordanian individual	▪
	<i>Apollon</i> rigid-hulled inflatable boats	S/2022/427	LAAF / Greek individual	▪ Annex 34
	<i>Corrubia</i> Class patrol boats	S/2019/914	Member State	▪ Converted to naval vessels post-delivery.
	<i>Damen Stan Patrol 1605</i> Class patrol boats	S/2018/812		
	<i>Damen Stan 2706</i> fast patrol boat	S/2024/914	Volume FZCO Jordanian individual	

⁴¹⁷ Pre-2011 Libyan inventory based on that equipment reported in Jane's publications and the IISS Military Balance (<https://www.iiss.org/publications/the-military-balance-plus>).

⁴¹⁸ Also <https://twitter.com/Oded121351/status/1328016339072638978>, 15 November 2020.

⁴¹⁹ <https://www.oryxspioenkop.com/2022/08/photo-report-haftars-last-parade.html>, 27 August 2022.

⁴²⁰ Information from shipping company.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	<i>Lambro Olympic D74</i> Fast Patrol Boat	S/2022/427	Libya SSA	▪ In use with SSA
	<i>MRC-1250</i> rigid-hulled inflatable boats	S/2021/229	Greek individuals Lancaster6	▪ a.k.a. <i>Javelin</i> Class. ▪ Project Opus.
	<i>OCEA</i> fast patrol boats 110 MKII (2)	S/2024/914	LAAF	▪
	Offshore Patrol Vessel <i>Alkarama</i>	S/2018/812 S/2019/914	Universal Satcom Services, UAE	
	Patrol Boat <i>Alqayid Saqar</i>	S/2022/427	Libya SSA	▪ Type UID. ▪ Classed as military as dual use and subsequently armed.
	<i>Penguin</i> “ <i>Flex Fighter Max</i> ” crew boat/security boat	New	See table 3 and annex 21.	
	<i>Raidco</i> RPB 20 class patrol boats	S/2019/914	Member State	▪ Converted to naval vessels post-delivery.
	<i>Rodman 66</i> fast patrol boat	S/2024/914	Volume FZCO Jordanian individual	
Radars and EW	Aselsan <i>Koral</i> Electronic Warfare System	S/2021/229	Türkiye	
	** 1RL131 P-18 Early Warning Radar	S/2022/427	UID	
	LEMZ 96L6/E Target Acquisition Radar	S/2021/229	UID	
	Samel-90 Mobile IED Jammer	S/2019/914	UID	
	Aselsan <i>Ihasavar</i> UAV Jammer	S/2023/673	Türkiye	
Small Arms and Light Weapons	5.56mm AK-103 Assault Rifles	S/2022/427	Likely Russian PMC	
	5.56mm JAWS-556 Assault Rifles	S/2022/427	Jordan	
	5.56mm MFR Multi-Functional Rifles	S/2022/427	Türkiye	
	5.56mm MPT 55K Assault Rifles	S/2022/427	Türkiye	
	5.56mm KCR 556 7.5” infantry rifle	S/2023/673	Türkiye	
	5.56 x 45mm SAR 223C Assault Rifles	S/2024/914	UID	
	7.62 x 39mm AK-103-1 Assault Rifles	S/2022/427	UID	
	7.62 x 39mm AR-M9F Assault Rifles	S/2016/209	UAE	
	7.62 x 39mm Type 63-1 Assault Rifle	S/2022/427	UID	
	7.62 x 51mm FN FAL Assault Rifle	S/2013/99	UAE	
	7.62 x 51mm JNG-90 <i>Bora -12</i> Sniper Rifle	S/2022/427 S/2024/914	Türkiye UID	
	7.62mm KNT-76 Sniper Rifle	S/2023/673	Türkiye	
	7.62 x 51mm MPT 76 Assault Rifles	S/2022/427	UID	
	7.62 x 54mmR Type-80 General Purpose Machine Gun ⁴²¹	S/2022/427	UID	
	0.308" <i>Accuracy International</i> AW308 Sniper Rifle	S/2023/673	UID	
	0.308" <i>Sako</i> TRG 22 Sniper Rifles	S/2023/673	UID	
	0.338 <i>Orsis</i> T-5000 Sniper Rifle	S/2022/427	UID	▪ Chambered for <i>Lapua</i> rounds.
	0.338 <i>Steyr</i> SSG-08 Sniper Rifle (Variant or Copy)	S/2022/427	Russian PMC	▪ Chambered for <i>Lapua</i> rounds.
	0.50" Barrett M82 Anti Material Rifle	S/2023/673	UID	
	9mm Canik TP9 Series Pistol	S/2024/914	UID	▪
	9mm Caracal F Pistols	S/2015/128	UAE	

⁴²¹ https://twitter.com/r_u_vid/status/1221227142911905793, 26 January 2020.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	9mm <i>EKOL</i> P29 Blank Firing Pistols	S/2019/914	UID	
	9mm <i>SUR</i> BRT M9 Blank Firing Pistols	S/2022/427	UID	
	12.7 x 108mm W-85 Heavy Machine Gun	S/2022/427	UID	
	AGS 30mm Grenade Launcher	S/2021/229	Russian PMC	▪ Either AGS-17 or AGS-30 based on ammunition recovered.
	VOG-25 40mm Grenade Launcher	S/2021/229	Russian PMC	▪ Based on ammunition recovered.
	40 x 46mm <i>Akdas</i> AK-40-GL Grenade Launchers	S/2022/427	Türkiye	
	RPG-32 <i>Nashbab</i> Rocket Launcher	S/2019/914	Jordan	
	** SPG-9 73mm Recoilless Rifle	S/2022/427	UID	
	Type-69 85mm Rocket Launcher	S/2022/427	UID	
	500 hunting rifles	S/2024/914	Darkmax Tekstil Nourhan Company	
Tanks (MBT)	M-60 <i>Patton</i> ⁴²²	S/2022/427	Türkiye	
	T-62MV	S/2021/229	Russian PMC	▪ Also see annex 56.
Uncrewed Aerial Vehicles (UAV)	Adcom <i>Yabhon-HMD</i>	S/2019/914	UAE	
	Aeryon <i>Scout Micro</i>	S/2013/99	Zariba Security Corporation	
	Aselsan <i>Serce-2</i> UAV	S/2023/673	Türkiye	
	Chilong CL-11 VTOL	S/2019/914	UID	▪ Dual use system.
	** DJI Inspire	S/2022/427	UID	
	Mohajer-2	S/2019/914	UID	
	Orbiter-3	S/2019/914	GNA-AF	▪ Dual use system.
	Orlan-10	S/2019/914	HAF	▪ Possibly from ChVK Wagner.
	Schiebel Camcopter S-100	S/2017/466	UID	▪ With a UID Militia.
	Xiamen <i>Mugin</i> 4450	S/2021/229	UID	▪ Dual use system.
	Zala 421-16E	S/2022/427	UID	▪ With HAF.
UAV (Loitering Munition)	IAI <i>Harpy</i>	S/2021/229	UID	▪ With GNU-AF.
	STM <i>Kargu-2</i>	S/2021/229	Türkiye	
	WB <i>Warmate</i>	S/2021/229	UID	
Uncrewed Aerial Combat Vehicles (UACV)	Bayraktar TB2	S/2019/914	Türkiye	
	Bayraktar <i>AKINCI</i>	S/2024/914	Türkiye	
	TAI <i>Anka</i>	S/2021/229	Türkiye	
	Wing Loong I	S/2017/466	UAE	
	Wing Loong II	S/2019/914	UAE	
Miscellaneous	AN/PEQ-15 Advanced Target Pointer Illuminator Aiming Laser (ATPIAL)	S/2022/427	UID	
	AN/PVS-7 Night Vision Goggles	S/2022/427	UID	
	Weapons equipped with <i>Eye</i> System	New	Pakistan	
	Aselsan A100 Night Vision Monocular	S/2022/427	Türkiye	

⁴²² Also <https://twitter.com/MiddleEastWatch/status/1281616199957323776>, 10 July 2020.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	Aselsan A940 Night Vision Weapon Sights	S/2023/673	Türkiye	
	Aselsan A940 Weapon Sights	S/2023/673	Türkiye	
	Dahua DHI-UAV-D-1000JHV2 Anti Drone Gun	S/2021/229	UID	
	Holographic Weapon Sights (HWS)	S/2022/427	Türkiye	
	Sordin Supreme Pro-X Hearing Protectors	S/2022/427	UID	

Table 26.2

Confirmed arms and related materiel transferred to Libya (26 February 2011 – 14 February 2026) (ammunition and explosive ordnance)

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
Air to Ground Missiles (AGM)	BA-7 Blue Arrow	S/2019/914	UAE	
Anti-Tank (ATGM)	FGM-148 <i>Javelin</i>	S/2019/914	Member State	▪ Present under resolution 2214 (2015).
	<i>Rocketsan</i> UMTAS	S/2021/229	Türkiye	
Anti-Tank (Rockets)	M-79 Osa	S/2022/427	UID	
Engineer Stores	ML-8 anti-lift initiators	S/2021/229	Russian PMC	
Free Flight Rockets (FFR)	122mm <i>Rocketsan</i> FFR	S/2022/427	Türkiye UAE	
Grenades	F1 Fragmentation	S/2022/427	ChVK Wagner	
	30mm VOG-17M Grenades	S/2021/229	ChVK Wagner	
	40mm OGi-7MA projected grenades	S/2023/673	UID	
	40mm VOG-25 Grenades	S/2021/229	ChVK Wagner	
	<i>Tanin</i> TBG-7 Thermobaric Grenade	S/2023/673	HAF	
Laser Guided Bombs (LGB) or Smart Micro Munition (SMM)	GBU-12 <i>Paveway</i> II	S/2017/466	UAE	
	<i>Rocketsan</i> MAM-C	S/2023/673	UID	
	<i>Rocketsan</i> MAM-L	S/2023/673	Türkiye	
Laser Guided Projectiles (LGP)	155mm GP-1A	S/2017/466 S/2018/812	UAE	
	155mm GP-6	S/2019/914	UAE	
Mines (Anti-personnel)	MON-50	S/2022/427	ChVK Wagner	
	MON-90	S/2022/427	ChVK Wagner	
	MON-200	S/2022/427	ChVK Wagner	
	OZM-72	S/2022/427	ChVK Wagner	
	PMN-2	S/2021/229	ChVK Wagner	
	POM-2R	S/2021/229	ChVK Wagner	
Mines (Anti-Tank)	TM-62M	S/2022/427	Russian PMC	
Mortar Bombs	120mm high explosive	S/2021/229	UID	
	120mm M62P8 high explosive	S/2021/229	UAE	
	120mm M62P10 high explosive	S/2022/427	UAE	
Small Arms and Cannon Ammunition	7.62 x 39mm	S/2015/128 S/2016/209	Belarus UID	▪ For Ministry of Interior.
	7.62 x 39mm	S/2016/209	Sudan	
	7.62 x 39mm TulAmmo	S/2021/229	Russian PMC	▪ Lot A421/2019.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Panel Report</i>	<i>Responsible</i>	<i>Remarks</i>
	7.62 x 51mm M80	S/2016/209	Qatar	
	7.62 x 54Rmm	S/2016/209	UID	▪ Manufactured in 2012.
	12.7 x 108mm	S/2013/99 S/2015/128	UAE	
	14.5 x 114mm	S/2015/128	Belarus	▪ For Ministry of Interior.
	23 x 115mm	S/2015/128	Belarus	▪ For Ministry of Interior.
Thermobaric Munitions	KBP RPO-A <i>Shmel</i>	S/2021/229	ChVK Wagner	

2. Tables 26.3 and 26.4 summarise arms and military materiel that have been reported in open sources as new transfers. The Panel is still investigating these alleged transfers as: (a) in some cases the arms and military materiel were in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo; and/or (b) the imagery was not of high enough resolution to identify serial numbers or lot/batch numbers to confirm post-2011 manufacture, and thus enable the initiation of tracing requests to identify supply chains. The Panel continues to investigate to find confirmatory information to the appropriate evidential standards.

Table 26.3

Reported but not yet confirmed arms and related materiel transferred to Libya (26 February 2011 –14 February 2026) (weapon systems and equipment) ⁴²³

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Remarks</i>
Air Defence (Missiles)	S-125 (SA-3)	▪ This system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. ▪ Reports in June 2020 of supply from Ukraine to Türkiye,⁴²⁴ and then deployed to Al Watiya.⁴²⁵ No S-125 appear on satellite imagery of Al Watiya at that time, only <i>HAWK</i> MIM.
Anti-Tank (ATGW)	9M113 <i>Konkurs</i> ⁴²⁶	▪ This system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. ▪ Also seen with HAF 106 brigade in November 2020 exercise, but resolution of imagery insufficient to identify if post-2011 production. ▪ More confirmatory evidence required before post-2011 transfer to Libya can be proven.
Armoured Vehicles (APC)	<i>NIMR</i> II ⁴²⁷	▪ This vehicle was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. The unit badge on the vehicle dates back to 1970. ▪ Supplied under a contract signed in 2009 between Libya and the Bin Jamr Group, UAE.⁴²⁸ ▪ The imagery was not sufficient to allow for confirmation of a new transfer to Libya without other confirmatory evidence.
Armoured Vehicles (IAFV)	BRDM-2	▪ This weapon system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. ▪ S/2016/209 reported the transfer of these APC types from Libya to Mali. ▪ Ukraine sold 108 BRDM to a UAE customer in 2017.⁴²⁹ ▪ More confirmatory evidence required before post-2011 transfer to Libya can be proven.
Artillery (Towed)	** 122mm D-30 Howitzer ⁴³⁰	▪ This weapon system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. ▪ More confirmatory evidence required before post-2011 transfer to Libya can be proven.

⁴²³ Listed primarily in <https://www.oryxspioenkop.com/2020/06/types-of-arms-and-equipment-supplied-to.html>, 23 March 2021.

⁴²⁴ <https://avia-pro.net/news/na-vooruzhenii-livii-poyavilis-ukrainskie-s-125-protiv-rossiyskih-mig-29-i-su-24>, 8 July 2020.

⁴²⁵ https://www.youtube.com/watch?v=_mPg5CTUJHQ, 12 July 2020.

⁴²⁶ Reported capture. <https://twitter.com/AnalystMick/status/1249681644933599233>, 13 April 2020.

⁴²⁷ <https://twitter.com/oded121351/status/966794267585925120>, 22 February 2018.

⁴²⁸ <http://www.army-guide.com/eng/product.php?prodID=3936&printmode=1>. Accessed 21 January 2022.

⁴²⁹ <https://defence-blog.com/ukraine-sold-108-brdm-2-armoured-reconnaissance-vehicles-to-uae/>, 1 August 2017.

⁴³⁰ <https://twitter.com/Oded121351/status/1328016339072638978>, 15 November 2020.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Remarks</i>
	152mm 2A65 Msta-B Howitzer	- This weapon system was NOT in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - The open-source imagery that initially referred to this weapon was later updated to attribute the gun as a G5 Howitzer.⁴³¹ - The Panel has yet to find any imagery of the weapon system deployed in Libya.
	155mm Norinco AH4 Gun-Howitzer	- This weapon system was NOT in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - Procured by UAE in 2019.⁴³² - Ammunition for the weapon system reported in S/2017/466, S/2018/812 and S/2019/914, but this may be compatible with the 155mm G5 Howitzer known to have been transferred. - The Panel has yet to find any imagery of the weapon system proving deployment in Libya.
Artillery (MLRS)	107mm LSRVM <i>Morava</i>	- The 128mm version was reported in S/2021/229. - Also see table 26.1.
	107mm <i>Taka</i>	- Copy of Chinese Type-63 manufactured in Sudan. - The single source imagery cannot confirm the weapon type, nor deployment in Libya.⁴³³
Logistic Vehicles	Safir Light Utility Vehicle	- This vehicle was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - More confirmatory evidence required before post-2011 transfer to Libya can be proven.
Mortars (Field)	60mm Type-32	Image resolution insufficient for 100% identification.⁴³⁴
	82mm 82-BM-37 ⁴³⁵	- This weapon system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - More confirmatory evidence required before post-2011 transfer to Libya can be proven.
Mortars (Self-propelled)	120mm <i>Boragh</i> Armoured Mortar Vehicle	The single source imagery identified is insufficient to allow for confirmation of a new transfer to Libya.⁴³⁶
Radars and EW	Grozna-S Counter UAV	The single source imagery identified is insufficient to allow for confirmation of a new transfer to Libya.⁴³⁷
	Grozna-6	The single source image is of a Grozna-6 deployed in the UAE,⁴³⁸ but the Panel has yet to see imagery of the system deployed in Libya.⁴³⁹
	Krasuha	Single source on 18 May 2020 with no supporting high-resolution imagery to allow for confirmation of type or location in Libya.⁴⁴⁰
Small Arms and Light Weapons	CZ Scorpion EVO 3 A1 submachine gun	- This system type was identified to be in LAAF's possession on two occasions.⁴⁴¹ - Unable to independently corroborate beyond geolocation.
	7.62 x 54mmR PKM General Purpose Machine Gun	- This system was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - More confirmatory evidence required before post-2011 transfer to Libya can be proven.

