

# Strengthening the Regulation of Private Military and Security Companies in the Middle East and North Africa Region

A Montreux Document Forum Regional Meeting



## Contributors

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# I. Introduction

The Middle East and North Africa (MENA) region hosts a large private military and security industry. This development of the industry is notably driven by the outsourcing and privatisation of a variety of military and security services by States and the demand to secure extractive operations.

Private military and security companies (PMSCs),<sup>1</sup> while not inherently risky, bring the risk of undermining human and national security and endangering international humanitarian law (IHL), human rights, and development through weak governance. Weak governance also results in ill-defined relationships between public security providers and PMSCs and thus a risk of private actors taking over core public security functions by stealth. Weak governance of the PMSC industry includes insufficient regulation, monitoring, and accountability frameworks as well as in the widespread absence of robust data on the industry. These global trends are also seen in the MENA region.

To engage with States from the region, the Co-Chairs of the Montreux Document Forum (MDF), namely the Swiss Federal Department of Foreign Affairs (FDFA) and the International Committee of the Red Cross (ICRC) – with the support of the Geneva Centre for Security Sector Governance (DCAF) – organised the first MDF meeting for the MENA region on the 22nd and 23rd of June 2021. The conference facilitated an exchange on challenges, good practices, and national and regional experiences with PMSCs regulation, oversight, and accountability. In addition, the regional meeting increased awareness amongst States in the region on the Montreux Document and identified concrete ways in which the Montreux Document can help advance regulation, oversight, and accountability. The conference gathered around 60 participants from 14 States in the MENA region as well as Montreux Document participants.

This report presents a narrative of the challenges and regulatory approaches around PMSCs in the Middle East and North Africa region. The content of the report is drawn from panel presentations and interventions made during the discussion sessions, as well as desk-based research and academic sources intended to supplement and contextualize conference discussions. The next section (II) introduces the Montreux Document and the Montreux Document Forum. Section III offers an overview of the PMSC industry in the region, especially regarding the complexification of armed conflicts. Building on the information shared by States, in section IV the report outlines specific regulatory challenges identified. Section V highlights the added value of the Montreux Document and its good practices for the region. Finally, section VI concludes with reflections for follow-up and further outreach based on opportunities identified by this report.

## II. Overview of the Montreux Document and the Montreux Document Forum

### The Montreux Document

As presented by Jonathan Cuénoud, Legal Advisor on IHL from the Federal Department of Foreign Affairs of Switzerland, the Montreux Document reaffirms existing obligations of States under international law, particularly IHL and human rights law, relating to the activities of PMSCs, in particular in situations of armed conflict. It also lists good practices designed to help States take national measures to implement these obligations.

As the result of a joint initiative launched by Switzerland and the ICRC in 2006, the Montreux Document recalls and compiles applicable international obligations of States, PMSCs, and international organizations. It is a practical and realistic contribution that aims to promote respect for IHL and human rights law and provides a blueprint for

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1. According to the Montreux Document, private military and security services include, in particular, armed guarding and protection of persons and objects, such as convoys, buildings and other places; maintenance and operation of weapons systems; prisoner detention; and advice to or training of local forces and security personnel.

States to regulate PMSCs effectively. Regardless of their support for the Montreux Document, States are subject to the international legal obligations contained in the document. The Montreux Document is non-binding and does not take a stand on the legitimacy of PMSCs. It does not endorse or condemn their use and does not prescribe which services PMSCs can and cannot provide. Although the Document was developed with the view that PMSCs operate in situations of armed conflict, it may also be instructive for post-conflict situations and for other, comparable situations. Furthermore, most of the good practices are ideally put in place during peacetime.

The Montreux Document highlights the responsibilities of three types of States:

- Contracting States (countries that hire PMSCs);
- Territorial States (countries on whose territory PMSCs operate), and;
- Home States (countries in which PMSCs are based).

Other States can also exercise jurisdiction if one of their nationals commits a crime abroad.

Part 1 of the Montreux Document recalls the pertinent legal obligations of States regarding PMSCs. These obligations are primarily drawn from existing IHL and human rights law treaties, and customary international law.

