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**STEERING COMMITTEE FOR HUMAN RIGHTS
(CDDH)**

**Draft CDDH Report
on possible amendment of Appendices 1 and 3 to Committee of Ministers'
Recommendation CM/Rec(2021)2 on measures against the trade in goods used
for the death penalty, torture and other cruel, inhuman or degrading treatment or
punishment and on the possibility of introducing a simplified amendment
procedure for Appendix 2¹**

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I. Introduction

1. In 2021, the Committee of Ministers of the Council of Europe adopted Recommendation CM/Rec(2021)2 to member States on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment (CM/Rec(2021)2 or the Recommendation). This Recommendation was adopted in response to the need to establish “multilaterally agreed common international standards on the trade in inherently cruel, inhuman or degrading equipment, as well as law enforcement equipment and weapons and other relevant goods which can be misused for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment” at the Council of Europe level.

2. The Recommendation sets out a number of measures to be undertaken by Council of Europe member States:

- i) prohibit the trade in inherently abusive goods and equipment;
- ii) regulate and license the export and transit of certain pharmaceutical chemicals;
- iii) establish effective national export and transit control measures regarding the trade in law enforcement goods and equipment which can be misused by officials to inflict torture and other inhuman or degrading treatment or punishment.²

The Recommendation also calls on member States to:

- iv) exchange information, promote dissemination and cooperation to facilitate effective national implementation and cross-border coordination;
- v) encourage non-member States to adopt similar measures; and
- vi) take action in other international fora to combat the trade in such goods.³

3. The Recommendation includes three Appendices listing:

- i) prohibited inherently abusive goods and equipment (Appendix 1);
- ii) pharmaceutical chemicals used in lethal injection executions, the export and transit of which should be regulated and licensed (Appendix 2);
- iii) controlled goods and equipment that may have legitimate law enforcement uses in accordance with international and regional human rights standards but which may be misused to inflict torture or other inhuman or degrading treatment or punishment (Appendix 3).

4. The Recommendation calls for an examination of its implementation five years after its adoption. In line with its Terms of Reference for 2024–2027, the Steering Committee for Human Rights (CDDH) undertook this examination and its findings were published in June 2025.⁴ In its report the CDDH proposed that:

“[T]he Committee of Ministers initiates a review with a view to possible revision of Appendices 1 and 3 of the Recommendation in order to reflect international developments, address emerging risks and align with the UN Special Rapporteur on torture’s proposed Category A and B lists and the revised draft annexes of the EU Anti-Torture Regulation.

² CM/Rec (2021)2, Appendix, 1.1 to 3.2.8.

³ [CM/Rec \(2021\)2](#), Appendix, 4 to 6.2.

⁴ CDDH Report on the implementation of Recommendation CM/Rec(2021)2 on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment, CDDH(2025)R102 Addendum 4 REV.

This review could also consider introducing a simplified procedure for the amendment of Appendix 2 regarding pharmaceuticals used in lethal injection executions.”⁵

5. On 7 October 2025, the Committee of Ministers took note of the CDDH report on the implementation of the Recommendation and:

“invited the CDDH to review Appendices 1 and 3 to Recommendation CM/Rec(2021)2 with a view to their revision in the light of the lists proposed by the United Nations Special Rapporteur on Torture and Cruel, Inhuman or Degrading Treatment or Punishment and the revised annexes of the European Union Regulation (EU) 2019/125, and to examine the possibility of introducing a simplified procedure for the amendment of Appendix 2 regarding pharmaceuticals used in lethal injection executions”.⁶

This invitation was then included in the revised CDDH terms of reference for 2026–2027.⁷

II. Possible revision of Appendix 1 (prohibited goods) and Appendix 3 (controlled goods) to the Recommendation

7. This Section details the results of a standardised review of relevant law enforcement equipment types not currently covered under the Recommendation or that are inappropriately addressed under this instrument and makes proposals for possible changes to Appendix 1 (prohibited goods) and Appendix 3 (controlled goods) of the Recommendation. To facilitate consistent review, the following information and format will be presented for each relevant law enforcement equipment type considered:

- Description of the equipment and its intended purpose;
- Medical and human rights concerns;
- Numbers of companies manufacturing and/or promoting this equipment;
- Whether and if so, how the equipment is addressed under the EU Anti Torture Regulation Annexes;
- Whether and if so, how the equipment is addressed under the UN Special Rapporteur on Torture’s 2023 Report and accompanying lists;
- A proposal for how law enforcement equipment type should be addressed under the Recommendation i.e. whether and how the equipment should be listed in Appendix 1 (prohibited goods) or Appendix 3 (controlled goods) of the instrument.

a. Law enforcement equipment that should be prohibited

i. Direct contact electric shock equipment

Description

8. A range of law enforcement equipment and weapons including electric shock ‘stun guns’, batons, gloves and shields which deliver a painful electric shock through direct contact between electrodes and the target individual. Voltage varies between models, as does the length of the shock delivered. Certain projectile electric shock weapons (often known by the common brand name Tasers) incorporate the capability of being used as direct contact shock weapons.

⁵ CDDH(2025)R102 Addendum 4 REV, paragraph 146.

⁶ CM/Del/Dec(2025)1539/4.1 - Steering Committee for Human Rights (CDDH) - d. Report on the implementation of Recommendation CM/Rec(2021)2 of the Committee of Ministers to member States on measures against the trade in goods used for the death penalty, torture and other cruel, inhuman or degrading treatment or punishment, 7 October 2025, 3.b.

⁷ CDDH(2025)25.

Health and human rights concerns

9. Direct contact shock weapons cause intense pain at the touch of a button, often without leaving long-lasting identifiable physical traces. Their use is inherently abusive and punitive; they are often used to administer sustained shock, multiple shocks, or to shock people on inappropriate/vulnerable parts of the body, including in acts of sexual degradation. Their use has often been documented on already restrained individuals in acts of torture.⁸ There are less harmful, lawful means for close quarters control and restraint, such as, depending on the circumstances, pepper spray, batons or open hand techniques. A 2025 Amnesty International report highlighted torture and other ill-treatment using direct contact and other electric shock weapons in custodial and non-custodial settings from 2014 to 2024 in over 40 countries across all world regions.⁹

10. The UN Special Rapporteur on Torture stated that direct contact electric shock weapons are inherently cruel and degrading and that their manufacture, trade and use would constitute a violation of the UN Convention against Torture.¹⁰

11. According to the UN Guidance on Less-Lethal Weapons in Law Enforcement:
 “7.4.12 The risk of inflicting pain or suffering so severe that it may amount to an element of torture or cruel, inhuman or degrading treatment or punishment is especially high when a weapon is used in drive-stun [i.e. direct contact] mode to apply electricity directly to an individual without incapacitating them. Such applications may also raise the individual's level of aggression, as a result of the pain inflicted.”¹¹

12. According to the UNODC/OHCHR Resource book on the use of force and firearms in law enforcement:

“With regard to electroshock stun guns, shields [...] and batons, experts have agreed that there is no tactical utility to any of these that cannot be achieved with another device, and the risk of arbitrary force amounting to torture or other forms of ill-treatment is too great. As such, their use is not advised.”¹²

The European Committee for the Prevention of Torture (CPT) have expressed “strong reservations” about the use of direct contact electric shock weapons, stating that “properly trained law enforcement officers have many other control techniques available to them when they are in touching distance of a person who has to be brought under their control”,¹³ a position echoed by the European Court of Human Rights.¹⁴

Companies manufacturing and/or promoting direct contact electric shock weapons and devices from 1 January 2020 – 31 December 2025¹⁵

Number of companies	Number of countries where companies based	Countries
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⁸ See Amnesty International, *“I still can't sleep at night”: The Global Abuse of Electric Shock (Equipment)*, Index Number: POL 30/8990/2025, 6 March 2025, www.amnesty.org/en/documents/pol30/8990/2025/en/

⁹ See Amnesty International, *“I still can't sleep at night”: The Global Abuse of Electric Shock Equipment*, Index Number: POL 30/8990/2025, 6 March 2025, www.amnesty.org/en/documents/pol30/8990/2025/en/

¹⁰ UN Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, paras 26, 27, 54.

¹¹ OHCHR, *Guidance on Less-Lethal Weapons in Law Enforcement*, 2020, , para. 7.4.12.

¹² UNODC and OHCHR, *Resource book on the use of force and firearms in law enforcement*, 2017, p. 94

¹³ CPT, “Electrical Discharge Weapons”, *op. cit.*, note 33, para. 78;

¹⁴ See also ECHR, *Anzhelo Georgiev and Others v. Bulgaria*, judgment of 30 September 2014, para. 76.

¹⁵ Data compiled from Omega Research Foundation company database, 3 June 2026

238	42	Argentina, Bangladesh, Belarus, Bosnia and Herzegovina, Brazil, Bulgaria, Cameroon, Canada, China, Croatia, Cyprus, Czechia, France, Germany, Greece, Hungary, India, Indonesia, Israel, Kazakhstan, Korea, Republic of, Malaysia, Mexico, Morocco, Nigeria, Pakistan, Peru, Poland, Portugal, Romania, Russian Federation, Slovakia, Slovenia, South Africa, Spain, Taiwan, Tanzania, United Republic of Thailand, Ukraine, United Arab Emirates, United Kingdom, United States
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Whether/how equipment addressed under EU Anti Torture Regulation Annexes

13. “Portable electric discharge weapons that can target only one individual each time an electric shock is administered, including but not limited to electric shock batons, electric shock shields stun guns and electric shock dart guns”¹⁶ and “kits containing the essential components for assembly of such portable discharge weapons.”¹⁷ All these weapons – i.e. both direct contact and projectile electric shock weapons – have been listed in Annex III (controlled goods) since 2005.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

14. “Direct contact electric shock weapons” specifically including “electric shock batons”, “electric shock shields” and “stun guns” are listed as Category A (prohibited) goods.¹⁸ In addition, those models of projectile electric shock weapons that “can be switched into direct contact mode” serve “no legitimate purpose, like the stun guns and other direct contact electric shock weapons, and fall under Category A prohibited items.”¹⁹

Whether/how equipment addressed under Recommendation CM/Rec(2021)2

15. Direct contact electric shock and projectile electric shock weapons are currently listed in Appendix III (controlled goods).

Proposal

16. Given the health and human rights concerns, the widespread promotion of such devices to the law enforcement community, and in line with the UN Special Rapporteur on Torture’s recommendations, the Committee of Ministers should recommend that member States prohibit direct contact electric shock weapons, while projectile electric shock weapons should remain controlled. Consequently, the items, as described below, should be moved from Appendix III (controlled goods) to Appendix I (prohibited goods) respectively.

Suggested text:

“Portable direct contact electric discharge weapons that can target only one individual each time an electric shock is administered, including but not limited to electric shock batons, electric shock

¹⁶ “Note: This item does not prohibit individual electronic shock devices when accompanying their user for the user’s own personal protection.” European Union, EU Anti Torture Regulation (2025), Annex III, 2.1.

¹⁷ European Union, EU Anti Torture Regulation (2025), Annex III, 2.2.

¹⁸ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 3.2.

¹⁹ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, p.8.

shields, and electric shock ‘stun guns’, and kits containing the essential components for assembly of such portable direct contact discharge weapons.”

17. The current item description covering electric discharge weapons in Appendix III (controlled) goods, should be amended and its scope reduced to take account of the above proposed changes.

Suggested text

“Electric shock dart guns, and kits containing the essential components for assembly of such weapons.”²⁰

ii. *Electric shock launchers designed to fire multiple projectiles*

Description

18. Electric shock launchers designed to fire multiple projectiles at the same time or in rapid succession from a distance, on two or more individuals at the same time.

Health and human rights concerns

19. Because the individual projectiles cannot be accurately aimed at specific individuals, such devices are inherently indiscriminate in nature. Consequently, their employment risks injuring bystanders. Furthermore, there is also the risk that multiple projectiles or barbs will impact one individual with the potential of delivering multiple shocks.

Companies manufacturing or promoting this equipment

20. There has been previous development and promotion of these weapons by a company in North America, which was halted. There was previous promotion of this weapon by a European company based in a Council of Europe member State until at least 2017, which is now halted. There were reports of attempted development of a similar weapon by a Russian company in 2017.²¹ There are no reports of subsequent commercial promotion or of deployment to date.

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

21. “Fixed or mountable electric discharge weapons that cover a wide area and can target multiple individuals with electrical shocks”, were added to the list of Annex III controlled goods in 2014.²²

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

22. This equipment is not addressed under the UN SRT Report.

²⁰ Council of Europe Member States should prohibit the law enforcement use of the direct contact “drive stun” mode of all electric shock projectile weapons in all circumstances. States should require the removal of the direct contact “drive stun” mode from all models of projectile electric shock weapons intended and/or promoted to law enforcement officials. States should permanently disable this function in all models currently in possession of law enforcement entities or remove them from use.

²¹ Omega Research Foundation, Manufacture, trade and use of ‘tools of torture’ in the Council of Europe, 2018, p.26.

²² European Union, EU Anti-Torture Regulation, 2025, Annex III, 2.3.

Whether/how equipment addressed under CM/Rec(2021)2

23. This equipment is currently listed in Appendix III (controlled goods).

Proposal

24. Whilst recognising that there does not appear to be any current company manufacturing or promoting these goods, given their inherently indiscriminate nature, the Committee of Ministers should recommend that member States prohibit electric shock launchers designed to fire multiple projectiles. Consequently, such items should be moved from Appendix III (controlled goods) to Annex I (prohibited goods).

Suggested text:

“Fixed or mountable electric discharge weapons that cover a wide area and can target multiple individuals with electric shocks”.

iii. Multiple kinetic impact projectiles

Description

25. Ammunition containing more than one kinetic impact projectile. The projectiles contained in this ammunition are non-metallic and can be made from rubber, plastic, or wood, and can vary in terms of their size, number, and shape. The number included in each can range from a small number of large balls or blocks to hundreds of small pellets.

Health and human rights concerns

26. Ammunition containing multiple kinetic impact projectiles is inaccurate, indiscriminate, and arbitrary, as it is not possible to accurately target all of the projectiles dispersed. It poses significant health risks to both those targeted and bystanders. Thus, such ammunition cannot be used safely and in a way that meets the principles of necessity and proportionality. Its use also carries a significant risk of serious injuries, including to sensitive parts of the body such as the head or eyes. This ammunition also poses a significant risk to bystanders. For example, during the October 2019 protests in Chile, carabineros fired over 140,000 rounds of rubberised buckshot at those involved.²³ According to Chile’s National Institute for Human Rights, police actions in the protests resulted in more than 440 eye injuries, with over 30 cases of eye loss, or ocular rupture.²⁴

27. In their UN Guidance on Less-Lethal Weapons in Law Enforcement, OHCHR stated that “Certain projectiles are highly inaccurate. To meet international standards, impact projectiles should be capable of striking an individual to within a 10-centimetre diameter of the targeted point when fired from the designated range.”²⁵ Furthermore, “Multiple projectiles fired at the same time are inaccurate and, in general, their use cannot comply with the principles of necessity and proportionality.”²⁶

²³ National Institute for Human Rights (INDH), “INDH entrega nuevo reporte de cifras a cuatro meses de iniciada la crisis social”, 19 February 2020, indh.cl/indh-entrega-nuevo-reporte-de-cifras-a-cuatro-meses-de-iniciada-la-crisis-social/; Amnesty International, *Eyes on Chile: Police Violence and Command Responsibility during the period of social unrest*, October 2020, (Index: AMR 22/3133/2020), [amnesty.org/en/latest/research/2020/10/eyes-on-chile-police-violence-at-protests](https://www.amnesty.org/en/latest/research/2020/10/eyes-on-chile-police-violence-at-protests)

²⁴ National Institute for Human Rights, “INDH entrega nuevo reporte de cifras a cuatro meses de iniciada la crisis social”, 19 February 2020, indh.cl/indh-entrega-nuevo-reporte-de-cifras-a-cuatro-meses-de-iniciada-la-crisis-social/

²⁵ OHCHR, *UN Human Rights Guidance on Less-Lethal weapons in law enforcement*, 2020, para. 7.5.4.

