Management of Material of War

For the purpose of the International Code of Conduct for Private Security Providers (ICoC or "the Code"), the term '**material of war'** encompasses hazardous material such as munitions and explosives or other energetic material. For most PSCs, holding of such hazardous items tends to be limited to small arms cartridges (e.g. ball) and possibly pyrotechnics such as flares, signals, incendiary or illuminating ammunition, and other smoke and tear-effect devices. The Indicators developed in this document mainly relate to this limited **possession of hazardous material**. In exceptional cases where PSCs hold more hazardous material, such as detonators and explosives, reference to other documents like the UN International Ammunition Technical Guidelines (IATGs) is also needed. It is important to note that within this document is also included material of war recovered by PSCs through confiscation, discovery or transfer.

Besides hazardous items, the term 'material of war' also includes **Ballistic Protective Equipment** (BPE) such as body armour, vests, ballistic plates, helmets, armoured vehicles and similar. Not included under this heading however are weapons, both less-lethal and lethal as well as weapons-related equipment (such as weapons sights). These are addressed in a separate document entitled 'Management of Weapons'. Likewise, the subject of weapons (and ammunition) *training* merits its own separate document, apart from where it relates to asset management, in which case the matter is addressed in this or the Management of Weapons document.

The indicators provided below are based on authoritative publications and established good practice on the management of material of war within the private security industry and wider (e.g. IATGs, ISO 18788 and ANSI/ASIS PSC1). They address the legal and safety domains as well industry standards and good practice. They provide a **pathway for PSCs wishing to enhance proficiency in the management of material of war and ensure regulatory compliance**. They also provide the framework for reaching affiliate, transitional membership and certified membership status in ICoCA.

Although comprehensive in nature and specifically attuned to private security companies, these Indicators **do not** represent all available technical guidance on the management of material of war. Where needed, particularly on *how* to implement certain Indicators, further detail is available and should be heeded in authoritative documents such as those listed at Annex A. Ultimately it is the responsibility of **the user** to seek out the necessary information and to evaluate whether the recommendations in this document are feasible, useful and appropriate for the company and operating environment, to ensure the safe, legal and efficient management of material of war.

Reflecting the approach adopted for the Code's other Indicators, this document speaks to the full spectrum of PSCs:
- **Level 0** is intended for non-members of ICoCA who are interested in implementing basic good practice in material of war management. They might also be considering taking the first step towards ICoCA affiliation.

- **Level 1** comprises of Affiliates (i.e. those companies with affiliate status in ICoCA, having met certain criteria laid down by ICoCA). PSCs at Level 1 might also be in the process of fulfilling the criteria to progress to transitional membership status (i.e. Level 2).
- **Level 2** comprises those companies that have reached transitional membership status on the path to full certification.
- **Level 3** comprises those companies that have been granted certified membership status of ICoCA by attaining and maintaining relevant industry standards and certification (e.g. ISO 18788; PSC.1), along with ICoCA certification. An emphasis on continual improvement by Level 3, certified members is important.

The first set of Indicators deals with legal compliance, and is applicable to all PSC Levels. Likewise, the second set dealing with safety compliance is applicable to all. The final set is on industry good practice, where there is a degree of variance for each PSC Level. Here, the terms 'Plan', 'Develop', 'Implement', 'Improve' are used to **depict the extent to which PSCs at each Level should engage with a particular Indicator – as a *bare* minimum**.

Indicators Tables

Compliance – Legal
Comply with the laws and regulations of the countries where the company is registered and operating for every contract, as well as applicable international law (including international humanitarian law, international human rights law, and UN sanctions on the provision of war material and related services) and applicable authorization requirements, including permits and licenses, relating to (for example):   • Acquisition.   • Possession.   • Use.   • Import, export, brokering and transhipment.   • Movement and transport within the country (including local authority transfer permits).   • Inventory management and accounting control, including traceability.   • Inspection and maintenance.   • Training and provision of other security-related services.   • Transfer of possession or ownership, including sale, within the country.   • Return, disposal and destruction (including at contract/licence/company expiry).