⁴³¹ <https://twitter.com/Oded121351/status/1328016339072638978/photo/1>, 15 November 2020; and <https://twitter.com/darksecretplace/status/1328024363887595520>, 15 November 2020.

⁴³²

https://www.armyrecognition.com/march_2019_global_defense_security_army_news_industry/norinco_ah4_155_mm_howitzers_for_united_arab_emirates_army.html, 1 March 2019.

⁴³³ <https://postlmg.cc/fkz4Rqhp>, undated. Accessed 23 January 2022.

⁴³⁴ <https://twitter.com/libyatogether20/status/1378031351132254209>, 2 April 2021.

⁴³⁵ <https://twitter.com/Oded121351/status/1328012799948312576>, 15 November 2020.

⁴³⁶ <https://twitter.com/tariqgibre1/status/601900388267208704>, 23 May 2015; and <https://postimg.cc/4K7MjjVH>, undated. Accessed 23 January 2022.

⁴³⁷ <https://twitter.com/towersight/status/1292885386902069249>, 10 August 2020.

⁴³⁸ <https://www.menadefense.net/mideast/les-emirats-arabes-unis-se-dotent-de-brouilleurs-bielorusses-groza-6/>, 25 June 2020.

⁴³⁹ <https://army-tech.net/forum/index.php?threads/الانكرونية-البيلاروسية-منظومة-الحرب-الالكترونية-البيلاروسية-groza-18194.العاصف>, 25 April 2020.

⁴⁴⁰ <https://libya.liveuamap.com/en/2020/18-may-gna-turkish-uav-airstrike-on--electronic-warfare-system>, 20 May 2020.

⁴⁴¹ <https://www.facebook.com/Libya.WID/posts/pfbid0AS1grfHmCophckPsqwM4oQpmGpbLSMo2BitzPB4MbvVNZEgkZF7bD48RK5s5kFcl>; and <https://www.facebook.com/Libya.WID/posts/pfbid03s67wThAa2LLLjSL9LdpHbpxjZtqnsJzdz1U1MVqKUJaYVLdiTqE7hXkwsK5iN1ZI>.

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Remarks</i>
Tanks (MBT)	T-55E	- The T-55 was in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - HAF official social media showed a T-55 variant with the Tariq bin Ziyad brigade in 2020.⁴⁴² - ChvK Wagner personnel also repaired 16 and overhauled 31 T-55 variants in 2019, so possible these are from that work.⁴⁴³ - More confirmatory evidence required before post-2011 transfer to Libya can be proven.
	T-62M	- T-62 variants were in the inventory of the Libyan Armed Forces prior to the 2011 arms embargo. - ChvK Wagner personnel also repaired 4 and overhauled 9 T-62 variants in 2019.⁴⁴⁴ - The imagery was not sufficient to allow for confirmation of a new transfer to Libya.
UAV	Ababil-2	- Reported as operated by HAF. - Image resolution insufficient for 100% identification of type or location.⁴⁴⁵
	Zagil	- The Panel has identified a single-source report alleging Sudan supplied this UAV type in 2014.⁴⁴⁶ The imagery shows Libyan officers but is insufficient to prove the presence of this UAV type in Libya. - No open-source imagery of a "Zagil" UAV could be found to allow for confirmation of UAV type.

Table 26.4

**Reported but not confirmed arms and related materiel transferred to Libya (26 February 2011 –14 February 2026)
(ammunition and explosive ordnance)**

<i>Generic type</i>	<i>Nomenclature / Calibre</i>	<i>Remarks</i>
Artillery	155mm 2K25 Krasnopol laser guided projectile.	- Reported as being for the 152mm 2A65 Msta-B Howitzer, so possible calibre error in report. - Imagery insufficient to confirm calibre or transfer to Libya.⁴⁴⁷ - The imagery could equally be of a GP1, which is a direct copy.⁴⁴⁸ GP1 reported in in S/2017/466 and S/2018/812.
Engineer Stores	Fateh-4 mine clearance line charge	The single source imagery identified is insufficient to allow for confirmation of a transfer to Libya.⁴⁴⁹
Mines (Anti-personnel)	MON-100	- The Libyan Mine Action Centre (LibMAC) have confirmed that no mines of this type have been reported, identified or rendered safe in Libya to date.⁴⁵⁰ - The single source imagery identified is insufficient to allow for confirmation of a transfer to Libya.⁴⁵¹
Mines (Anti-Tank)	TM-83	- LibMAC have confirmed that no mines of this type have been reported, identified or rendered safe in Libya to date.⁴⁵² - The single source imagery is insufficient to confirm type or transfer to Libya.⁴⁵³

⁴⁴² <https://www.youtube.com/watch?v=LXt5d1iacEk>, 14 November 2020. [14min 29sec].

⁴⁴³ Table 77.2 to [S/2021/229](#).

⁴⁴⁴ Table 77.2 to [S/2021/229](#).

⁴⁴⁵ <https://postimg.cc/3dNhpry1>. Accessed 23 January 2022.

⁴⁴⁶ <https://m.facebook.com/1445146409065850/photos/a.1445154462398378/1484269561820201/?type=3&source=54>, 9 August 2014.

⁴⁴⁷ <https://twitter.com/lostweapons/status/1243787785724542976?lang=he>, 28 March 2020.

⁴⁴⁸ Confidential source analysis.

⁴⁴⁹ https://vk.com/wall-98555648_224885?lang=en, 10 August 2021.

⁴⁵⁰ Email to Panel of 25 January 2022.

⁴⁵¹ https://www.libyaobserver.ly/news/libyas-interior-ministry-urges-south-tripoli-residents-not-return-home-just-yet?qt-libya_weather=1&qt-sidebar_tabs=1, 8 June 2020.

⁴⁵² Ibid.

⁴⁵³ <https://twitter.com/analystmick/status/1125785280626200576>, 7 May 2019.

Annex 27 Equipment transfers

1. The Panel identified three incidents of equipment transfers (table 27.1) that appeared on open sources but was not able to independently corroborate beyond geolocation or other means, thus not reaching the evidentiary threshold to substantiate the transfers. The cumulative evidence shows that the presence of the equipment in Libya is more likely than not (appendices 27.A to 27.C).

Table 27.1
Equipment transfers

<i>Date identified</i>	<i>End User</i>	<i>Equipment nomenclature</i>	<i>Cross-references</i>	<i>Responsible</i>
3 May 2023	GNU-AF	INKAS Titan-S 4x4 APC	Same type identified being possessed by LAAF ⁴⁵⁴	UID *
12 Nov 2023	GNU-AF	INKAS Titan-DS APC	Same type identified being possessed by LAAF ⁴⁵⁵	UID
19 Nov 2024	LAAF	CZ Scorpion EVO 3 A1 submachine gun		UID

* Unidentified.

⁴⁵⁴ Annex 58 of [S/2024/419](#).

⁴⁵⁵ Annex 56 of [S/2021/229](#).

Appendix 27.A: INKAS Titan-S 4x4 Armoured Personnel Carriers

1. In its report [S/2024/914](#),⁴⁵⁶ the Panel identified the presence of Inkas Titan-S 4x4 Armoured Personnel Carriers (APCs) operated by the Libyan Arab armed forces (LAAF) criminal investigation department. Similarly, the Panel identified the presence of INKAS Titan-S 4x4 APCs operated by the Government of National Unity-affiliated forces (GNU-AF) on two occasions: a) from the social media account of the 555 Infantry Brigade,⁴⁵⁷ displaying the APC during the visit of a military delegation of a Member State to 22 Infantry Battalion on 3 May 2023 in Tripoli, Libya; and b) from the social media account of the “Presidency of the General Staff” of the Libyan Army,⁴⁵⁸ presenting a graduation ceremony attended by former Chief of the General Staff of the Libyan Army, Mohamed Al-Haddad on 25 February 2025 in Gharyan, Libya.
2. The Panel requested further information from the GNU and INKAS Armored Vehicles LLC, United Arab Emirates (hereinafter INKAS UAE). INKAS UAE responded on 14 May 2025 stating that: a) INKAS UAE had never sold, exported or transferred Titan-S APC or any other civilian or military vehicle to Libya; b) the presence of such vehicles in the region was not the result of any direct or indirect transaction conducted by INKAS UAE; c) certain companies in other countries had copied INKAS UAE designs; and d) INKAS UAE had discontinued production of the previous Titan-S model and had introduced completely redesigned versions of both platforms with distinct structural and design features. GNU did not respond.
3. In response to the Panel’s inquiry on the transfer of the INKAS Titan-DS APC to the LAAF in 2020, INKAS UAE provided similar answers indicating that it had not exported any vehicles to Libya and referring to other companies’ similar products. The Panel assessed in its report [S/2021/229](#) that it was not convinced of the veracity of the manufacturer’s response.⁴⁵⁹ As no further detailed information has been provided by INKAS UAE in its response of 14 May 2025 in this regard, nor any specific information about the new version of its Titan-S APCs, the Panel’s assessment remained unchanged.
4. Titan-S 4x4 APCs are military equipment. This vehicle type appeared on open sources but the Panel was not able to independently corroborate beyond geolocation or other means as of the time of writing, thus not reaching the evidentiary threshold to substantiate the transfer. The cumulative evidence shows that the presence of this equipment in Libya is more likely than not.

Figure 27.A.1

Titan-S 4x4 APC present in the 22 Battalion’s camp



Figure 27.A.2

Titan-S 4x4 APC on INKAS website



⁴⁵⁶ Annex 58 to [S/2024/914](#).

⁴⁵⁷ <https://www.facebook.com/Arma.Libya/posts/pfbid02jr4cmvMFFXqkiHrJfHpmARaAH8stqE6WH79TKMcGbxnukYYd6DVnPqZSLQj6eJHKI>, 5 May 2023.

⁴⁵⁸ <https://www.facebook.com/The.presidency.of.the.General.Staff.To.Libyan.Army/posts/pfbid0LWHDLQXWPVnRTqnTYHXpRYUZBb561bQmQydEXkgVgqy3JcAaJTEa3cBJ95yyV4d8l>, 26 February 2025.

⁴⁵⁹ Annex 56 of [S/2021/229](#).

Figure 27.A.3
Geolocation of the 22 Battalion's camp⁴⁶⁰



Developed by Panel of Experts

Google Earth Pro. Image © 2025 Airbus. Imagery date 30 April 2023.

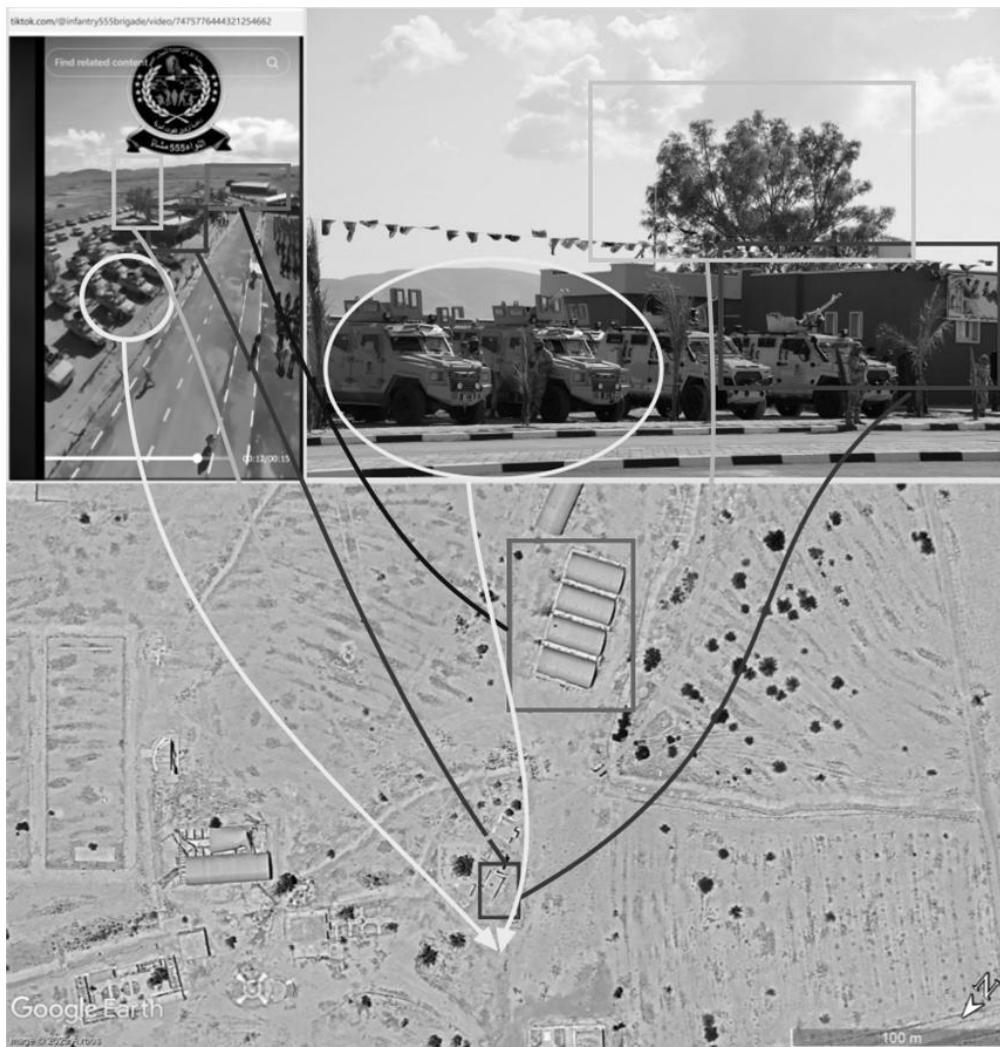
⁴⁶⁰ Geocoordinates: 32°49'58.3"N 13°10'32.0"E.

Figure 27.A.4

Titan-S 4x4 APCs present during a graduation ceremony on 25 February 2025 in Gharyan, Libya



Figure 27.A.5
Geolocation of the graduation ceremony⁴⁶¹



Developed by Panel of Experts

Google Earth Pro. © 2025 Airbus. Imagery date 30 June 2023.

Sources:

1. <https://www.facebook.com/Brigade111Ly/videos/234953536084502>, at 2:14, 13 November 2023.
2. <https://www.facebook.com/Arma.Libya/videos/6268276853227772>, at 2:33, 12 May 2023.
3. <https://www.facebook.com/photo/?fbid=948015727500508&set=pcb.948017187500362>, 26 February 2025.
4. <https://www.facebook.com/photo/?fbid=948015727500508&set=pcb.948017187500362>, 26 February 2025.
5. <https://www.tiktok.com/@infantry555brigade/video/7475776444321254662>, at 0:12, 27 February 2025.
6. <https://inkas.ae/inkas-titan-s/>.

⁴⁶¹ Geocoordinates: 32°13'56.8"N 12°54'15.8"E.

Appendix 27.B: INKAS Titan-DS Armoured Personnel Carriers

1. In its report [S/2021/229](#),⁴⁶² the Panel identified the presence of INKAS Titan-DS APC operated by Tariq bin Ziyad (TBZ) of the Libyan Arab armed forces (LAAF). In the current reporting period, the Panel identified, from the social media account of 111 Brigade,⁴⁶³ Government of National Unity-affiliated forces (GNU-AF), the presence of INKAS Titan-DS APCs during a parade held on 12 November 2023 in the Brigade's camp in Tripoli, Libya.