²⁶ OHCHR, *UN Human Rights Guidance on Less-Lethal weapons in law enforcement*, 2020, para. 7.5.6.

28. A previous UN Special Rapporteur on Torture has stated that “Another issue arising with regard to certain “less lethal” weapons is their indiscriminate effects, which make it difficult to restrict the use of force and the resulting harm as required by the principles of necessity and proportionality, particularly in the presence of innocent bystanders (for example, in crowd control or hostage-taking). While the indiscriminate nature of a weapon alone does not necessarily make it cruel, inhuman or degrading, it may do so in conjunction with the gravity of its effects (for example, certain kinetic impact projectiles)...”²⁷

Companies manufacturing and/or promoting multiple kinetic impact projectiles from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
74	33	Argentina, Australia, Brazil, Bulgaria, Canada, Chile, China, Colombia, Czech Republic, Ecuador, France, Germany, Greece, Honduras, India, Indonesia, Israel, Italy, Kazakhstan, Korea, Republic of, New Zealand, Pakistan, Peru, Russian Federation, Serbia, Singapore, Spain, Switzerland, Türkiye, Ukraine, United Kingdom, United States, Venezuela

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

29. “Ammunition containing multiple kinetic impact projectiles” was added to Annex III (controlled goods) in 2025.²⁸

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

30. “Ammunition containing multiple non-metallic kinetic impact projectiles” are listed as Category A (prohibited) goods.²⁹

Whether/how equipment addressed under CM/Rec(2021)2

31. This equipment is not addressed under CM/Rec(2021)2.

Proposal

32. Given their inherently indiscriminate nature, significant risks to health, notably the large number of eye injuries and facial injuries reported from their use, widespread promotion to the law enforcement community, and considering the recommendation of the UN Special Rapporteur on Torture, the Committee of Ministers should recommend that member States prohibit

²⁷ UN Special Rapporteur on Torture, *Report on extra-custodial use of force and the prohibition of torture*, A/72/178, 2017, paragraph 55

²⁸ Note: This item includes ammunition that can be made from rubber, plastic, or wood, and can vary in terms of their size, number, and shape. The number included in each can range from a small number of large balls or blocks to hundreds of small pellets. This item does not control equipment controlled by items ML1 and ML 2 of the Common Military List of the European Union, European Union, EU Anti-Torture Regulation, 2025, Annex III, 2.6.

²⁹ UN Special Rapporteur 2023 Torture Trade Report, Annex 1, 2.6.

“ammunition containing multiple non-metallic kinetic impact projectiles”. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Ammunition containing multiple non-metallic kinetic impact projectiles

Note: This ammunition can be weapon-launched or hand-thrown (i.e. KIP grenades). This item includes ammunition that can be made from rubber, plastic, or wood, and can vary in terms of their size, number, and shape. The number included in each can range from a small number of large balls or blocks to hundreds of small pellets.”

iv. Multiple barrel launchers

Description

33. Multiple barrel launchers typically have between 2 and 36 barrels, and can be stand-alone or mounted onto vehicles, such as 4x4 vehicles, unmanned ground vehicles, or seafaring vessels. The launchers can be manually operated or operated by remote control, allowing for individual, sequential, or simultaneous firing of kinetic impact projectiles or projectiles containing riot control agents (chemical irritants), resulting in rapid fire or bursts of fire.

Health and human rights concerns

34. Multiple barrel launchers cannot be accurately aimed and enable very high rates of uncontrolled firing, as such they cannot comply with the principles of necessity and proportionality and their use in law enforcement. When used with kinetic impact projectiles they risk serious, unwarranted risk of injuries – including life-changing injuries such as loss of sight – to bystanders. When used to launch salvos of projectiles containing riot control agents (RCAs), they can deliver excessive and potentially injurious quantities of such chemicals to large numbers of people in a short time frame and before they can safely evacuate the area. Their inappropriate and dangerous use against protests has previously been documented notably in Colombia³⁰ and Lebanon³¹.

35. According to the UN Special Rapporteur on Torture:

“Ammunition and launchers containing multiple (as opposed to single) projectiles are unsafe to deploy. Because they are inaccurate, they hit targets indiscriminately and arbitrarily, and pose a significant risk to bystanders, to whom authorities owe a duty of care. Such projectiles can cause significant injuries, including to sensitive parts of the body such as the head or eyes. They can also provoke panic and dangerous stampedes.”³²

36. Similarly the UNODC/OHCHR Resource book on the use of force and firearms in law enforcement states that “Weapons that fire multiple projectiles at the same time, or that otherwise cannot be targeted at a specific individual, should never be used due to the risk of injury to bystanders.”³³ Furthermore the UN Guidance on Less-Lethal Weapons in Law Enforcement

³⁰ Amnesty International and Omega Research Foundation, “My Eye Exploded”: the Global Abuse of Kinetic Impact Projectiles, Index Number: ACT 30/6384/2023, 14 March 2023, www.amnesty.org/en/documents/act30/6384/2023/en/, p.24; Organization of American States (OAS), “Inter-American Commission on Human Rights (IACHR), Observations and recommendations: Working visit to Colombia”, Visit: June 2021, oas.org/en/iachr/reports/pdfs/ObservacionesVisita_CIDH_Colombia_ENG.pdf, para 47.

³¹ Amnesty International and Omega Research Foundation, “My Eye Exploded”: the Global Abuse of Kinetic Impact Projectiles, Index Number: ACT 30/6384/2023, 14 March 2023, www.amnesty.org/en/documents/act30/6384/2023/en/, pp.33-34.

³² UN Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, para. 53.

³³ UNODC and OHCHR, *Resource book on the use of force and firearms in law enforcement*, 2017, p. 94.

“Multiple projectiles fired at the same time are inaccurate and, in general, their use cannot comply with the principles of necessity and proportionality... and “Kinetic impact projectiles should not be fired in automatic mode.”³⁴

Companies manufacturing and/or promoting multiple barrel launchers from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
20	9	Brazil, China, Colombia, France, India, Indonesia, Israel, Republic of Korea, United States

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

37. “Launchers and dissemination devices including multiple barrel launchers”³⁵ were added to Annex III (controlled goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

38. “Automatic/multi-barrel launchers firing kinetic impact projectiles” are listed as Category A (prohibited) goods.³⁶

Whether/how equipment addressed under CM/Rec(2021)2

39. This equipment is not addressed under CM/Rec(2021)2

Proposal

40. Given their indiscriminate nature when fired in salvos, significant risks to health and human rights, and considering the recommendation of the UN Special Rapporteur on Torture, the Committee of Ministers should recommend that member States prohibit “multiple barrel launchers for use in law enforcement”. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text

“Multiple barrel launchers for use in law enforcement.

Note: This item includes multiple-barrel launchers that typically have between 2 and 36 barrels, and can be stand-alone or mounted onto vehicles, unmanned ground vehicles, or seafaring vessels. The launchers can be manually operated or operated by remote control, allowing for individual, sequential, or simultaneous firing of kinetic impact projectiles or projectiles containing chemical irritants, resulting in rapid fire or bursts of fire.”

³⁴ OHCHR, *UN Guidance on Less-Lethal Weapons in Law Enforcement*, 2020, paragraphs 7.5.5 & 7.5.6.

³⁵ Note: This item includes multiple-barrel launchers that typically have between 2 and 36 barrels, and can be stand-alone or mounted onto vehicles, unmanned ground vehicles, or seafaring vessels. The launchers can be manually operated or operated by remote control, allowing for individual, sequential, or simultaneous firing of kinetic impact munitions or chemical irritants, resulting in rapid fire or bursts of fire. This item does not control equipment controlled by items ML1 and ML 2 of the Common Military List of the European Union. European Union, EU Anti-Torture Regulation, Annex III, 2.5.

³⁶ UN Special Rapporteur 2023 Torture Trade Report, Annex 1, 2.7.

v. *Aerial platform-based delivery mechanisms designed to disperse significant quantities of riot control agents*

Description

41. Certain delivery mechanisms such as large capacity sprayers are designed to disperse riot control agents, potentially in large amounts, from an aircraft, helicopter or unmanned aerial vehicle (drone). Other aerial platform-based delivery mechanisms including multi-barrel launchers or projectile release mechanisms are capable of firing salvoes of RCA projectiles or dropping such projectiles onto large numbers of people below.

Health and human rights concerns

42. The widespread aerial dispersal of RCAs (for example from sprayers attached to drones, helicopters or planes), or alternatively the firing or dropping of large salvoes of RCA projectiles may not allow for sufficient accuracy in targeting to ensure lawful use. For example, if used against demonstrations, peaceful participants or bystanders can be affected even if they are not the target. Depending on the nature of use certain aerial dispersal and delivery mechanisms have the capacity to disperse or deliver significant quantities of RCAs to large numbers of people in a short time frame and before they can safely evacuate the area.

43. If RCA projectiles and other munitions are dropped over or launched directly at an individual or group, the kinetic energy of any impact of the projectile or munition carries a risk of unnecessary injury potentially amounting to excessive force. This risk is significantly greater when such munitions are dropped from a great height or a projectile is launched from a weapon.

Companies manufacturing and/or promoting equipment and projectiles for dispensing significant quantities of RCAs from aerial platforms 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
5	4	Brazil, France, Israel, South Africa

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

44. “Equipment and explosive projectiles for dispensing injurious quantities of riot control agents from aerial platforms”³⁷ were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

45. Not addressed in this formulation in the UN SRT report.

Whether/how equipment addressed under CM/Rec(2021)2

46. Equipment not addressed under CM/Rec(2021)2.

³⁷ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 5.2. Note: This item does not control smoke grenades and does not control aerial platforms as such. This item includes equipment where the mode of dispersal is inherently inaccurate, or the equipment or projectiles are able to disperse amounts of riot control agent that are injurious.

Proposal

47. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation, the Committee of Ministers should recommend that member States prohibit aerial platform-based delivery mechanisms designed to disperse significant quantities of riot control agents. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Aerial platform-based delivery mechanisms designed to disperse significant quantities of riot control agents.

Note: This item does not control smoke grenades and does not control aerial platforms as such. This item does include equipment where the mode of dispersal is inherently inaccurate, or the equipment or projectiles are able to disperse a significant amount of riot control agent over a wide area. Illustrative types of delivery mechanism covered include multi-barrel launchers, automatic projectiles launchers, multiple projectile release mechanisms and large capacity sprayers.”

vi. Fixed equipment for dissemination of RCAs in enclosed spaces

Description

48. Fixed equipment for the dissemination of riot control agents that can be attached to a wall or ceiling inside a prison or place of detention. Certain models not specifically promoted for custodial use incorporate automated system, using motion sensor technology.

Health and human rights concerns

49. The placement of RCA dissemination devices in confined spaces or poorly ventilated rooms, or their use in situations where prisoners, detainees, or other targets cannot leave the contaminated area quickly, could pose a risk of resultant build-up of toxic chemicals, leading to serious injury or death. The employment of such devices in larger enclosed areas such as prison halls also has the potential to lead to injuries resulting from panic and stampedes. These devices can be indiscriminate, affecting bystanders as well as those targeted. The autonomous or semi-autonomous nature of certain models also poses the risk that they will be activated inappropriately.

50. With regard to the dissemination of RCAs in closed spaces in general, UNODC/OHCHR have stated that: “Exposure to high concentrations of such chemicals, or over a prolonged period, can cause severe injury or even death. Therefore, the use of RCAs must be carefully controlled, and they should not be used in confined or enclosed spaces.”³⁸ Similarly, the UN Special Rapporteur on Torture has written that the use of tear gas in “closed confinements” could make it cruel, inhuman or degrading because of the “gravity of its effects”.³⁹ The UN Guidance on Less-Lethal Weapons in Law Enforcement has noted that “in certain circumstances the consequences

³⁸ UNODC and OHCHR, *Resource book on the use of force and firearms in law enforcement*, 2017, p. 86.

³⁹ UN Special Rapporteur on Torture and other cruel, inhuman or degrading treatment or punishment, *Extra-custodial use of force and the prohibition of torture and other cruel, inhuman or degrading treatment or punishment*, UN.doc A/72/178, 20 July 2017, documents-dds-ny.un.org/doc/UNDOC/GEN/N17/223/15/PDF/N1722315.pdf?OpenElement, para. 55.

of using chemical irritants may be lethal, such as when they are dispersed in confined spaces and result in high levels of exposure.”⁴⁰

Companies manufacturing and/or promoting fixed equipment for dissemination of RCAs in enclosed spaces, from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
2	1	United States

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

51. Fixed equipment for the dissemination of incapacitating or irritating chemical substances in enclosed spaces, were moved from Annex III (controlled goods) to Annex II (prohibited goods) in 2025.⁴¹

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

52. Fixed sprayers are listed as Category B controlled goods.⁴²

Whether/how equipment addressed in CM/Rec(2021)2

53. “Fixed RCA dispersal equipment intended for disseminating a limited dose of RCA over a small area inside a building” is currently listed under Appendix 3 (controlled goods).

Proposal

54. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation, the Committee of Ministers should recommend that member States prohibit fixed indoor RCA dissemination equipment. Consequently, this item should be added to Appendix 1 (prohibited goods) list. The existing Appendix III (controlled goods) text should be deleted: “fixed RCA dispersal equipment intended for disseminating a limited dose of RCA over a small area inside a building”

Suggested text:

“Fixed equipment for the dissemination of riot control agents in enclosed spaces”.

vii. Large calibre projectiles containing riot control agents

Description

55. The majority of RCA projectiles promoted for law enforcement have calibres below 56mm. However, certain projectiles containing riot control agents with a calibre above 56mm, have been designed to deliver large quantities of such agents over a very wide area or extended distances. They include mortar shells, howitzer shells, artillery shells and rocket-propelled grenades, some of which have been promoted for use in law enforcement.

⁴⁰ OHCHR, *UN Guidance on Less-Lethal Weapons in Law Enforcement*, 7.3.3.

⁴¹ European Union, *EU Anti-Torture Regulation*, 2025, Annex II, 5.1.

⁴² UN Special Rapporteur on Torture, *Torture Trade Report*, 2023, Annex 2, 4.5.