Part 2 contains a description of good practices which aim to provide guidance and assistance to States in regulating PMSCs. The good practices include determining which services may or may not be contracted out to PMSCs, requiring appropriate training, establishing terms for granting licenses and adopting measures to improve supervision, transparency, and accountability of PMSCs. They are addressed primarily to States but may also be instructive to other relevant actors, such as International Organisations, civil society organisations (CSOs), companies that contract PMSCs, as well as PMSCs themselves and their personnel. This section of the Montreux Document offers a possible blueprint for regulation.

## The Montreux Document Forum as a tool to implement the Montreux Document

The Montreux Document Forum was created in 2014 by the participating States because there was a need to exchange good practices concerning the regulation of PMSCs and to implement such good practices at the national level. This need remains and is ever more relevant given that worldwide the private military and security industry is growing. This shows in the number of Montreux Document participants, which has more than tripled since the date of adoption of the Montreux Document in 2008: from 17 to 58 States and 3 international organisations. The goal of the Forum is to promote the national implementation of the Montreux Document and convene as many States and international organisations as possible to support it actively. The MDF further aims to strengthen an exchange on lessons learned, good practices, and challenges of the regulation of PMSCs and support governments in establishing appropriate national regulation and oversight mechanisms.

Montreux Document participants have established two working groups within the MDF: the Working Group on the International Code of Conduct Association (ICoCA Working Group), currently chaired by the United States of America, and the Working Group on the use of private military and security companies in maritime security (Maritime Working Group), currently chaired by Portugal. These Working Groups are open to all Montreux Document participants. As expressed during the Regional meeting by the Chair of the Maritime Working group, the Forum may establish other working groups in specific thematic areas to develop assistance and cooperation among States. The MDF is supported by its technical Secretariat, namely the Geneva Centre for Security Sector Governance (DCAF).

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**“** While it is upon the parties to an armed conflict to decide whether or not to hire services of PMSCs and for which role, States have the obligation to respect and to ensure respect for international humanitarian law and human rights law”

(Jonathan Cuénoud, Legal Advisor on IHL, Federal Department of Foreign Affairs of Switzerland).

## III. Private Military and Security Companies in the Middle East and North Africa Region

### Characteristics of the PMSC industry

The private military and security industry is large and diverse in the Middle East and North Africa region. A sharp increase in the use of PMSCs in combat operations in Iraq and Afghanistan in the early 2000s, along with allegations of misconduct, brought visibility to this industry. Following the 2008 financial crisis, the PMSC industry in the region evolved to offer services such as maritime security, cybersecurity, security for extractives, and protection services for humanitarian and non-governmental organisations. More recently, there has been an upsurge of combat services offered by PMSCs in different contexts.

The rise of PMSCs in fragile contexts with armed conflict and weak government regulation and oversight has led to concerns over violations of IHL and international human rights law (IHRL), with PMSCs and their employees notably accused of violence against civilians and forced labour. In addition, a sense of impunity and lack of accountability for PMSCs, their personnel, and their clients has been noted.

The region exhibits remarkable diversity in terms of the size and scope of national PMSC industries. This diversity is explained by a variety of factors, such as the existence of armed conflicts or the presence of sectors with specific security needs (e.g., the oil and gas industry).

#### Background information A): PMSC in extractive industries

The vast oil, gas, and mining sectors in the Middle East and North Africa have led to demand for a broad range of public and private security providers. PMSCs play an essential role in addressing threats such as attacks against installations by persons and drones, cyber threats, and piracy. This explains why the region counts for a substantial share of the global \$33.9 billion market of private security services to oil and gas companies.

The PMSC industry, in many cases, makes a meaningful contribution to the stability of a key economic sector - yet security services contracted by governments and extractives companies also have a bearing on the human rights of third parties, such as local communities. To address human rights risks, extractives companies and governments should conduct a comprehensive assessment of human rights risks associated with the security of their operations. PMSCs, for their part, need to have appropriate procedures in place to ensure adherence to applicable laws and regulations and international good practices, such as relevant corporate standards of business conduct.

Several PMSCs working for the extractives sector have been accused of not adhering to such regulations. In some cases, PMSCs are alleged to have violated national laws, e.g., by carrying illegal arms. In other cases, especially in fragile environments, PMSCs are alleged to have committed grave violations of human rights, including torture, abduction, arbitrary detention, and extrajudicial killings. The prevention and sanctioning of human rights abuses by PMSC employees are complicated by often complex and opaque contracting arrangements.