2. The Panel requested further information from the GNU and INKAS Armoured Vehicles LLC, United Arab Emirates (INKAS UAE). INKAS UAE responded on 14 May 2025 stating that: a) INKAS UAE had never sold, exported or transferred any Titan-DS or Titan-s APC to any other civilian or military vehicle to Libya; b) the presence of such vehicles in the region was not the result of any direct or indirect transaction conducted by INKAS UAE; c) certain companies in other countries had copied INKAS UAE designs; and d) INKAS UAE had already discontinued production of the previous Titan-DS model and had introduced completely redesigned versions of both platforms with distinct structural and design features. GNU did not respond.

3. In response to the Panel's inquiry on the transfer of Titan-DS APC to LAAF in 2020, INKAS UAE provided similar answers indicating that it had not exported any vehicles to Libya and referring to other companies' similar products. The Panel assessed in its report S/2021/229 that it was not convinced of the veracity of the manufacturer's response. No further detailed information has been provided by INKAS UAE in its response of 14 May 2025 in this regard, nor any specific information about the new version of its Titan-DS APCs. The Panel's assessment remained unchanged.

4. Titan-DS APCs are military equipment. This vehicle type appeared on open sources but the Panel was not able to independently corroborate beyond geolocation or other means as of the time of writing, thus not reaching the evidentiary threshold to substantiate the transfer. The cumulative evidence shows that the presence of this equipment in Libya is more likely than not.

Figure 27.B.1

Titan-DS present during 111 Brigade's parade



Figure 27.B.2

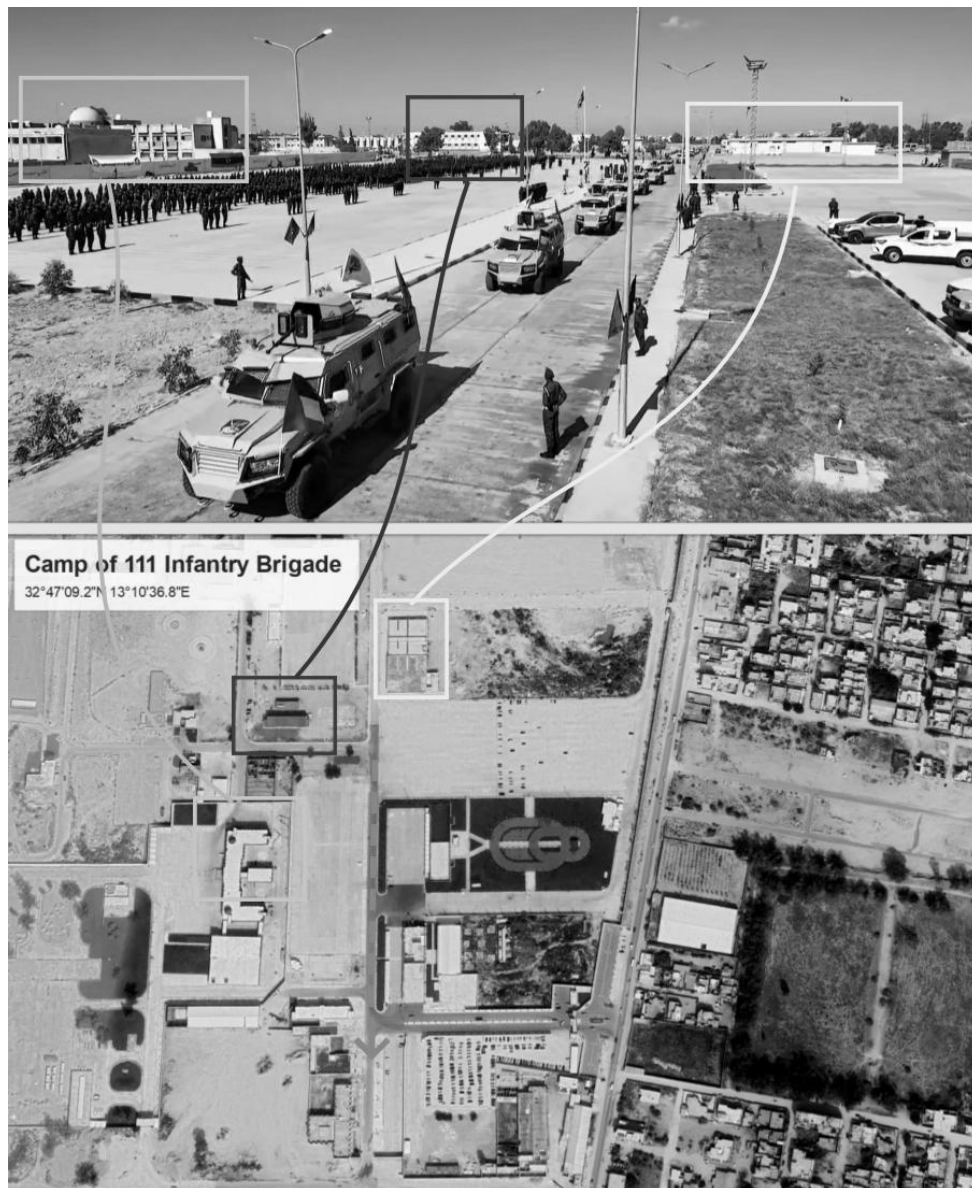
Titan-DS APC on INKAS website



⁴⁶² Annex 56 to [S/2021/229](#).

⁴⁶³ <https://www.facebook.com/Brigade111Ly/videos/234953536084502>, 13 November 2023.

Figure 27.B.3
Geolocation of 111 Infantry Brigade's camp⁴⁶⁴



Developed by Panel of Experts

Google Earth Pro. © 2025 Airbus. Imagery date 30 March 2025.

Sources:

1. <https://www.facebook.com/Brigade111Ly/videos/234953536084502> at 2:14, 13 November 2023.
2. <https://www.facebook.com/Arma.Libya/videos/6268276853227772>, at 2:33, 12 May 2023.
3. <https://www.facebook.com/photo/?fbid=948015727500508&set=pcb.948017187500362>, 26 February 2025.
4. <https://www.facebook.com/photo/?fbid=948015727500508&set=pcb.948017187500362>, 26 February 2025.
5. <https://www.tiktok.com/@infantry555brigade/video/7475776444321254662>, at 0:12, 27 February 2025.
6. <https://inkas.ae/inkas-titan-ds/>, accessed on 6 April 2025.

⁴⁶⁴ Geocoordinates: 32°47'11.2"N 13°10'36.2"E.

Appendix 27.C: CZ Scorpion EVO 3 A1 submachine guns

1. The Panel identified, from the social media account of the “Libyan army media division”,⁴⁶⁵ equipment with design features identical to CZ Scorpion EVO 3 A1 submachine guns on two occasions: a) at the opening ceremony of Sky Dive Benghazi Tower, held on 19 November 2024 at the headquarters of 87 battalion of Libyan Arab armed forces (LAAF) in Benghazi; and b) at the graduation ceremony of “a new batch of officers”, held on 13 January 2025 in Sabha. CZ scorpion EVO 3 A1 submachine guns are manufactured by Česká Zbrojovka a.s. in Uherský Brod, Czechia.⁴⁶⁶
2. This is the first time the Panel has identified such equipment in the context of Libya. The Panel requested further information from Czechia and LAAF. In its response, Czechia stated that: a) the Czech authorities excluded supply, sale or transfer of any submachine guns model CZ Scorpion EVO 3 A1 to Libya; and b) the Czech authorities cannot confirm with certainty that the arms are submachine guns models CZ Scorpion EVO due to the missing serial numbers or other identification elements.⁴⁶⁷ LAAF did not respond.
3. This equipment type appeared in open sources but the Panel was not able to independently corroborate beyond geolocation or other means as of the time of writing, thus not reaching the evidentiary threshold to substantiate the transfer.

Figure 27.C.1

CZ Scorpion EVO 3 A1 submachine gun during the opening ceremony of Sky Dive Benghazi



⁴⁶⁵ <https://www.facebook.com/Libya.WID/posts/pfbid0AS1grfHmCophckPsqwM4oQpmGpbLSMo2BitzPB4MbvVNZEGkZF7bD48RK5s5kFcl>; and <https://www.facebook.com/Libya.WID/posts/pfbid03s67wThAa2LLLjSL9LdpHbxpjZtqnsJzd1U1MVqKUJaYVLdiTqE7hXkwsK5iN1Zl>.

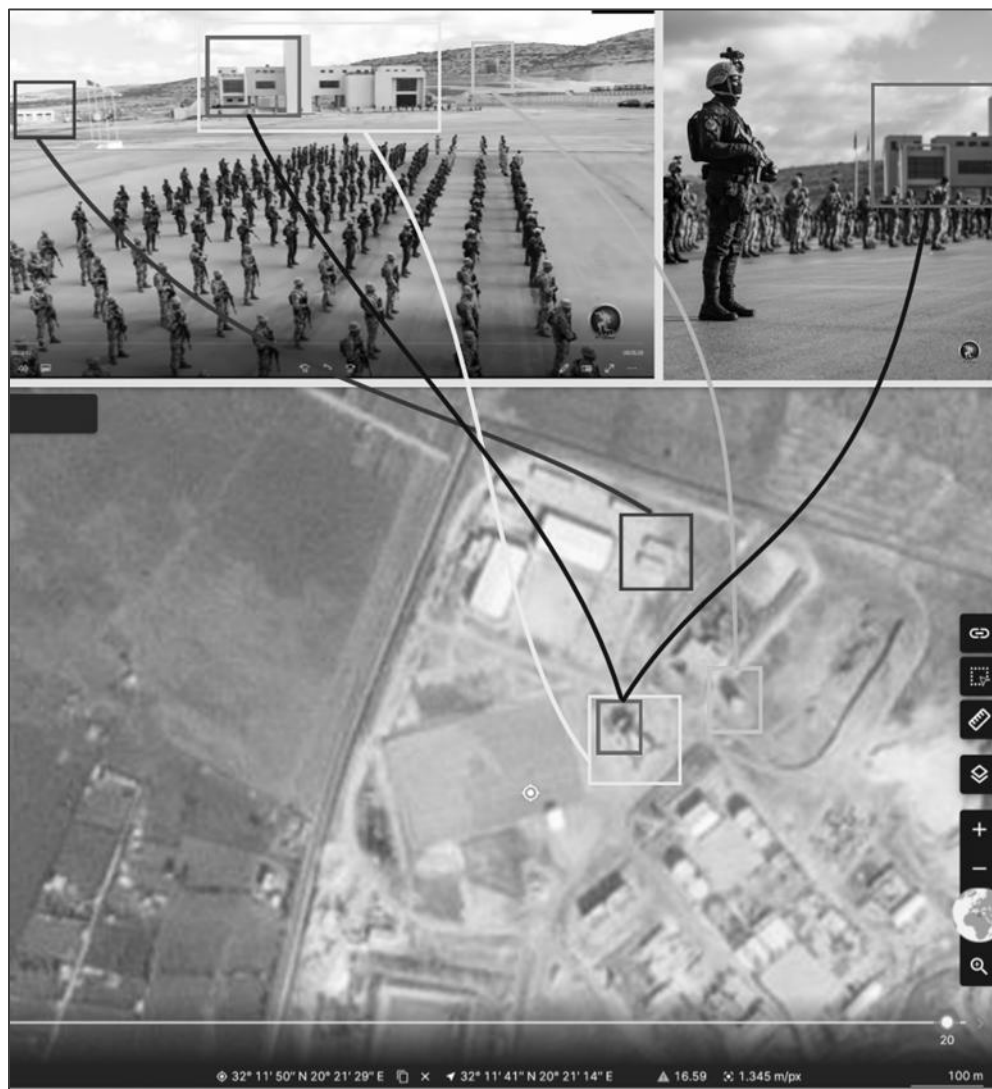
⁴⁶⁶ http://www.czub.cz/en/catalog/86-law-enforcement-military/OS-AUT/CZ_SCORPION_EVO_3_A1.aspx.

⁴⁶⁷ Letter from Czechia on 14 May 2025.

Figure 27.C.2
CZ Scorpion EVO 3 A1 submachine gun



Figure 27.C.3
Geolocation of the opening ceremony⁴⁶⁸



Developed by Panel of Experts

Source: Planet Labs, 20 November 2024.

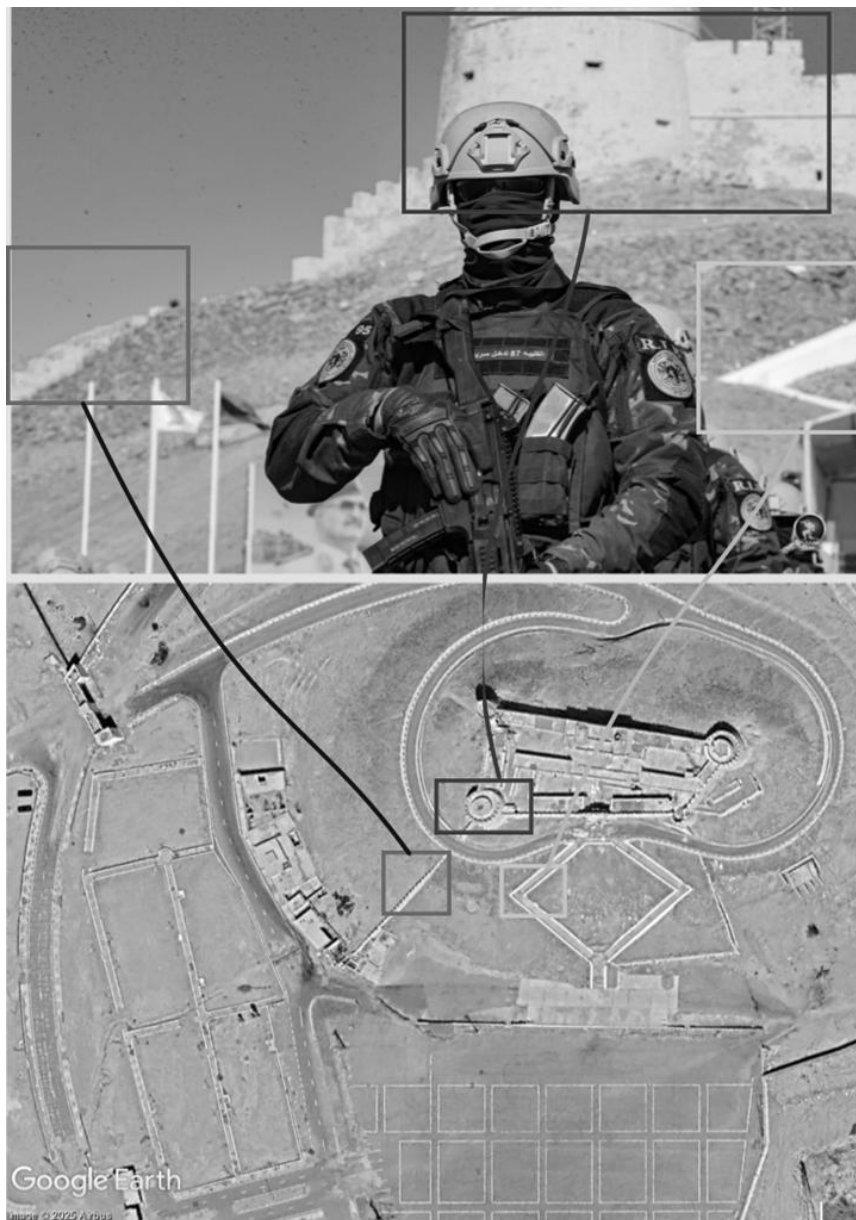
⁴⁶⁸ Geocoordinates: 32°11'50"N 20°21'30"E.

Figure 27.C.4

CZ Scorpion EVO 3 A1 submachine gun at a graduation ceremony on 13 January 2025 in Sabha



Figure 27.C.5
Geolocation of the graduation ceremony⁴⁶⁹



Developed by Panel of Experts

Google Earth Pro, © 2025 Airbus. Imagery date 8 March 2025.

