

Freedom of Information Act 2000 (FOIA)

Decision notice

Date: 23 February 2024

Public Authority: Department for Business and Trade ("DBT")
Address: Old Admiralty Building
London
SW1A 2DY

Decision (including any steps ordered)

1. The complainant has requested information on export licence applications made by named companies. DBT refused the request on the grounds that it was vexatious, as set out in FOIA section 14(1). At the same time DBT also applied section 14(1) to three other requests made before and after that request.
2. The Commissioner's decision is that the requests are not vexatious. He has also determined that DBT is in breach of FOIA section 17 for failing to provide its response to two of the four requests within 20 working days of the date of receipt of the requests for information.
3. The Commissioner requires DBT to take the following steps to:
 - Issue a fresh response to the requests under FOIA without relying on section 14(1).
4. The public authority must take these steps within 35 calendar days of the date of this decision notice. Failure to comply may result in the Commissioner making written certification of this fact to the High Court pursuant to section 54 of the Act and may be dealt with as a contempt of court.

Request and response

5. On 3 April 2023 the complainant wrote to the Department for International Trade¹ and requested information in the following terms:

“For each of the following UK companies:

UAV ENGINES LIMITED (Cage code U8369)

UAV TACTICAL SYSTEMS LIMITED (Cage code KCYD9)

FERRANTI TECHNOLOGIES LIMITED (Cage codes K0663, K1888, K6412)

ELBIT SYSTEMS UK LIMITED (Cage code U1GD8)

INSTRO PRECISION LIMITED (Cage code U2879)

ELITE KL LIMITED (Cage code U4581)

Please provide the following information in the form of a table with six columns for each of the 8 company codes.

1. The NUMBERS of export licence applications made for each cage code to export ANY military list items to Israel for end-use by the State of Israel from 2016-present.

2. For each application in (1) the DATE of application.

3. For each application in (1) the KIND of licence applied for (i.e. SIEL, OIEL, Direct, Incorporation, temporary or any given)

4. For each application in (1) the DATE of approval, refusal, and/or other result.

5. For each application in (1) the RESULT of the application (i.e. Approved, Refused, Stopped, Withdrawn or any other given.)

6. For each application in (1) the STATUS of each licence application (i.e. pending, extant, expired, exhausted or any other status given).

7. For each application in (1) the

¹ Following a machinery of government change announced on 7 February 2023 the Department for International Trade is now the Department for Business and Trade.

7. a, the END-USE given in application records
7. b, the ULTIMATE END-USE given in application records
7. c, the END-USER given in application records
7. d, the ULTIMATE END-USER given in application records
8. For each application in 1, the precise Military List Codes and descriptions.

If this request exceeds the costs limit and appears overly burdensome please prioritise the request and confine to the information available within the limit by taking the order of companies as the order of priority (UAV Engines, UAV Tactical, Ferranti etc), and the numerical order of sections as the order of priority (1,2,3,4 etc) equally.

That is please provide all company data available under column 1 as the priority over all column information for company 1. So I would prefer numbers of applications (1) for all companies than all information (1-6) for just one company (UAV Engines)."

6. On 17 April 2023 DBT wrote to the complainant requesting clarification of the request in terms of their definition of "the State of Israel" and whether this referred to all Israeli government entities.
7. On 5 May 2023 the complainant confirmed that they referred to all Israeli government entities.
8. On 6 June 2023 DBT wrote to the complainant and explained that it held information in the scope of the request but required further time to consider the application of FOIA section 43 – commercial interests.
9. On 22 June 2023 DBT responded, advising that it was relying on FOIA section 14(1) to refuse this request and others made by the complainant on 23 March 2023, 25 May 2023 and 5 June 2023.
10. On the same day the complainant challenged the application of section 14 and requested an internal review, explaining:

"I believe DBT is seeking to avoid public scrutiny on its decisions to licence exports of military equipment to destinations of human rights concern, and where there is documented evidence of violation of UN sanctions."
11. Following an internal review DBT wrote to the complainant on 21 August 2023 upholding its previous response relying on section 14.

