

Supporting Effective Implementation of United Nations Sanctions on North Korea

HOW-TO GUIDES

Hugh Griffiths



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A publication of the Small Arms Survey's Strengthening Implementation and Enforcement of the Arms Embargo on North Korea (SAENK) project, with support from the Kingdom of the Netherlands



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Introduction



The Small Arms Survey's Strengthening Implementation and Enforcement of the Arms Embargo on North Korea (SAENK) project contributes to the efforts of the UN Sanctions Committee and Panel of Experts on North Korea to curb arms proliferation and enhance international peace and security.

This project and its outputs were made possible with the support of the Kingdom of the Netherlands.

Learn more on the SAENK resource page of the Small Arms Survey website.



The Small Arms Survey's three How-to guides on 'Supporting effective implementation of United Nations sanctions on North Korea' are user-friendly resources intended for governmental stakeholders, policy practitioners, and other subject matter experts.

They aim to increase knowledge of how to implement and enforce UN sanctions on North Korea by helping practitioners identify evasion trends and practical risk assessment techniques.



III. List of abbreviations

DPRK	Democratic People's Republic of Korea
ESCAP	United Nations Economic and Social Commission for Asia and the Pacific
FEC	Future Electronic Company
FTB	Foreign Trade Bank
GBAE	General Bureau of Atomic Energy
GPM	General Precious Metal
HCMC	Haeyang Crew Management Co. Ltd
IFC	International financial centre
KOMID	Korea Mining Development Trading Corporation
KUDB	Korea United Development Bank
MANPADS	Man-portable air defence system(s)
MIC	Military Industry Corporation
OMM	Ocean Maritime Management Company
RPG	Rocket-propelled grenade
SAENK	Strengthening Implementation and Enforcement of the Arms Embargo on North Korea
SAM	Surface-to-air missile
SCUD	Subsonic Cruise Unarmed Decoy
SPLA	Sudan People's Liberation Army
SSRC	Scientific Studies Research Centre
UAE	United Arab Emirates
UN	United Nations
UNSCR	United Nations Security Council Resolution



Guide 1

Supporting effective implementation
of United Nations sanctions on North Korea

How to prevent North Korean arms embargo violations





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DPRK	Democratic People's Republic of Korea
FEC	Future Electronic Company
KOMID	Korea Mining Development Trading Corporation
MANPADS	Man-portable air defence system(s)
MIC	Military Industry Corporation
RPG	Rocket-propelled Grenade
SAENK	Strengthening Implementation and Enforcement of the Arms Embargo on North Korea
SAM	Surface to Air Missile
SCUD	Subsonic Cruise Unarmed Decoy
UNSCR	United Nations Security Council Resolution



I. Risk typology of North Korean arms embargo violations

The following products and services have been found to have been manufactured and exported or otherwise supplied or offered by North Korean overseas brokers.

Therefore, within the context of the United Nations Security Council Resolutions (UNSCRs), the sourcing or import of such products should be subject to appropriate levels of due diligence.

I. Risk typology of North Korean arms embargo violations



Exports (from North Korea)

- Ammunition
- Small arms
- Light weapons
- Munitions
- Conventional arms
- Tracked and towed weapons
- Ballistic missile-related items
- Other military equipment
- Repair services



I. Risk typology of North Korean arms embargo violations

Exports (from North Korea): Ammunition



7.62 mm and 9mm side arm ammunition



7.62 x 39 mm and 7.62 x 54 mm assault rifle ammunition



12.7 mm and 7.62 mm machine gun ammunition

I. Risk typology of North Korean arms embargo violations



Exports (from North Korea): Small arms



7.62 mm and 9mm side arms



7.62 x 39 mm and 7.62 x 54 mm assault rifles



7.62 x 39 mm Dragunov-type sniper rifles



I. Risk typology of North Korean arms embargo violations

Exports (from North Korea): Light weapons



7.62 x 54 mm PKM-type light machine guns



12.7 mm heavy machine guns



Multi-barrelled grenade launchers



SA-16 Igla-type man-portable air defence systems (MANPADS)



Type-9 rocket-propelled grenades (RPGs) and launchers



60 mm and 120 mm mortars

I. Risk typology of North Korean arms embargo violations



Exports (from North Korea): Munitions



Grenades



Malyutka anti-tank missiles



Aerial bombs



I. Risk typology of North Korean arms embargo violations

Exports (from North Korea): Conventional arms



122 mm multiple rocket launchers



300 mm multiple rocket launchers



SA-3 Pechora-type surface-to-air missiles (SAMs)