Health and human rights concerns

56. Large amounts of riot control agent dispersed could cause injury to both those targeted and to bystanders. Both those people targeted, as well as bystanders, could be injured by the kinetic impact of the projectiles, fragments, or shrapnel. The projectiles could easily be used to collectively ill-treat or punish large groups of people.⁴³

57. The Chemical Weapons Convention (CWC) prohibits the use of riot control agents as a method of warfare.⁴⁴ The CWC permits the employment of certain toxic chemicals (specifically including riot control agents) for “purposes not prohibited” specifically including “law enforcement including riot control” but only where the “types and quantities [of toxic chemicals] are consistent with such purposes”.⁴⁵ The manufacture, trade and use of large calibre RCA projectiles such as mortar shells, etc. would almost certainly breach the CWC – though guidance on criteria has not been established.

58. Large calibre projectiles containing riot control agents, including mortar, artillery and rocket-delivered systems, have previously been reported as having been developed, manufactured or promoted by companies based in a number of States, including China, Russia, Türkiye and the United States.⁴⁶ For example a Turkish company was identified marketing 120mm 17kg mortar shells filled with the RCA, CS, on its website, at Turkish arms fairs, and at a South African arms fair in 2010. When this was brought to the Turkish Government’s attention, it prohibited such marketing and all remaining stockpiles of this RCA mortar shell and all related marketing materials were destroyed.⁴⁷ No contemporaneous data is currently available to allow an assessment of the scale of manufacture, promotion or trade in such equipment during the period covered by this report.

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

59. Large calibre projectiles containing riot control agents were listed in Annex III (controlled goods) in 2025.⁴⁸

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

60. Large calibre chemical irritant munitions (greater than 56mm) are listed in Category B controlled goods.⁴⁹

⁴³ See, for example, Amnesty International, *Iraq: Iranian tear gas grenades among those causing gruesome protester deaths*, 13 December 2019, www.amnesty.org/en/latest/news/2019/10/iraq-gruesome-string-of-fatalities-as-new-tear-gas-grenades-pierce-protesters-skulls/

⁴⁴ Chemical Weapons Convention, Article 1.5, www.opcw.org/sites/default/files/documents/CWC/CWC_en.pdf

⁴⁵ Chemical Weapons Convention, Articles 2, 1(a); 9(d), www.opcw.org/sites/default/files/documents/CWC/CWC_en.pdf

⁴⁶ See for example: Crowley, M., *Drawing the line: Regulation of “wide area” riot control agent delivery mechanisms under the Chemical Weapons Convention*, Omega Research Foundation and Bradford University, April 2013; Crowley M., *Chinese “wide area” riot control agent means of delivery: implications for the Chemical Weapons Convention*, Omega Research Foundation & Bradford University, November 2015;

⁴⁷ In addition to footnote 48 see: Correspondence from Ambassador Dogan, Permanent Representative of Turkey to the Organisation for the Prohibition of Chemical Weapons, to Bradford University and the Omega Research Foundation, 29th March 2013.

⁴⁸ European Union, EU Anti-Torture Regulation, 2025, Annex III, 3.6. Note: This item includes projectiles containing riot control agents, notably OC and PAVA with a calibre above 56mm. The use of such items must be consistent with relevant provisions of the Chemical Weapons Convention, notably Article 2.1 and 2.9.d.

⁴⁹ UN Special Rapporteur on Torture, Torture Trade Report, 2023, Annex 2, 4.6.

Whether/how equipment addressed under CM/Rec(2021)2

61. Equipment not addressed under CM/Rec(2021)2.

Proposal

62. Given the previous development, manufacture and promotion of such RCA projectiles, their inherent unsuitability for law enforcement due to their excessive size and delivery of excessive quantities of RCAs, the risks to health of those targeted and bystanders, and potential for use in widespread punishment and ill-treatment, the Committee of Ministers should recommend that member States prohibit large calibre projectiles containing riot control agents. Consequently, this item should be listed in Appendix I (prohibited goods).

Suggested text:

“Large calibre projectiles containing riot control agents.

Note: This item incorporates projectiles containing riot control agents, notably CS, CN, CR, OC and PAVA with a calibre above 56mm including mortar, artillery and rocket-delivered projectiles.”

viii. Neck cuffs***Description***

63. A metal cuff that fastens around the neck and can be linked with a chain to other restraints such as handcuffs or leg cuffs.

Health and human rights concerns

64. Cuffs designed to be secured around the neck increase the risk of severe neck injuries and asphyxiation. The use of these restraints can help facilitate torture or other ill-treatment (especially when used to restrain a person in stress positions). This equipment is inherently degrading and its use fulfils no legitimate law enforcement purpose that cannot be achieved through less harmful means. The Nelson Mandela Rules state: “The use of ... instruments of restraint which are inherently degrading or painful shall be prohibited.”⁵⁰

Companies manufacturing and/or promoting neck cuffs, from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
3	2	Pakistan, United States

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

65. “Individual cuffs or rings fitted with a locking mechanism, having an inside circumference exceeding 165 mm when the ratchet is engaged at the last notch entering the locking mechanism” were listed under Annex III controlled goods in 2014.⁵¹ And the associated Note states, “This item

⁵⁰ Nelson Mandela Rules, 2016, Rule 47.

⁵¹ European Union, EU Anti-Torture Regulation, 2025, Annex III, 1.2.

includes neck restraints and other individual cuffs or rings fitted with a locking mechanism, which are linked to ordinary handcuffs by means of a chain.”

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

66. This is not addressed in the UN Special Rapporteur’s Report.

Whether/how equipment addressed under CM/Rec(2021)2

67. Equipment not addressed under CM/Rec(2021)2.

Proposal

68. Given the risk of injury, the inherently degrading nature of such restraints and their current promotion by certain companies to the law enforcement community, the Committee of Ministers should recommend that member States prohibit neck cuffs. Consequently, this item should be listed in Appendix I (prohibited goods).

Suggested text:

“Neck cuffs.”

ix. Rigid bar combination cuffs

Description

69. Rigid bar combination cuffs are restraints in which hand restraints and leg restraints are linked together by a rigid metal bar.

Health and human rights concerns

70. Rigid bar combination cuffs severely restrict movement, significantly increasing the risk of falls and associated injuries. By fixing the position of the hands and legs in relation to each other, the rigid bar can force the restrained person into an unnatural and potentially painful posture.

71. This equipment is inherently degrading and its use fulfils no legitimate law enforcement purpose that cannot be achieved through less harmful means. The Nelson Mandela Rules state: “The use of ... instruments of restraint which are inherently degrading or painful shall be prohibited.”⁵²

Companies manufacturing and/or promoting rigid bar combination cuffs from 1 January 2020–31 December 2025

Number of companies	Number of countries where companies based	Countries
2	2	Pakistan, United States

⁵² Nelson Mandela Rules, 2016, Rule 47.

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

72. This is not addressed in the EU Anti-Torture Regulation

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

73. Although not expressly addressed in the UN Special Rapporteur's report, rigid bar combination cuffs present similar human rights objections to weighted hand or leg restraints which are listed as Category A prohibited goods.⁵³

Whether/how equipment addressed under CM/Rec(2021)2

74. Equipment not addressed under CM/Rec(2021)2.

Proposal

75. Given the risk of injury, the inherently degrading nature of such restraints and their current promotion by certain companies to the law enforcement community, the Committee of Ministers should recommend that member States prohibit rigid bar combination cuffs. Consequently, this item should be added to Appendix I (prohibited goods) list.

Suggested text

"Rigid bar combination cuffs.

Note: Rigid bar combination cuffs are restraints in which hand restraints and leg restraints are linked together by a rigid bar, typically made of metal."

x. Weighted hand restraints

Description

76. Two metal cuffs attached by a heavy chain of considerable weight. The cuffs are usually non-adjustable and larger than those of ordinary handcuffs and may have additional weights added.

Health and human rights concerns

77. The use of weighted hand cuffs constitutes a *prima facie* violation of the prohibition of torture and other ill-treatment. Their use fulfils no legitimate law enforcement purpose that cannot be achieved through less harmful means. These cuffs are heavier than is necessary to adequately restrain an individual, and wearing them is inherently degrading. The weight significantly restricts movement whilst increasing the risk of wrist injury. Prolonged use of these cuffs can lead to lacerations, which may lead to blood poisoning and other long-term physical impairments.

78. According to the UN Special Rapporteur on Torture: "The added weight causes stress to the hands or legs, restricts movement and increases the risk of injury. They are considered to be a stress position contrary to the prohibition on cruel, inhuman or degrading treatment or punishment. Weighted restraints fulfil no legitimate purpose that cannot be achieved through the use of standard hand or leg cuff."⁵⁴ According to the UNODC and OHCHR Resource book : "There

⁵³ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 1.4.

⁵⁴ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 1.6

should be an absolute prohibition on weighted restraints”.⁵⁵ In addition the Nelson Mandela Rules: “The use of ... instruments of restraint which are inherently degrading or painful shall be prohibited.”⁵⁶

Companies manufacturing and/or promoting weighted hand restraints, from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
4	3	China, Germany, India

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

79. Although weighted leg restraints were added to Annex II (prohibited goods) in 2014⁵⁷, weighted hand restraints are not addressed in the EU Anti-Torture Regulation

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

80. Weighted hand or leg restraints are listed as Category A prohibited goods.⁵⁸

Whether/how equipment addressed under CM/Rec(2021)2

81. Although weighted leg restraints are prohibited under CM/Rec(2021)2, weighted hand restraints are not covered by this instrument.

Proposal

82. Given the risk of injury, the inherently degrading nature of such restraints, their current promotion by certain companies to the law enforcement community, and the UN Special Rapporteur’s recommendation that they be prohibited, the Committee of Ministers should recommend that member States prohibit weighted hand cuffs.

Suggested text:

The existing Appendix I (prohibited goods) text “Weighted leg restraints” should be amended to “Weighted hand or weighted leg restraints”.

xi. Sjamboks

Description

83. Sjamboks are a type of heavy whip, traditionally made of leather, but now also made of other materials, such as plastic. Sjamboks have been long used particularly in certain parts of Southern Africa, for cattle droving. Certain companies have also manufactured and promoted their use in law enforcement, in such cases the products may not always be called sjamboks but are physically and functionally similar.

⁵⁵ UNODC and OHCHR, *Resource book on the use of force and firearms in law enforcement*, 2017, p. 84.

⁵⁶ Nelson Mandela Rules, 2016, Rule 47.

⁵⁷ European Union, EU Anti-Torture Regulation, 2014, 2.3.

⁵⁸ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 1.6.

Health and human rights concerns

84. According to the UN Special Rapporteur on Torture:
 “Sjamboks have been used to violently attack crowds or individuals at protests or other extra-custodial settings. Due to their design, the level of force used is hard to control, and sjamboks cannot be used without inflicting excessive and unnecessary pain. They can cause lacerations and other injuries, which may lead to permanent scarring or infection. Whips and sjamboks fulfil no legitimate law enforcement purpose that cannot be achieved through the use of standard batons or other less harmful means.”⁵⁹

Companies manufacturing and/or promoting Sjamboks from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
8	6	China, France, Korea, Republic of Korea, Pakistan, South Africa, Taiwan

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

85. Sjamboks⁶⁰ were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

86. Whips and sjamboks are listed as Category A (prohibited) goods.⁶¹

Whether/how equipment addressed under CM/Rec(2021)2

87. Equipment not addressed under CM/Rec(2021)2.

Proposal

88. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation and that the UN Special Rapporteur on Torture recommends its prohibition, the Committee of Ministers should recommend that member States prohibit sjamboks. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Sjamboks.

Note: This item describes a type of heavy whip, traditionally made of leather, or of other materials, such as plastic. This item does not cover instruments traditionally used for herding animals. Certain products covered under this item are physically and functionally similar and promoted for law enforcement use but may not always be called sjamboks.”

⁵⁹ UN Special Rapporteur 2023 Torture Trade Report, Annex I

⁶⁰ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 4.3..Note: This item alludes to a type of heavy whip, traditionally made of leather, or of other materials, such as plastic. This item does not cover instruments traditionally used for herding animals.

⁶¹ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 2.4.

xii. Lathis**Description**

89. Lathis are long flexible batons (usually 1m or longer), traditionally made of wood or bamboo but more recently have also been manufactured using polycarbonate. Certain companies have manufactured and promoted their use in law enforcement, in such cases the products may not always be called lathis but are physically and functionally similar.

Health and human rights concerns

90. According to the UN Special Rapporteur on Torture, “The extra length of lathis means that they deliver a greater level kinetic force than conventional batons, causing excessive pain and increasing the risk of serious injury. Certain types of heavier lathis are particularly dangerous. Their use fulfils no legitimate law enforcement purpose that cannot be achieved through the use of standard batons.”⁶²

Companies manufacturing and/or promoting lathis from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
17	2	India, China

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

91. Lathis⁶³ were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

92. Lathis are listed as Category A (prohibited) goods.⁶⁴

Whether/how equipment addressed under CM/Rec(2021)2

93. Equipment not addressed under CM/Rec(2021)2.

Proposal

94. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation and that the UN Special Rapporteur on Torture recommends its prohibition, the Committee of Ministers should recommend that member States prohibit lathis. Consequently, this item should be added to Appendix 1 prohibited goods list.

⁶² UN Special Rapporteur 2023 Torture Trade Report, Annex I

⁶³ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 3.3. *Note:* Lathis are long flexible batons (over 1m long), traditionally made of wood or bamboo but also polycarbonate of the kind used as a weapon by police officers.

⁶⁴ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 2.5.

Suggested text

“Lathis.

Note: Lathis are long flexible batons (over 1m long), traditionally made of wood or bamboo but also polycarbonate or rubber. Batons promoted for law enforcement use that are longer than 1 metre are physically and functionally equivalent to lathis, although they may not be explicitly described as lathis.”

xiii. Spiked body armour**Description**

95. Body armour, including arm guards, with spikes or serrations made of metal or other hard material.

Health and human rights concerns

96. According to the UN Special Rapporteur on Torture, “Spiked ... body armour cannot be used without inflicting excessive and unnecessary pain, as they can tear through skin and cause injury. The use of this equipment fulfils no legitimate law enforcement purpose that cannot be achieved through standard body armour...”⁶⁵

Companies manufacturing and/or promoting spiked body armour from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
2	2	China, Cyprus

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

97. “Body armour with spikes or serrations made of metal or other hard material”⁶⁶ was listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

98. “Spiked shields and body armour” are listed as Category A (prohibited) goods.⁶⁷

Whether/how equipment addressed under CM/Rec(2021)2

99. Equipment not addressed under CM/Rec(2021)2.

⁶⁵ UN Special Rapporteur 2023 Torture Trade Report, Annex I

⁶⁶European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 3.5. Note: This item does not control body armours with load-bearing systems featuring parts made of metal or other hard material used to attach or carry equipment

⁶⁷ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 2.2.

Proposal

100. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation and that the UN Special Rapporteur recommends its prohibition, the Committee of Ministers should recommend that member States prohibit spiked body armour. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Body armour with spikes or serrations made of metal or other hard material

Note: This item does not control body armour with load-bearing systems featuring parts made of metal or other hard material used to attach or carry equipment. This item also does not control body armour or shields fitted with glass-breaking tips or projections, provided that they are designed and positioned for that purpose and not for offensive use against persons.”

xiv. Weighted batons and gloves

Description

101. While standard batons and standard protective gloves are important protective equipment for officials, weighted batons and gloves are significantly heavier and/or have weights added to particular areas. This additional weighting is not necessary for legitimate law enforcement purposes.