Scope of the case

12. The complainant contacted the Commissioner on 24 August 2023 to complain about the way their requests for information had been handled. They explained:

“To be clear, my requests are not frivolous. There are overwhelming and vital public interest arguments for disclosure of all the details of military export licence applications I have requested, which will be set out in my submissions in due course. The public interest arguments involve serious allegations of violations of international law, including UN and OSCE arms embargoes, and the assistance of war crimes and crimes against humanity by end-user armed forces in Turkey, Azerbaijan, Saudi-Arabia, UAE, Israel, and USA.”

13. The Commissioner considers that the scope of his investigation is to consider DBT’s reliance on FOIA section 14 to determine the requests vexatious. The Commissioner has included an annex containing the three requests received by DBT before and after its adoption of section 14 to the request set out in paragraph 5.

Reasons for decision

Section 14(1) – vexatious requests

14. Section 14(1) of FOIA states that a public authority is not obliged to comply with a request for information if the request is vexatious.
15. The word “vexatious” is not defined in FOIA. However, as the Commissioner’s updated guidance on section 14(1) states, it is established that section 14(1) is designed to protect public authorities by allowing them to refuse any requests which have the potential to cause a disproportionate or unjustified level of disruption, irritation or distress.
16. FOIA gives individuals a greater right of access to official information in order to make bodies more transparent and accountable. As such, it is an important constitutional right. Therefore, engaging section 14(1) is a high hurdle.
17. However, the Commissioner recognises that dealing with unreasonable requests can strain resources and get in the way of delivering mainstream services or answering legitimate requests. These requests can also damage the reputation of the legislation itself.

18. The emphasis on protecting public authorities' resources from unreasonable requests was acknowledged by the Upper Tribunal (UT) in the leading case on section 14(1), *Information Commissioner vs Devon County Council & Dransfield* [2012] UKUT 440 (AAC)², (28 January 2013) ("Dransfield"). Although the case was subsequently appealed to the Court of Appeal, the UT's general guidance was supported, and established the Commissioner's approach.
19. Dransfield established that the key question for a public authority to ask itself is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress.
20. The four broad themes considered by the Upper Tribunal in Dransfield were:
 - the burden (on the public authority and its staff);
 - the motive (of the requester);
 - the value or serious purpose (of the request); and
 - any harassment or distress (of and to staff).
21. However, the UT emphasised that these four broad themes are not a checklist, and are not exhaustive. They stated:

"all the circumstances need to be considered in reaching what is ultimately a value judgement as to whether the request in issue is vexatious in the sense of being a disproportionate, manifestly unjustified, inappropriate or improper use of FOIA" (paragraph 82).
22. In considering whether a request may be vexatious solely on the grounds of burden the tribunal in *Independent Police Complaints Commissioner vs The Information Commissioner* (EA/2011/0222), 29 March 2012³ found:

"A request may be so grossly oppressive in terms of the resources and time demanded by compliance as to be vexatious, regardless of the intentions or bona fides of the requester. If so, it is not prevented from

² <https://administrativeappeals.decisions.tribunals.gov.uk/Aspx/view.aspx?id=3680>

³

<https://informationrights.decisions.tribunals.gov.uk/DBFiles/Decision/i725/20120329%20Decision%20EA20110222.pdf>

being vexatious just because the authority could have relied instead on s.12 [section 12 of the FOIA]." (paragraph 15).

23. The Commissioner's guidance⁴ explains that a public authority cannot rely on section 12 for the cost and effort associated with considering exemptions or redacting exempt information. Section 14(1) may be adopted in such circumstances. However, there is a high threshold for refusing a request on such grounds. The following points are pertinent to the application:

- the requester has asked for a substantial volume of information; **and**
- the public authority has real concerns about potentially exempt information, which it is able to substantiate, if asked to do so by the Commissioner; **and**
- any potentially exempt information cannot easily be isolated because it is scattered throughout the requested material.