MIG 21 jet fighters



Patrol boats



Submarines

I. Risk typology of North Korean arms embargo violations



Exports (from North Korea): Tracked and towed weapons



130 mm towed field guns

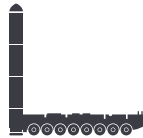


T-55, T-62-type tanks



I. Risk typology of North Korean arms embargo violations

Exports (from North Korea): Ballistic missile-related items



Scud-type ballistic missiles



Scud-type ballistic missile components



Scud-type ballistic missile technical assistance

I. Risk typology of North Korean arms embargo violations



Exports (from North Korea): Other military equipment



Tactical vests



Encrypted tactical communications systems



Gas masks and chemical warfare protective clothing, equipment, and vehicles



Air defence radar systems



I. Risk typology of North Korean arms embargo violations

Exports (from North Korea): Repair services



Tank repair services



Patrol boat repair services



Submarine repair services



Air defence repair services

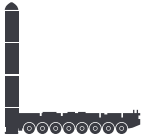
I. Risk typology of North Korean arms embargo violations



Imports (to North Korea)



Nuclear-related items



Ballistic missile-related dual-use and commercial items



Controlled or sensitive goods used for advanced military equipment projects in North Korea and overseas



I. Risk typology of North Korean arms embargo violations

Security assistance cooperation (with North Korea)

- Training
- Construction

I. Risk typology of North Korean arms embargo violations



Security assistance cooperation (with North Korea)

Training



Presidential Guard training



Army special forces training



Paramilitary/special police training



Electronic surveillance training



Tank crew training



Helicopter gunnery training



MIG-21 jet fighter training



I. Risk typology of North Korean arms embargo violations

Security assistance cooperation (with North Korea)

Construction



Construction of military camps



Construction of Ministry of Defence buildings



Construction of intelligence and security service headquarters

II. North Korean embargo evasion techniques

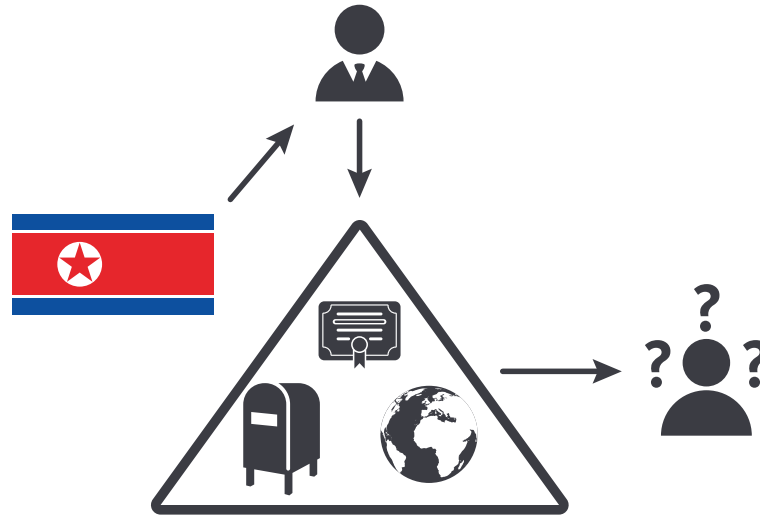


- North Korean overseas brokering to source, broker, or trans-ship arms-related goods
- North Korean overseas brokering networks to source, manufacture, and promote arms-related goods
- North Korean overseas brokering to non-state actors
- North Korean export control circumvention through a trusted foreign intermediary



II. North Korean embargo evasion techniques

North Korean overseas brokering to source, broker, or trans-ship arms-related goods