- Weighted batons: flexible metal encased in leather or rubber, or batons with additional weighting at the tip designed to increase the kinetic impact to the target.
- Weighted gloves are usually made of leather, with metal weights covering the knuckles, fingers, or back of the hand.

Health and human rights concerns

102. According to the UN Special Rapporteur on Torture: “The additional kinetic energy generated by weighted gloves and batons can cause excessive pain and increases the risk of serious injury, especially if used on vulnerable areas of the body. They fulfil no legitimate law enforcement purpose that cannot be achieved through the use of standard batons and standard protective gloves.”⁶⁸

Table of companies manufacturing and/or promoting “weighted batons” and “weighted gloves” from 1 January 2020 – 31 December 2025

Number of companies of weighted gloves	Number of countries where companies based	Countries
9	5	Bangladesh, Canada, France, Pakistan, United States
Number of companies of weighted batons	Number of countries where companies based	Countries
19	7	Bangladesh, France, Germany, Pakistan, South Africa, Taiwan, United States

⁶⁸ UN Special Rapporteur 2023 Torture Trade Report, Annex I

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

103. “Weighted batons or batons encased in thick leather or rubber with additional weighting designed to increase kinetic impact to the target and weighted gloves or other similar devices”⁶⁹ were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

104. “Weighted batons and gloves” are listed as Category A (prohibited) goods.⁷⁰

Whether/how equipment addressed under CM/Rec(2021)2

105. Equipment not addressed under CM/Rec(2021)2.

Proposal

106. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation and that the UN Special Rapporteur recommends its prohibition, the Committee of Ministers should recommend that member States prohibit weighted batons and weighted gloves. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Weighted batons and weighted gloves or other similar devices.

Notes: 1. Weighted baton: flexible metal encased in leather or rubber, or batons with additional weighting at one end designed to increase the kinetic impact to the target. This item does not control standard batons fitted with a glass-breaking tip or other glass-breaking features, provided that they are designed and positioned exclusively for that purpose and not to increase kinetic impact against persons. 2. Weighted gloves are usually made of leather and have powdered steel or lead sewn into the material over the knuckle, fingers, or back of the hand.”

xv. Leg irons

Description

107. Leg irons are non-adjustable metal rings or other non-adjustable metal restraints that are fixed around a prisoner’s ankles, normally by means of a bolt or screw arrangement. They can be hinged or unhinged and are normally linked with a chain. They are distinct from leg cuffs which can be adjusted on a detainee’s ankle.

Health and human rights concerns

108. As leg irons cannot be made smaller or bigger to account for prisoner’s leg width their use when too tight risks restricting/cutting off the detainee’s blood circulation causing serious injury or

⁶⁹ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 3.2. *Notes:* 1. Weighted baton: A flat device consisting of metal (spring steel) encased in thick leather or rubber and used for slapping or striking a person; or a short baton consisting of spring steel encased in leather, sometimes weighted at one end with lead shot, and used for striking a person. 2. Weighted gloves are usually made of leather and have powdered steel or lead sewn into the material over the knuckle, fingers, or back of the hand

⁷⁰ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 2.3.

death. Even when such blood restriction does not occur, prolonged use of these cuffs can lead to lacerations, which can lead to blood poisoning and other long-term physical impairments. Their use can help facilitate torture or other ill-treatment (especially stress positions), and is inherently degrading. Their use fulfils no legitimate law enforcement purpose that cannot be achieved through the use of standard hand or leg restraints.

109. Rule 47 of the UN Standard Minimum Rules for the Treatment of Prisoners [Nelson Mandela Rules] prohibits the use of "instruments of restraint which are inherently degrading or painful." Rule 43(2) of Nelson Mandela Rules states: "Instruments of restraint shall never be applied as a sanction for disciplinary offences."⁷¹ Article 68.1 of the European Prison Rules reiterates this prohibition.⁷² In 2000, the European Parliament affirmed that the use of leg-irons was inherently cruel, inhuman or degrading and they should be banned.⁷³ The Namibian High Court noted "the practice to use chains and leg-irons on human beings is a humiliating experience which reduces the person ... to the level of a hobbled animal ... [it is] a strong reminder of days gone by when people of this continent were carted away in bondage to be sold like chattels".⁷⁴

Companies manufacturing and/or promoting leg irons from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
7	3	China, Pakistan, Taiwan

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

110. 'Leg irons'⁷⁵ were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

111. Leg irons are not specifically addressed in the UN Special Rapporteur report & lists.

Whether/how equipment addressed under CM/Rec(2021)2

112. Equipment not addressed under CM/Rec(2021)2.

Proposal

113. Given the risk of injury, the inherently degrading nature of these restraints, and noting that they are now prohibited under the EU Anti-Torture Regulation, the Committee of Ministers should

⁷¹ UN Standard Minimum Rules for the Treatment of Prisoners, Rule 47, 43(2), www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf

⁷² Council of Europe, European Prison Rules, 68.1, rm.coe.int/european-prison-rules-978-92-871-5982-3/16806ab9ae

⁷³ EP Resolution on the Council's second Annual Report according to Operative Provision 8 of the European code of Conduct on Arms Exports (131771/1/2000-C5-0111/2001-2001/2050(COS)) 3 October 2001

⁷⁴ *Namunjepo and Ors v. Commanding Office Windhoek Prison and Another* (SA 3/98) [1999] NASC 3; 2000(6), 9 July 1999.

⁷⁵ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 2.5. 'Leg irons are non-adjustable metal rings or other non-adjustable metal restraints that are fixed around a prisoner's ankles, normally by means of a bolt or screw arrangement. They can be hinged or unhinged and are normally linked with a chain. (They are distinct from leg cuffs which can be adjusted on a detainee's ankle (Annex III, 1.3)).

recommend that member States prohibit leg irons. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Leg irons.

Note: Leg irons are non-adjustable metal rings or other non-adjustable metal restraints that are fixed around a prisoner’s ankles, normally by means of a bolt or screw arrangement. They can be hinged or unhinged and are normally linked with a chain. (They are distinct from leg cuffs which can be adjusted on a detainee’s ankle).”

xvi. Gang chains

Description

114. Multiple pairs of handcuffs, leg cuffs, belly chains, or a combination of these, attached to a single chain (often made of metal), restraining several people together in a chain.

Health and human rights concerns

115. According to the UN Special Rapporteur on Torture, “Gang chains are designed to enable several prisoners to be restrained together in places of detention or situations (including forced labour such as road maintenance work or agriculture). The practice of chaining prisoners together as a group is inherently inhuman and degrading, conjuring extremely negative and harmful connotations of the historical practices of slavery or other forms of servitude. They can pose an increased risk of injury to prisoners on the chain, including when one person falls or loses their balance causing other members of the group to topple and fall. Further, their use fulfils no legitimate law enforcement purpose that cannot be achieved through the use of standard hand or leg restraints.”⁷⁶

116. According to the Nelson Mandela Rules, “The use of ... instruments of restraint which are inherently degrading or painful shall be prohibited.”⁷⁷ In addition the Nelson Mandela Rules further provide in respect of prisoner working conditions: “The precautions laid down to protect the safety and health of free workers shall be equally observed in prisons.”⁷⁸

Companies manufacturing and/or promoting gang chains from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
12	6	China, Germany, Republic of Korea, Malaysia, Russian Federation, United States

⁷⁶ UN Special Rapporteur 2023 Torture Trade Report, Annex I

⁷⁷ UN Standard Minimum Rules for the Treatment of Prisoners, General Assembly resolution A/70/175, 8 January 2016, (Nelson Mandela Rules), Rule 47.

⁷⁸ UN Standard Minimum Rules for the Treatment of Prisoners, General Assembly resolution A/70/175, 8 January 2016, (Nelson Mandela Rules), Rule 101(2). See, also, Rules 96-100.

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

117. Gang chains were listed in Annex II prohibited goods in 2025⁷⁹.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

118. Gang chains are listed as Category A (prohibited) goods.⁸⁰

Whether/how equipment addressed under CM/Rec(2021)2

119. “Gang chains” are currently listed in Appendix III (controlled goods).

Proposal

120. Given the risk of injury, the inherently degrading nature of such restraints, their current promotion by certain companies to the law enforcement community, and the UN Special Rapporteur’s recommendation that they be prohibited, the CM should recommend that member States prohibit gang chains. Consequently, this item should be moved from Appendix III (controlled goods) to Appendix 1 (prohibited goods) list.

Suggested text:

“Gang chains

Note: Gang chains comprise multiple pairs of handcuffs, leg cuffs, belly chains, or a combination of these, attached to a single chain (often made of metal), restraining several people together in a chain.”

xvii. Hoods and blindfolds***Description***

121. A blindfold is a piece of fabric designed to cover the eyes and a hood is a piece of fabric designed to enclose the entire head. Some models are secured in place with a lock around the neck, while others are attached to other restraints, such as handcuffs.

Health and human rights concerns

122. According to the UN Special Rapporteur on Torture, “The use of hoods and blindfolds can lead to disorientation and stress; while certain types of hood carries a risk of suffocation, asphyxiation and strangulation. Because blindfolding and hooding prevents the detainee identifying perpetrators it enables further torture and decreases likelihood of subsequent accountability. The hoods and blindfolds can cause anxiety, agitation, acute distress and irritability, increasing stress to the detainee. For persons suffering from claustrophobia, they can trigger other adverse reactions including panic. The use of hoods and blindfolds fulfils no legitimate law enforcement purpose.”⁸¹

⁷⁹ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 2.4. Note: Gang chains comprise multiple pairs of handcuffs, leg cuffs, belly chains, or a combination of these, attached to a single chain (often made of metal), restraining several people together in a chain.

⁸⁰ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 1.5.

⁸¹ UN Special Rapporteur 2023 Torture Trade Report, Annex I

123. The UN Committee Against Torture has repeatedly stated that blindfolding and hooding can constitute torture or other ill-treatment.⁸² The Council of Europe Committee for the Prevention of Torture “recommends that the blindfolding of persons who are in police custody be expressly prohibited”.⁸³ The European Court of Human Rights has stated that blindfolding a prisoner causes disorientation and means that an individual cannot identify those who were mistreating him contrary to the fundamental principles of a democratic society.⁸⁴ Furthermore, according to the Court, hooding, when used in combination with other interrogation techniques, was held to constitute inhuman treatment.⁸⁵

Companies manufacturing and/or promoting hoods and blindfolds from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
4	2	Pakistan, United States

Whether/how equipment addressed under EU Anti Torture Regulation Annexes

124. “Hoods and blindfolds solely designed for law enforcement purposes to block the vision and/or enclose the face of a person/detainee, including such hoods and blindfolds when linked by a chain to ordinary handcuffs or other restraints.”⁸⁶ They were listed in Annex II (prohibited goods) in 2025.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

125. “Hoods and blindfolds” are listed as Category A (prohibited) goods.⁸⁷

Whether/how equipment addressed under CM/Rec(2021)2

126. Equipment not addressed under CM/Rec(2021)2.

Proposal

127. Given human rights and health concerns, and noting that this equipment type is now prohibited under the EU Anti-Torture Regulation and that the UN Special Rapporteur recommends its prohibition, the CM should recommend that member States prohibit hoods and blindfolds. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

⁸² Committee Against Torture (52nd session) Supplement No. 44, A/52/44, Conclusions on Israel, para. 257; Committee Against Torture, Report on Mexico produced by the Committee under Article 20 of the Convention, and Reply from the Government of Mexico, CAT/C/75, 26 May 2003, paras. 142-143; Ireland v. United Kingdom, App. No. 5310/70, 18 January 1978, para. 96(b) and reasons for the court para. 3; Ocalan v. Turkey, App. No. 46221/99, 12 May 2005.

⁸³ CPT Standards, “Substantive” sections of the CPT’s General Reports, January 2015, CPT/Inf/E (2002) 1 - Rev. 2015, para. 38.

⁸⁴ Aksoy v. Turkey, App. No. 21987/93, 18 December 1996, paras. 60 and 80; Aydin v. Turkey, App. No. 57/1996/676/866, 25 September 1997, para. 84.

⁸⁵ Ireland v. United Kingdom, App. No. 5310/71, 18 January 1978, para. 96(b) and reasons for the court para. 3.

⁸⁶ European Union, EU Anti-Torture Regulation, 2025, Annex II prohibited goods, 2.11. Note: This item does not include spit hoods which are controlled in Annex III 1.4.

⁸⁷ UN Special Rapporteur 2023 Torture Trade Report, Annex I, 1.9

Suggested text

“Hoods and blindfolds solely designed for law enforcement purposes to block the vision and/or enclose the face of a person/detainee, including such hoods and blindfolds when linked by a chain to ordinary handcuffs or other restraints.

Note: This item does not include spit hoods which are list in Appendix III (controlled goods) list.”

xviii. Anti-personnel directed energy weapons**Description**

128. A range of weapons designed for use against human beings that utilize different forms of directed energy. They include:

- Millimetre wave weapons that are purportedly intended to non-injurious heat the topmost layer of skin of those targeted with a focused beam of millimetre wave energy and thereby encourage persons to leave the area because of “an intolerable heating sensation”. Vehicle-mounted models for potential use in crowd dispersal as well as models for indoor use (potentially in prisons) have previously been developed, but have never been used in either law enforcement or military operations.
- A hand-held weapon that employs a high-energy laser that “irradiates the skin” of those targeted.

Health and human rights concerns

129. According to the UN Special Rapporteur on Torture “These weapons are intended to enforce compliance at a distance through intolerable pain. The silent and invisible nature of the directed energy beam makes avoidance of the weapon difficult, which could prevent people from dispersing safely and lead to panic-driven stampedes. A long exposure to this directed energy could potentially lead to serious injuries. The width of the energy beam can be widened, so that it targets individuals, multiple individuals, or a crowd indiscriminately.”⁸⁸

130. According to the UN Guidance on Less-Lethal Weapons in Law Enforcement: “The use of [directed-energy weapons liable to cause serious injury] is widely considered to violate international human rights law. They should not be used in law enforcement.”⁸⁹

State entities or companies developing, manufacturing or promoting anti-personnel directed energy weapons

131. A US-based company and the US military cooperatively developed a vehicle-based millimetre wave weapon – the Active Denial System [ADS] - that has subsequently been repeatedly tested and trialled. To date, it has not been employed by either law enforcement or military. Originally vehicle-based, smaller versions of this weapon were also developed and marketed, but have never been employed, and now seem to have been withdrawn.⁹⁰ A Chinese

⁸⁸ UN Special Rapporteur 2023 Torture Trade Report, Annex I

⁸⁹ OHCHR, UN human rights guidance on less-lethal weapons in law enforcement, 2020, para 5.1.