DBT's position

24. DBT explained to the Commissioner that it considered the most significant factor in its determination of the requests as vexatious was the burden imposed on its resources. It advised that the complainant had submitted 19 requests in 2021, 12 in 2022 and 8 by June 2023.

25. It went on to explain:

"This has and continues to create a significant burden on ECJU [Export Control Joint Unit] resources including that of specially trained Technical Advisors who review and advise on information to be disclosed. Technical Advisors have to undergo an intensive 18-month period of training to undertake their role within ECJU of assessing the technical aspects of an export licence application. Their role is particularly complex as they have to balance a number of different considerations when assessing licence applications including legislation, compliance with international regimes, potential end-use of the good(s) and compliance with the Strategic Export Licensing Criteria (<https://questions-statements.parliament.uk/written-statements/detail/2021-12-08/hcws449>). This involves them engaging and seeking advice from a number of other government departments.

⁴ <https://ico.org.uk/for-organisations/foi-eir-and-access-to-information/freedom-of-information-and-environmental-information-regulations/section-14-dealing-with-vexatious-requests/how-do-we-deal-with-a-single-burdensome-request/>

To assess the technical aspects of a military or dual-use good(s), technical advisors often have to read through hundreds of pages of material provided by a company as part of their licence application. ECJU's Technical Assessment Unit is made up of approximately 15 trained Technical Officers who, between them, assess c.18,000 standard individual export licence (SIEL) applications per year, all with varying degrees of complexity. For each FOI request of the nature invariably submitted by the complainant, at least three members of staff are involved in locating, retrieving and assessing the information potentially in scope of the request.

If a particular request, which is often the case, requires our Technical Advisors to review each individual licence application to assess and retrieve the requested information, this can take up to 30 minutes per application. If a large number of licence applications, again which is often the case, fall within scope of that particular request then it would take our Technical Advisors a significant number of hours to assess which information, if any, should be disclosed. This means that our Technical Advisors are diverted away from ECJU's core function of assessing export licence applications which contributes to a delay in processing licence applications and in turn hinders UK exports and exporters. Given the specialist nature of their job and the specialist training required to undertake their role, it is not possible for us to recruit more staff from other parts of the Department to cover a Technical Advisor's work."

26. DBT further explained that in addition to technical advisers, ECJU's policy advisers are also often involved in assessing the information in scope of the complainant's requests which in turn impacts on their resource. DBT provided an example regarding a request for goods which were for end-use by Israel. It explained that this request involved policy advisers spending three days considering the licence applications and deciding which exemptions, if any, were applicable to the information in scope. DBT added that as the majority of the time taken concerned considerations of exemptions and redaction of the information to be disclosed the request could not apply section 12 (cost of compliance exceeds appropriate limit).

27. From its experience of handling the complainant's requests DBT explained that:

"there is likely to be a large amount of data in each current FOIA request which engages a number of exemptions, including but not limited to Sections 41 (information provided in confidence), Section 43 (commercial interests) and Section 22 (intended for future publication) of the FOIA."

28. DBT considers that the volume and pattern of the complainant's requests suggests they will continue to make frequent similar requests and as a result will continue to place a disproportionate burden on ECJU resources in the future.

29. DBT's view is that there is:

"... a considerable public interest in the fair and appropriate use of public resources. We do not consider that the use of public resource in this manner would be in the public interest."

30. DBT accepted that:

"...the complainant may have a serious purpose to their requests, that is to campaign against the government's political and financial support for arms exports and the exports of arms where they might be used in international conflict. However, we believe that this is outweighed by the significant burden the frequency, similarity and totality of the requests has had and is likely to continue to have on the Department."

31. DBT expanded on this saying:

"Whilst the complainant may have a serious purpose to their repeated requests... there should be an objective public interest in the information sought behind that serious purpose. We would argue that the objective public interest is served by the general disclosure made by DBT in its publication of the Annual and Quarterly Reports on Strategic Export Controls. These reports contain detailed information on export licences issued, refused or revoked, by destination, including the overall value, type (e.g., Military, Other) and a summary of the items covered by these licences. They are available to view at GOV.UK⁵.