Comply with any prohibitions pertaining to the alteration/modification of material of war (including physical alterations to ammunition that modify or remove lot, batch, serial number or any other markings intended to facilitate tracing).

Compliance – Safety
Comply with applicable Health and Safety legislation.
As part of the planning process prior to commencing a new contract, calculate the quantity and type of ammunition required for the identified tasks, and also work out the storage requirements. Seek to use ammunition natures that present the least hazard (so as to minimise the risk and reduce the management burden) and avoid fielding more than is needed.
Apply the following practices: - Ammunition stored and secured in a different place to weapons. - Keep the following apart: detonators; damaged and hazardous items; pyrotechnics; propellants; High Explosives. (Note 1.4S ball ammunition can be stored with other ammunition types). - Regularly and safely dispose of confiscated/unserviceable ammunition. - Produce Standing Operating Procedures (SOPs) covering, amongst other things, the safety drills and processes for the storage of ammunition.
Where possible, site hazardous material away from: population centres; where there is a serious risk of fire; in close proximity to large radio transmitters (due to the effect of electromagnetic radiation). If this cannot be avoided, identify mitigating measures to reduce the risk (such as reduce the amount of ammunition stored at that location). If the residual risk is still assessed to be too high, select an alternative site with lower risk.
Ensure all material of war is maintained in a safe, serviceable condition by complying with the following safety practices: - Obtain advice from specialists/technicians on the best storage methods and places. - Conduct regular inspections by appropriately trained staff, to include the monitoring of the shelf lives of ammunition items. - Preferably, store material of war in clean, swept areas; in the shade; on firm, dry ground. - In warm, tropical climates, consider ventilation and ways of reducing humidity. - Prohibit smoking within proximity of hazardous material. - Remove all empty wooden boxes and other combustible material from areas where hazardous material is located. - Ensure normal safety precautions are carried out whenever material of war is being inspected and cleaned. - Clean all ready-use ammunition at least every week, removing any loaded ammunition from magazines. - Select a dedicated cleaning area where procedures can be properly supervised and where full safety precautions can be carried out. - When cleaning, avoid items coming into contact with sand and water. Place on clean and dry surfaces (e.g. tarpaulins). - Implement stock rotation, for instance by using older operational ammunition for training and backfilling with newer stocks.

Adhere to ammunition and other hazardous material fire safety principles of: prevent spread; fight fire from a safe position; exercise caution in using water (due to the potential hazardous effect on chemical substances).	
Adopt the following drills (with SOPs covering the details) for fire incidents involving ammunition and other hazardous material: - If the fire is small and it is possible to extinguish safely, use appropriate extinguishers (or other means) to do so. - If the fire cannot be extinguished swiftly, activate the nearest fire alarm. - Evacuate the danger area of all personnel. - Ensure all personnel are accounted for. - Call Fire and Rescue. - If the fire is spreading rapidly and/or is out of control, begin preparing for a wider evacuation. - Ammunition experts should assist the authorities in carrying out these drills.	
Have sufficient organic firefighting equipment available and also a supply of local water (in case Fire and Rescue cannot provide). The equipment should conform to local regulations and contractual requirements and be sited at each location where material of war is stored.	

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
Accounting and Storage				
Create <u>comprehensive</u> processes and records, published in widely available SOPs for the secure handling, storage, issue, maintenance, transport and use of material of war.	*Develop*		*Implement*	*Improve*
Have ledgers available to record the holdings of ammunition, down to the following level of detail: country of manufacture; supplier details; lot/batch number; calibre; type; quantity; location where ammunition is kept. A written ledger is good; an electronic one is better. Retain Ledger records for at least 10 years.		*Implement*		*Improve*
Have a similar/same ledger to record receipts and issues. This should include dates and times of receipts and issues, and relevant names and signatures. Retain Ledger records for at least 10 years.		*Implement*		*Improve*
In a similar/same ledger, maintain a record of the quantity, type, date and location whenever ammunition is expended (including on training). This should include losses. Retain Ledger records for at least 10 years		*Implement*		*Improve*
Ensure only a limited and agreed number of named individuals have access to the accounting ledgers.			*Implement*	*Improve*
Provide two layers of security for all stocks of material of war (e.g. secure room and locked containers).			*Implement*	*Improve*
Establish a robust system for the secure custody of access keys to material of war storage facilities			*Implement*	*Improve*
Only allow material of war to be stored at a company location – not at an employee's home.			*Implement*	*Improve*