⁹⁰ Joint Intermediate Force Capabilities Office (JIFCO), U.S. Department of Defense Non-Lethal Weapons Program Active Denial Technology Factsheet, 11 May 2020. For further information see JIFCO website, <https://jnlwp.defense.gov/Future-Intermediate-Force-Capabilities/Active-Denial-Technology/>; Omega Research Foundation and Amnesty International. 2015. *Grasping the Nettle: Ending Europe's Trade in execution and torture technology*. EUR 01/1632/2015 pp.47-48. *Lethal in Disguise*, Physicians for Human Rights and International Network of Civil Liberties Organizations (INCLO), March 2016 pp.78-83; *Lethal in Disguise 2*, Physicians for Human Rights and INCLO, March 2023, pp.115-116.

company has developed and currently promotes a hand-held “non-lethal weapon” that employs a high-energy laser that “irradiates the skin, it can cause the criminal's skin to carbonize instantly and cause severe pain...”⁹¹

Whether/how equipment addressed in EU Anti Torture Regulation Annexes

132. These weapons are not addressed by the EU Anti-Torture Regulation.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

133. “Millimetre wave weapons” are listed as Category A (prohibited) goods.⁹²

Whether/how equipment addressed under CM/Rec(2021)2

134. Equipment not addressed under CM/Rec(2021)2.

Proposal

135. Although recognizing that development and promotion of these weapons has to date been limited, given the risks to health and human rights, and noting that the UN Special Rapporteur on Torture recommends that millimetre wave weapons be prohibited, the CM should recommend that member States prohibit anti-personnel directed energy weapons. Consequently, this item should be added to Appendix 1 (prohibited goods) list.

Suggested text:

“Anti-personnel directed energy weapons designed to inflict pain against human beings.”

b. Law enforcement equipment that should be controlled

i. Single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles

Description

136. Single kinetic impact projectiles can be fired from different types of launcher. Calibres include 12 gauge (shotgun ammunition), 37/38 mm, 40 mm, and 42 mm. Such ammunition is designed to incapacitate the targeted individual via blunt trauma without penetrating the skin or causing permanent injury. The projectiles contained in the ammunition can be rubber, plastic, foam, wood, or fabric (bean bags –fabric bags filled with small balls or pellets), and can vary greatly in terms of their size, shape, accuracy, and impact force.

Human rights and health concerns

137. Although single KIPs and associated launchers can be legitimately employed by law enforcement officials, human rights organisations have documented their widespread misuse. From 2017-22, Amnesty International documented the unlawful, often punitive, use of kinetic impact projectiles in at least 33 countries or territories in all regions. These cases include police firing projectiles at short range and at head height; firing randomly into crowds of peaceful

⁹¹ <http://www.haqc.com/products/category1/product1.html>

⁹² UN Special Rapporteur 2023 Torture Trade Report, Annex I, 4.1

protesters; firing at fleeing protesters; and one case of firing into a crowd from a military helicopter.⁹³ According to the UN Special Rapporteur on Torture: “Kinetic impact projectiles should only be used against specific violent individuals, only at or beyond minimum safe distance and must never be targeted at the head, face or neck.”⁹⁴ Furthermore the UN Special Rapporteur on Torture States that: “Ammunition that is inaccurate or impacts with excessive force is dangerous.” The UN Guidance on Less Lethal Weapons in Law Enforcement recommends “impact projectiles should be capable of striking an individual to within a 10-centimetre diameter of the targeted point when fired from the designated range”.⁹⁵

Companies manufacturing and/or promoting single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
Single KIPs 142	42	Argentina, Australia, Belgium, Brazil, Bulgaria, Canada, China, Colombia, Cyprus, Czech Republic, Ecuador, France, Germany, Greece, Hong Kong, India, Indonesia, Israel, Italy, Republic of Korea, Mexico, Montenegro, New Zealand, North Macedonia, Pakistan, Peru, Poland, Portugal, Russian Federation, Serbia, Singapore, Slovenia, South Africa, Spain, Switzerland, Taiwan, United Republic of Tanzania, Türkiye, United Arab Emirates, United Kingdom, United States, Venezuela
Single/limited shot launchers 80	29	Australia, Belgium, Brazil, Bulgaria, Canada, China, Denmark, France, Georgia, Germany, Hungary, India, Indonesia, Israel, Italy, Republic of Korea, Mexico, Pakistan, Poland, Russian Federation, Serbia, Singapore, South Africa, Spain, Switzerland, Taiwan, Türkiye, United Kingdom, United States

Whether/how equipment addressed under EU Anti-Torture Regulation

138. Single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles⁹⁶. They were listed in Annex III (controlled goods) in 2025.

⁹³ Amnesty International/ Omega Research Foundation, “My Eye Exploded”: the Global Abuse of Kinetic Impact Projectiles, (Index: ACT 30/6384/2023), 14 March 2023, p. 11.

⁹⁴ UN SRT, Annex 2, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment A/78/324, www.ohchr.org/sites/default/files/documents/issues/torture/sr/annex-ii-document-august-2023-18-09-23.pdf, p. 7.

⁹⁵ OHCHR, Guidance on less-lethal weapons in law enforcement, 2020, para. 7.5.4.

⁹⁶ EU Anti-Torture Regulation, Annex III, 2.4. Note: This item includes projectiles commonly known as rubber or plastic bullets or impact rounds, chemical irritant impact projectiles and beanbags. They come in different shapes and sizes include large and small balls or cylinders, and can be made of rubber, PVC, dense foam, or wood. This item does not control equipment controlled by items ML1, 2 and 12 of the Common Military List of the European Union

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

139. “Single/limited shot launchers” and “Ammunition containing single non-metallic projectiles” are both listed as Category B (controlled) goods.⁹⁷

Whether/how equipment addressed under CM/Rec(2021)2

140. This equipment is not addressed under this instrument.

Proposal

141. Given the human rights and health concerns of the misuse of this equipment, and noting that it is now controlled under the EU Anti-Torture Regulation and that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles. Consequently, this item should be added to Appendix III (controlled goods) list.

Suggested text:

“Single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles.

Note: This item includes projectiles commonly known as rubber or plastic bullets or impact rounds, chemical irritant impact projectiles and beanbags. They come in different shapes and sizes include large and small balls or cylinders, and can be made of rubber, PVC, dense foam, or wood.”

ii. Stun grenades

Description

142. Stun grenades (also called flashbangs, pyrotechnic or disorientation devices) are designed to surprise and temporarily disorientate/blind people through intense exposure to sound and light, among other effects. They emit deafeningly loud noise and blinding light; some also emit inert smoke or chemical irritants. Certain types (“sting ball” grenades) emit numerous kinetic impact projectiles. Stun grenades can be hand-thrown or fired from a weapon. They can generate temperatures of more than 3,000 degrees Celsius. Their effects are indiscriminate within a wide radius (at least 7 metres for acute effects, depending on model).

Health and human rights concerns

143. The most common injuries associated with the use of stun grenades are burns, hearing loss or damage (e.g. tinnitus, eardrum rupture), as well as other blast and fragmentation injuries including deterioration of sight. Though not designed to fragment, some models have sprayed casing fragments on detonation; stun grenades have also been known to start fires. Finally, there is the risk of stampede, panic and resulting falls.⁹⁸

⁹⁷ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 2.3

⁹⁸ Omega Research Foundation, *Stun Grenades*, omegaresearchfoundation.org/what-we-do/other-police-equipment/stun-grenades/; *Lethal in Disguise II*, <https://lethalindisguise.org/wp-content/uploads/2022/12/LID2-Main-Report-Pages-Final-1.pdf>, pp. 88-97; OSCE, *Handbook on Monitoring Freedom of Peaceful Assembly*, cdn.osce.org/sites/default/files/f/documents/d/1/473439_0.pdf, p. 93; UN SRT, Annex 2, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment A/78/324, www.ohchr.org/sites/default/files/documents/issues/torture/sr/annex-ii-document-august-2023-18-09-23.pdf, p. 13.

144. According to the UN Guidance on Less lethal Weapons:

“6.1.4 Disorientation or distraction devices, such as pyrotechnic flash-bang grenades, are designed to give a warning or to help facilitate a safe arrest, especially in the course of high-risk operations. The use of pyrotechnic flash-bang grenades directly against a person would be unlawful as it could cause serious burn or blast injuries and, in certain cases, there could even be a risk of fragmentation.”⁹⁹

145. The UN Special Rapporteur on the Rights to Freedom of Peaceful Assembly has stated that “It is important that States not deploy overly harmful weapons in response to assemblies. Stun grenades, for instance, *should never be used in the context of assemblies.*” (Italics added.)¹⁰⁰

Table of companies manufacturing and/or promoting stun grenades from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
86	31	Argentina, Australia, Brazil, Bulgaria, Canada, Chile, China, Colombia, France, Germany, Greece, India, Israel, Italy, Kazakhstan, Korea, Republic of, North Macedonia, Norway, Peru, Romania, Russian Federation, Serbia, Singapore, South Africa, Spain, Switzerland, Türkiye, United Arab Emirates, United Kingdom, United States, Venezuela

Whether/how equipment addressed under EU Anti Torture Regulation

146. These devices are not addressed under the EU Anti-Torture Regulation.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

147. “Stun grenades” are listed as Category B (controlled) goods.¹⁰¹

For examples of serious injury and death resulting from the use of stun grenades see for example: Amnesty International, *Greece: Freedom of assembly at risk and unlawful use of force in the era of COVID-19*, Index Number: EUR 25/4399/2021, 14 July 2021, www.amnesty.org/en/documents/eur25/4399/2021/en/; Amnesty International, *Israel/ OPT: End brutal repression of Palestinians protesting forced displacement in occupied East Jerusalem*, 10 May 2021, www.amnesty.org/en/latest/news/2021/05/israel-opt-end-brutal-repression-of-palestinians-protesting-forced-displacement-in-occupied-east-jerusalem-2/; www.hrw.org/news/2014/01/30/ukraine-police-attacked-dozens-journalists-medics; Human Rights Watch, *Brazil: Investigate Police Response to World Cup Protests* 5 June 2014, www.hrw.org/news/2014/06/25/brazil-investigate-police-response-world-cup-protests; *Lebanon: Prison Deaths, Injuries Need Independent Investigation*, 5 April 2011, www.hrw.org/news/2011/04/08/lebanon-prison-deaths-injuries-need-independent-investigation. INCLO/PHR, *Case Study: France*, lethalindisguise.org/case-studies/france/; *Belarus: Violence, Abuse in Response to Election Protests*, 11 August 2020, www.hrw.org/news/2020/08/11/belarus-violence-abuse-response-election-protests

⁹⁹ OHCHR, *UN Guidance on Less-Lethal Weapons in Law Enforcement*, 2020, paragraph 6.1.4.

¹⁰⁰ United Nations, *Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association*, Clément Nyaletsossi Voule*, A/HRC/50/42, 16 May 2022, Paragraph 46, see also UN Committee Against Torture, *Concluding observations on the eighth periodic report of France*, CAT/C/FRA/CO/8, 22 May 2025.

¹⁰¹ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 5.5

Whether/how equipment addressed under CM/Rec(2021)2

148. This equipment is not addressed under this instrument.

Proposal

149. Given the human rights and health concerns of the misuse of this equipment, and that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control stun grenades. Consequently, this item should be added to Appendix III (controlled goods) list.

Suggested text:

“Stun grenades

Note: This item covers only law enforcement stun grenades and does not address items intended for military use.

Note: Stun grenades that emit kinetic impact projectiles (i.e. sting ball grenades) are considered to be multiple kinetic impact projectiles and are consequently listed under Appendix I prohibited goods list.”

iii. Police batons

Description

150. Police batons are usually made of rubber, wood, plastic or metal. These are one of the most common types of less lethal weapons with which law enforcement officers are equipped. There are three main types of batons used by law enforcement officials: straight batons, which vary in length from 20 to 80cm, side-handle batons/tonfas, which are straight batons with a handle on one side; and telescopic/extendable batons, which usually extend up to 2 or 3 times their retracted length and are typically made of aluminium.

Human rights and health concerns

151. Batons are widely misused by law enforcement officials to inflict unnecessary or excessive force through beating. Force from side-handled and longer batons is harder to control, and they can be used to inflict greater injury. If driven 'end on' into the target individual, batons can cause bleeding and serious injury, including injuries to internal organs. Overarm strikes and strikes to the head and other vulnerable areas increase the risk of serious injury or death. Batons are sometimes used to apply dangerous restraint techniques, particularly neck holds that restrict breathing. Amnesty International and the Omega Research Foundation documented 188 incidents of the misuse of batons and other striking weapons, from 2011-21 in 35 countries, covering all regions of the globe.¹⁰²

152. The UN Special Rapporteur on Torture has stated that “Baton weapons have been misused to inflict pain and injury by targeting victims’ joints, using abusive neck holds to choke, or committing sexual assault such as anal or vaginal rape.”¹⁰³ In a number of its country reports

¹⁰² Amnesty International and Omega Research Foundation, *Blunt Force: Investigating the misuse of police batons and related equipment*, 9 September 2021, www.amnesty.org/en/latest/research/2021/09/blunt-force/

¹⁰³ UN Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, para. 59.

the European Committee for the Prevention of Torture has highlighted the misuse of police batons including in neck holds.¹⁰⁴

Companies manufacturing and/or promoting police batons from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
252	44	Argentina, Belgium, Brazil, Cameroon, Canada, Chile, China, Cyprus, Czech Republic, Ecuador, France, Germany, Greece, Hong Kong, India, Israel, Italy, Japan, Korea, Republic of, Malaysia, Mexico, Morocco, New Zealand, North Macedonia, Norway, Peru, Poland, Portugal, Romania, Russian Federation, Serbia, Slovakia, Slovenia, South Africa, Spain, Sweden, Taiwan, Tanzania, United Republic of, Thailand, Türkiye, Ukraine, United Arab Emirates, United Kingdom, United States

Whether/how equipment addressed under the EU Anti Torture Regulation

153. This equipment is not addressed under the EU Anti-Torture Regulation.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

154. “Batons” are listed as Category B (controlled) goods.¹⁰⁵

Whether/how equipment addressed under CM/Rec(2021)2

155. This equipment is not addressed under this instrument.

Proposal

156. Given the human rights and health concerns of the widespread misuse of this equipment and that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control batons. Consequently, this item should be added to Appendix III (controlled goods) list

Suggested text:

“Batons

Note: Spiked (or serrated) metal batons are on listed in Appendix I prohibited goods and banned under the Recommendation.”

¹⁰⁴ See for example Committee for the Prevention of Torture, *Report to the Slovenian Government on the visit to Slovenia carried out by the CPT from 31 January to 6 February 2012*, 19 July 2013, CPT/Inf (2013) 16, para. 67.

¹⁰⁵ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 2.1

iv. Police handcuffs

Description

157. Ordinary handcuffs consisting of two adjustable wrist cuffs joined together by a short chain, rigid bar or hinge that allows a limited degree of movement.