Our view is that the complainant has a particular personal interest in accessing this type of information, we do not consider that there is any wider public interest in the level of detail the complainant seeks. As acknowledged above, there is a significant public interest in the export of military and dual use goods to overseas destinations, particularly destinations of concern. However, this public interest is met by the information ECJU publishes in its annual report of strategic export controls which clearly sets out the type of goods which are exported from the UK, the value of those goods and the destination to which those goods are being exported. In addition to this, ECJU provides a public searchable database which allows members of the public to

⁵ <https://www.gov.uk/guidance/strategic-export-controls-licensing-data>

conduct bespoke searches of published export licensing data. This database can be accessed at:
<https://www.exportcontroldb.trade.gov.uk/sdb2/fox/sdb/>.

and is free to use.

We do not consider that there is a wider public interest in the disclosure of sensitive commercial trading activities, as requested by the complainant, including the details of the parties to a contract and specific and/or technical details regarding goods exported under a licence.”

32. In summary DBT accepts the value and purpose of the requests for the complainant but considers that from a broader public interest there is limited value. It states that processing the recurring requests not only distracts and delays the handling of other FOIA requests but also distracts staff from their core activities.

The complainant's position

33. The complainant has explained his position to the Commissioner as follows:

“I challenge the application of section 14 in a blanket fashion to these requests. DBT do not dispute the seriousness of purpose of the four requests, and cite two years of previous requests (again all serious in purpose) as relevant to its response. DBT has processed previous requests without applying section 14 but now uses them as evidence to justify the application of section 14 in the four most recent requests. This is not in accordance with the law. FOIA is applicant blind. DBT can not use a history of previous processed requests to build a case for vexation, otherwise the law would be placing a finite limit on the rights of the requestor under FOIA.”

34. The complainant went on to explain their view:

“The four refused requests are unrelated and do not repeat previous requests. Where there is similarity with previous requests this is due to the fact that my work is intended to track changes in export licence approvals across time, there is of necessity a repetition of the terms in some cases in order to examine details and establish facts. It should also be noted that repeating the same terms of requests through time has helped me identify errors in previous responses from DBT and clarified how its definitions have been interpreted (often very narrowly).”

35. The complainant explained in detail that some of the previously disclosed information has been used in news articles and academic publications to inform public debate on “apparent violations of the UK

arms export controls." They also advised that disclosed information has been submitted as evidence:

"... in several criminal trials of protesters since 2022 where the information has been accepted as fact relevant to the defences of individuals facing convictions, fines and loss of liberty for their alleged offences.

By 'accepted as fact' I wish to further explain the information previously disclosed to me by DBT and then provided by me to the defence case of protesters against Elbit facing criminal charges has been accepted as 'agreed facts by the defence and the Crown in Crown Court criminal proceedings.

It follows that my previous requests and disclosure obtained via them have assisted the justice system as a whole and not simply defendants [sic] facing charges."

36. The complainant went on to state:

"It is now clear from recent disclosures from DBT under FOIA... that a UK trade minister assured Elbit's Israel representatives in an Israeli business lobby meeting in January 2022 that from 2021 the British Government had committed to stopping boycott, divestment and sanctions protest actions against the British subsidiaries of the Israeli private arms company Elbit Ltd."

They relied on the following link⁶ to the What Do They Know website to support this statement.

37. The complainant considers that there has been a change in approach from DBT regarding their requests for information. They believe that the vexatious determination has followed the use of previously disclosed information in witness statements as referenced above in paragraph 35. Their view is that DBT is seeking to prevent:

"...this flow of evidence to the domestic court by blocking my latest requests, and in doing so after committing support to a private corporation and the Israeli government that it would do so."