Sources:

1. <https://www.facebook.com/photo/?fbid=539586482180461&set=pcb.539597298846046>, 19 November 2024.
2. <https://www.facebook.com/Libya.WID/videos/1619356185631873> at 0:13, 19 November 2024.
3. <https://www.facebook.com/photo/?fbid=576791525126623&set=pcb.576861808452928>, 13 January 2025.
4. http://www.czub.cz/en/catalog/86-law-enforcement-military/OS-AUT/CZ_SCORPION_EVO_3_A1.aspx, accessed on 2 April 2025.

⁴⁶⁹ Geocoordinates: 27°00'32.39"N, 14°27'16.17"E.

Annex 28 Special operations trainings for 36 SOF battalion of LAAF by Belarus

1. The Panel found that trainings were provided for the Libyan Arab armed forces (LAAF) units in Belarus. The Panel identified from multiple open-source social media accounts, including that of the “Libyan army media division”, that 36 special operation forces (SOF) battalion of LAAF completed military training courses of “intensive programmes to raise combat efficiency and enhance readiness to carry out various missions with high efficiency, in the Republic of Belarus”.⁴⁷⁰ A graduation ceremony, attended by chief of staff of the land forces Saddam Haftar, featured a special operation exercise which involved a military helicopter, armoured personnel carriers (APCs) and sniper shooting (figures 28.1 to 28.3).⁴⁷¹ These social media accounts also reported on 28 February 2025 that the 36 SOF battalion returned to Benghazi from Belarus.

Figure 28.1

Special operation exercise



Figure 28.2

Special operation exercise



Figure 28.3

Sniper firing exercise



Sources:

1. <https://x.com/Ibnwatanlibya/status/1895848494633795755>, 1 March 2025; and
2. <https://www.facebook.com/Libya.WID/posts/pfbid0ZGqzt3eyLBbtrKazCaQH55B93DjYDu8c9n7HEvrov7Fi9c6uHyjUjnHEfL8JtRfCl>, 28 February 2025.

⁴⁷⁰ <https://www.facebook.com/Libya.WID/posts/pfbid0ZGqzt3eyLBbtrKazCaQH55B93DjYDu8c9n7HEvrov7Fi9c6uHyjUjnHEfL8JtRfCl>, 28 February 2025;

<https://www.facebook.com/Libya.WID/videos/910868761124889/>, 28 February 2025; and <https://x.com/Ibnwatanlibya/status/1895848494633795755>, 1 March 2025.

⁴⁷¹ Same as above.

2. The Panel further identified that in addition to the special operations and sniper firing exercises at the ceremony, parachute training was also a component of the training course. Posts of several social media accounts⁴⁷² claimed to be owned by elements of 36 SOF battalion who participated in the trainings in Belarus, documented their parachuting exercise conducted in Vitebsk, Belarus.⁴⁷³

3. TikTok account A (TA-A) posted on 7 April 2025 a photo of a group of armed personnel posing in front of a UAZ-452 vehicle in military green colour scheme with the license of “0833-0” (figure 28.4), which bore characteristics of Belarussian military vehicle license plates (black letters/numbers on white background, four digits followed by a dash and a letter/number). On 14 May 2025, the same account posted a short video footage captioned with “36 Special Forces” showing a group of personnel in military uniforms boarding an Antonov An-2 aircraft with the registration of “EW-360AB” (figure 28.5). This aircraft is operated⁴⁷⁴ by the Voluntary Society for Assistance to the Army, Aviation and Navy of the Republic of Belarus (DOSAAF) (figure 28.6).⁴⁷⁵ Based in Vitebsk, Belarus, DOSAAF is tasked, according to the organization’s website, with “training of specialists for the armed forces, other troops and military formations” (figure 28.7).⁴⁷⁶

Figure 28.4

TA-A in front of a Belarussian-military-featured vehicle⁴⁷⁷



Figure 28.5

Forces boarding EW-360AB aircraft



⁴⁷² Referred in this report as “TikTok account A”, “TikTok account B” and “TikTok account C”.

⁴⁷³ Geolocation of 55°09'36.2"N 29°58'42.3"E.

⁴⁷⁴ <https://russianplanes.net/reginfo/155622>.

⁴⁷⁵ <https://beldosaaf.by/o-dosaaf/>, and <https://beldosaaf.by/>.

⁴⁷⁶ <https://beldosaaf.by/podgotovka-molodezhi-k-voennoj-sluzhbe/>.

⁴⁷⁷ <https://vayar.mil.by/upload/iblock/60a/xasjmacorjw9s1d1qbarhqgwk43miw.JPG>,.

Figure 28.6

DOSAAF as the operator of EW-360AB

russianplanes.net/reginfo/155622		
HOME PHOTO REGISTRIES DATA SEARCH COMMENTS ABOUT THE		
FLIGHT CARD		
Antonov An-2T		
Onboard No.: EW-360AB		
Current status:	is being exploited	links
operator:	Belarus - DOSAAF (BelOSTO) by since 2014 (11 years 5 months)	
In operation:	since November 1981 (43 years 8 months)	
KB developer:	Antonov	
base type:	An-2(registry ➡)	
category:	passenger	
Manufacturer:	PZL-Mielec ➡	

Developed by the Panel of Experts

Sources:

1. <https://vayar.mil.by>.
2. <https://beldosaaf.by>.
3. <https://www.tiktok.com/en>.

4. On 2 March 2025, TikTok account B (TA-B) posted an image of a uniformed individual holding a certificate with Belarussian and Libyan national flags, identical to the certificates shared by TikTok account C (TA-C) and “Libyan army media division” (figure 28.8).⁴⁷⁸ TikTok account B posted a sky-view image (figure 28.9), likely taken during a parachute training, showing the landscape surrounding DOSAAF’s facilities (figure 28.10).

Figure 28.8

Elements of 36 SOF battalion posing with certificates (TA-B and TA-C)

Figure 28.7

EW-360AB operated by DOSAAF

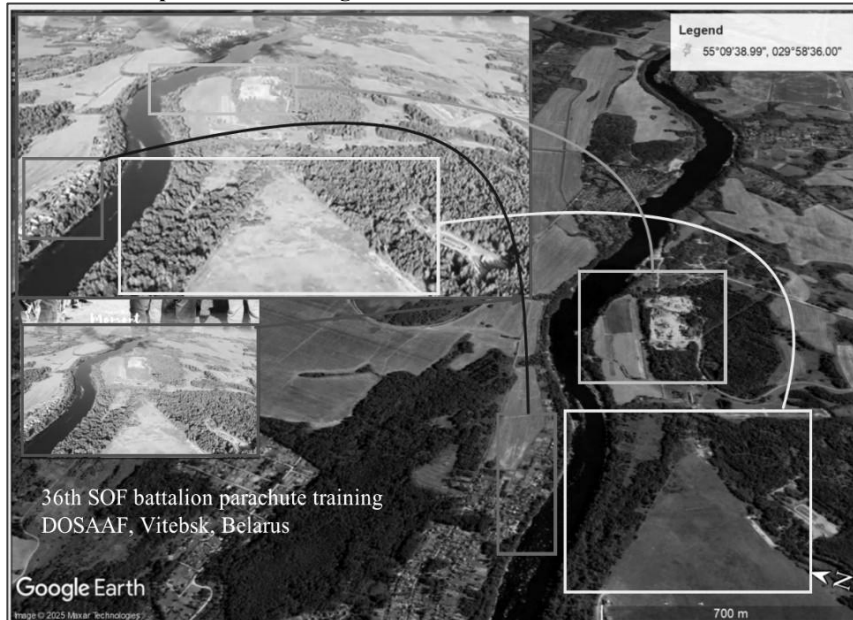
⁴⁷⁸ <https://www.facebook.com/photo/?fbid=608378188634623&set=pcb.608378491967926>,

Figure 28.9

Skyview during parachute training (TA-B)



Figure 28.10

Geolocation of parachute training in Belarus⁴⁷⁹

Developed by the Panel of Experts

Google Earth Pro. Image ©2025 Maxar Technologies. Imagery Date: 25 August 2022.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Sources:

1. <https://www.tiktok.com/en>, and
2. <https://www.facebook.com/Libya.WID/posts/pfbid0ZGqzt3eyLBbtrKazCaQH55B93DjYDu8c9n7HEvrov7Fi9c6uHyjUjnHEfL8JtRfCl>.

5. The Panel further identified that elements of the 36 SOF battalion took a flight provided by Belavia Airlines (flight number B28801, aircraft registration EW-457PA) from Minsk to Benghazi on 27 February 2025 (figures 28.11 and 28.12). This aircraft conducted six flights⁴⁸⁰ between Minsk and Benghazi between 25 February and 17 April 2025.

6. The Panel requested further information from the Republic of Belarus and LAAF. Belarus responded that: a) Belarus is committed to strict compliance with the sanctions resolutions of the United Nations Security Council, including with regard to Libya; b) The Libyan citizens received special training in the Republic of Belarus in providing security for critical infrastructure sites, in maintaining law and order and performing security and cash collection activities, and in ensuring the safety of Libyan citizens in distress; c) These activities were carried out in full compliance with paragraph 10 of Security Council resolution 2095 (2013); and d) The Libyan citizens were flown by Belavia Airlines on the Minsk-Benghazi route on 27 February 2025".⁴⁸¹ LAAF confirmed to the Panel that its forces were trained by Belarus, without referring to specific trainings.⁴⁸²

7. The trainings, involving parachuting, special operations and sniper firing, were of a military nature. While paragraph 10 of resolution 2095 (2013) exempts the provision of training when intended solely for security or disarmament assistance to the Libyan government, 36 SOF battalion is not among the forces under the control of the Libyan Government.⁴⁸³ The provision of special operation trainings was a violation of paragraph 9 of resolution 1970 (2011) by the Republic of Belarus.

⁴⁷⁹ Geocoordinates of 55°09'38.99", 29°58'36.00".

⁴⁸⁰ On 25 February, 27 February, 10 March, 7 April, 14 April and 17 April 2025.

⁴⁸¹ Letter from Belarus on 4 June 2025.

⁴⁸² LAAF'S statement in response to Panel's inquiry during its visit in November 2025.

⁴⁸³ Forces under the control of the Libyan government (the Libyan Coast Guard, explosive ordnance disposal units and the Presidential Guard of the Government of National Accord), were announced on 27 May 2017.

The provision of flight services for LAAF's 36 SOF battalion constituted a violation of paragraph 9 of resolution 1970 (2011) by Belavia Airlines.

Figure 28.11

Element of 36 SOF battalion taking a flight provided by Belavia Airlines back to Benghazi from Belarus



Figure 28.12

Flight information of EW-457PA on 27 February 2025

27 Feb 2025	Benghazi (BEN)	Minsk (MSQ)	B28802	6:17	4:10 PM	2:52 PM	10:45 PM	Landed 10:09 PM	KML	CSV	Play
27 Feb 2025	Minsk (MSQ)	Benghazi (BEN)	B28801	6:45	7:35 AM	7:52 AM	1:45 PM	Landed 1:37 PM	KML	CSV	Play
26 Feb 2025	Sharm el-Sheikh (SSH)	Minsk (MSQ)	B28216	6:11	12:30 PM	12:34 PM	8:15 PM	Landed 7:45 PM	KML	CSV	Play
26 Feb 2025	Minsk (MSQ)	Sharm el-Sheikh (SSH)	B28215	6:17	5:40 AM	6:03 AM	11:30 AM	Landed 11:21 AM	KML	CSV	Play
26 Feb 2025	Benghazi (BEN)	Minsk (MSQ)	B28802	-	2:51 AM	—	3:48 AM	Landed 3:48 AM	KML	CSV	Play
25 Feb 2025	Benghazi (BEN)	Minsk (MSQ)	B28802	6:05	5:40 PM	8:42 PM	1:25 AM	Landed 3:47 AM	KML	CSV	Play
25 Feb 2025	Minsk (MSQ)	Benghazi (BEN)	B28801	8:42	8:50 AM	10:04 AM	12:00 PM	Landed 5:46 PM	KML	CSV	Play

Developed by the Panel of Experts

Sources:

1. <https://www.facebook.com/Libya.WID/videos/910868761124889/>, and
2. [flightradar24.com](https://www.flightradar24.com)

Annex 29 Training for 87 battalion of LAAF by Belarus

1. The Panel identified that members of 87 battalion of the Libyan Arab armed forces (LAAF) completed advanced training courses in the Republic of Belarus during the reporting period.
2. According to multiple open-source social media accounts, including that of the “Libyan army media division”,⁴⁸⁴ elements of 87 battalion, out of approximately 400 to 430 in total, participated in multiple military exercises and were awarded with certificates, with training time “from November 2024 to August 2025” and issued by “the Academy of National Security of the Republic of Belarus”, at the closing ceremony for the completion of the training courses. Open sources also showed multiple exercises, including sniper firing, special operations and parachuting, were conducted at closing ceremony, which was attended by Deputy Defence Minister of Belarus, LAAF’s deputy chief of staff of the land forces, director of the training department, and commander of the 87 battalion (see figures 29.1 to 29.7).
3. The Panel further identified the ceremony was held at the “Air Force and Air Defence Forces training ground Domanovo”, about 180 km southwest of Minsk, Belarus (figures 29.8 and 29.10).⁴⁸⁵

Figure 29.1

Multiple exercises during the closing ceremony



Figure 29.2

Multiple exercises during the closing ceremony



⁴⁸⁴ <https://www.facebook.com/Libya.WID/posts/pfbid0o8J4cE2T5RGgr9pp5VHL2M9WuYiaLzHWncnFWH6FVgp2ohgrHNkGJ24RYPmSWCgdl>, 8 September 2025;
<https://www.facebook.com/Libya.WID/videos/24485296771080509>, 8 September 2025; and
<https://x.com/Ibnwatanlibya/status/1965005049853292902>, 8 September 2025.