### The increased complexity of armed conflicts and the regional security landscape

Private military and security companies are providing services in or related to several armed conflicts in the region. Services include providing training for soldiers and pilots; the management of complex logistics chains, including weaponry; the maintenance of weapons systems and aircraft; the protection of persons and property; and demining services. Additionally, reports point to the direct involvement of PMSCs and PMSC-like actors in combat operations. There are significant allegations of misconduct of PMSCs in armed conflicts, including war crimes and crimes against humanity. Moreover, the employment of PMSCs in or related to armed conflicts in the region may contribute to the escalation of conflicts, undermining prospects of peaceful resolution.

Eva Svoboda, ICRC Deputy Director of International Law and Policy, illustrated that several ongoing and prolonged armed conflicts destabilize the Middle East and North Africa region. This situation is exacerbated by other factors,

such as climate change, but also the COVID pandemic. Armed conflicts in the region are complex, particularly looking at the multiplicity of actors involved. In this regard, several elements must be highlighted:

- **Support of local actors by external parties, such as PMSCs:** One of the features of armed conflict in the region is the growing involvement of PMSCs since the early 2000s. PMSCs operating in conflicts in the region include companies offering military support services, maintenance, and training services for new weapons. The latter are high in demand, given that weapons imports have increased drastically in recent years.
- **State Support of local actors:** Over the past two decades, there have been many States intervening or assisting in armed conflicts in support of local actors in the Middle East and on the African continent. This has led to an increasingly dense and global web of interactions between local actors and external allied States.
- **Multiplication of non-state armed groups:** The operational environment is further complicated by the multiplication and diversification of non-state armed groups in the Middle East and North Africa region. The number of non-international armed conflicts has more than doubled since the early 2000s, particularly due to the fragmentation of non-state armed groups into smaller splinter groups following internal divisions amongst members.
- **Diversification of non-state armed groups:** Armed groups are not only multiplying; they are diversifying. There is a variety in the organizational structure of these groups operating in the Middle East regarding size, motivation, and capabilities.

Overall, these trends raise a variety of legal and operational challenges. The multiplication of armed actors, many of which lack training on IHL rules, heightens the risk of harm to civilian populations, who often gets caught up in conflict. Also, these trends pose a challenge concerning the diffusion of responsibility. Lastly, there is a challenge regarding dialogue with parties to the conflict. The increasing number of actors involved has complicated the ability of humanitarian organisations to engage with parties to a conflict. Furthermore, due to the fragmentation of armed groups, leadership quickly changes, making it difficult to pinpoint the appropriate interlocutor.

At the same time, these trends present opportunities to enhance respect for international humanitarian law as required under the Geneva Conventions to which all States are party. For instance, States that provide support to a conflict party are in a particularly strong position to influence the party's behaviour towards compliance with the applicable law. The ICRC has also found (in its study on the Roots of Restraint in War) that the more decentralized groups are, the more they tend to be influenced by external actors, giving humanitarian organizations opportunities to engage with these external actors to enhance compliance to international norms and good practices.

Participants at the regional conference acknowledged that the complexities of armed conflicts may heighten the risk of repression and crimes against humanity by PMSCs, which are considered violations of international human rights law and international humanitarian law. For this purpose, legislative reform in accordance with the guidelines of the Montreux Document can foster the prevention of human rights abuses and IHL violations.

#### **Background information B): PMSCs in cyber security**

Over the past decade, the cyber security market in the region blossomed as governments sought to build up cyber capabilities. Private providers of such services are diverse, ranging from traditional telecom companies to companies specialising in military- or intelligence-grade cyber systems and technologies. The newly built cyber capacities protect against increasing cyber-attacks towards governments in the region. However, the growth of the cybersecurity market has also led to human rights concerns, as cyber PMSC services are often contracted with little regard or emphasis on safeguarding human rights, especially privacy rights, of those about whom information is gathered. In addition, scholars warn that given the nature of the cyber-context and cyber activities of PMSCs, State control is inherently limited.

## IV. Legislative Challenges Related to PMSC Regulation

Inadequate legal and policy frameworks create a variety of challenges in relation to private military and security companies, significantly reducing the possibility for national regulators to regulate and hold the PMSC industry accountable. The presentations and discussion in the Regional Meeting identified several relevant areas of PMSC regulation.