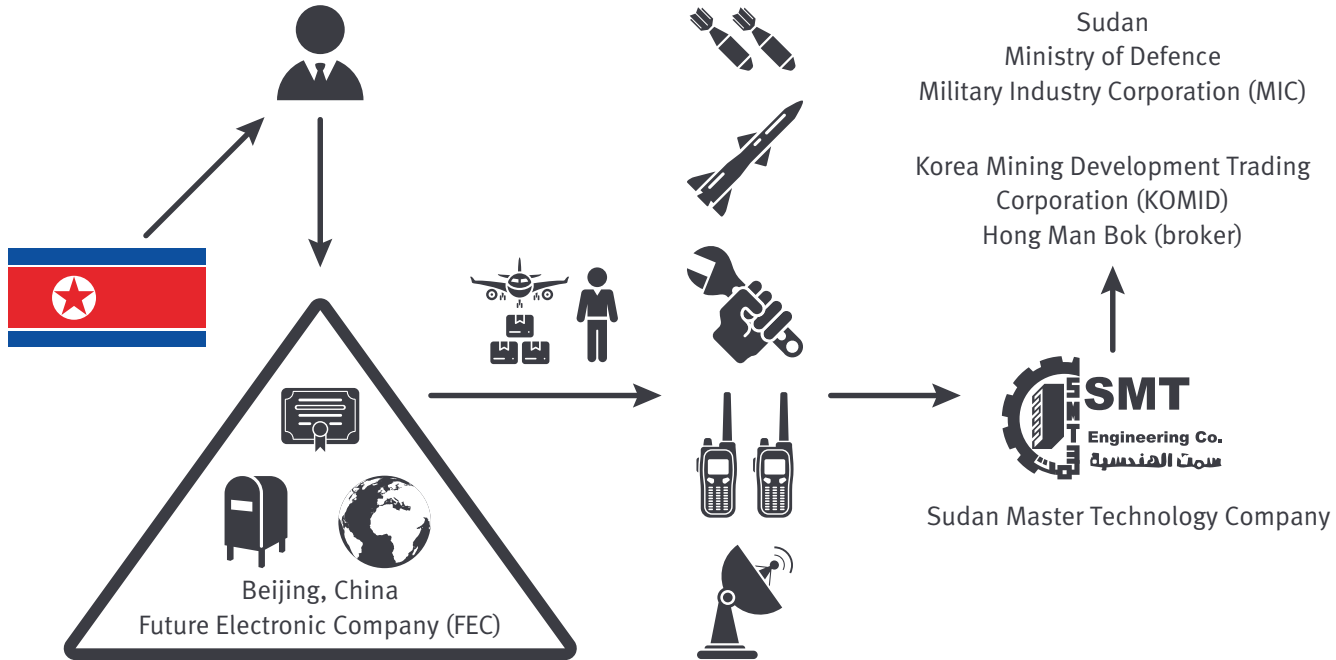


To disguise origin or cover North Korean involvement, North Korean arms brokers establish offices overseas in order to source, broker, or trans-ship arms-related goods.

II. North Korean embargo evasion techniques

North Korean overseas brokering to source, broker, or trans-ship arms-related goods

Documented example



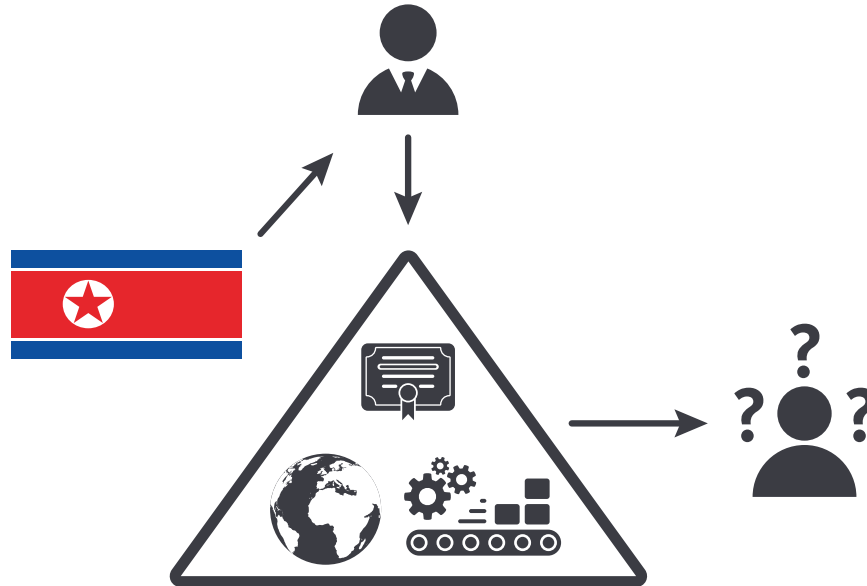
Korea Mining Development Trading Corporation uses Future Electronic Company, Beijing, to supply Sudan with prohibited products and services (UNSC, 2019, paras. 84–85, annexes 26–27).





II. North Korean embargo evasion techniques

North Korean overseas brokering networks to source, manufacture, and promote arms-related goods



North Korean arms companies establish overseas facilities in order to source, manufacture, and promote arms-related goods.

II. North Korean embargo evasion techniques

North Korean overseas brokering networks to source, manufacture, and promote arms-related goods

Documented example



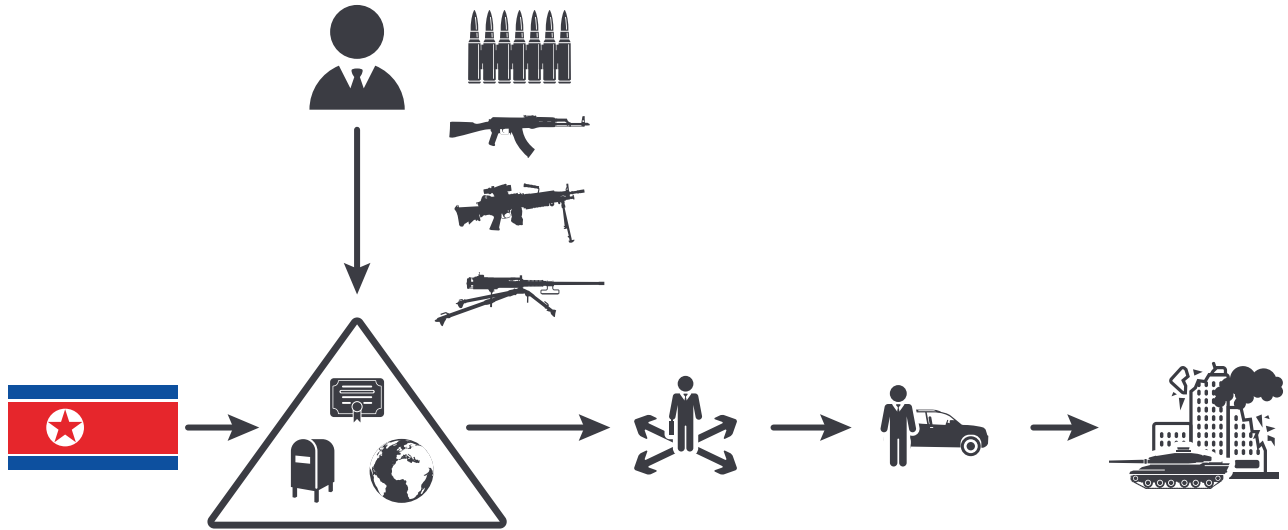
Encrypted military tactical communications equipment manufactured in North Korea and Malaysia shipped via air to Eritrea (UNSC, 2017a, paras. 72–87).