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https://www.whatdotheyknow.com/request/minutes_and_briefings_of_lobbyin/response/2518226/attach/4/Annex%20A%20Briefing.pdf?cookie_passthrough=

applications and the wider implications of military exports to specific locations.

44. Regarding the complainant's comments at paragraph 33 the Commissioner would point out that DBT is entitled to consider the history of requests made by a complainant, whether or not those requests were complied with, when forming its view of a fresh request. In determining requests to be vexatious a public authority is not placing a finite limit on an individual's right to request information.
45. The Commissioner has not been provided with any evidence to demonstrate DBT offering advice and assistance to the complainant in order to refine their request before making a vexatious determination. The Commissioner would expect a public authority to contact the requester to see if they are willing to submit a less burdensome request. Certainly, where burden is the sole ground for considering an otherwise reasonable request to be vexatious, the Commissioner considers such contact as a matter of good practice. The Commissioner notes that in its response of 22 June 2023 informing the complainant that section 14(1) had been applied to four requests, DBT advised the complainant to allow three months between requests and:

"...to ensure that we have considered and responded to your previous request(s) before submitting another one. Also, to ease the burden on public resources in extracting the information you have requested, may we request that you refrain from making requests for information we know you have previously received."

46. The Commissioner has not been provided with any further comment by either party on the making of repeat requests, however he would expect any such request to be considered under section 14(2) – repeated requests, as long as , for example, the information held is the same as that held at the time of the previous request, a reasonable interval has not elapsed and the information in question had previously been disclosed. He is also not convinced that in the circumstances of this case a limit of four requests a year is a reasonable figure for a government department.
47. As acknowledged by DBT at paragraph 30 above the complainant has a serious purpose to their requests. DBT considers this to be a "particular personal interest" with no wider public interest in the detailed requests made by the complainant. The Commissioner disagrees. He considers that in the current climate of international affairs regarding military operations, there is a wide public interest in the requested information. The Commissioner also notes the complainant's comments in paragraph 35 regarding the wider use of information resulting from their requests for information.

48. DBT argues that the objective public interest is served by its publication of the Annual and Quarterly Reports on Strategic Export Controls, referenced in paragraph 31. The Commissioner has reviewed the reports and notes that a reasonable level of detail is provided. However, the reports do not provide the specific information sought by the complainant.
49. The Commissioner is aware that in a previous case⁸ brought to him by the complainant against the Department for International Trade, the public authority relied on several exemptions to redact the information it went on to disclose in scope of a similar request. On that occasion the Commissioner upheld the application of the exemptions cited however the complainant nevertheless received some information in the scope of his request.
50. Although the Commissioner understands that the provision of information as a duty under FOIA may not be government departments' teams' core operation it is nevertheless an important function. The Commissioner has accepted DBT's explanations regarding the requirement for the input of particular members of the ECJU, however he would expect there to be sufficient resource in place to anticipate and fulfil DBT's responsibilities under the FOIA in regard to the receipt of information requests. The Commissioner acknowledges that FOIA sections 12 and 14 do not require those resources to be used disproportionately, however, in this case the Commissioner does not consider that the requests are disproportionate in all the circumstances.
51. In this case DBT has not provided the Commissioner with any specific estimates of the time required to consider the request of 3 April 2023 (clarified on 5 May 2023). Similarly it has not provided any estimates on the other requests of 23 March 2023, 25 May 2023 and 5 June 2023. The Commissioner notes that the request of 23 March 2023 is the second refinement of the request of 1 February 2023 to which section 12 was twice applied by DBT. The Commissioner also notes that in the clarified request of 5 May 2023 and in the request of 25 May 2023 the complainant specifically provided guidance on how to limit the request.
52. The Commissioner has considered all the circumstances of this case including any available evidence regarding the complainant's requests or conduct prior to the requests covered in this notice; the burden on the ECJU as described by DBT; the pattern of requests including the frequency and likelihood to continue and the public interest, in the

⁸ <https://icosearch.ico.org.uk/s/search.html?collection=ico-meta&profile=decisions&query&query=IC-109528-K3H7>

context of section 14, in disclosure of the information concerned. Having taken account of all of the above his decision is that section 14(1) is not engaged in this case.