### Scope of legislation

To lay a solid foundation for the regulation of private military and security companies, the scope of national legislation must be clear. This means PMSCs must be defined, specific permitted services laid out, prohibited activities explained, and the scope of the applicability of the law discussed. Unclear definitions of PMSCs, as well as overly strict or excessively vague definitions of permitted and prohibited activities can undermine the effectiveness of legislation. In addition, the distinction between the functions of PMSCs and those of the police and/or the armed forces can be blurred, creating confusion over the division of roles and responsibilities, and potentially leading to the inappropriate use of coercive force by PMSCs.

To address these challenges, good practices (assembled in the Legislative Guidance Tool developed by DCAF) suggests holding broad consultations with a variety of stakeholders when drafting legislation. Based on these consultations, States can carefully determine and stipulate in the legislation which services and activities PMSCs may or may not provide. In addition, States shall include rules on the use of force permitted by private military and security personnel. Finally, States shall ensure the roles of private and public security are distinguishable.

All States in the MENA region define the activities of 'private security companies' and/or 'private security and guarding companies' in their legal frameworks. None of the frameworks address the activities of private military companies.

#### Examples of good practice:

- The legislation of Qatar specifies that firearms can only be used for legitimate self-defence in accordance with articles 49 and 50 of the Penal code. Private security can only use force with an explicit permission from the unit's leader and after a verbal warning had been issued to the aggressor or resistor.
- The legislation of Jordan declares that private security personnel wear specific uniforms - each company with a distinctive sign.

### Authority Responsible for the PMSC Industry

At a national level, monitoring mechanisms are often weak, non-existent or poorly applied. This can reduce direct control over the security sector by government actors and complicate the protection of labour rights and human rights.

It is thus international good practice to create a designated PMSC authority, tasked explicitly with and designed for the regulation, oversight, and accountability of the sector and to establish systematic, diligent, and institutionalised monitoring mechanisms within this authority.

In the MENA region, in many States there is no dedicated authority. There remains a vast potential to further improve monitoring and oversight of the industry as well as enforcement of national legislation.

#### Examples of good practice:

The United Arab Emirates legislation on PMSCs empowers a 'Competent Authority' to handle, supervise, and follow up on the work of PMSCs and allows it to access company records and to conduct audits at any time.

## Training of Private Military and Security Personnel

Adequate training of private military and security personnel is vital to mitigate the risk of misconduct of private security guards. Different challenges related to the training of private military and security companies can be defined, namely the lack adequate training and practical knowledge in:

- The application of IHL and human rights;
- Cultures, traditions, and values of local communities where they operate;
- Training in the safe and appropriate use of weapons and firearms which they are permitted to carry;
- Training on the use of force.

According to good practice, States shall task a national entity to design and oversee mandatory training for PMSC managers and personnel. Thereafter, minimum training requirements for PMSC personnel who can carry weapons and firearms in the course of their duties should be set. Finally, States are recommended to ensure that legislation includes requirements for mandatory human rights and IHL training tailored for both managers and personnel as a prerequisite for PMSCs gaining authorisations to operate.

Most States in the region require PMSC personnel to undertake basic training courses that last several weeks. However, the exact content of the training, as well as minimum requirements are often not as specific as international good practice suggest.

### Example of good practice:

The Iraqi legal framework stands out as the only legal regime that requires PMSCs to train their employees in human rights and ensure their knowledge of human rights principles.

## Accountability and Effective Remedies to Victims

Especially in complex environments or situations of weak governance, PMSCs may not be held accountable for violating national laws and standards. Sanctions for violations of international law may not exist or are often not enforced. In addition, the transnational character of some PMSCs or their activities can create accountability gaps. Finally, national legislation rarely establishes mechanisms that ensure effective remedies for victims.

Good practice suggests defining appropriate sanctions for national and international law violations and ensuring that PMSCs respect applicable national and international laws and standards as specifically related to labour law, immigration law, and tax law.

In addition, in line with the three-State logic of the Montreux Document, Home States of PMSCs (States where companies are headquartered) must also regulate the activities of PMSCs abroad.