Human rights and health concerns

158. Handcuffs are a basic tool for legitimate law enforcement, but they are frequently employed for torture and other ill-treatment. Handcuffs are frequently used to keep detainees in stress positions for prolonged periods and, at times, in combination with other equipment such as pepper spray and electric shock devices to facilitate the commission of torture or other ill-treatment.¹⁰⁶

159. Rule 33 of the UN Standard Minimum Rules for the Treatment of Prisoners states that "Instruments of restraint, such as handcuffs, chains, irons and strait-jackets, shall never be applied as a punishment".¹⁰⁷ The European Prison Rules state that: "68.4 Handcuffs... shall not be used except: a if necessary, as a precaution against escape during a transfer...; or b ...if other methods of control fail, in order to protect a prisoner from self-injury, injury to others or to prevent serious damage to property.... 68.3 Instruments of restraint shall not be applied for any longer time than is strictly necessary."¹⁰⁸

160. However, the UN Special Rapporteur on Torture has reported that the "Misuse [of restraints including handcuffs] includes excessive tightening, prolonged use, stress positions, including suspending prisoners, or to facilitate torture in conjunction with other means of force such as batons or pepper spray, or by restricting movement to perpetrate rape or other sexual assault."¹⁰⁹

Table of companies manufacturing and/or promoting police handcuffs from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
276	44	Argentina, Australia, Austria, Brazil, Canada, Chile, China, Colombia, Croatia, Cyprus, Czech Republic, Ecuador, Estonia, France, Germany, Hungary, India, Indonesia, Israel, Italy, Korea, Republic of, Malaysia,

¹⁰⁶ For illustrative examples of such misuse see: Amnesty International, *Iran: Officials Responsible for Finger-Amputations Must Face Accountability for Torture*, 31 July 2025, www.amnestyusa.org/press-releases/iran-officials-responsible-for-finger-amputations-must-face-accountability-for-torture/; Amnesty International, *Israel: Palestinians from Gaza held in secret detention describe torture - new testimonies*, 18 July 2024, www.amnesty.org/en/latest/news/2024/07/israel-must-end-mass-incommunicado-detention-and-torture-of-palestinians-from-gaza/; Amnesty International, 'TIGER BASE' OF ATROCITIES HUMAN RIGHTS VIOLATIONS BY NIGERIA POLICE ANTI-KIDNAPPING UNIT IN OWERRI, (Index: AFR 44/0719/2026), February 2026, www.amnesty.org/en/wp-content/uploads/2026/02/AFR4407192026ENGLISH.pdf

¹⁰⁷ United Nations, *Standard Minimum Rules for the Treatment of Prisoners*, Rule 33, www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-ebook.pdf

¹⁰⁸ Council of Europe, *European Prison Rules*, 2006, 68.2-3, rm.coe.int/european-prison-rules-978-92-871-5982-3/16806ab9ae

¹⁰⁹ UN Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, para. 58.

		Mexico, Morocco, New Zealand, Nigeria, North Macedonia, Pakistan, Peru, Philippines, Poland, Romania, Russian Federation, Slovakia, South Africa, Spain, Switzerland, Taiwan, Tanzania, United Republic of, Thailand, Türkiye, United Arab Emirates, United Kingdom, United States
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Whether/how equipment addressed under the EU Anti Torture Regulation

161. Handcuffs are not covered under the EU Anti-Torture Regulation.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

162. “Handcuffs” are listed as Category B (controlled) goods.¹¹⁰

Whether/how equipment addressed under CM/Rec(2021)2

163. This equipment is not addressed under this instrument.

Proposal

164. Given the human rights and health concerns of the widespread misuse of this equipment and that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control handcuffs. Consequently, this item should be added to Appendix III controlled goods list

Suggested text:

“Handcuffs and non-metallic, functionally similar restraints

Note: This item includes ordinary metal handcuffs consisting of two adjustable wrist cuffs joined together by a short chain, rigid bar or hinge that allows a limited degree of movement. It also includes non-metallic functionally similar restraints such as fabric or plastic restraints.

Note: Weighted hand restraints are listed in Appendix I prohibited goods and banned under the Recommendation.”

v. Leg cuffs

Description

165. Two adjustable cuffs, usually made of metal, fastened around the ankles and attached by a chain to allow the detainee some movement. The cuffs are usually larger than those of ordinary handcuffs. They are used to restrict movement. They can help to prevent escape or to stop the restrained person from causing harm to themselves or another person.

Health and human rights concerns

166. Leg cuffs can be misused to facilitate torture or other ill-treatment, especially when misused to restrain a person in stress positions. Overtightening or prolonged use can lead to pain,

¹¹⁰ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 1.3

discomfort, or permanent injury. Prolonged use of leg cuffs can lead to deep vein thrombosis or lacerations, which can also lead to blood poisoning and other long-term physical impairments. Leg cuffs also pose the risk secondary injuries from falling.

Table of companies manufacturing and/or promoting leg cuffs from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
90	20	Australia, Brazil, Canada, China, Cyprus, Czech Republic, France, Germany, India, Korea, Republic of, Malaysia, New Zealand, Pakistan, Poland, Slovakia, South Africa, Spain, Taiwan, United Kingdom, United States

Whether/how equipment addressed under the EU Anti Torture Regulation

167. Legcuffs” were listed as Annex III (controlled) goods under the EU Anti-Torture Regulation in 2025.¹¹¹

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

168. “Legcuffs” are listed as Category B (controlled) goods.¹¹²

Whether/how equipment addressed under CM/Rec(2021)2

169. This equipment is not addressed under this instrument.

Proposal

170. Given the human rights and health concerns of the misuse of this equipment, and noting that they are controlled under the EU Anti-Torture Regulation and that the UN Special Rapporteur on Torture recommends that they be controlled, the CM should recommend that member States should control legcuffs. Consequently, this item should be added to Appendix III (controlled goods) list

Suggested text:

“Leg cuffs

Notes: 1. Leg cuffs are restraints consisting of two adjustable cuffs, usually made of metal, fastened around the ankles, and attached by a chain to allow the detainee some movement. The cuffs are usually larger than those ordinary handcuffs. 2. This item does not control “leg irons” and “gang chains” listed in Appendix 1 (prohibited goods).”

¹¹¹ European Union, EU Anti-Torture Regulation, Annex III. 1.3. Notes: 1. Leg cuffs are restraints consisting of two cuffs, usually made of metal, fastened around the ankles, and attached by a chain to allow the detainee some movement. The cuff size is usually larger than those ordinary handcuffs and is adjustable. 2. This item does not control leg restraints and gang chains prohibited by items 2.3, 2.4, 2.5 and 2.6 of Annex II.

¹¹² UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 1.4

vi. Restraint chairs and restraint boards with non-metallic restraints

Restraint chair with non-metallic restraints

Description

171. Chairs with a range of restraining points, straps, or cuffs made from fabric or leather.

Health and human rights concerns

172. The UN Special Rapporteur on Torture has stated that “This type of equipment should only be used by medically-trained personnel, for a specified and legitimate medical reason, with close supervision, and in a human rights-compliant manner. Any non-medical use, notably for restraining those in custody, should be prohibited. Restraint chairs are prone to being used as punishment and can facilitate torture or other ill-treatment, especially when additional force or equipment is used on the restrained individual.”¹¹³ The UN Committee against Torture has recommended the abolition of “restraint chairs as methods of restraining those in custody”, as “Their use almost invariably leads to breaches of Article 16 [prohibition against ill-treatment].”¹¹⁴

Restraint board with non-metallic restraints

Description

173. Boards with a range of restraining points, straps or cuffs made from fabric or leather.

Health and human rights concerns

174. According to the UN Special Rapporteur on Torture, “This type of equipment should only be used by medically-trained personnel, for a specified and legitimate medical reason, with close supervision, and in a human rights-compliant manner. The use of these restraint beds in any other circumstances fulfils no legitimate purpose that cannot be achieved through standard restraints. The UN Committee against Torture’s concerns and recommended prohibition of restraint chairs as methods of restraining those in custody should also be applied to restraint boards.”¹¹⁵

Companies manufacturing and/or promoting restraint chairs and restraint boards with non-metallic restraints from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
Restraint chairs with non-metallic restraints – 4	2	China, United States
Restraint chairs with non-metallic restraints – 4	2	China, United States

¹¹³ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 1.1.

¹¹⁴ UN Committee against Torture (CAT), *Conclusions and Recommendations of the CAT: United States of America*, 15 May 2000, A/55/44, p 32.

¹¹⁵ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 1.2.

Whether/how equipment addressed under the EU Anti Torture Regulation

175. Neither “chairs with non-metallic restraints” or “boards with non-metallic restraints” are covered by the EU Anti-Torture Regulation.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

176. “Restraint chairs with non-metallic restraints” and “restraint boards with non-metallic restraints” are both listed as Category B (controlled) goods.¹¹⁶

Whether/how equipment addressed under CM/Rec(2021)2

177. This equipment is not addressed under this instrument.

Proposal

178. Given the human rights and health concerns of the misuse of this equipment, and noting that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States should control both chairs and boards with non-metallic restraints. Consequently, this item should be added to Appendix III (controlled goods) list

Suggested text

“Restraint chairs with non-metallic restraints” and “restraint boards with non-metallic restraints

Note: This item does not control “restraint chairs with metallic restraints” and “restraint boards with metallic restraints” listed in Appendix 1 (prohibited goods) list.”

vii. Malodorants

Description

179. Malodorants are chemicals that have a foul or deeply unpleasant smell. The smell can linger and be difficult to remove from clothing. Malodorants can be dispersed by hand-held spray, grenades, launched projectiles, drones, and water cannon.

Health and human rights concerns

180. Any proposed law enforcement equipment or weapon and method of use should be independently tested to assess the medical and health risks. However, there is limited public information detailing the chemicals employed as malodorants and the effects of their use on the people they are used against. The use of malodorants to disperse public gatherings can be indiscriminate, affecting all of those in the contaminated area. The misuse of malodorants chemicals as a method of punishment or humiliation should be classed as ill-treatment and should be prohibited.

¹¹⁶ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 1.1& 1.2 respectively.

Table of companies manufacturing and/or promoting malodorants from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
3	2	Israel, United States

Whether/how equipment addressed under the EU Anti Torture Regulation

181. “Malodorant chemical mixtures formulated to produce a foul and deeply unpleasant smell for riot control purposes provided they are non-injurious and have no long-lasting health effects” were listed as Annex III (controlled) goods under the EU Anti-Torture Regulation in 2025.¹¹⁷

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

182. “Malodorants” are listed as Category B (controlled) goods.¹¹⁸

Whether/how equipment addressed under CM/Rec(2021)2

183. This equipment is not addressed under this instrument.

Proposal

184. Given the human rights and health concerns of the misuse of this equipment, and noting that it is controlled under the EU Anti-Torture Regulation that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States should control malodorants. Consequently, this item should be added to Appendix III controlled goods list.

Suggested text:

“Malodorant chemical mixtures formulated to produce a foul and deeply unpleasant smell for riot control purposes.

Notes: 1. This item is defined as being a chemical or chemical mixture solely designed for law enforcement purposes and formulated to produce a foul and deeply unpleasant smell, provided that it is non-injurious and has no long-lasting health effects. It can be dispersed by a range of delivery mechanisms including hand-held spray, grenades, launched projectiles, drones, and water cannon. 2. This item does not control malodorants or malodorant chemical mixtures that are not intended for law enforcement purposes.”

¹¹⁷ European Union, EU Anti-Torture Regulation, Annex III. 3.7. *Notes:* 1. This item is defined as being a mixture solely designed for law enforcement purposes containing at least one of the following range of chemicals formulated to produce a foul and deeply unpleasant smell and that can be dispersed by hand-held spray, grenades, launched projectiles, drones, and water cannon: 1. Thioacetone (CAS code 4756-05-2) 2. Allicin (CAS code 539-86-6) 3. Skatole (CAS code 83-34-1) 4. Cadaverine (CAS code 462-94-2) 5. Putrescine (CAS code 110-60-1) 6. Ammonium hydrosulfide (CAS code 12124-99-1) 7. Ethanethiol (CAS code 75-08-1) 8. Propanethiol (CAS code 107-03-9) 9. Isobutylthiol (CAS code 513-44-0) 10. Butanethiol (CAS code 109-79-5) 2. This item does not control malodorant chemical mixtures that are not intended for law enforcement purposes.

¹¹⁸ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 4.2

viii. Less-lethal weapons intended to be deployed on unmanned aerial vehicles (drones)

Description

185. A launcher that is attached to an unmanned aerial vehicle (drone), which can fire or disperse chemical irritants, kinetic impact projectiles or other less-lethal ammunition against individuals or small groups, over a small area.

Health and human rights concerns

186. Aerial vehicles used to disperse less lethal KIPs and RCA projectiles may not be sufficiently accurate in targeting to ensure lawful use. These weapons can be indiscriminate depending on the type and number of projectiles used. Bystanders at a demonstration can be affected. The kinetic energy of any impact of the projectile dropped over or launched directly at an individual or group carries a risk of injury. This risk is significantly greater when projectiles are dropped from a great height or launched from a weapon.

Table of companies manufacturing and/or promoting less lethal weapons intended to be used on unmanned aerial vehicles (drones) from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
6	5	Australia, Brazil, Canada, Israel, United States

Whether/how equipment addressed under the EU Anti Torture Regulation

187. This equipment is not controlled under the EU Anti-Torture Regulation. However, “equipment and explosive projectiles for dispensing injurious quantities of riot control agents from aerial platforms”¹¹⁹ are listed as Annex I prohibited goods.

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

188. “Unmanned aerial vehicles (drones) armed with less-lethal weapons” are listed as Category B (controlled) goods.¹²⁰

Whether/how equipment addressed under CM/Rec(2021)2

189. This equipment is not addressed under this instrument.

Proposal

190. Given the human rights and health concerns of the misuse of this equipment, and noting that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should

¹¹⁹ European Union, EU Anti-Torture Regulation, Annex I prohibited goods, 5.2. Note: This item does not control smoke grenades and does not control aerial platforms as such. This item includes equipment where the mode of dispersal is inherently inaccurate, or the equipment or projectiles are able to disperse amounts of riot control agent that are injurious.

¹²⁰ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 4.2

recommend that member States control less-lethal weapons intended for deployment on drones. Consequently, these items should be added to Appendix III (controlled goods).

Suggested text:

“Less-lethal weapons that are intended to be deployed on unmanned aerial vehicles (drones) that can only target one individual or a small group of individuals, over a small area.

Note: this item covers the following drone-fixed weapons:

- Single barrel launchers capable of firing or dropping a limited number of kinetic impact projectiles and riot control agent projectiles over a small area;
- electric shock projectile weapons firing a limited number of projectiles targeting individuals
- riot control agent sprayers and other dispersal mechanisms or disseminate a limited dose of RCA over a small area.

Note: This does not include “Equipment and explosive projectiles for dispensing injurious quantities of riot control agents from aerial platforms” of Appendix 1 (prohibited goods) list.”

ix. Acoustic devices and weapons

Description

191. Acoustic devices are loudspeaker devices that can project high-volume sound over long distances. While they can be used to convey information like normal public address systems, they can also produce high-volume sounds at various frequencies, including at levels and frequencies that can be highly irritating or cause pain [alert tones]. Acoustic devices can be free-standing, vehicle-mounted, embedded in riot control shields, handheld or body-worn (i.e., over the shoulder or strapped to the chest). Some acoustic devices have been specifically marketed as “acoustic weapons”.

Health and human rights concerns

192. A number of serious health risks are associated with the use of acoustic devices and weapons, particularly at close range, at loud volume and/or for excessive lengths of time. Such risks range from temporary pain, eardrum rupture and loss of balance to deafness. In order to mitigate risks and prevent injuries, an appropriate decibel limit and a minimum range should be set in advance for all use of warning devices. There is a clear risk of acoustic weapons being indiscriminate in their effects, targeting sections of the crowd instead of focusing on individuals within it. This increases the risk that uninvolved persons may be affected.