II. North Korean embargo evasion techniques

North Korean overseas brokering to non-state actors

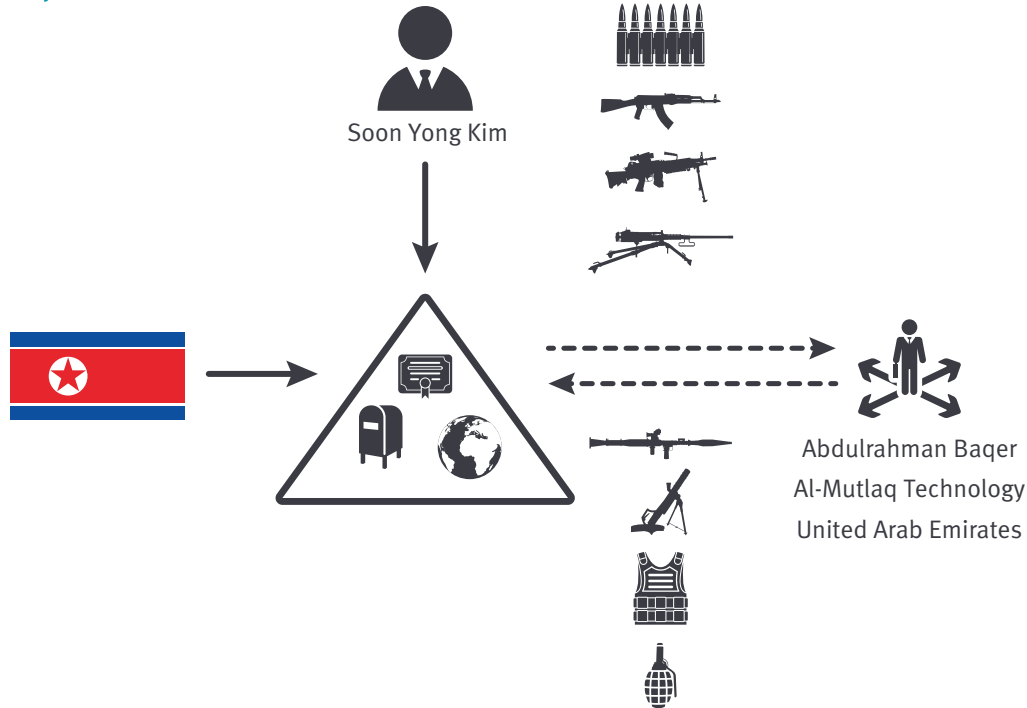


North Korean overseas arms brokers supply arms to global small arms brokers for sales in conflict areas.

II. North Korean embargo evasion techniques

North Korean overseas brokering to non-state actors

Documented example



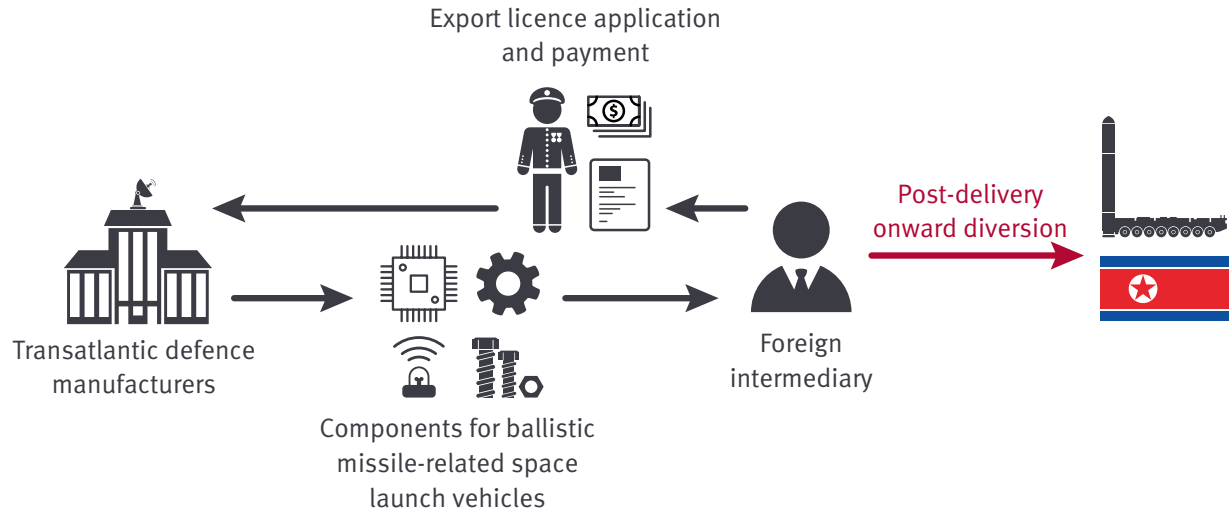
Beijing-based North Korean arms broker Soon Yong Kim agreed to supply USD 100 million of small arms and light weapons to a United Arab Emirates arms broker in 2015 (UNSC, 2016a, annexes 1, 104–05).