⁴⁸⁵ Geocoordinates: 52°46'21.2"N 25°39'43.6"E

Figure 29.3

Multiple exercises during the closing ceremony

Figure 29.4

Multiple exercises during the closing ceremony

Figure 29.5

Elements of 87 battalion in the closing ceremony

Figure 29.6

Belarus and LAAF officials attending the closing ceremony

Figure 29.7

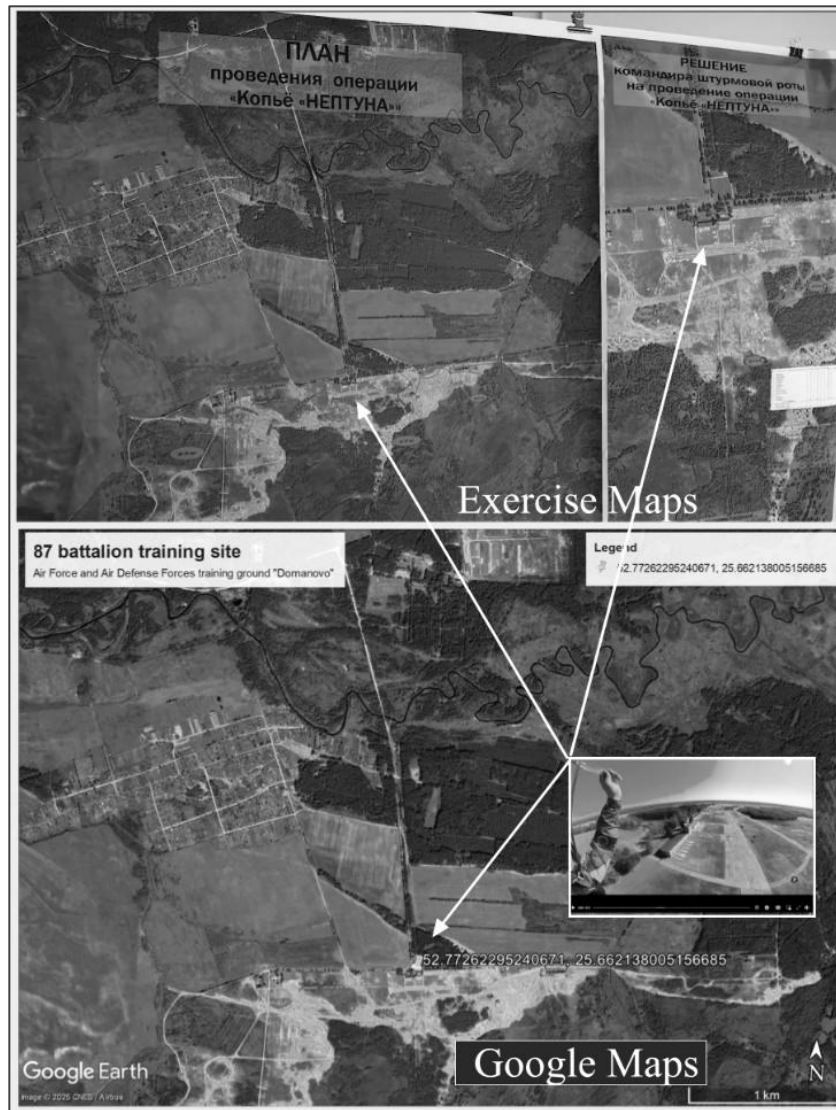
Awarding of certificate issued by “the Academy of National Security of the Republic of Belarus”

Figure 29.8
Geolocation of the exercises



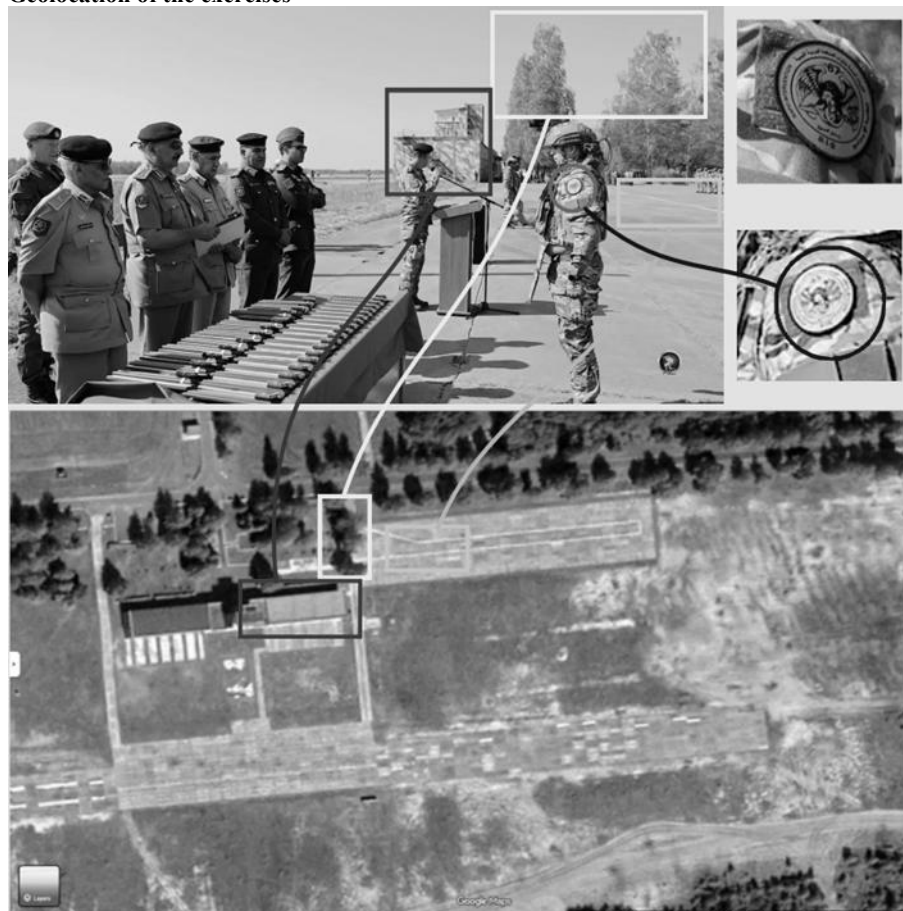
Google Earth. Image ©2025 CNES/Airbus. Imagery Date: 24 August 2019.

Figure 29.9
Geolocation of the exercises



Google Earth. Image ©2025 CNES/Airbus. Imagery Date: 24 August 2019.

Figure 29.10

Geolocation of the exercises⁴⁸⁶

Developed by the Panel of Experts

Google Earth Pro. Image ©2025 CNES/Airbus. Imagery Date: 24 August 2019.

Sources:

1. <https://www.facebook.com/Libya.WID/videos/24485296771080509>, 8 September 2025;
2. <https://www.facebook.com/Libya.WID/posts/pfbid0o8J4cE2T5RGgr9pp5VHL2M9WuYiaLzHWncnFWH6FVgp2ohgrHNkGJ24RYPmSWCgdl>, 8 September 2025;
3. <https://x.com/Ibnwatanlibya/status/1965005049853292902>, 8 September 2025.

4. An open-source media post dated 16 September 2025 reported that the trainees returned home after completing an advanced training program in the Republic of Belarus⁴⁸⁷. The Panel identified that Belavia Airlines of Belarus provided flight service (flight number B28801) for elements of 87 battalion using its aircraft (registration: EW-588PD) on 15 September 2025 (see figures 29.11 to 29.14). Belavia had conducted 40 flights using its four passenger aircraft (EW-455PA, EW-456PA, EW-457PA and EW-588PD) from Minsk to Benghazi between November 2024 and December 2025 (table 29.1). Coincidentally, Belavia started to intensify its flights to Benghazi in line with the starting time of the trainings for 87 battalion in Belarus.

5. In response to the Panel's enquiry, Belarus responded that: a) Belarus is committed to strict compliance with the sanctions resolutions of the United Nations Security Council, including with regard to Libya; b) Libyan citizens received training in the Republic of Belarus in providing security for critical infrastructure sites, in maintaining law and order and performing security and cash collection activities, and in emergency prevention and response; and c) These activities were

⁴⁸⁶ Geocoordinates: 52°46'22.0"N 25°39'49.1"E.

⁴⁸⁷ <https://www.lannews.com/ar/?p=442899>, 16 September 2025.

carried out in full compliance with paragraph 10 of Security Council resolution 2095 (2013).⁴⁸⁸ LAAF confirmed to the Panel that its forces were trained by Belarus, without referring to specific trainings.⁴⁸⁹

6. With all publicly available information, coupled with corroboration undertaken by the Panel, the explanation provided by Belarus is not convincing. In light of the volume of the flights, publicly available imagery corroborated through geolocation, and testimony, the Panel assessed that the trainings were of military nature. The provision of such trainings constituted a violation of paragraph 9 of resolution 1970 (2011) by the Republic of Belarus. The provision of flight services for LAAF's 87 battalion constituted a violation of paragraph 9 of resolution 1970 (2011) by Belavia Airlines.

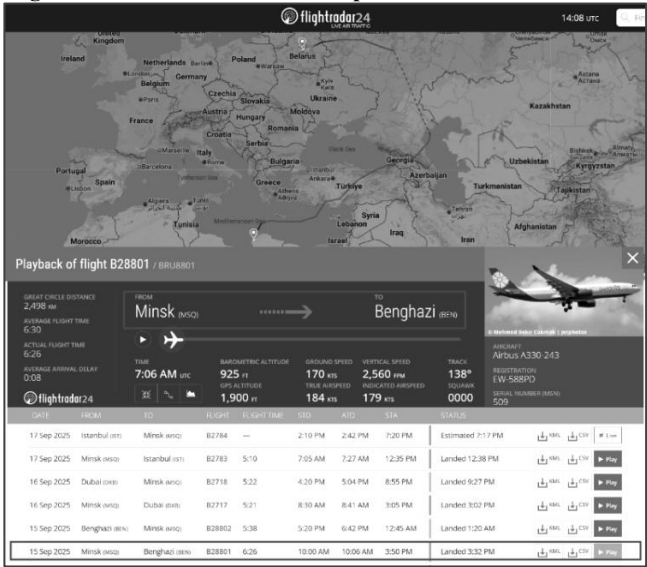
Figure 29.12
Elements of 87 battalion taking EW-588PD to Benghazi



Figure 29.13
Elements of 87 battalion taking EW-588PD to Benghazi



Figure 29.14
Flight data of EW-588PD on 15 September 2025



Developed by the Panel of Experts

Sources:

1. <https://www.lananews.com/ar/?p=442899>, 16 September 2025.
2. FlightRadar24.com

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations

⁴⁸⁸ Letter from Belarus on 24 November 2025.

⁴⁸⁹ LAAF'S statement in response to Panel's inquiry during its visit in November 2025.

Table 29.1

Flight activities of Belavia Airlines' aircraft from Minsk to Benghazi

Registration	Dates	Start of Route	End of Route	Flight Number	Status (local)
EW-455PA	19 Dec 2024	Minsk	Benghazi	B28801	Landed 14:43
	3 Feb 2025	Minsk	Benghazi	B28801	Landed 15:29
	10 Feb 2025	Minsk	Benghazi	B28801	Landed 16:29
	24 Feb 2025	Minsk	Benghazi	B28801	Landed 19:10
	8 May 2025	Minsk	Benghazi	B28801	Landed 20:01
	3 Sep 2025	Minsk	Benghazi	B28801	Landed 16:36
EW-456PA	13 Nov 2024	Minsk	Benghazi	B28801	Landed 13:32
	14 Jan 2025	Minsk	Benghazi	B28801	Landed 15:26
	16 Jan 2025	Minsk	Benghazi	B28801	Landed 15:00
	22 Jan 2025	Minsk	Benghazi	B28801	Landed 11:30
	6 Feb 2025	Minsk	Benghazi	B28801	Landed 12:27
	21 Apr 2025	Minsk	Benghazi	B28801	Landed 19:06
	19 May 2025	Minsk	Benghazi	B28801	Landed 20:45
EW-457PA	25 Feb 2025	Minsk	Benghazi	B28801	Landed 17:46
	27 Feb 2025	Minsk	Benghazi	B28801	Landed 13:37
	10 Mar 2025	Minsk	Benghazi	B28801	Landed 14:20
	7 Apr 2025	Minsk	Benghazi	B28801	Landed 15:25
	14 Apr 2025	Minsk	Benghazi	B28801	Landed 20:43
	17 Apr 2025	Minsk	Benghazi	B28801	Landed 18:37
EW-588PD	18 Jun 2025	Minsk	Benghazi	B28801	Landed 16:13
	20 Jun 2025	Minsk	Benghazi	B28801	Landed 16:53
	23 Jun 2025	Minsk	Benghazi	B28801	Landed 17:19
	28 Jun 2025	Minsk	Benghazi	B28801	Landed 15:07
	30 Jun 2025	Minsk	Benghazi	B28801	Landed 11:16
	4 Jul 2025	Minsk	Benghazi	B28801	Landed 16:20
	9 Jul 2025	Minsk	Benghazi	B28801	Landed 17:29
	21 Jul 2025	Minsk	Benghazi	B28801	Landed 16:23
	23 Jul 2025	Minsk	Benghazi	B28801	Landed 15:46
	4 Aug 2025	Minsk	Benghazi	B28801	Landed 15:57
	9 Aug 2025	Minsk	Benghazi	B28801	Landed 15:48
	11 Aug 2025	Minsk	Benghazi	B28801	Landed 15:27
	18 Aug 2025	Minsk	Benghazi	B28801	Landed 16:19
	1 Sep 2025	Minsk	Benghazi	B28801	Landed 15:36
	15 Sep 2025	Minsk	Benghazi	B28801	Landed 15:32
	20 Sep 2025	Minsk	Benghazi	B28801	Landed 15:32
	1 Oct 2025	Minsk	Benghazi	B28801	Landed 16:24
	13 Oct 2025	Minsk	Benghazi	B28801	Landed 16:11
	20 Oct 2025	Minsk	Benghazi	B28801	Landed 16:29
	10 Nov 2025	Minsk	Benghazi	B28801	Landed 17:35
	29 Dec 2025	Minsk	Benghazi	B28801	Landed 16:03

Source: flightradar24.com

Annex 30 Military training for GNU-AF by Italy

1. The Panel identified that the Bilateral Assistance and Support Mission in Libya (MIASIT)⁴⁹⁰ of the Ministry of Defence of Italy, conducted a training course of “military combat method”, which was completed on 26 December 2024, for 27 cadets at the Military Academy of Tripoli. Instructors from the Mobile Training Team of the Parachuting Training Centre and the 184th “Nembo” Command Unit of Italy carried out the trainings on the hand-to-hand combat techniques for Libyan participants.
2. The Panel requested further information from Italy and the Government of National Unity (GNU).⁴⁹¹ No reply was received. The “military combat method” training was of military nature. Thus, the provision of such training for Military Academy of Tripoli cadets constituted a violation of paragraph 9 of resolution 1970 (2011) by Italy.

Figure 30.1
Geolocation of the training⁴⁹²



Developed by the Panel of Experts

Google Earth. Image ©2025 Airbus. Imagery Date: 20 March 2025.

⁴⁹⁰ <https://www.difesa.it/operazionimilitari/op-intern-corso/libia-missione-bilaterale-di-supperto-e-assistenza/notizie-teatro/missione-in-libia-concluso-corso-basico-metodo-combattimento-militare/59826.html>.

⁴⁹¹ Panel's letters on 2 December 2025.

⁴⁹² Geocoordinates: 32°50'21.0"N 13°12'07.2"E.

Figure 30.2
Military combat method training



Figure 30.3
Training certificate awarding



Sources:

1. <https://www.difesa.it/operazionimilitari/op-intern-corso/libia-missione-bilaterale-di-supperto-e-assistenza/notizie-teatro/missione-in-libia-concluso-corso-basico-metodo-combattimento-militare/59826.html>; and
2. Google Earth Pro. Airbus © 2025, imagery date: 30 March 2025.

Annex 31 Military trainings

1. The Panel identified five incidents of military training provisions (table 30.1) that appeared on open sources but was not able to independently corroborate beyond geolocation or other means as of the time of writing, thus not reaching the evidentiary threshold to substantiate the conduct of these trainings (appendices A and B to the annex).

Table 31.1

Military trainings

<i>Date identified</i>	<i>Type of training support</i>	<i>Place</i>	<i>End User</i>	<i>Training Provider</i>
17 Sep 2025	Shooting trainings	Cairo	LAAF	Egypt
18 Dec 2024	Special forces training	Tripoli	GNU-AF	Türkiye
30 Apr 2025	Special operations in residential places, advanced level use of light weapons	Tripoli	GNU-AF	Türkiye
7 Aug 2025	Special operations tactics and techniques	Tripoli	GNU-AF	Türkiye
28 Aug 2025	Specialized security training	Tripoli	GNU-AF	Türkiye

Appendix 31.A: Training for LAAF by Egypt

1. The Panel identified that during the visit to the Egyptian Military Academy (EMA) of the chief of general staff of the Libyan Arab armed forces (LAAF), Khaled Haftar,⁴⁹³ elements of LAAF received trainings at the EMA, including shooting training.⁴⁹⁴ The Panel requested further information from Egypt and LAAF.⁴⁹⁵ No response was received from Egypt. LAAF stated that its forces received trainings by multiple Member States, including Egypt, without referring to any specific trainings.⁴⁹⁶
2. The trainings appeared in open sources, but the Panel was unable to independently corroborate beyond geolocation or other means as of the time of writing.

Figure 31.A.1
LAAF elements at EMA



Figure 31.A.2
Shooting training



⁴⁹³ 29°57'44.0"N 31°36'10.4"E.

⁴⁹⁴ <https://www.facebook.com/Libya.WID/posts/pfbid0Z5A7kWZM11Rx5HLBj3vmwzEkTeJcwVpUVxYR2LeZv15ErpL1G6fGE M9C5ZXLSCtcl>, 17 September 2025.

<https://x.com/Ibnwatanlibya/status/196800688523303798>, 17 September 2025.

⁴⁹⁵ Panel's letters on 1 October 2025.

⁴⁹⁶ LAAF'S statement in response to Panel's inquiry during its visit to Benghazi in November 2025.