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
Permit the storage of material of war at smaller operating sites away from main stockpiles when the threat levels are high. (There should be no change however in the accounting and supervision procedures).		Implement		Improve
Ensure that when employees go on leave, or when their ammunition is not required for a week or more, it is removed from the magazines and returned to stores.		Implement		Improve
Permit the storage of ammunition not in-use to be kept sealed in its parent packaging, to ease accounting and enhance serviceability.		Implement		Improve
Establish and publicise an *amnesty* system, permitting employees to return all unaccounted for material of war without fear of sanction. This should include a concerted campaign once a year to maximise the retrieval of such items. (Clearly marked amnesty boxes located at each company location should be considered).	Plan	Develop	Implement	Improve
When moving material of war between sites, ensure that any such movement is authorised by the local authorities and that company staff are in possession of any applicable permits.		Implement		Improve
Supervision				
Establish a system of accounting checks of all material of war at all PSC locations. The frequency should be as follows: - Daily: 100% count by line managers/supervisors of all *signed-out* ammunition (and other material of war). - Weekly: 100% check by line managers/supervisors of the quantity of <u>all</u> holdings of material of war, particularly ready use ammunition. (Note: sealed consignments in the stores should not be opened, but the markings should be checked as should the integrity of the packaging). - Three-monthly stocktakes (at least): 100% check by line managers/supervisors of the quantity and serial/batch/lot number of all holdings of material of war. (Note: sealed consignments should not be opened, but the markings should be checked as should the integrity of the packaging). - On hand-over of staff responsible for material of war accounting: 100% check by line managers/supervisors of the quantity and serial/batch/lot number of all holdings of material of war. (Note: sealed consignments should not be opened, but the markings should be checked as should the integrity of the packaging). A record of the date and person conducting each check should be kept for at least 10 years.		Implement		Improve
Designate and publish the directors/managers within the Company who have specific responsibilities for material of war management. The details should feature in respective job descriptions and relevant policy		Implement		Improve

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
documents. Duties should include periodic checks of the quantity and type of material of war (e.g. once every quarter).				
Conduct independent and regular inspections of material of war holdings and accounting processes (i.e. by personnel (company or external) with no direct involvement in the day-to-day management of the stocks).	*Plan*	*Develop*	*Implement*	*Improve*
Create and widely publicise a procedure for the rapid reporting of material of war management incidents (including the provision of confidential communication channels for when required).	*Plan*	*Develop*	*Implement*	*Improve*
Establish an independent internal inquiry system for serious incidents (e.g. unplanned explosion at munition sites (UEMS)) causing fatalities, injury, major damage to equipment, environmental contamination, reputational harm. A report should be produced for internal purposes, and where applicable for the client and the local authorities. Such an inquiry should seek to establish: - Time and location of the incident. - Identity of any persons involved including their addresses and other contact details. - Injuries/damage sustained. - Circumstances leading up to the incident. - Root causes. - Any measures taken by the company in response to the incident. - Recommended follow-on action	*Plan*	*Develop*	*Implement*	*Improve*
Establish an independent internal investigation and inquiry procedure to be immediately activated upon any report of material of war losses.	*Plan*	*Develop*	*Implement*	*Improve*
Create and sustain a culture of continuous improvement through: systematic assessment of performance; capturing best practice; implementing lessons learned; horizon-scanning for new ideas, freedoms and constraints.	*Plan*	*Develop*	*Implement*	*Improve*
Staff				
- As part of the recruit selection process, all potential employees who are required as part of their duties to manage or have access to material of war should be assessed on their physical, mental and behavioural suitability. This should include checks of identity, human rights violations, dishonourable discharge, criminal history, and any prohibitions related to acquiring, owning, possessing and/or using a weapon). - Such checks should be conducted by individuals with the relevant competencies.			*Implement*	*Improve*