53. The Commissioner therefore requires DBT to provide the complainant with fresh responses to the four requests that do not rely on section 14(1) of FOIA.

Procedural matters

54. FOIA section 17(5) provides that:

“A public authority which, in relation to any request for information, is relying on a claim that section 12 or 14 applies must, within the time for complying with section 1(1), give the applicant a notice stating that fact.”

55. FOIA section 10 requires that a public authority must comply with section 1(1) promptly and in any event not later than twentieth working day following the date of receipt.
56. DBT responded within FOIA in respect of the requests of 25 May 2023 and 5 June 2023 as it provided its response on 22 June 2023. However, in respect of the twice refined request of 23 March 2023 and the clarified request of 5 May 2023 DBT's section 14 response was provided outside the 20 working days required by section 10.
57. The Commissioner therefore finds DBT in breach of section 17.

Right of appeal

58. Either party has the right to appeal against this decision notice to the First-tier Tribunal (Information Rights). Information about the appeals process may be obtained from:

First-tier Tribunal (Information Rights)
GRC & GRP Tribunals,
PO Box 9300,
LEICESTER,
LE1 8DJ

Tel: 0203 936 8963

Fax: 0870 739 5836

Email: grc@justice.gov.uk

Website: www.justice.gov.uk/tribunals/general-regulatory-chamber

59. If you wish to appeal against a decision notice, you can obtain information on how to appeal along with the relevant forms from the Information Tribunal website.

60. Any Notice of Appeal should be served on the Tribunal within 28 (calendar) days of the date on which this decision notice is sent.

Signed

Susan Hughes
Senior Case Officer
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Annex

Request from 23 March 2023 DBT reference FOI2023/01646:

"EDO MBM Technology Ltd/ L3HARRIS RELEASE & INTEGRATED SOLUTIONS LTD export licence applications (2014-Present) (1/2/2023)".

You have asked for the request to be narrowed under section 14 of FOIA. I am happy to do so.

Please confine the request to within the scope of just the following destination countries

1. Turkey,
2. France,
3. Brazil,

between 2014-present (01/02/2023)

2. A table breaking down this licence application data as follows

2.a. Precise ML and/or dual-use code and description of goods in each application

2.b. Date of each application completion

2.c. Date of each application submission

2.d. Outcome of each application (refused, approved, withdrawn, pending, etc.)

2.e. Status of each licence (expired, extant, exhausted, revoked, etc.)

2.f. Type of licence (SIEL, OIEL, Direct or Incorporation, etc.)

2.g. Destination country for each licence

2.h. Ultimate end-user for goods.

Please ensure the table is presented in order of application completion dates, not submission dates.

3. Please highlight with any licence applications that are submitted for the export of "HORNET" and "WASP" bomb racks.

4. Please highlight ANY licences in 3. above, that are submitted for the export of HORNET and WASP bomb racks to the following companies:

4.a. ROKETSAN, Turkey

4.b. BAYKAR MAKINA, Turkey

4.c. Turkish Aerospace industries (TAI) (TUSAŞ), Turkey

5. Please highlight ANY licence applications above, that are submitted for the export of HORNET and WASP bomb racks to ANY destination for end-use on the following air systems:

5.a. Bayraktar TB2 (Baykar Makina)

5.b. Bayraktar AKINCI (Baykar Makina)

5.c. TAI ANKA (TUSAŞ Hürkuş)

5.d. TAI Hürkuş (TUSAŞ Hürkuş)

5.e. Karayel (Vestel)

6. Please provide end-use undertakings/certificates for all licence applications identified in parts 3, 4 & 5 above.

7. Please provide ANY documents in parts 4, 5, 6, above that contain the name or signature of the following individuals:

Selçuk Bayraktar

Haluk Bayraktar

Özdemir Bayraktar

CLARIFICATION For avoidance of doubt, "HORNET" and " WASP" bomb racks referred to in this request should be interpreted as referring to equipment, components, and/or technology related to Hornet and Wasp bomb racks, not just complete hardware."