Figure 31.A.3
Parade at EMA and the geolocation⁴⁹⁷



Developed by the Panel of Experts

Sources:

1. <https://www.facebook.com/Libya.WID/posts/pfbid0Z5A7kWZM11Rx5HLBj3vmwzEkTeJcwVpUVxYR2LeZv15ErpL1G6fGEM9C5ZXLSCtcl>, 17 September 2025.
2. <https://x.com/Ibnwatanlibya/status/1968006885233303798>, 17 September 2025.
3. Google Earth Pro. © Airbus 2025, imagery date 30 March 2025.

⁴⁹⁷ Geocoordinates: 29°57'44.8"N 31°36'10.4"E.

Appendix 31.B: Training for GNU-AF by Türkiye

1. The Panel identified from open sources that Türkiye provided four trainings for Government of National Unity affiliated forces (GNU-AF), in cooperation with the Libyan Specialized Training Institute for Security Operations at the Institute's training centre⁴⁹⁸ and the Falcon Nest training centre, Tripoli.⁴⁹⁹ The trainings included a special forces training course completed on 18 December 2024,⁵⁰⁰ two training courses on "special operations in residential places" and "advanced level use of light weapons for superiority" completed on 30 April 2025,⁵⁰¹ a training course on "special operations tactics and techniques" completed on 7 August 2025,⁵⁰² and specialized security training courses completed on 28 August 2025.⁵⁰³

2. The Panel requested further information from Türkiye and the GNU.⁵⁰⁴ Türkiye responded that: a) Türkiye has been undertaking assistance and advisory efforts in Libya in the fields of training, demining and disposal of improvised explosive devices (IEDs) as well as humanitarian aid and assistance in the health sector; b) these activities were conducted in line with the requests received from the Libyan Government, based on the legitimate Memoranda of Understanding which have been "duly signed and implemented in accordance with international law"; c) the support and consultancy activities were designed to assist the formation of a unified regular army and to help increase the capacity of the Libyan Armed Forces to combat terrorist organizations, especially "Daesh" and to prevent irregular migration; and d) the assistance and advisory activities that are conducted by Türkiye upon the request of Libyan authorities within the framework of Memoranda of Understanding signed between two sides in accordance with law and also aim to combat irregular migration and human smuggling in an effective and humane manner.⁵⁰⁵ GNU did not respond.

3. The trainings appeared on open sources, but the Panel was unable to independently corroborate beyond geolocation or other means as of the time of writing.

Figure 31.B.1

Special forces training on 18 December 2024



Figure 31.B.2

Special forces training on 18 December 2024



⁴⁹⁸ 32° 52' 32" N 13° 23' 27" E.

⁴⁹⁹ 32° 40' 09" N 14° 04' 08" E.

⁵⁰⁰ https://www.facebook.com/permalink.php?story_fbid=pfbid025AixL46qz6qMhiZXto6JQJ3ConVwgDr9Y2RSckgeTJSVFN5jvcQFTm9SnaJm3RoXl&id=100077311147392, 19 December 2024.

⁵⁰¹ https://www.facebook.com/permalink.php?story_fbid=pfbid02JMbzpuXbr3ta52ptZSGFLw1DezzJ3Q6ypFK6N55A3w7UL6ppojoHEHrWhLxgD8A4l&id=100077311147392, 30 April 2025.

⁵⁰² https://www.facebook.com/permalink.php?story_fbid=pfbid0hUySdiaZerULhkZNjzyFzZZLuJtTotFz7WfwDtjjKpDnNgj9X49v6nXVEdPqV7nXl&id=100077311147392, 7 August 2025.

⁵⁰³ https://www.facebook.com/permalink.php?story_fbid=pfbid0axq9dfByVuWRMq61iXXuseX31W1FKq4s3bSsaLwwukrTwwHaE8tpjHepFx4CYGE9l&id=100077311147392, 29 August 2025.

⁵⁰⁴ Panel's letters on 2 December 2025.

⁵⁰⁵ Letter from Türkiye dated 12 December 2025.

Figure 31.B.3
Special forces training on 18 December 2024



Figure 31.B.4
Geolocation of the training site



Figure 31.B.5
Light weapons training on 30 April 2025



Figure 31.B.6
Special operations training on 30 April 2025



Figure 31.B.7
Light weapons training on 30 April 2025



Figure 31.B.8
Geolocation of the training site



Figure 31.B.9

Special operations training on 7 August 2025

Figure 31.B.11

Special operations training on 7 August 2025

Figure 31.B.10

Special operations training on 7 August 2025

Figure 31.B.12

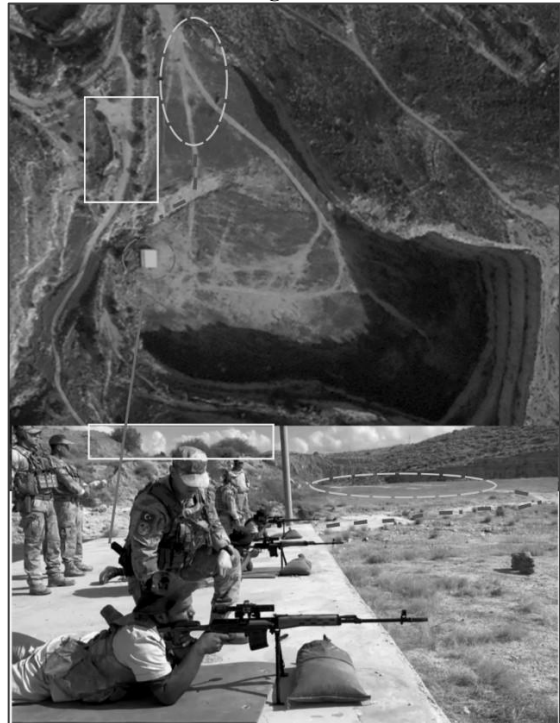
Geolocation of the training

Figure 31.B.13
Specialized security training on 28 August 2025



Figure 31.B.15
Specialized security training on 28 August 2025

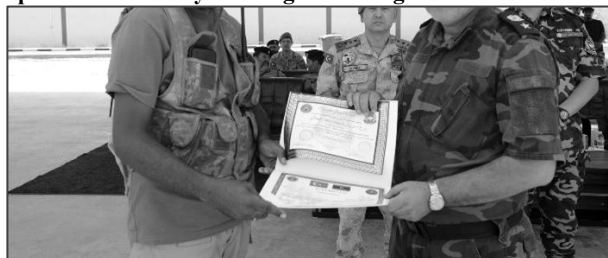


Figure 31.B.14
Specialized security training on 28 August 2025



Figure 31.B.16
Geolocation of the training site



Google Earth™ maps annotated by the Panel of Experts

Sources:

1. <https://www.facebook.com/profile.php?id=100077311147392>
2. Google Earth Pro. © 2025 Airbus, Maxar Technologies, imagery date 30 July 2023.
3. Planet Labs

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 32 Egyptian military flight assistance for LAAF

1. The Panel identified from an open-source flight-tracking platform⁵⁰⁶ that two Egyptian C-130 military transport aircraft (registrations of SU-BAD and SU-BEY) and two C295 military transport aircraft (registrations of SU-BTG and SU-BTL) conducted flights from Benghazi in an eastern direction on 27 May 2025 (figures 32.1 to 32.4). Information about the preceding flights of these aircraft to Libya was unknown to the Panel. The Panel further identified from open sources, including social media accounts of the “general command of the Libyan Arab armed forces” (LAAF),⁵⁰⁷ the “chief of staff of the security forces”,⁵⁰⁸ the “Libyan army media division”,⁵⁰⁹ and Almasar TV,⁵¹⁰ that two C-130 military transport aircraft and two C295 military transport aircraft provided flights for LAAF’s paratroopers during the military parade held by the LAAF on 26 May 2025, marking the 11th anniversary of Operation Al-Karama (Dignity) at the “military city”,⁵¹¹ southwest of Benghazi. These aircraft, although their national flags and serial numbers on the tails and fuselages have been overpainted or covered, bore features of the above-mentioned Egyptian military transport aircraft (registrations of SU-BAD, SU-BEY, SU-BTG and SU-BTL), with one C-130 aircraft’s registration visually recognised as SU-BEY (figures 32.5 to 32.8).
2. The Panel requested further information from Egypt and LAAF. Egypt responded that: a) its four military transport aircraft participated, upon the request of LAAF, in transporting and training its paratroopers during the parade; b) the four aircraft did not participate in other activities; and c) the air route was confined between East Cairo airbase and Benghazi.⁵¹² LAAF’s response was reflected in paragraphs 7 and 9 of Annex 24 of this report.
3. Providing transportation with military aircraft for LAAF’s paratroopers during its military parade constituted a violation of paragraph 9 of resolution 1970 (2011) by Egypt.

⁵⁰⁶ flightradar24.com

⁵⁰⁷ <https://www.facebook.com/General.official.leadership/posts/pfbid02Y6r6GEBYV3eyo2JeK96W4rdywRmCTeiq9NwrzX6RShYQFipMjUXat3hC8doCtKLDI>, 26 May 2025;

⁵⁰⁸ https://www.facebook.com/permalink.php?story_fbid=pfbid0y5JTSS8atBaJDjcpLfk1huNQPP4uBgA54a9LX8QJpb9zBFmb9AwQicTvcLy5Jzg7l&id=100095331095690, 26 May 2025;

⁵⁰⁹ <https://www.facebook.com/Libya.WID/posts/pfbid032s97zBWkFu82HbCV9ctSeJibmyjgnzX4kNuayEP4mVYzrbJ55CvaTnD47QLqWrNUl>, 26 May 2025;

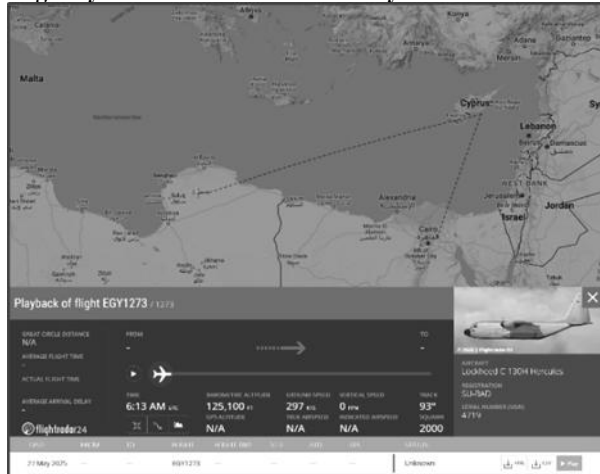
<https://www.facebook.com/Libya.WID/videos/576957125027547>, 26 May 2025; and

⁵¹⁰ <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.

⁵¹¹ Geocoordinates: 31°32'37.3560"N, 20°00'43.2720"E.

⁵¹² Letter from Egypt on 25 August 2025.

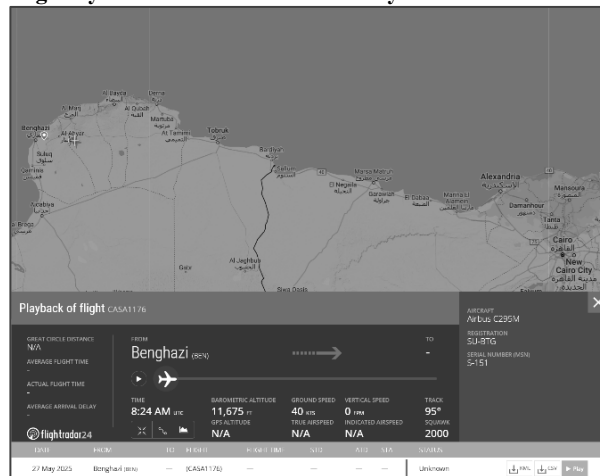
Figure 32.1

Flight by Aircraft SU-BAD on 27 May 2025

Source: Flightradar24.com.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 32.3

Flight by Aircraft SU-BTG on 27 May 2025

Source: Flightradar24.com.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 32.2

Flight by Aircraft SU-BEY on 27 May 2025

Source: Flightradar24.com.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 32.4

Flight by Aircraft SU-BTL on 27 May 2025

Source: Flightradar24.com.