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
- Physical, mental and behavioural re-assessment should be conducted on a regular basis (e.g. at least every 12 months). - Companies should ensure that sub-contractors similarly comply.				
Ensure all personnel handling material of war (particularly ammunition) have the competency to read, record and check all identification markings.		*Implement*		*Improve*
Conduct tailored <u>induction</u> training on ammunition management for all new staff who have responsibility for material of war management to ensure they have the knowledge and competencies to carry out their functions safely, effectively and efficiently. (Appropriate budgets and resources should be allocated to support such activities).		*Implement*		*Improve*
Conduct tailored <u>recurrent</u> training *and testing* on ammunition management for all staff who have responsibility for material of war management to ensure they have the knowledge and competencies to carry out their functions safely, effectively and efficiently. (Appropriate budgets and resources should be allocated to support such activities). Where possible this should be done every 12 months.		*Implement*		*Improve*
Ensure company employees with responsibility for ammunition storage are aware of the risks associated with the six explosive hazard classifications signs: - 1.1 — Explosives with a mass explosion hazard (nitro-glycerine/dynamite) - the most hazardous category. - 1.2 — Explosives with a blast/projection hazard. - 1.3 — Explosives with a minor blast hazard (rocket propellant, display fireworks). - 1.4 — Explosives with a major fire hazard (consumer fireworks, ammunition). - 1.5 — Blasting agents. - 1.6 — Extremely insensitive explosives.	*Plan*	*Develop*	*Implement*	*Improve*
Recognise the added-value by achieving gender balance and awareness within the company, and take decisive action towards accomplishing this objective.		*Implement*		*Improve*
Maintenance and Repair				
Prohibit in-house repair and/or refurbishment of ammunition and other hazardous material of war. Either return it to the manufacturer or if beyond repair, assign it for destruction.		*Implement*		*Improve*
Ensure that all material of war awaiting repair is appropriately marked, recorded, and stored in a segregated area, thereby preventing a mix-up with serviceable items.		*Implement*		*Improve*

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
Disposal				
Ensure that all material of war awaiting disposal (through destruction or transfer to the national authorities) is appropriately marked, recorded and stored in a segregated area, thereby preventing a mix-up with other items.		*Implement*		*Improve*
Where material of war is to be destroyed, this should be carried out by the national authorities. If the latter grant authority for the material to be destroyed by the company, this must only be performed by trained staff and in accordance with international best practice. Open-burning or controlled detonation are two potential methods of destruction.		*Implement*		*Improve*
Take photographs before, during and after destruction, capturing all markings. Attach the photographs to the documentation submitted to the national authorities and retain copies. Ensure all ledgers are amended accordingly and retain records for at least 10 years.	*Plan*	*Develop*	*Implement*	*Improve*
Losses and Recoveries				
Ensure company employees with responsibility for material of war management are aware of the causes of '*diversion*' (i.e., unauthorised rerouting or appropriation). This can include: erratic checks; duplication of ledgers; frequent changes/over-loading of logisticians and armorers; poorly documented handovers; insufficient independent audits.	*Plan*	*Develop*	*Implement*	*Improve*
Initiate measures to reduce the potential for diversion, such as: - Procurement: only order sufficient to fulfil assessed needs; only pay for those items that have been delivered and obtain proper receipts; 100% check of quantities and markings on arrival; ensure that more than one staff member is involved. - Records: enter the details of all authorised modifications in the holdings ledger; account for all expended ammunition on training and operations as soon as it occurs. - Reporting: insist on the immediate reporting of all losses of material of war. - Sanctions: have in place appropriate disciplinary procedures for inadequate records, documentation and supervision that have led/or have the potential to lead to the diversion of material of war.	*Plan*	*Develop*	*Implement*	*Improve*