193. The UN Special Rapporteur on Torture has warned that “These weapons and devices pose a risk of causing temporary or permanent hearing damage, depending on the model, distance and duration of exposure. They can be misused indiscriminately against a crowd or to inflict injury on targeted individuals. When used continuously over prolonged periods, such as in a prison setting, such misuse could amount to sensory (noise) torture or other cruel, inhuman or degrading treatment or punishment.”¹²¹ Furthermore the UN Guidance on Less-Lethal Weapons in Law Enforcement stated that “The indiscriminate use of an acoustic weapon against a crowd,

¹²¹ UN SRT, Annex 2, Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, A/78/324, www.ohchr.org/sites/default/files/documents/issues/torture/sr/annex-ii-document-august-2023-18-09-23.pdf, p. 12.

or against targeted individuals at a range where the decibel output is likely to cause permanent hearing damage, would be unlawful.”¹²²

Table of companies manufacturing and/or promoting acoustic weapons and devices from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
40	17	Argentina, Brazil, China, Cyprus, France, Germany, Greece, Israel, Italy, Korea, Republic of, Mexico, Russian Federation, South Africa, Spain, United Arab Emirates, United Kingdom, United States

Whether and how equipment is addressed under the EU Anti Torture Regulation

194. This equipment is not covered under the EU Anti Torture Regulation

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

195. “Acoustic weapons and devices” are listed as Category B (controlled) goods.¹²³

Whether/how equipment addressed under CM/Rec(2021)2

196. This equipment is not addressed under this instrument.

Proposal

197. Given the human rights and health concerns of the misuse of this equipment, and noting that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control acoustic weapons and devices. Consequently, this item should be added to Appendix III controlled goods list.

Suggested text:

“Acoustic weapons and acoustic devices.

Note: In addition to acoustic weapons, this item would include acoustic hailing devices that incorporate an alert tone and that are promoted for law enforcement purposes. It would not include acoustic hailing devices that do not incorporate such an alert tone and are promoted solely for wide area or long-range communication in civilian contexts.”

x. Dazzling light weapons and dazzling laser weapons

Description

198. Dazzling light weapons and dazzling laser weapons are ocular disruption devices, which normally include either light emitting diodes (LEDs) or a laser. These weapons are intended to cause temporary loss of vision, but no long-term damage to the eyes. Most contemporary dazzling

¹²² OHCHR, *UN Guidance on Less-Lethal Weapons in Law Enforcement*, 2020, paragraph 7.8.5.

¹²³ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 5.2

systems operate in either the red or green areas of the electromagnetic spectrum. Some products can “dazzle” suspects from up to 1000m in daylight, and up to 3000m at night. Dazzling light and laser weapons can be rifle-shaped with bipods and picatinny rail, shaped like a baton, or designed to be attached as accessories to small arms or light weapons.

Health and human rights concerns

199. The UN Special Rapporteur on Torture has warned that “Dazzling lights and lasers may cause permanent loss or damage to vision, blurred vision, sensitivity to light, and headaches depending on the model and manner of employment. These weapons may also cause secondary injuries from falls or collisions due to temporary loss of vision.”¹²⁴

200. According to the UN Guidance on Less-Lethal Weapons in Law Enforcement, dazzling weapons should not be used “with intent to blind or where permanent blindness is the likely outcome.”¹²⁵

Table of companies manufacturing and/or promoting dazzling light weapons or dazzling laser weapons from 1 January 2020 – 31 December 2025

Number of companies	Number of countries where companies based	Countries
14	7	China, France, India, Peru, Russian Federation, South Africa, United Arab Emirates

Whether and how equipment is addressed under the EU Anti Torture Regulation

201. This equipment is not covered under the EU Anti Torture Regulation

Whether/how equipment addressed under UN Special Rapporteur 2023 Report/Lists

202. “Dazzling lights and lasers” are listed as Category B (controlled) goods.¹²⁶

Whether/how equipment addressed under CM/Rec(2021)2

203. This equipment is not addressed under this instrument.

Proposal

204. Given the health and human rights concerns arising from misuse of this equipment, and noting that the UN Special Rapporteur on Torture recommends that it be controlled, the CM should recommend that member States control dazzling laser and dazzling light weapons. Consequently, this item should be added to Appendix III controlled goods list.

¹²⁴ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 5.3

¹²⁵ OHCHR, *UN human rights guidance on less-lethal weapons in law enforcement*, paragraph 7.6.4.

¹²⁶ UN Special Rapporteur 2023 Torture Trade Report, Annex 2, 5.3

Suggested text:

“Dazzling lights and lasers”

c. Law enforcement equipment and weapons categories meriting further study

205. The previous sections of this report included certain categories of law enforcement equipment and weapons that the UN Special Rapporteur on Torture determined to be either Category A prohibited goods or Category B controlled goods but which were not currently prohibited or controlled under the EU Anti Torture Regulation. Following analysis of the health and human rights concerns arising from the use of these goods as well as current knowledge on the nature and scale of their manufacture and promotion, it was determined that they posed significant human rights risks and their trade should consequently be either prohibited or controlled under the Recommendation, as appropriate. Such a determination could not at this stage be made for the following goods highlighted by the UN Special Rapporteur:

- Combination cuffs
- Belly chains/restraint belts
- Riot control shields

III. Development of a simplified procedure for the amendment of Appendix 2 of the Recommendation regarding pharmaceuticals used in lethal injection executions

a. Summary of existing CM/Rec(2021)2 measures to regulate export and transit of certain (Appendix 2) pharmaceutical chemicals to prevent transfer for use in lethal injection executions whilst ensuring trade of these substances for medical or other lawful purposes is not impeded.

206. Section 2 of Recommendation CM/Rec (2021)2 elaborates “measures regarding the export and transit of certain pharmaceutical chemicals”. Under principle 2.1., “Member States should regulate and license the export and transit of certain pharmaceutical chemicals to ensure that they are not transferred for use in lethal injection executions in States still applying the death penalty. Member States’ action should not limit the trade in such chemicals for medical, veterinary or other legitimate purposes.”¹²⁷ Under principle 2.3. “Member States should also ensure that effective, proportionate and dissuasive sanctions apply in cases of non-compliance.”¹²⁸

207. Principle 2.2. states that: “Regulation should include those pharmaceutical chemicals listed in Appendix 2 and the list should be regularly reviewed, and, if appropriate, updated, in order to take account of changes in the production, trade in and use of such chemicals.”¹²⁹

208. Appendix 2 (List of pharmaceutical chemicals employed in lethal injection execution) currently incorporates:

“Short and intermediate acting barbiturate anaesthetic agents including, but not limited to:

- i. amobarbital (CAS RN 57-43-2);
- ii. amobarbital sodium salt (CAS RN 64-43-7);
- iii. pentobarbital (CAS RN 76-74-4);
- iv. pentobarbital sodium salt (CAS 57-33-0);

¹²⁷ CM/Rec(2021)2, Principle 2.1

¹²⁸ CM/Rec(2021)2, Principle 2.3

¹²⁹ CM/Rec(2021)2, Principle 2.2

- v. secobarbital (CAS RN 76-73-3);
- vi. secobarbital sodium salt (CAS RN 309-43-3);
- vii. thiopental (CAS RN 76-75-5);
- viii. thiopental sodium salt (CAS RN 71-73-8), also known as thiopentone sodium;
- ix. products containing one of the anaesthetic agents listed under short and intermediate acting barbiturate anaesthetic agents.”¹³⁰

209. The Explanatory Memorandum that accompanies CM/Rec(2021)2 states that “The list detailed in Annex 2 is currently limited to certain specific short and intermediate acting barbiturate anaesthetic agents employed in, or approved for, lethal injection execution procedures. This list does not presently include all short and intermediate acting barbiturate anaesthetic agents employed in, or approved for, lethal injection execution procedures, or additional chemicals commonly employed together with such anaesthetic agents, as components in lethal injections. These additional medicines are not listed in Annex 2 on the basis that their manufacturers have put in place appropriate controls to prevent their sale for use in executions. In light of effective self-regulation by pharmaceutical companies, further regulation would pose an undue burden on legitimate trade and thereby impact patient access to medicines without adding any benefit.”¹³¹

210. The Explanatory Memorandum continues, “The list of medicines listed in Annex 2 requiring export authorization so as to prevent their use for lethal injection execution includes only: (a) those specific pharmaceutical chemicals that have previously been used or are currently approved for lethal injection execution in a country that has not abolished capital punishment, and (b) for which the pharmaceutical industry does not have sufficient distribution controls in place to prevent the misuse of the specific pharmaceutical chemicals in executions.”¹³²

b. Review existing Appendix 2 list of pharmaceuticals used in lethal injection executions and highlight whether it should be amended and if so how.

211. Principle 2.2. recommends that the list of Annex 2 pharmaceutical chemicals should be regularly reviewed and, if appropriate updated, in order to consider changes in the production, trade and use of such chemicals.

212. The Explanatory Memorandum states that this review provision “...[U]nderlines the need for Council of Europe member States to remain particularly vigilant regarding developments in the pharmaceutical industry as well as changing patterns in the misuse of pharmaceutical chemicals for lethal injection executions arising as a result of adoption or extension (or indeed suspension or abolition) of the death penalty by certain States, or due to alterations in execution methodologies and the introduction of new drugs for this purpose in death penalty countries.”¹³³

213. Furthermore, the Explanatory Memorandum states that “...*it is particularly desirable that a common approach and common list of chemicals be maintained, as elaborated in Annex 2. Consequently, Council of Europe member States should explore mechanisms for undertaking the review of Annex 2 chemicals in a coordinated manner, facilitated by the CDDH.* Furthermore, when conducting their review of Annex 2, States should consult with third party experts and representatives of the pharmaceutical industry to mitigate against the risk of inadvertently impacting the legitimate trade of medicines or otherwise making changes that could have unintended negative consequences.”¹³⁴ (Emphasis added).

¹³⁰ CM/Rec(2021)2, Appendix 2

¹³¹ CM/Rec(2021)2, Explanatory Memorandum, paragraph 74.

¹³² Explanatory Memorandum, 2021, paragraph 75.

¹³³ Explanatory Memorandum, 2021, paragraph 76.

¹³⁴ Explanatory Memorandum, paragraph 77.

214. As part of its examination of implementation of Recommendation CM/Rec(2021)2, the CDDH reviewed Appendix 2, noting that “Since the adoption of the Recommendation, Appendix 2 has not been revised or updated.”¹³⁵

215. During the CDDH Workshop held to facilitate and inform the Committee’s examination of the Recommendation and its implementation, experts informed the CDDH that lethal injection remains the default method of execution in all but one active death penalty US state, as well as at the US federal level. Some states use a single-drug protocol – most commonly pentobarbital – while others employ two- or three-drug protocols.”¹³⁶ Experts highlighted that the “tight regulations and transparency requirements governing pharmaceutical products used in lethal injections have made them increasingly difficult for US states to procure. This has promoted a search for alternative substances or the recourse to alternative methods of execution, such as firing squad or [causing death through] nitrogen [hypoxia], the latter method implying having access to nitrogen gas.”¹³⁷ “Experts also considered that, while there is a significant information gap concerning the use of nitrogen gas, the focus of regulatory efforts should remain on lethal injections and the pharmaceutical trade.”¹³⁸

216. During the CDDH Workshop “Experts also stated that, thanks to the proactive actions taken by pharmaceutical manufacturers, the sale of these medicines to prisons has been blocked, and *there is currently no identified need to update Appendix 2.*” (Emphasis added).¹³⁹ The Workshop also noted that the European Commission had recently undertaken a review of the annexes to the EU Anti-Torture Regulation, and that the European Commission had not proposed any changes to Annex IV, which contains an identical list of pharmaceutical chemicals to Appendix 2 of the Recommendation.¹⁴⁰

217. The Secretariat subsequently contacted relevant civil society experts so as to inform the preparation of this section of the Technical Report. A representative of Reprieve stated that the current coverage of the Recommendation in terms of goods remains appropriate within the present context of the United States, where it is most relevant. A number of US states and the Federal Government have indicated an intention to resume or increase executions using lethal injection¹⁴¹, so vigilance from Council of Europe member States remains important.

218. With regard to the developing use of nitrogen gas in executions, the representative noted that several US States have introduced nitrogen gas suffocation as a method of execution, and executions using this method have taken place in two States. However, at present there is no indication of where the nitrogen gas used in such executions is being sourced from – whether from within Council of Europe member States or elsewhere. To date, we have not observed any trade in nitrogen gas for execution purposes originating from Council of Europe member States, nor is it currently evident that there is a need to add nitrogen gas or related equipment to Appendix 2. Moreover, the potential impact of such a step on legitimate trade is not yet clear. We therefore do not recommend any changes at this time, but emergency procedures to amend the regulation in light of changes in this space would be welcome.¹⁴²

¹³⁵ CDDH(2025)R102 Addendum 4 REV, paragraph 68.

¹³⁶ CDDH(2025)R102 Addendum 4 REV, paragraph 71.

¹³⁷ CDDH(2025)R102 Addendum 4 REV, paragraph 69.

¹³⁸ CDDH(2025)R102 Addendum 4 REV, paragraph 68.

¹³⁹ CDDH(2025)R102 Addendum 4 REV, paragraph 72.

¹⁴⁰ CDDH(2025)R102 Addendum 4 REV, paragraph 72.

¹⁴¹ US Executive Order 14164, “Restoring the Death Penalty and Protecting Public Safety,” directing the US Attorney General to “take all necessary and lawful action” to ensure states with capital punishment have a sufficient supply of drugs for lethal injection.

¹⁴² Discussions and subsequent correspondence with Blaire Andres, Senior Advisor US Death Penalty Project, Reprieve.

219. At their 1555th meeting on 25 March 2026, the Ministers' Deputies examined the abolition of the death penalty including in the United States. They recalled the Committee of Ministers' Declaration of 30 January 2024 expressing its particular concern over the unprecedented use in the State of Alabama of a new and controversial method of execution referred to as nitrogen hypoxia, despite serious concerns raised by a number of international organisations including the United Nations that it "... may amount to torture, cruel, inhuman or degrading treatment; noted with regret that this State has continued to carry out executions using this method, that the State of Louisiana also used it, and that several other States of the United States of America have authorised its use".¹⁴³

c. Explore the utility of developing emergency review and revision procedure, to allow timely inclusion of new substances in Appendix 2 where there is immediate risk of their transfer and use in lethal injection executions.

220. Although neither experts attending the CDDH Workshop, nor the CDDH itself, recommended that Appendix 2 be revised at that time, the CDDH Report stated: "Nonetheless, it was underlined during the Workshop that *the [Appendix 2] list should be subject to continuous review, including through an emergency procedure, where necessary*, to allow for the timely inclusion of new substances." (Emphasis added). The CDDH Report argued that "Such a mechanism would help maintain safeguards without unnecessarily disrupting legitimate trade. It could also serve as a constructive incentive for companies to strengthen their internal compliance systems and supply chain controls." Consequently, the CDDH recommended that the current review of the Appendices to the Recommendation "could also consider introducing a simplified procedure for the amendment of Appendix 2 regarding pharmaceuticals used in lethal injection executions."