II. North Korean embargo evasion techniques

North Korean export control circumvention through a trusted foreign intermediary





- Relevant UNSCRs prohibiting arms-related transfers (from North Korea)
- North Korean export violation and brokering risks in the arms-related transfer chain
- Reducing North Korean export violation and brokering risks in the arms-related transfer chain



III. Preventing and detecting procurement of conventional arms and services (from North Korea)

Relevant UNSCRs prohibiting arms-related transfers (from North Korea)



UNSCR 1718 (UNSC, 2006):

- Paragraph 8 a (i): prohibits the supply from North Korea of ‘any battle tanks, armoured combat vehicles, large calibre artillery systems, combat aircraft, attack helicopters, warships, missiles or missile systems as defined for the purpose of the United Nations Register on Conventional Arms, or related materiel including spare parts’.



UNSCR 1874 (UNSC, 2009):

- Paragraph 9: prohibits the supply by North Korea of ‘all arms and related materiel, as well as ... financial transactions, technical training, advice, services or assistance related to the provision, manufacture, maintenance or use of such arms or materiel’.



UNSCR 2270 (UNSC, 2016b):

- Paragraph 7: prohibits ‘the shipment of items to or from the DPRK* for repair, servicing, refurbishing, testing, reverse-engineering, and marketing, regardless of whether ownership or control is transferred, and underscores that the measures specified in paragraph 8 (e) of UNSCR 1718 (2006) shall also apply to any individual traveling for the purposes of carrying out the activities described ...’.



- Paragraph 8: prohibits ‘any item, except food or medicine, if the State determines that such item could directly contribute to the development of the DPRK’s operational capabilities of its armed forces, or to exports that support or enhance the operational capabilities of armed forces of another member state outside the DPRK’.

*The Democratic People’s Republic of Korea, referred to as North Korea throughout these guides.

III. Preventing and detecting procurement of conventional arms and services (from North Korea)



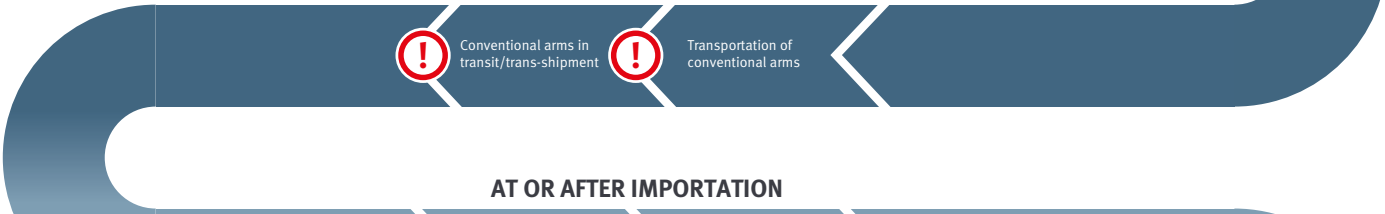
North Korean export violation and brokering risks in the arms-related transfer chain, with reduction measures

- Before the transfer
- During the transfer

BEFORE THE TRANSFER



DURING THE TRANSFER



AT OR AFTER IMPORTATION



POST-DELIVERY STORAGE





III. Preventing and detecting procurement of conventional arms and services (from North Korea)

North Korean export violation and brokering risks in the arms-related transfer chain

Before the transfer

BEFORE THE TRANSFER



Importing member state's Ministry of Defence or armed forces staff negotiate and authorize contract with North Korean government officials without the consent of the Ministry of Foreign Affairs or parliament in the importing member state.



Foreign broker conceals North Korean involvement in the arms transfer from the importing member state's authorities.



Importing member state or entity does not detect the involvement of North Korean arms brokers, equipment, or services.

III. Preventing and detecting procurement of conventional arms and services (from North Korea)



Reducing North Korean export violation and brokering risks in the arms-related transfer chain: Before the transfer

BEFORE THE TRANSFER



Importing member state's Ministry of Defence and armed forces staff consult with Ministry of Foreign Affairs to ensure UNSCRs are implemented and that arms-related imports do not involve North Korean entities, personnel or equipment.



Brokers are subject to background checks, licensed, and notified regarding United Nations arms embargoes on North Korea.