Industry Good Practices	Level 0	Level 1	Level 2	Level 3
Set up a systematic process for when company personnel discover, obtain or receive material of war not belonging to the company. This should cover: reception arrangements; transferal processes; storage; documentation.	Plan	Develop	Implement	Improve
Partners, Suppliers, Sub-contractors				
Conduct human rights due diligence checks of all partners, suppliers and sub/prime-contractors prior to working with them.	Plan	Develop	Implement	Improve
Conduct due diligence checks of all partners, suppliers and sub/prime-contractors on their record of material of war management prior to working with them (e.g. incidents of unplanned explosions at munitions sites (UEMS)).	Plan	Develop	Implement	Improve
Agree with partners, suppliers and sub/prime-contractors that they will conform, where applicable, to the legal, safety and good practice indicators for material of war management given in this document.	Plan	Develop	Implement	Improve
Establish in-house monitoring of the performance and behaviour of partners, suppliers and sub/prime-contractors to ensure compliance.	Plan	Develop	Implement	Improve

Feedback

This is intended to be a '**living document**' that may be updated and further adapted as the realities of PSCs evolve and additional best practices are identified in the industry. ICOCA welcomes feedback from Members, Affiliates and other stakeholders.

Further Reading

General

- ***The Code - ICoCA - International Code of Conduct Association 09 November 2010:*** ICoCA requirements on management of weapons, weapons training, management of material of war and incident reporting.

- ***ANSI/ ASIS PSC1 Management System for Quality of PSC Operations:*** information on selection, background screening and vetting of personnel and sub-contractors; competence, training and awareness; Use of Force training; performance; incident management, monitoring, reporting and investigation; procurement and management of weapons, hazardous materials and munitions.

- ***IOS 18788 Management System for Private Security Operations****:* information on weapons authorisations; procurement and management of weapons, hazardous materials and munitions; Incident monitoring, reporting and investigations.

- ***The Arms Trade Treaty (ATT)****:* information on arms export and export assessment, import, transit or transshipment, brokering, diversion and record keeping.

- ***ITI (International Instrument to enable States to Identify and Trace, in a timely and reliable manner, Illicit Small Arms and Light Weapons)****:* information on the marking, recording and tracing of weapons.

- ***Fire Arms Protocol (Protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations convention against transnational organized crime)****:* information on criminalisation; confiscation, seizure and disposal; record-keeping; marking of firearms; deactivation of firearms; requirements for export, import and transit licensing or authorisation systems; security and preventative measures; brokers and brokering.

- ***Staying Safe: Effective Weapons and Ammunition Management (WAM) during the COVID-19 Crisis | by Small Arms Survey | Medium:*** 6-minute Small Arms Survey blog.

- *A Guide to the UN Small Arms Process: 2016 Update | Small Arms Survey*: concise manual to assist and inform policymakers new to small arms on the international agenda. Covers definitions and terminology, a brief history of the small arms process, summaries of key issues, instruments and measures; and an overview of the roles of various institutions.

- *The Montreux Document and the International Code of Conduct – Understanding the relationship between international initiatives to regulate the global private security industry .pdf*: DCAF 2016 paper providing a detailed comparison between good practices contained in the Montreux Document and the ICoC principles, examining to what extent states may build on the ICoC and its Association in order to regulate the provision of private security services effectively and thereby implement good practices identified in the Montreux Document.

- *DCAF Toolkit Use of Force.pdf*: 2019 DCAF publication providing a guidance tool for States on the basic principles and requirements for state regulatory frameworks on the use of force by private security providers.

- *Private Security Governance and National Action Plans (NAPs) on Business and Human Rights | DCAF – Geneva Centre for Security Sector Governance*: DCAF and the Danish Institute for Human Rights this publication provides insight and guidance on the analysis of existing legal frameworks and policy responses for the development of new laws, policies, and practices that respond specifically to the human rights risks related to the private security industry. It is a tool for States and other human rights stakeholders, such as national human rights institutions (NHRIs) and civil society organisations (CSOs) as well as private security providers (PSPs) themselves, to evaluate the human rights risks and impacts of ongoing and potential private security operations and services.

Munitions Management and Safety

- *IATGs (International Ammunition Technical Guidelines)*: covering ammunition management principles, risk management, accounting, storage facilities, infrastructure, equipment and operations, surveillance, transport, security, destruction, accident reporting and investigations.

- *UN Transport of Dangerous Goods, Model Regulations*: provisions for dangerous goods classification and transport of explosives and ammunition.