Many States in the MENA region allow the regulator or the Ministry of Interior to sanction misconduct by PMSCs. However, legislation remains vague regarding their extra-territorial application. This extra-territorial application would be significant given the ongoing armed conflicts in the region. In situations of armed conflict, PMSCs are often not adequately addressed by the legislation and regulations of the States in which they operate (so-called 'Territorial States'): legislation may be insufficient, public institutions may not have regulatory capacities in practice, or both. If legislation of States where PMSCs are based in (so-called 'Home States') are not of an extraterritorial nature, and the legislation and regulatory frameworks of regional 'Contracting States' lack precise rules regarding the procurement and contracting of PMSCs, this may induce a significant governance gap.

## V. Regulating PMSCs in the Middle East and North Africa: the added value of the Montreux Document and the Montreux Document Forum

Participants of the Regional Conference discussed different challenges in regulating, monitoring, and overseeing PMSCs across the region. PMSCs are expanding in scope and services, which further complicates the governance of the sector. The Montreux Document and its good practices could provide helpful guidance for MENA States to set appropriate regulatory standards and support effective oversight and accountability. During the conference, Montreux Document participants from the region also underlined the unique importance of the Montreux Document Forum for discussing and sharing good practices among States.

As the security landscape continues to change globally, the requirements for effective regulation have also shifted. This development raises questions for States, including:

- Which types of military or security functions should be outsourced to private companies?
- How do States monitor the activities of PMSCs and how do States respond to abuses of human rights and violations of IHL?
- Who should be monitoring PMSCs and their personnel?
- What are the mechanisms for effective remedies to help victims?

To address such questions, the Montreux Document Forum developed several guidance tools and offers contextualised support packages for States.

### Guidance tools

The Forum has facilitated the development of tools to assist States and international organisations in implementing the Montreux Document standards and good practices. These good practices enable States to review the conformity of domestic legislation and practice with existing obligations under international humanitarian and human rights law.

- **Legislative Guidance Tool:** This tool contains practical step-by-step guidance for States on building appropriate regulation and oversight mechanisms for the private military and security industry. The guidance tool is aimed at parliamentarians and law and policymakers that wish to develop or update national regulation of the industry.

The guidance tool covers permitted and prohibited activities for PMSCs, guidance on setting up an authority responsible for the PMSC industry, obligations of PMSCs and their personnel, as well as good practices in terms of accountability and effective remedies for victims.

Discussions and presentations during the regional conference showed several areas for potential improvements of national legislation of PMSCs. The Legislative Guidance Tool can thus be immensely useful for countries of the region.

- **Contract guidance tool:** This tool provides practical guidance for States and other stakeholders on structuring their contracts and contracting procedures for private military and security services, drawing on international norms and standards. The tool further raises awareness on the crucial role of effective contracting processes, which integrate respect for International Human Rights Law and International Humanitarian Law, based on lessons and good practices from existing procedures.

Building on the three-State logic of the Montreux Document, experts and participants discussed the importance of the contracting State in regulating the PMSC industry. This is especially vital in situations of conflict or weak governance. Increasing awareness of the obligations of Contracting States could therefore help address existing governance gaps.

### Case Study: Switzerland

Building on the Legislative Guidance Tool and the Contract Guidance Tool, Switzerland developed a new law on PMSCs that entered into force in 2015. As Co-Chair of the Montreux Document, Switzerland wanted to implement good practices of the Montreux Document at a national level. In addition, the growth of PMSCs based in Switzerland necessitated updated national legislation.

The law focuses on two approaches. On the one side, it regulates companies based in Switzerland (Home-State approach). This extraterritorial application of the legislation is of particular importance for Switzerland as a Home State to hold accountable PMSCs operating in armed conflict where the rule of law may be weak, and where the local population is particularly vulnerable. In addition, it regulates services that are contracted by the Swiss government abroad (Contracting-State approach). Swiss law covers a wide variety of military and security services. Eligible companies need to become members of the International Code of Conduct Association.

Companies need to declare their activities to the regulatory authority and in case of doubts regarding the adherence to national law, the regulatory authority conducts a review.

## Advisory support for states to regulate PMSCs

To support the implementation of the Montreux Document and its good practices, the MDF Secretariat offers contextualized support packages developed in consultation with national actors and driven by national challenges. These advisory projects are guided by the principles of impartiality, local ownership, inclusivity, and gender equality.

The forms of advisory support can include:



**Knowledge gathering:** To better understand the national PMSC industry, the MDF can provide support in mapping the PMSC industry in the national context, analysing gaps in the policy, legal and regulatory framework, or conduct a gender analysis of the industry.