Disclaimer: The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Figure 32.5

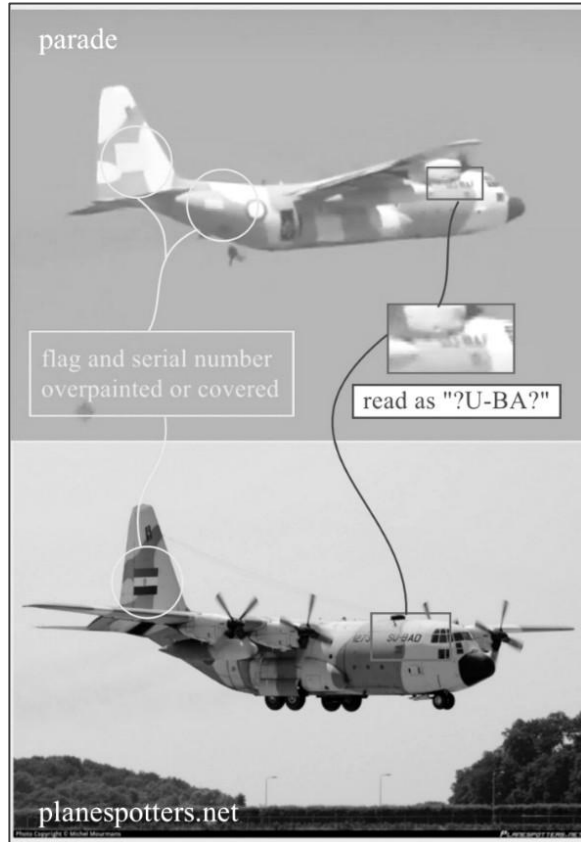
Aircraft SU-BAD

Figure 32.6

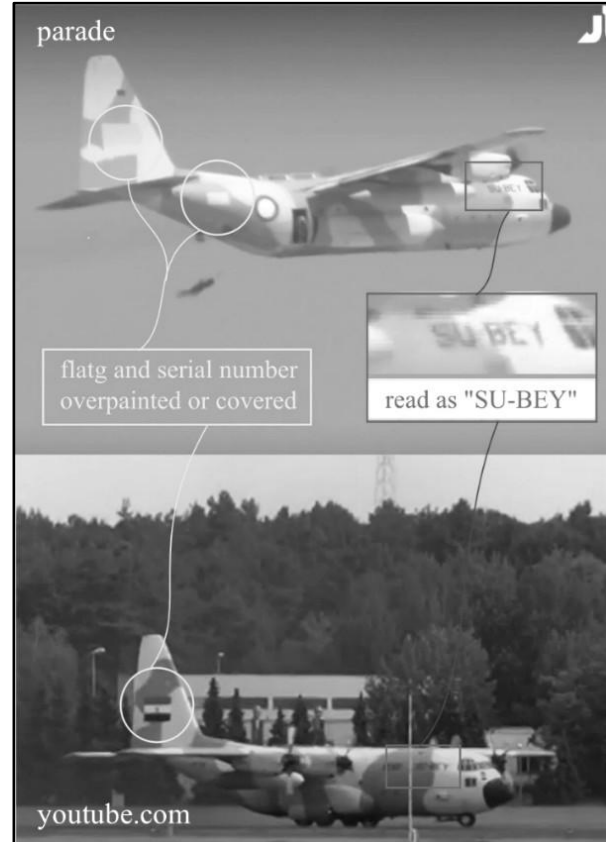
Aircraft SU-BEY

Figure 32.7

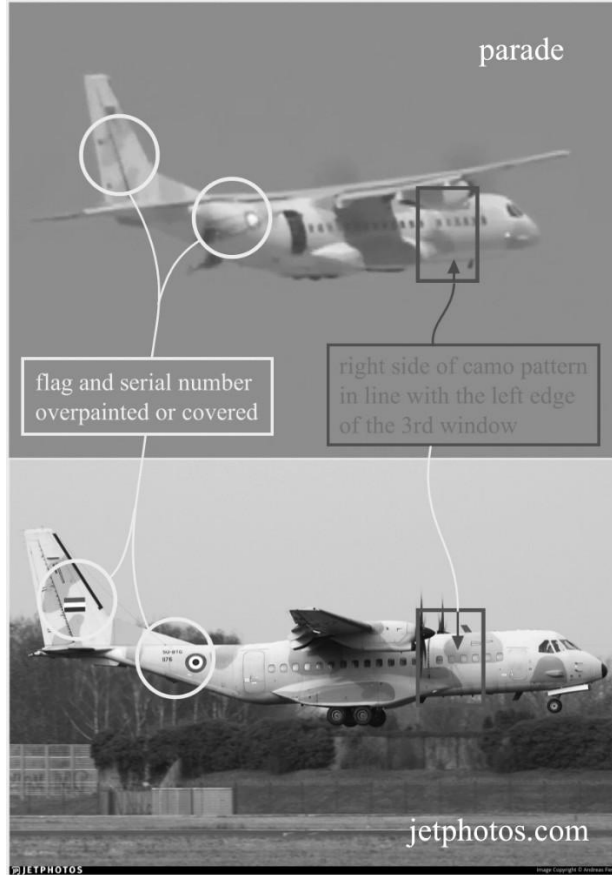
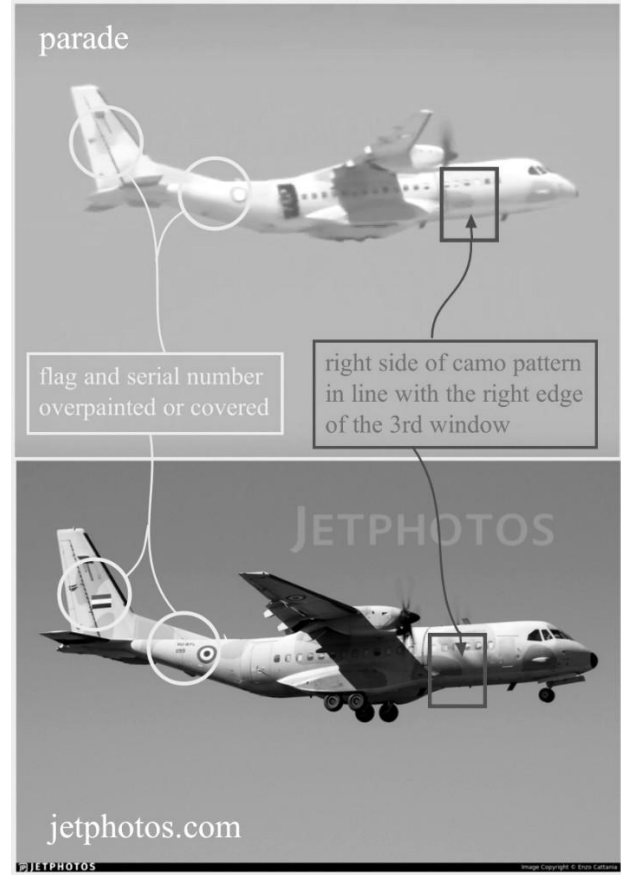
Aircraft SU-BTG

Figure 32.8

Aircraft SU-BTL

Developed by Panel of Experts

Sources:

1. <https://www.facebook.com/AlMasarTV/videos/23986329850959896>, 26 May 2025.
2. <https://www.planespotters.net/photo/398345/su-bad-egyptian-air-force-lockheed-c-130h-hercules-l-382>.
3. <https://www.youtube.com/watch?v=IhNZK6rrZyY>, at 4:54 21 January 2024.
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5. <https://www.jetphotos.com/photo/11082142>.
6. [flightradar24.com](https://www.flightradar24.com)

Annex 33 Interdiction of TBZ vessels by Spain

A. Overview

1. On 27 August 2025, Spain intercepted the MV Lila Mumbai (IMO 9253143),⁵¹³ carrying 10 vessels, as she was approaching Ceuta for provisioning. The vessel was en route from Port Rashid, United Arab Emirates (UAE), where she loaded the vessels and departed from on 14 July 2025. The Spanish authorities offloaded the 10 vessels onboard the MV Lila Mumbai in the port of Algeciras (table 33.1 and appendix 33.A, figure 33.A.1).

2. The Spanish authorities granted the Panel access to those vessels on 6 November 2025 for an inspection. The Panel found that they consisted of a) two 36-metres Grandweld TBZ fast patrol vessels (FPV) of the same make and model that were already transferred to Libya (annex. 21); b) six 15-metres 2020 Volume fast interceptor craft (FIC) with gun mounts, and c) two 17-metres 2020 Volume fast landing craft (FLC). The FIC and FLC were in different stages of completion.

3. The Panel found that Amro Ibrahim's network, that was responsible for the transfer of 23 vessels to Benghazi, was also responsible for this attempted transfer (annex 21).

Table 33.1
Vessels intercepted en route to Benghazi

<i>Amount</i>	<i>Name or hull number</i>	<i>IMO/MMSI number</i>	<i>Length</i>	<i>Vessel type</i>	<i>Producer, seller or marketer, point of origin</i>
1	TBZ17	1089144	38m	FPV	Grandweld Shipyards, UAE
1	TBZ18	1089156	38m		
6	#8-i1516GR, #10-i1516GR, #18-i1516GR, #19-i1516GR, #20-i1516GR, #21-i1516GR	n/a	15m	FIC	2020 Volume by Asha Co, UAE
2	1612#3, 1612#4	n/a	17m	FLC	

B. Grandweld vessels

1. Overview

4. The two TBZ FPVs were built by Dubai-based Grandweld Shipyards (a branch of Atos International LLC) in Dubai Maritime City (UAE),⁵¹⁴ Port Rashid Mubarak Group Shipyard (AEPR).A).

5. With all circumstantial evidence considered, the Panel found that Grandweld Shipyards was wilfully negligent in its due diligence obligations vis-a-vis the end-user and the intended destination of the ten vessels.

2. Involved parties

6. As per cargo documentation reviewed by the Panel, the cargo destined to Benghazi consisted of two 38-metres work boats titled TBZ 17 and TBZ 18 (12.5 tons each), six 15-metres vessels titled Interceptor (6 tons each) and two 17-metres landing craft titled as such (11 tons each).

7. The shipper was Omar Mustafa's II Solution FZE (UAE) (see annex XX). The vessel named TBZ17 and TBZ18 were included in the cargo description. The consignee was Danube Shipping Company (Benghazi). For both, see also annexes 21 and 35). Omar Mustafa represented II Solutions FZE in the organization of this transport. Omar Mustafa's Multham International Limited (Hong Kong, China) commissioned the construction of the two Grandweld TBZ vessels and registered them under the Saint Kitts and Nevis flag. Saint Kitts and Nevis terminated the registration in late July 2025. The

⁵¹³ Flag: Liberia.

⁵¹⁴ 25°15'55.9"N, 55°15'47.0"E.

company also was the owner, manager and operator of the TBZ vessels. Before the transfer of ownership to Multham of TBZ17 and TBZ18, both were briefly owned, managed and operated by 2020 Volume Boats Maintenance & Repairing FZE (UAE), Amro Ibrahim's company.

8. The Panel identified a) AAL Shipping GmbH & Co. KG (Germany) as the time charterer of the vessel, and thus the responsible carrier; and b) Cigisped Middle East FZE (UAE) as the deck space charterer, and thus the responsible voyage charter party.

9. AAL Shipping responded to the Panel that a) it had a long-standing business relationship with the deck space charterer; b) it screened the involved parties against sanctions lists; c) it recognized that their compliance policies had proven to be insufficient; and d) it took concrete steps to improve its due diligence.⁵¹⁵

10. The Panel assessed that a) neither reputation nor long-standing business relationships would guarantee sanctions compliance by business partners; and b) screening against sanctions lists was insufficient, as restrictive measures like arms embargoes were not contained in lists of individuals and entities under sanctions.

11. Cigisped Middle East FZE, without providing any supporting documentation, informed the Panel that a) it assumed the role of deck space charterer only and was not the charterer of the MV Lila Mumbai; b) it acted as freight forwarder procuring the deck space for the transport of the vessels from Port Rashid to Benghazi; c) it was not provided with technical drawings that would have allowed them to identify the vessels as military equipment; d) it was not involved in the export procedure; e) in hindsight and in light of the Panel's findings, it "recognised that certain vessel characteristics may warrant enhanced scrutiny when Libya is the destination"; and e) it took concrete steps to improve its due diligence.⁵¹⁶

12. The Panel assessed that for above points a) and b), a deck space charterer bore responsibility for the transported cargo that goes beyond ensuring safe cargo transportation and includes sanctions compliance; c) the relevant cargo documentation identified the vessels' names starting with "TBZ" and others as "interceptor", which were clear indicators for military end-users in the context of Libya, referring to LAAF's TBZ brigade; and d) export clearances bore no relevance on individual due diligence by each concerned party.

13. The Panel assessed that the enhanced due diligence responsibilities emanating from transports into a country under a UN arms embargo apply collectively to all parties that have operational control, even if only about a part of the transfer. This applies to the charterer and carrier alike, particularly in cases where the operational control remains with the latter. Together with other parties involved in maritime transport, such as deck space charterers or freight loaders, all parties carry collective responsibility for ensuring sanctions compliance.

3. Grandweld 38-metres TBZ fast patrol vessels

14. The Panel identified the two 38-metres vessels as the MV TBZ17 (IMO 1089144) and the MV TBZ18 (IMO 1089156) aluminium-hulled vessels produced by Grandweld Shipyard in the UAE. Both vessels were naval grey.

15. The Panel found that the vessels' design, structure, propulsion, manoeuvrability, configuration, including force commander cabin, armoury and fast-launch auxiliary vessel ramp, as well as the onboard equipment, including (unmounted but pre-wired) police lights and sirens, tactical bridge lighting, communications suite, and navigational equipment classify them as fast patrol vessels (FPV) intended for specialized official roles, such as maritime law enforcement, border patrol, or military use.

16. The vessels had a protruding platform under the bridge in the bow section that was structurally reinforced in a manner that it could support the mounting of a variety of small and medium calibre weaponry, realistically up to a 40mm cannon. That platform is in the same place as where a model of the FPV TBZ13 (IMO 1089106) had its gun mounted; that same model was displayed at the Grandweld stand at NAVDEX Dubai, February 2025 (annex 21, appendix 21.C).

17. The auxiliary vessels, one mounted on each of the TBZ vessels' fast-launch ramps, were two-outboard 6.5-metres rigid-hulled inflatable boats (RHIBs), identified by the Panel as pertaining to the workboat line of a UAE-based producer, without any military modifications. The Panel assessed that that producer had sold the two RHIBs to Grandweld Shipyards and was unaware of their export to Libya.

⁵¹⁵ Meeting with AAL Shipping, 3 November 2025.

⁵¹⁶ Communication from Cigisped Middle East, 20 January 2026.

18. The FPV TBZ17 had signs of previous waterborne activities evidenced by marine growth on its lower hull; this was evidenced by a navigational report examined by the Panel during the inspection.

19. Onboard the FPV TBZ18, the Panel also observed technical documentation relating to the two TBZ FPVs and to several FPVs of the same type delivered to Libya in 2025 (appendix 33.A and annex 21).

20. For inspection images of the FPVs TBZ17 and TBZ18 see appendix 33.A.

C. 2020 Volume Boats FICs and FLCs

1. Fast interceptor craft

21. The Panel identified the six interceptor vessels as 15-metres quad-outboard, stepped-hull design aluminium fast interceptor craft (FIC). The vessels were naval grey.

22. The vessels were in various stages of completion, from fully finished (one vessel) to 20 to 40 percent built completion. The unfinished vessels contained many boxes with boat building material including spare parts, navigation and communication equipment, other vessel furnishing and used power tools.

23. The Panel assessed that the interceptor vessels were high-speed vessels intended for specialized official roles, such as maritime law enforcement, border patrol, or military use. The assessment was based on their design, structure, propulsion, manoeuvrability, seating structure and configuration, as well as onboard equipment, including police light and siren switches, communications suite, and navigational equipment. Each vessel also had two pedestal gun mounts soldered to their aft section, which were also identified as gun mounts in documentation onboard one the vessels examined by the Panel.

24. The Panel established that the FICs were marketed as Interceptor by “2020 Volume Boats by Asha Co”, Amro Ibrahim’s company. 2020 Volume Boats Maintenance & Repairing FZE (UAE) was not registered as a shipyard and used a local shipyard to produce the two types of vessels it marketed. With all circumstantial evidence considered, the Panel assessed that Grandweld Shipyards was the producer of the FICs.

25. For inspection images of the 2020 Volume FICs, see appendix 33.A.

2. Fast landing craft

26. The Panel identified the two 17-metres landing craft as aluminium-hulled fast landing craft (FLC), marketed by Amro Ibrahim’s “2020 Volume Boats by Asha Co”.

27. The two FLCs were at 40 percent and 70 percent stages of completion; particularly, their bridge sections were mostly unfinished. Their hull sections were naval grey, whilst their bridge sections white. Both vessels contained large numbers of boxes containing boat building material including spare parts, navigation and communication equipment, other vessel furnishing and used power tools. One landing craft also contained a mould frame to produce fibre glass boats. With all circumstantial evidence considered, the Panel assessed that Grandweld Shipyards was the producer of the FLCs.

28. For inspection images of the 2020 Volume FLCs, see appendix 33.A.

3. Response by Amro Ibrahim

29. In response to the Panel’s opportunity to reply, Amro Ibrahim, representing Asha Co. a) asserted the civilian nature of both the FICs and the FLCs; b) provided schematic drawings of the vessels; and c) quoted regulatory oversight by the UAE authorities. The Panel found the statements made and documentation provided to be contradictory to evidence gathered by the Panel, including during the inspection of the vessels. The drawings of the interceptor model shared by Amro Ibrahim did not correspond to the models inspected by the Panel; during the inspection, the Panel observed weapon mounts and corollary documentation issued by Asha Co. Owing to the large amount of evidence gathered, and taking all circumstantial evidence into consideration, the Panel found Amro Ibrahim’s statements not credible.

D. Panel assessment

30. The Panel assessed the FPV TBZ17, the FPV TBZ18 and the six FICs as naval-type vessels and thus military equipment, whose delivery to Benghazi would have fallen within the scope of paragraph 9 of resolution 1970 (2011).

31. The Panel assessed that while the two FLCs may also have a civilian application, their design and the context qualifies them as military equipment; their design, color and relatively low cargo capacity in terms of weight indicate an intended use for platoon-size fast transport and landing rather than the transport of heavy equipment for uses such as disaster response. Given that the two FLCs were part of the same cargo as the naval-type vessels, with the same shipper and consignee, both of which have been identified by the Panel in several arms embargo violations and attempted arms embargo violations, the Panel assessed that their intended end-user was the LAAF. Thus, the Panel classified the two FLCs as military equipment whose delivery to Benghazi would have fallen within the scope of paragraph 9 of resolution 1970 (2011).

32. Lastly, the Panel assessed that, owing to the different stages of completion of the FICs and FLCs, the network of Amro Ibrahim and Omar Mustafa either already possessed a shipbuilding workshop in Libya, or was in the process of creating such a workshop.