- *A Practical Guide to Life-cycle Management of Ammunition | Small Arms Survey*: introduction to the Small Arms Survey's LCMA model and describes the role of national ownership in creating an enabling environment in which states can establish and maintain an LCMA system.

- *Munitions Safety Information Analysis Center | MSIAC (nato.int)*: NATO free online resource with help to reduce, and eliminate, the risk to personnel and materiel from explosive incidents associated with own munitions.

- *Small Arms Survey Podcast #23: The Dangers of Excess Munitions Stockpiles: the UEMS Handbook | Small Arms Survey*: 7 ½ minute podcast on the Small Arms Survey Handbook 'Unplanned Explosions at Munitions Sites (UEMS): Excess Stockpiles as Liabilities rather than Assets', published in June 2014.

Weapons Management and Safety

- https://www.unidir.org/publication/reference-methodology-national-weapons-and-ammunition-management-baseline-assessments: a reference methodology for national weapons and ammunition management baseline assessments.

- *MOSAIC (Modular Small Arms Implementation Compendium)*: information on SALW international transfer, end-use and end-user controls; civilian access to SALW (MOSAIC 03.30:2015 Section 13 – regulating PSC); stockpile management: weapons; marking and recording; destruction.

- *UK Firearms Security Manual 2020*: information on cabinets, safes, gun rooms and armoury buildings.

- *An Introductory Guide to the Identification of Small Arms, Light Weapons, and Associated Ammunition | Small Arms Survey*: Provides the reader with a basic understanding of how to identify and analyse SALW as an aid to tracking proliferation.

Gender Perspectives

- *Taking stock of action on the illicit small arms trade: Gender-responsive small arms control | Small Arms Survey*: This blog post provides a short overview of four of the topics covered by the seventh panel of the Small Arms Survey 2020 online forum 'Taking stock of action on the illicit small arms trade' which explored how the principles intended to incorporate gender into arms control architecture, instruments, policies and programmes can be operationalized to create the impact they were intended to have.

- *Gender-responsive Small Arms Control: A Practical Guide | Small Arms Survey*: concrete suggestions for how to develop and support gender responsive programming to address the gendered phenomenon of armed violence providing a roadmap for mainstreaming gender into the small arms project cycle.

- *Small Arms Survey Podcast #48: Gender in Small Arms Control | Small Arms Survey*: podcast on Gender in small arms control, as part of the Gender Lens for Arms Control Support and Sustainability (GLASS) project.

- *GBV_ATT-brief.pdf (reachingcriticalwill.org)*: Gender based violence and the Arms Trade Treaty.

- *Gender and Security Toolkit | DCAF – Geneva Centre for Security Sector Governance*: a series of practical tools and policy guides to promote Gender equality and integrate a Gender perspective in the security and justice sector.

- **_Gender and Private Security Regulation Policy Brief.pdf (dcaf.ch)_** DCAF Policy Brief – Gender and Private Security Regulation.

Counter Diversion

- **_Diversion - Certificate (smallarmssurvey.org)_**_:_ Infographic series on possible measures to prevent and address diversion: supporting effective implementation of the ATT.

Training Resources

- **_Instructional Designer's Handbook – Simple Book Publishing (unizin.org)_**: compilation of presentations, readings, research and best practices to assist in designing a course of instruction.
- **_UNODC Systematic Approach to Training.qxd:_** nine-page overview from UNODC on the systematic approach to training model.
- **_ISO - ISO 10015:2019 - Quality management — Guidelines for competence management and people development_**: guidelines for an organization to establish, implement, maintain and improve systems for competence management and people development to positively affect outcomes related to the conformity of products and services and the needs and expectations of relevant interested parties.
- **_UNITAR Online Facilitation Guide: Methodological Tips (flipsnack.com)_**: Entitled 'How to Turn Face-to-Face int Online Events' this UN Institute for Training and Research online booklet intends to provide tips to support effective delivery of training content on-line.
- **_UNITAR Online Facilitation Guide: Designing Learning Events (flipsnack.com)_**: Entitled 'Guiding Questions for Designing Learning Events (Face-to Face and Online)' this UN Institute for Training and Research online booklet provides a list of key questions along nine key stages with a course design process.