**Policy Advice:** The Forum provides technical support to States in developing new legislation or updating existing national legal frameworks to ensure that it is comprehensive and reflects international good practices. This includes integrating governance of PMSCs in National Action Plans on Business and Human Rights.



**Implementation Support:** The Forum supports national actors in setting up mandated national regulatory authorities, building capacity of the existing ones, or supporting oversight and accountability mechanisms. It is essential that the national authority has an adequate capacity to control and oversee the PMSC industry.

Given the complex security situation in the Middle East and North Africa region, participants discussed the importance of implementing international norms and good practices in a contextualised manner. It is vital to assess and discuss challenges in the regulation of PMSCs with a wide set of stakeholders. The advisory support of the Montreux Document Forum thus constitutes an ideal tool for countries in the region to improve national governance of the private military and security industry.

## VI. Supporting States in Regulatory Efforts: Opportunities<sup>2</sup>

The Regional Conference showed a broad interest by governments in the MENA region in collaborating to foster the effective regulation of private military and security companies. Numerous legislative frameworks contain good practices. However, the conference also illustrated several areas for improving both national legislation and its enforcement. The MDF Regional Meeting offers a point of departure for continued discussions among States and other stakeholders. The conference did not adopt formal recommendations. Nonetheless, the following suggestions for the way forward offer concrete steps that could be considered:

- **The need to broaden support for the Montreux Document:** Private military and security companies will continue to play an essential role in the security architecture of the MENA region. The Montreux Document has proven a relevant tool in regulating PMSCs in times of armed conflict. Wider dissemination and bilateral engagement can foster appropriate vetting, training, and accountability of PMSCs and reduce the risk of violations of IHL and IHRL.

The Forum should continue to strengthen support by States and international organisations in the MENA region for the Montreux Document. Such outreach efforts can be conducted by the Co-Chairs of the MDF, namely Switzerland and the ICRC, through regional representations or the technical Secretariat, DCAF. Moreover, Montreux Document Participants themselves can undertake bilateral outreach briefings to neighbouring countries to raise awareness.

By joining the Montreux Document, States re-commit to the legal principles recalled in the document and express support for the good practices. States also send the political message that they accept the primary responsibility for ensuring that PMSCs respect international humanitarian law and human rights law.

- **The need to focus on national legislation and enforcement:** The Montreux Document provides a blueprint for PMSCs regulation, oversight, and accountability. However, it is upon States – notably those who hire PMSCs, those where PMSCs are registered, and those where PMSCs perform their services – to adopt and enforce laws to ensure that PMSCs enhance security and respect human rights. The conference illustrated that enforcement of national laws poses a significant challenge. The Montreux Document Forum provides a platform through which States can exchange experiences in the implementation of the good practices. Additionally, the advisory services of the Montreux Document Forum can support States in creating appropriate monitoring and accountability mechanisms.

- **Addressing the regulation of PMSCs in armed conflicts:**

In the MENA region and globally, effective regulation of private military and security companies in armed conflicts constitutes a significant challenge. The complexification of conflicts, the web of diverse actors to the conflicts, and weak governance capacities of territorial States exacerbate this issue.

The Montreux Document provides several avenues to address this problem. First, the three-State logic enables regulation of PMSCs from different angles. In cases of armed conflicts, the regulatory capacities of the Contracting States and the Home States become ever more critical. Moreover, on a political level, strengthened international cooperation is needed to ensure accountability of different actors involved in conflicts and to ensure the protection of civilians. The Montreux Document Forum constitutes a platform for States to exchange on such issues and foster collaboration. Creating political buy-in through this platform can produce promising opportunities to mitigate the risk of violations of IHL and IHRL by PMSCs.

Importantly, the Montreux Document can also be of use for situations outside of armed conflicts. First, systems to ensure respect for international humanitarian law and human rights law must be put in place before armed conflict or comparable situations erupt. In times of conflict, it may be difficult to put authorization or oversight mechanisms into place. And second, the good practices are not only relevant regarding PMSCs that operate in armed conflict but can be a blueprint for PMSC regulation in a myriad of scenarios.

2. The proposed ways forward were written by the Secretariat of the Montreux Document Forum, namely the Geneva Centre for Security Sector Governance (DCAF). They do not represent the consensual view of States, nor do they necessarily reflect the views of the Co-Chairs of the MDF.

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