Nationalities of brokers and technicians, and origin of the arms-related goods are confirmed by importing member state. Individuals and entities are checked against UN lists of designated entities and individuals and UN Panel of Experts' reports.



III. Preventing and detecting procurement of conventional arms and services (from North Korea)

Reducing North Korean export violation and brokering risks in the arms-related transfer chain: Before the transfer



Promote awareness of paragraph 8 of UNSCR 1718 (UNSC, 2006), paragraph 9 of UNSCR 1874 (UNSC, 2009), and paragraphs 8 and 9 of UNSCR 2270 (UNSC, 2016b) within procurement sections of Ministries of Defence and Interior and security services.



Consult UN, other designation lists, and UN Panel of Experts' reports to screen potential contractors against lists of designated and suspect entities.



Consult national inter-ministerial/inter-agency working groups established in response to UN sanctions on North Korea.



Publish names, nationalities, and addresses of foreign companies contracted to supply arms-related goods or services.



Promote awareness of paragraph 8 of UNSCR 1718 (UNSC, 2006), paragraph 9 of UNSCR 1874 (UNSC, 2009), and paragraphs 8 and 9 of UNSCR 2270 (UNSC, 2016b) within national and foreign arms-related contracting community.

III. Preventing and detecting procurement of conventional arms and services (from North Korea)



North Korean export violation and brokering risks in the arms-related transfer chain

During the transfer

DURING THE TRANSFER



Officials in the trans-shipment state are unaware of prohibition on all arms-related transfers from, or on behalf of, North Korea.



Officials in the trans-shipment state examine the documentation but do not screen company names for UN designated entities and those entities named in UN Panel of Experts' reports.



Officials in the trans-shipment state examine the documentation and screen company names for UN designated entities and those named in UN Panel of Experts reports, but do not check front company phone numbers and addresses that are shared with designated entities.



III. Preventing and detecting procurement of conventional arms and services (from North Korea)

Reducing North Korean export violation and brokering risks in the arms-related transfer chain: During the transfer

DURING THE TRANSFER



Trans-shipment state inspection officials are aware of the prohibition on all arms-related goods from or on behalf of North Korea; they examine import and freight documentation for designated entities and individuals and those named in UN Panel of Experts' reports, and in higher risk cases screen for addresses and telephone numbers that front companies share with designated entities.

III. Preventing and detecting procurement of conventional arms and services (from North Korea)



Reducing North Korean export violation and brokering risks in the arms-related transfer chain: During the transfer



Promote awareness of paragraph 8 of UNSCR 1718 (UNSC, 2006), paragraph 9 of UNSCR 1874 (UNSC, 2009), and paragraphs 8 and 9 of UNSCR 2270 (UNSC, 2016b) among customs officials, border guards, and other officials charged with transit/trans-shipment and interdiction.



Consult UN, other designation lists, and UN Panel of Experts' reports to screen higher risk transit/trans-shipment cases against lists of designated and suspect entities.



Check telephone numbers and addresses provided in documentation accompanying higher risk transit/trans-shipment cases for telephone numbers and addresses shared with designated entities and those named in UN Panel of Experts' reports.



Cooperate closely and share any information with other member states and any parties involved in the arms-related transfer chain.



Report interdictions to the UN Security Council 1718 Committee and cooperate with UN Panel of Experts.



IV. Preventing and detecting supply of conventional arms and services (to North Korea)

- Relevant UNSCRs prohibiting arms-related transfers (to North Korea)
- North Korean import violation risks in the arms-related transfer chain
- Reducing North Korean import violation risks in the arms-related transfer chain

IV. Preventing and detecting supply of conventional arms and services (to North Korea)



Relevant UNSCRs prohibiting arms-related transfers (to North Korea)



UNSCR1718 (UNSC, 2006):

- Paragraph 8: prohibits the supply of ‘any battle tanks, armoured combat vehicles, large calibre artillery systems, combat aircraft, attack helicopters, warships, missiles or missile systems as defined for the purpose of the United Nations Register on Conventional Arms, or related materiel including spare parts’.



UNSCR 2270 (UNSC, 2016b):

- Paragraph 6: prohibits the supply of ‘all arms and related materiel, including small arms and light weapons and their related materiel, as well as ... financial transactions, technical training, advice, services or assistance related to the provision, manufacture, maintenance or use of such arms and related materiel’.



- Paragraph 8: prohibits ‘any item, except food or medicine, if the State determines that such item could directly contribute to the development of the DPRK’s operational capabilities of its armed forces’.