221. The need for such emergency procedures to allow the control regime to swiftly respond to significant changes in the trade of specific pharmaceutical chemicals so as to prevent their transfer and subsequent misuse in lethal injection executions has previously been recognised by the European Union. The original version of the EU Anti Torture Regulation, had no such provision,¹⁴⁴ however an urgency procedure was subsequently added to this instrument.¹⁴⁵

222. Consequently, the European Commission is empowered to amend the Annexes of the EU Anti Torture Regulation – notably Annex II (prohibited goods), Annex III (controlled goods) and Annex IV (pharmaceutical chemicals) – through a delegated act which would only come into force two months after notification to the European Parliament and Council, provided there was no objection from either body.¹⁴⁶ However under Article 30 "Urgency procedure" the European Commission is empowered to amend Annex I (prohibited goods), Annex II (controlled goods) or Annex IV (pharmaceutical chemicals) "without delay" and the amendments "shall apply as long as no objection is expressed" by either the European Parliament or the Council.¹⁴⁷

¹⁴³ Ministers' Deputies, 1555th meeting, 25 March 2026, CM/Del/Dec(2026)1555/4.1 - Abolition of the death penalty – Thematic discussion, paragraph 8.

¹⁴⁴ European Union, COUNCIL REGULATION (EC) No 1236/2005 of 27 June 2005 concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment.

¹⁴⁵ For the latest iteration of the EU Anti Torture Regulation see: Consolidated text: Regulation (EU) 2019/125 of the European Parliament and of the Council of 16 January 2019 concerning trade in certain goods which could be used for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment (codification)

¹⁴⁶ EU Anti-Torture Regulation 2019, Articles 24 & 29

¹⁴⁷ EU Anti Torture Regulation, 2109, Article 30

223. Such provisions are envisioned to be used only when “imperative grounds of urgency so require”.¹⁴⁸ To date the European Commission has not employed such measures to amend Annex IV (pharmaceutical chemicals) or to amend Annex I (prohibited goods), Annex II (controlled goods).

224. At present, CM/Rec(2021)2 contains no similar “urgency procedure” in the text to amend Appendix 2 (pharmaceutical chemicals) or indeed Appendix 1 (prohibited goods) or Appendix 3 (controlled goods) in an expedited way when imperative grounds of urgency require, so as to bring such goods within the scope of the Recommendation and so prevent their export to recipients that would use them to carry out capital punishment, torture, other ill-treatment. At present, amendment of any part of CM/Rec(2021)2 would require a decision of the Committee of Ministers, normally after such changes had been considered and proposed by the relevant expert Committee, in this case the CDDH. Given that the Rapporteur Group on human rights (GR-H), to which the CDDH reports, generally meets every month, and the Ministers’ Deputies, which could adopt a decision to amend Appendix 2, generally meets every week, the most significant potential cause of procedural delay lies in the fact that the CDDH itself meets only twice a year.

d. Proposal for a simplified procedure for the amendment of Appendix 2 regarding pharmaceuticals used in lethal injection executions

225. Given the established procedure to amend Committee of Ministers Recommendations, a more urgent response to relevant developments could be achieved by the CDDH committing to reviewing the lists of pharmaceutical chemicals (Annex II) on a biennial basis to assess whether this list should be amended in the light of information indicating that additional pharmaceutical chemicals or other chemicals were being employed in lethal injection executions or that States were seeking to acquire such chemicals for these purposes. Following this biennial review, the CDDH would transmit its proposals to the Committee of Ministers for their consideration.

226. In addition, where it is made aware of imperative grounds of urgency, and immediate action is needed to control and thereby halt export of such additional pharmaceutical chemicals or other chemicals so as to prevent their use in lethal injection executions, the CDDH should commit to reviewing Annex II with a view to adding such chemicals to the list as soon as possible, i.e. at its next plenary meeting, and to transmitting this proposal to the Committee of Ministers for consideration as a matter of urgency.

227. This approach could also be extended to amendment of Appendix 1 (prohibited goods) and Appendix 3 (controlled goods).

¹⁴⁸ EU Anti Torture Regulation, 2109, Article 24

APPENDIX 1

Proposed Text for Revised Appendix 1 (Prohibited Goods List) and Appendix 3 (Controlled Goods List) of the Recommendation, with proposed modifications highlighted

Appendix 1

List of prohibited inherently abusive goods and equipment

Inherently abusive goods and equipment including, but not limited to:

- i. gallows, guillotines, blades for guillotines, gas chambers, electric chairs and automatic lethal injection systems designed for capital punishment;
- ii. thumb-cuffs, finger-cuffs, thumbscrews, bar fetters; **rigid bar combination cuffs**; cuffs for restraining human beings, designed to be anchored to a wall, floor or ceiling; **neck cuffs**; **weighted hand or** weighted leg restraints; **leg irons**¹⁴⁹; **gang chains**¹⁵⁰; gang chains comprising bar fetters or weighted leg restraints, restraint chairs and shackle boards/beds with metal restraints; cage beds and net beds;
- iii. **hoods and blindfolds solely designed for law enforcement purposes to block the vision and/or enclose the face of a person/detainee, including such hoods and blindfolds when linked by a chain to ordinary handcuffs or other restraints.**¹⁵¹
- iv. spiked batons or truncheons and shields with metal spikes, **body armour with spikes or serrations made of metal or other hard material**¹⁵²; whips comprising multiple lashes or thongs or having one or more lashes or thongs fitted with barbs, hooks, spikes, metal wire or similar objects enhancing the impact of the lash or thong; **sjamboks**¹⁵³; **“lathis”**¹⁵⁴; **weighted batons and weighted gloves or other similar devices**¹⁵⁵;

¹⁴⁹ Note: Leg irons are non-adjustable metal rings or other non-adjustable metal restraints that are fixed around a prisoner's ankles, normally by means of a bolt or screw arrangement. They can be hinged or unhinged and are normally linked with a chain. (They are distinct from leg cuffs which can be adjusted on a detainee's ankle). Note: Gang chains comprise multiple pairs of handcuffs, leg cuffs, belly chains, or a combination of these, attached to a single chain (often made of metal), restraining several people together in a chain.

¹⁵⁰ Note: Gang chains comprise multiple pairs of handcuffs, leg cuffs, belly chains, or a combination of these, attached to a single chain (often made of metal), restraining several people together in a chain.

¹⁵¹ Note: This item does not include spit hoods which are list in Appendix III (controlled goods) list.

¹⁵² Note: This item does not control body armour with load-bearing systems featuring parts made of metal or other hard material used to attach or carry equipment. This item also does not control body armour or shields fitted with glass-breaking tips or projections, provided that they are designed and positioned for that purpose and not for offensive use against persons.

¹⁵³ Note: This item describes a type of heavy whip, traditionally made of leather, or of other materials, such as plastic. This item does not cover instruments traditionally used for herding animals. Certain products covered under this item are physically and functionally similar and promoted for law enforcement use but may not always be called “sjamboks”.

¹⁵⁴ Note: Lathis are long flexible batons (over 1m long), traditionally made of wood or bamboo but also polycarbonate or rubber. Batons promoted for law enforcement use that are longer than 1 metre are physically and functionally equivalent to lathis, although they may not be explicitly described as “lathis”

¹⁵⁵ Notes: 1. Weighted baton: flexible metal encased in leather or rubber, or batons with additional weighting at one end designed to increase the kinetic impact to the target. This item does not control standard batons fitted with a glass-breaking tip or other glass-breaking features, provided that they are designed and positioned exclusively for

- v. **ammunition containing multiple non-metallic kinetic impact projectiles;**¹⁵⁶
- vi. **multiple barrel launchers for use in law enforcement**¹⁵⁷;
- vii. body-worn electric shock devices such as belts, sleeves and cuffs designed for restraining human beings by the administration of electric shocks.
- viii. **portable direct contact electric discharge weapons that can target only one individual each time an electric shock is administered, including but not limited to electric shock batons, electric shock shields and electric shock stun guns, and kits containing the essential components for assembly of such portable direct contact discharge weapons;**
- ix. **fixed or mountable electric discharge weapons that cover a wide area and can target multiple individuals with electric shocks;**
- x. **aerial platform-based delivery mechanisms designed to disperse significant quantities of riot control agents**¹⁵⁸;
- xi. **fixed equipment for the dissemination of riot control agents in enclosed spaces;**
- xii. **large calibre projectiles containing riot control agents**¹⁵⁹;
- xiii. **anti-personnel directed energy weapons designed to inflict pain against human beings.**

that purpose and not to increase kinetic impact against persons. 2. Weighted gloves are usually made of leather and have powdered steel or lead sewn into the material over the knuckle, fingers, or back of the hand

¹⁵⁶ Note: This ammunition can be weapon-launched or hand-thrown. This item includes ammunition that can be made from rubber, plastic, or wood, and can vary in terms of their size, number, and shape. The number included in each can range from a small number of large balls or blocks to hundreds of small pellets.

¹⁵⁷ Note: This item includes multiple-barrel launchers that typically have between 2 and 36 barrels, and can be stand-alone or mounted onto vehicles, unmanned ground vehicles, or seafaring vessels. The launchers can be manually operated or operated by remote control, allowing for individual, sequential, or simultaneous firing of kinetic impact projectiles or projectiles containing chemical irritants, resulting in rapid fire or bursts of fire.

¹⁵⁸ Note: This item does not control smoke grenades and does not control aerial platforms as such. This item does include equipment where the mode of dispersal is inherently inaccurate, or the equipment or projectiles are able to disperse a significant amount of riot control agent over a wide area. Illustrative types of delivery mechanism covered include multi-barrel launchers, automatic projectiles launchers, multiple projectile release mechanisms and large capacity sprayers.

¹⁵⁹ Note: This item includes projectiles containing riot control agents, notably CS, CN, CR, OC and PAVA with a calibre above 56mm.

Appendix 3

List of controlled goods and equipment

Controlled goods and equipment including, but not limited to:

- i. **leg cuffs**¹⁶⁰, shackles, gang chains, spit hoods, individual cuffs or rings fitted with a locking mechanism, having an inside circumference exceeding 165 mm when the ratchet is engaged at the last notch entering the locking mechanism;
- ii. **handcuffs and functionally similar non-metallic restraints**¹⁶¹;
- iii. restraint chairs with non-metallic restraints and restraint boards with non-metallic restraints¹⁶²
- iv. **portable electric discharge weapons that can target only one individual each time an electric shock is administered, including but not limited to electric shock batons, electric shock shields, stun guns and** electric shock dart guns, and kits containing the essential components for assembly of such portable discharge weapons;
- v. **fixed or mountable electric discharge weapons that cover a wide area and can target multiple individuals with electric shocks;**
- vi. riot control agents (RCAs) employed for law-enforcement purposes, such as:
 - a. 2-Chlorobenzylidenemalonitrile (CS) (CAS 2698- 41-1);
 - b. 2-Chloroacetophenone (CN) (CAS 532-27-4);
 - c. Dibenz-(b,f)-1,4-oxazepine, (CR) (CAS 257-07-8);
 - d. N-Nonanoylmorpholine, (MPA) (CAS 5299-64-9);
 - e. Oleoresin capsicum (OC) (CAS RN 8023-77-6);
 - f. Pelargonic acid vanillylamide (PAVA) (CAS RN 2444-46-4);
- vii. **malodorant chemical mixtures formulated to produce a foul and deeply unpleasant smell for riot control purposes;**¹⁶³

¹⁶⁰ Notes: 1. Leg cuffs are restraints consisting of two adjustable cuffs, usually made of metal, fastened around the ankles, and attached by a chain to allow the detainee some movement. The cuffs are usually larger than those ordinary handcuffs. 2. This item does not control “leg irons” and “gang chains” listed in Appendix 1 (prohibited goods).

¹⁶¹ Note: This item includes ordinary metal handcuffs consisting of two adjustable wrist cuffs joined together by a short chain, rigid bar or hinge that allows a limited degree of movement. It also includes non-metallic functionally similar restraints such as fabric or plastic restraints.

Note: Weighted hand restraints are listed in Appendix I prohibited goods and banned under the Recommendation

¹⁶² Note: This item does not control “restraint chairs with metallic restraints” and “restraint boards with metallic restraints” listed in Appendix 1 (prohibited goods) list.

¹⁶³ Notes: 1. This item is defined as being a chemical or chemical mixture solely designed for law enforcement purposes and formulated to produce a foul and deeply unpleasant smell, provided that it is non-injurious and has no long-lasting health effects. It can be dispersed by a range of delivery mechanisms including hand-held spray, grenades, launched projectiles, drones, and water cannon: This item does not control malodorants or malodorant chemical mixtures that are not intended for law enforcement purposes.

viii. RCA dispersal equipment targeting one individual or disseminating a limited dose over a small area;

ix. ~~fixed RCA dispersal equipment intended for disseminating a limited dose of RCA over a small area inside a building;~~

x. RCA dispersal equipment intended for disseminating RCAs over a wide area, including water cannons¹⁶⁴;

xi. Less lethal weapons intended to be deployed on unmanned aerial vehicles (drones) that can only target one individual or a small group of individuals, over a small area.¹⁶⁵

xii. Single shot kinetic impact projectile (KIP) launchers and associated kinetic impact projectiles;¹⁶⁶

xiii. stun grenades¹⁶⁷;

xiv. batons¹⁶⁸;

xv. acoustic weapons and acoustic devices.¹⁶⁹

xvi. Dazzling light weapons and dazzling laser weapons

¹⁶⁴ Note: This item does not control aerial platform-based delivery mechanisms which are listed separately in Appendix I (prohibited goods).

¹⁶⁵ Note this item covers the following drone-fixed weapons:

- Single barrel launchers capable of firing or dropping a limited number of kinetic impact projectiles and riot control agent projectiles over a small area;
- electric shock projectile weapons firing a limited number of projectiles targeting individuals
- riot control agent sprayers and other dispersal mechanisms or disseminate a limited dose of RCA over a small area.

Note: This does not include “Equipment and explosive projectiles for dispensing injurious quantities of riot control agents from aerial platforms” of Appendix 1 (prohibited goods) list.

¹⁶⁶ Note: This item includes projectiles commonly known as rubber or plastic bullets or impact rounds, chemical irritant impact projectiles and beanbags. They come in different shapes and sizes include large and small balls or cylinders, and can be made of rubber, PVC, dense foam, or wood.

¹⁶⁷ Note: This item covers only law enforcement stun grenades and does not address items intended for military use. Note: Stun grenades that emit kinetic impact projectiles (i.e. sting ball grenades) are considered to be multiple kinetic impact projectiles and are consequently listed under Appendix I prohibited goods list.

¹⁶⁸ Note: Spiked (or serrated) metal batons are on listed in Appendix I prohibited goods and banned under the Recommendation.

¹⁶⁹ Note: In addition to acoustic weapons, this item would include acoustic hailing devices that incorporate an alert tone and that are promoted for law enforcement purposes. It would not include acoustic hailing devices that do not incorporate such an alert tone and are promoted solely for wide area or long-range communication in civilian contexts.