Request from 25 May 2023 DBT reference FOI2023/02823

"For each of the following UK companies

UAV ENGINES LIMITED (Cage code U8369)

UAV TACTICAL SYSTEMS LIMITED (Cage code KCYD9)

FERRANTI TECHNOLOGIES LIMITED (Cage codes K0663, K1888, K6412)

ELBIT SYSTEMS UK LIMITED (Cage code U1GD8)

INSTRO PRECISION LIMITED (Cage code U2879)

ELITE KL LIMITED (Cage code U4581)

Please provide the following information in the form of a table .

1. The NUMBERS of export licence applications made from 2016-present for each of the above UK company's [sic] to export ANY military list items to Israel
 - 1.a. to any Elbit subsidiary [sic] in Israel.
 - 1.b. to any Israeli Aircraft Industries (IAI) subsidiary in Israel.
 - 1.c. to any other Israeli state owned or privately owned company in Israel.
2. For each application in (1) the DATE of application.
3. For each application in (1) the KIND of licence applied for (i.e. SIEL, OIEL, Direct, Incorporation [sic], temporary or any given)
4. For each application in (1) the DATE of approval, refusal, and/or other result
5. For each application in (1) the RESULT of the application (i.e. Approved, Refused, Stopped, Withdrawn or any other given.)
6. For each application in (1) the STATUS of each licence application (i.e. pending, extant, expired, exhausted or any other status given).
7. For each application in (1) the
 7. a, the END-USE given in application records
 7. b, the ULTIMATE END-USE given in application records
 7. c, the END-USER given in application records
 7. d, the ULTIMATE END-USER given in application records
8. For each application in 1, the precise Military List Codes and descriptions
9. For each application in 1, copies of the specific records held by DBT used to locate the information requested above and by which an independent observer could easily verify the information given in all parts of this request.

If this request exceeds the costs limit and appears overly burdensome please prioritise the request and confine to the information available within the limit by taking the order of companies as the order of priority (UAV Engines, UAV Tactical, Ferranti etc), and the numerical order of sections as the order of priority (1,2,3,4 etc) equally.

That is please provide all company data available under column 1 as the priority over all column information for company 1. So I would prefer numbers of applications (1) for all companies than all information (1-6) for just one company (UAV Engines)”

Request from 5 June 2023 DBT reference FOI2023/02975

“Part 1. BACKGROUND

According to a DBT freedom of information responses (FOI2021/04958 and FOI2022/03607) it is disclosed that on 11 November 2020, a Standard Individual Export Licence (SIEL) was issued by DBT to EDO MBM Technology Ltd, Home Farm Road, Brighton, for the proposed export of military items to Abu Dhabi, United Arab Emirates, described as:

- 1.(a). ML4. 'launching/handling/control equipment for munitions' (Maximum value £45,000,000.) and,
- 1.(b). ML22. 'technology for launching/handling/control equipment for munitions'. (Maximum value £2,100,000.)

Part 2. REQUEST FOR INFORMATION

Please confirm, with a YES or NO answer, whether or not,

- 2.(a). Any ML4 Items listed in 1 above are related to any precision guided munitions,
 - 2.(b). Any ML22 Items listed in 1 above are related to any precision guided munitions,
 - 2.(c). Any ML4 Items listed in 1 above are related to any Paveway precision guided munitions,
 - 2.(d). Any ML22 Items listed in 1 above are related to any Paveway precision guided munitions,
 - 2.(e). Any ML4 Items listed in 1 above are related to any unmanned air vehicle (UAV) systems,
 - 2.(f). Any ML22 Items listed in 1 above are related to any MQ-9 UAV systems.
3. Please provide copies of ALL licence application records that verify answers to the questions in Part 2 of this request.