UNSCR 2397 (UNSC, 2017b):

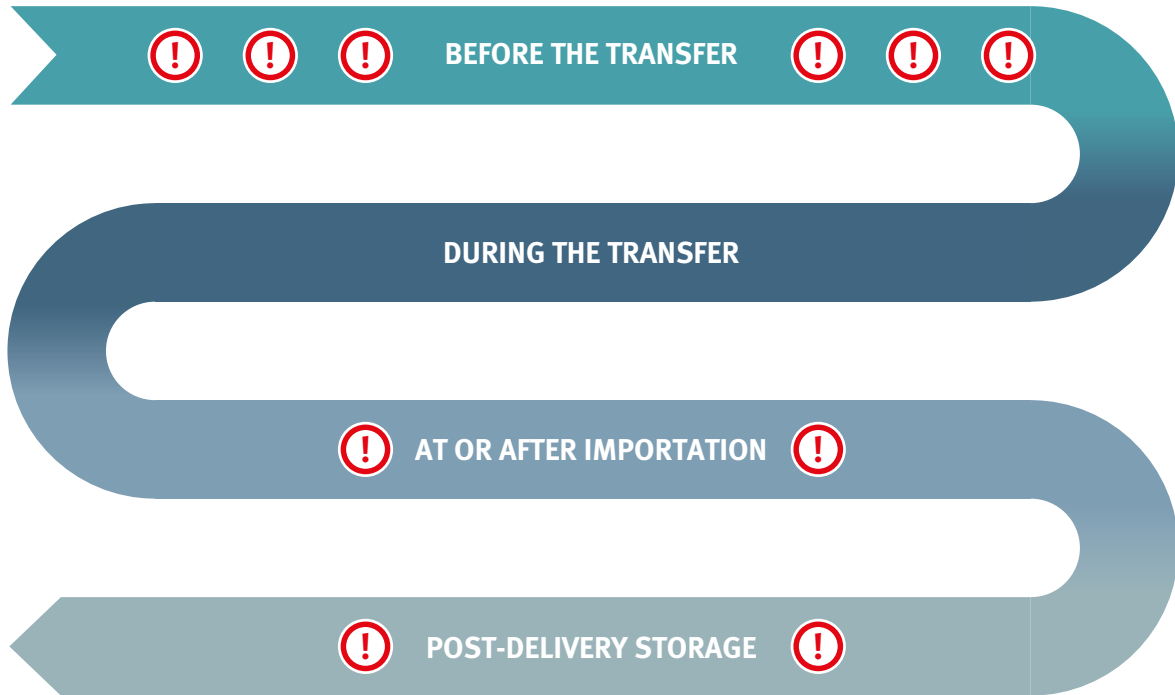
- Paragraph 7: prohibits the direct or indirect supply of ‘all industrial machinery’, ‘transportation vehicles’, ‘iron, steel and other metals’.



IV. Preventing and detecting supply of conventional arms and services (to North Korea)

North Korean import violation risks in the arms-related transfer chain, with reduction measures

- Before the transfer
- At or after importation
- Post-delivery storage



IV. Preventing and detecting supply of conventional arms and services (to North Korea)



North Korean import violation risks in the arms-related transfer chain

Before the transfer

BEFORE THE TRANSFER



North Korean trusted foreign national, broker, or intermediary falsifies export licence application form.

Foreign national, broker, or intermediary trusted by North Korea suborns employee of a known customer (larger, mainstream company) with manufacturing profile which provides legitimate address and justification for export licence application.



Known customer applies on behalf of foreign national trusted by North Korea.



Exporting company and export control authorities do not detect the involvement of North Korean proliferation networks; export licence is issued.



IV. Preventing and detecting supply of conventional arms and services (to North Korea)

North Korean import violation risks in the arms-related transfer chain

At or after importation

AT OR AFTER IMPORTATION



Controlled goods are delivered directly to foreign national, broker, or intermediary trusted by North Korea.



Controlled goods are delivered to staff member at a known customer company then transferred to foreign national, broker, or intermediary trusted by North Korea.