Appendix 33.A: Imagery of intercepted vessels

Figure 33.A.1

Overview of cargo inspected by the Panel, consisting of two fast patrol vessels (FPV), six fast interceptor craft (FIC) and two landing craft in various stages of completion



Source: Panel of Experts

Figure 33.A.2

Grandweld FPV TBZ18 (IMO 1089156)



Source: Panel of Experts

Figure 33.A.3

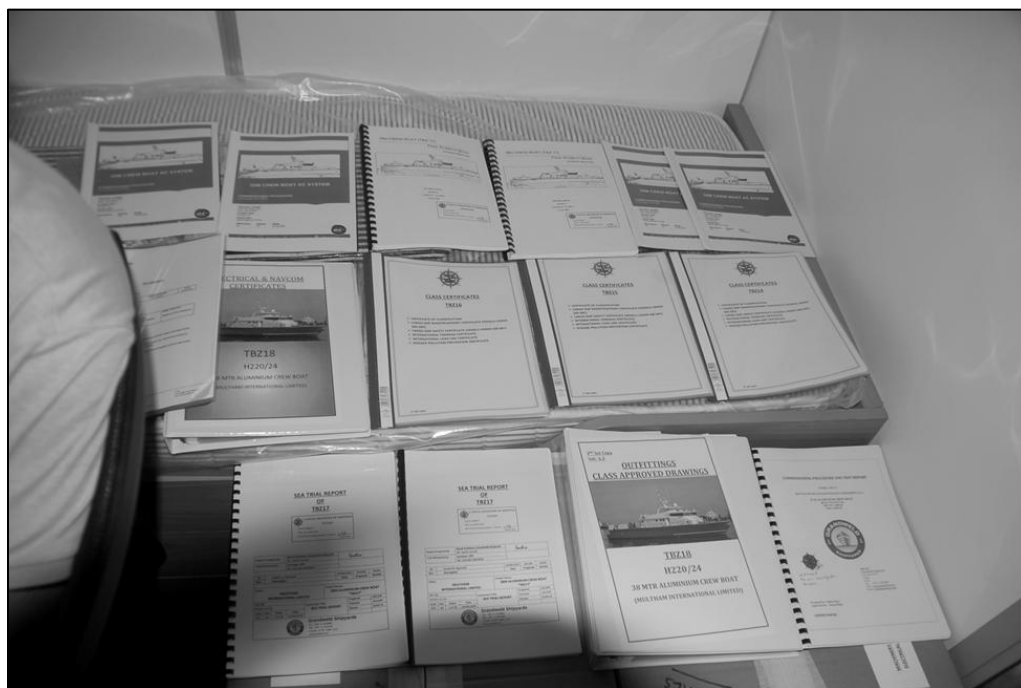
Imagery taken onboard FPV TBZ18 (IMO 1089156) showing an armoury, gun rack, a force commander cabin sign and police lights



Source: Panel of Experts

Figure 33.A.4

Documentation observed onboard Grandweld FPV TBZ18 (IMO 1089156) relating to FPVs TBZ14, TBZ15 and TBZ16, TBZ17 and TBZ18



Source: Panel of Experts

Figure 33.A.5

One of six 2020 Volume Boats FIC with stepped hull design visible under tarpaulin



Source: Panel of Experts

Figure 33.A.6

Cockpit of 2020 Volume FIC in finished condition (left); one of two aft section gun mounts (centre); interior of FIC in unfinished condition (right)



Source: Panel of Experts

Figure 33.A.7

Documentation observed onboard one 2020 Volume FIC showing its designation as Interceptor Patrol Boat and two designated weapon mounts



Source: Panel of Experts

Figure 33.A.8

One of two FLC



Annex 34 Seizure of materiel by Spain

Table 34.1

Materiel destined for Benghazi, seized by Spain

<i>Date of seizure</i>	<i>Amount</i>	<i>Type of materiel</i>	<i>Intended mode of transport</i>
May 2023	80	Thermal scopes	Maritime transport via container
	>100	Holographic sights	
	50	Picatinny rails	
May 2023	>350	Ballistic helmets	Maritime transport via container
	>100	Holographic sights	
	450	Picatinny rails	
	200	Military uniforms	
	400	Medical backpacks for combat medics	
Oct 2023	3	UAVs and one ground station	Private plane
Dec 2023	1	UAV	Private plane, via France

Annex 35 Fei Long-1 (FL-1) uncrewed aerial vehicle (UAV)

A. Overview

1. On 18 and 28 June 2024, respectively, the vessels MSC Arina (IMO: 9839284) and MSC Apolline (IMO: 9896983) arrived at Gioia Tauro port, Italy, following which the Italian authorities seized containers destined to Benghazi holding concealed and mis-declared components of what the Panel identified as relating to two Fei Long-1 (FL-1) medium-altitude long endurance (MALE) uncrewed aerial vehicles (UAV). The Panel examined the content of six containers in May 2025.

B. Fei Long (FL-1) UAV

1. Containers

2. On 20 and 21 May 2025, the Italian authorities provided access to the Panel to six containers in the port of Gioia Tauro, which had been seized there in June 2024. The Panel observed that the components were in six 40-foot shipping containers, some together with fake plywood wind turbine blades (table 35.1).

Table 35.1

Containers examined by the Panel

<i>Container number^a</i>	<i>Content</i>	<i>Transported by</i>
MSDU5870446	(1) FL-1 UAV fuselage	MSC Arina (IMO: 9839284)
MSDU6752406	(1) FL-1 UAV fuselage	MSC Arina (IMO: 9839284)
CAAU5613236	(1) FL-1 UAV wing, FL-1 (1) UAV V-tail surface (2) fake wind turbine blades	MSC Apolline (IMO: 9896983)
MEDU4500901	(1) FL-1 UAV wing, FL-1 (1) UAV V-tail surface (2) fake wind turbine blades	MSC Apolline (IMO: 9896983)
TGBU5535628	(1) FL-1 UAV wing, FL-1 (1) UAV V-tail surface (2) fake wind turbine blades	MSC Apolline (IMO: 9896983)
TGBU5589481	(1) FL-1 UAV wing, FL-1 (1) UAV V-tail surface (2) fake wind turbine blades	MSC Apolline (IMO: 9896983)

^a Source: Confidential.

2. Fuselages

3. The Panel observed two fuselages, which it found to be consistent with the design features and dimensions of those of the FL-1 UAV. The fuselages had been fully wrapped with white vinyl; one also had additional bubble wrap around it. The nose and tail sections had plywood covers, also wrapped with white vinyl. On one of the two fuselages, the vinyl had been partially removed. The fuselage with the fully intact vinyl and its covers had inscriptions in Chinese and English language suggesting that they were wind power generators, including “The Wind moves the world, the energy-saving world”, “Electricity – Keep away” and “Wind power maintenance hatch” (figure 35.1).

4. Under the white vinyl, the fuselages were military gray. The fuselages had no signs of wear and were primed with cabling and hydraulics. The nose section of one of the fuselages contained some carbon plating on the inside. Each fuselage had three fuel tanks mounted in their centre sections. Under the fuel tanks were some oil stains, suggesting previous use or testing. The fuselages missed several components: a) the engine; b) engine bay covers and cowlings; c) the wing root fairings; d) the landing gear; and e) the top and bottom covers of their nose sections that house aviation and electronic components (figures 35.2 and 35.3).

5. Both fuselages had serial numbers in various places starting with “FL1-xx” (figure 35.6).

3. Wings and V-tail surfaces

6. The Panel observed two left and two right wings, and two V-tail surfaces, all of which it found to be consistent with the design features and dimensions of those of the FL-1 UAV. The wings were each had two fake plywood/fiber-glass turbine blades on either side. One set of wings and V-tail surfaces were fully covered in bubble wrap; on others the bubble wrap had been mostly removed. (figure 35.4).

7. The wings and V-tail surfaces had no vinyl wrapping and were military grey. The wings had three multiple-pin and one single pin connector each, consistent with connectors at the wing mounting points of the fuselages. The V-tail surfaces had one multiple-pin connector. Each wing had twelve cabled hardpoints for the attachment of a total of three pylons per wing (figure 35.5).

8. The wings and V-tail surfaces had serial numbers in various places starting with “FL1-xx” (figure 35.6).

4. Panel assessment

9. The Panel found that the components examined were consistent in design and dimensions with the Fei Long-1 (Flying Dragon-1 or FL-1) medium-altitude long-endurance uncrewed aerial vehicles (MALE UAV), as advertised by Zhong Tian Guide Control Technology Company (ZT Guide) (China).⁵¹⁷ Serial numbers visible on fuselages, wings and V-tail surfaces also identified them as belonging to an FL-1 UAV.

10. The Panel assessed that owing to the multi-role platform capabilities of the FL-1, including the possibility to attach pylons for payload mounting, the FL-1 would be considered military equipment in the context of paragraph 9 of resolution 1970 (2011). Therefore, the Panel assessed the FL-1 components as spare parts under the same paragraph, whose delivery to Benghazi would have fallen within the scope of paragraph 9 of resolution 1970 (2011).

C. Shipper and consignee

11. Cargo documentation⁵¹⁸ showed that the six containers in which the UAV components were discovered had been loaded in the port of Qingdao, China (CNQIN). Container numbers MSDU5870446 and MSDU6752406 had been loaded aboard the *MSC Arina* on 8 April 2024 in Qingdao, under bill of lading number MEDUQR400761. Container numbers CAAU5613236, MEDU4500901, TGBU5535628, TGBU5589481 had been loaded aboard the *MSC Arina* on 8 April 2024 in Qingdao port and then transloaded aboard the *MSC Apolline* on 27 April 2024 in Ningbo port, China. After Qingdao, the *MSC Arina* made a port call in the Republic of Korea and another five port calls in China (including Ningbo, where four containers were transloaded to the *MSC Apolline*), one in Singapore and two in Spain. After Ningbo, *MSC Apolline* made port calls in Singapore and Morocco. Container tracking showed that none of the containers had been transloaded in other locations before arriving in Gioia Tauro port, Italy.

12. The UAV components had been declared as turbine blades and wind power equipment accessories in the cargo documentation. The customs declaration for the export of goods also showed that the items were mis-declared as 12 packages of wind turbine blades to the Chinese authorities.

13. The Panel identified Xinchang Midou Trading Co. Ltd (China) as the shipper for all six containers. The Panel also identified the involvement of Amro Ibrahim’s network (annexes 21 and 34): Omar Mustafa’s Emirati phone number⁵¹⁹ and his II Solution FZE (UAE) email address⁵²⁰ were provided as contact details for the consignee and notify party for all six containers, which was “Danube Shipping Co.” in Benghazi. That consignee is the same entity in Benghazi that the Panel identified as consignee of several vessels, including naval-type vessels, to Libya.⁵²¹

⁵¹⁷ <https://www.janes.com/osint-insights/defence-news/chinas-fl-1-male-uav-performs-maiden-flight>, 22 January 2019; <https://www.militarydrones.org.cn/fei-long-1-uav-china-price-manufacturer-p00126p1.html> (undated).

⁵¹⁸ Source: confidential.

⁵¹⁹ +971524139061.

⁵²⁰ omar.mustafa@iisolutions.co.

⁵²¹ Transfer of boats by 2020 Volume Boats Maintenance & Repairing LLC (UAE), para. 33 and Annex 24 of this report; and S/2024/914, para. 69 and annex 32, Section C.

Figure 35.1
Fuselage in vinyl wrapping with references to wind power generation equipment



Source: Panel of Experts.

Figure 35.2
Fuselage with vinyl wrapping mostly removed



Source: Panel of Experts.

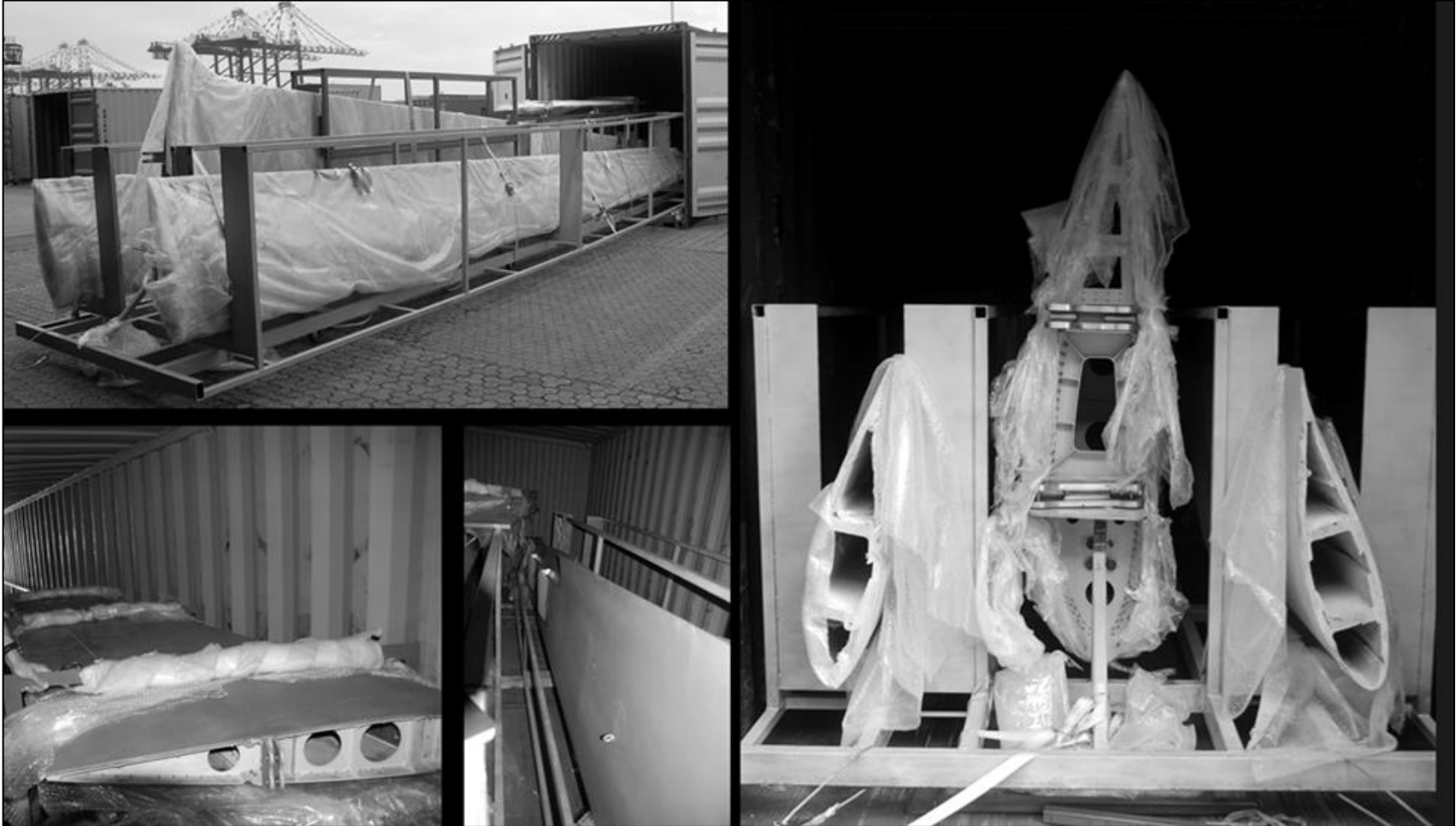
Figure 35.3

Fuselage: nose section missing top and bottom sections (top left); rear section with cabling and hydraulics (top right); cabling in nose section (bottom left); fuel tanks (bottom right)



Source: Panel of Experts.

Figure 35.4
Wings sided by fake plywood/fiber-glass wind turbine blades and V-tail surfaces



Source: Panel of Experts.

Figure 35.5
Wing cable connectors (top left); hard points for pylons with cabling



Source: Panel of Experts.

Figure 35.6
Sample of serial numbers observed on examined components



Source: Panel of Experts.

Annex 36 Updates to previously reported maritime transfer violations

A. MV BBC Alaska (IMO 9453793)

1. The Panel previously reported transfers of naval-type vessels by the MV BBC Alaska (IMO 9453793) from Port Rashid, UAE, to Benghazi in March 2024.⁵²² The Panel identified several individuals and entities as responsible for these transfers in violation of paragraph 9 of resolution 1970 (2011). One of these entities was BBC Chartering GmbH & Co. KG (Germany), which the Panel, by way of a typographical error, named as the “charterer” of the MV BBC Alaska. In fact, BBC Chartering GmbH & Co. KG is the vessel’s operator.

2. On 23 December 2025, BBC Chartering responded to the Panel’s letter dated 9 July 2024, in relation to the transfer. The points conveyed in that letter and the Panel’s assessment thereof are the same as laid out above (annex 21, section B, subsection 3) and relate to a different transfer by another vessel (MV BBC Rheiderland) that the company operates. Owing to the circumstances of the transfer onboard the MV BBC Alaska, the Panel’s finding regarding the company’s responsibility remains unchanged.

3. The Panel newly identified the deck space charterer of that voyage, Peters & May Ltd (United Kingdom). The Panel found Peters & May in violation of paragraph 9 of resolution 1970 (2011) for having procured the deck space for the transport of the Interceptor vessel to Libya in January 2024. Peters & May Ltd did not respond to the Panel’s letter dated 26 December 2026.

⁵²² [S/2024/914](#), para. 69 and annex 32, section C.

**Annex 37 New identifying information of Quren Salih Quren Al-Qadhafi (LYi.004) and
Hannibal Muammar Qadhafi (LYi.010) [CONFIDENTIAL]**
