

**From:** Ann Feltham [ann@caat.org.uk]

**Sent:** 27 April 2006 11:11

**To:** Ben Llewellyn

**Subject:** CAAT representation on the proposed Special Handling Arrangements

Dear Ben Llewellyn

The Campaign Against Arms Trade welcomes the proposed Special Handling Arrangements set out in Annex C of the Final Government Response To Consultation On ECGD's Anti-Bribery and Corruption Procedures. We have three comments to make.

Firstly, it is important that, in addition to the electronic searches suggested, enquiries are made as to the agent's integrity in the country in which s/he is based. This should be done through an appropriate person in the UK's diplomatic mission, who will almost always have far more information about the agent's connections and reputation than an ECGD official in London.

Through such enquiries, it should be possible to ascertain whether there is a relationship between the agent and the purchaser of the goods, for instance whether the agent is a public official or the relative of one. In this way, for example, it should have been possible to establish that the agents being used to secure the export of Alvis vehicles to Indonesia in the mid-1990's were the daughters of a Brigadier-General and of the country's President. The latter controlled the monies necessary to make the purchase. This should have led to questions about propriety of the deal.

Secondly, paragraph 2/5 of Annex C says that only one copy of the agent's details will be kept. Since even the most "top secret" of Government documents are copied to several people, this seems to be secrecy bordering on paranoia. CAAT would suggest that at least one additional copy is kept.

Finally, in paragraph 2/7 of Annex C, it says that the ECGD will be unlikely to be able to proceed with an application if the Applicant refuses to allow the ECGD to share an agent's identity with another person to allow further enquiries to take place. In these circumstances the application should always be refused. The Applicant has no automatic right to taxpayer support, and cannot expect it to be given unless the ECGD is supplied with the information it needs to be completely satisfied that no bribery or corruption is involved.

Best wishes,

Ann Feltham

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