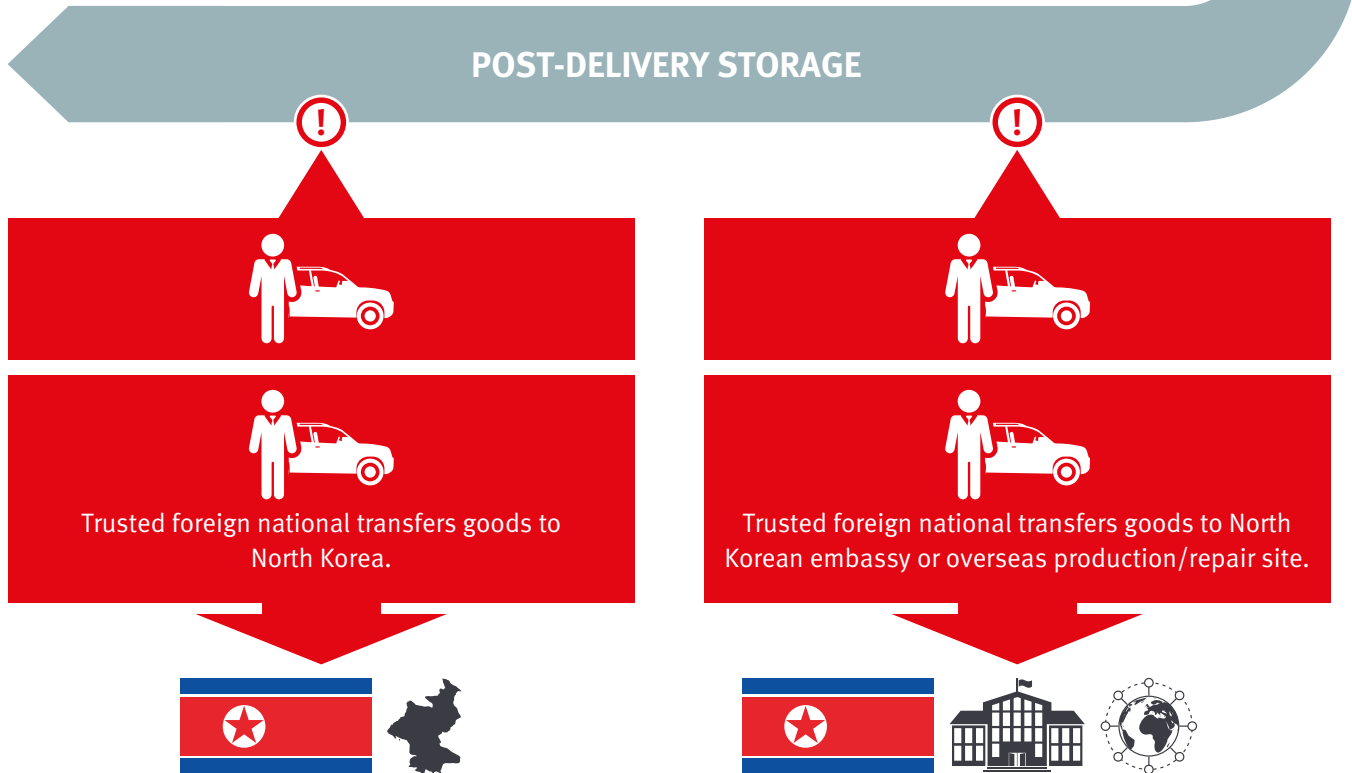


IV. Preventing and detecting supply of conventional arms and services (to North Korea)



North Korean import violation risks in the arms-related transfer chain

Post-delivery storage





IV. Preventing and detecting supply of conventional arms and services (to North Korea)

Reducing North Korean import violation risks in the arms-related transfer chain



Cooperate closely and share information with other member states and parties involved in export licensing and the arms-related transfer chain.



Share information on suspect or higher risk export licence applications with other member states and through mechanisms such as the Wassenaar Arrangement, Australia Group, Missile Technology Control Regime, and Nuclear Suppliers Group.



Consult UN, other designation lists, and UN Panel of Experts' reports to screen potential addresses, contact numbers, and individuals against lists of designated and suspect entities.



Consult national inter-ministerial/inter-agency working groups established in response to UN sanctions on North Korea.



Consult UN Panel of Experts monitoring sanctions on North Korea.



- Relevant UNSCRs prohibiting security assistance cooperation with North Korean military and police
- Reducing North Korean procurement cooperation



V. Preventing and detecting security assistance cooperation (with North Korea)

Relevant UNSCRs prohibiting security assistance cooperation with North Korean military and police



UNSCR 1874 (UNSC, 2009):

- Paragraph 9: prohibits the supply by North Korea of ‘all arms and related materiel, as well as ... financial transactions, technical training, advice, services or assistance related to the provision, manufacture, maintenance or use of such arms or materiel’.



UNSCR 2270 (UNSC, 2016b):

- Paragraph 9: ‘prohibits States from engaging in the hosting of trainers, advisors, or other officials for the purpose of military-, paramilitary- or police-related training’.

V. Preventing and detecting security assistance cooperation (with North Korea)



Reducing North Korean procurement cooperation



Promote awareness of paragraphs 9 of UNSCRs 1874 (UNSC, 2009) and 2270 (UNSC, 2016b) within procurement sections of Ministries of Defence and Interior and security services.



Consult UN, other designation lists, and UN Panel of Experts' reports to screen potential contractors against lists of designated entities.



Conduct screening to ensure that foreign firms do not act as proxies for North Korean overseas labour or defence entities.



Publish names and nationalities of foreign companies conducting security assistance training, infrastructure, or repairs.



Repatriate North Korean workers as per paragraph 8 of UNSCR 2397 (UNSC, 2017b) by 31 December 2019.



VI. References

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- . 2009. Resolution 1874 (2009). S/RES/1874 of 12 June.
 - . 2016a. Letter dated 22 February 2016 from the Panel of Experts established pursuant to Resolution 1874 (2009) addressed to the President of the Security Council. S/2016/157 of 24 February.
 - . 2016b. Resolution 2270 (2016). S/RES/2270 of 2 March.
 - . 2017a. Letter dated 17 February 2017 from the Panel of Experts established pursuant to Resolution 1874 (2009) addressed to the President of the Security Council. S/2017/150 of 27 February.
 - . 2017b. Resolution 2397 (2017). S/RES/2397 of 17 December.
 - . 2019. Letter dated 21 February 2019 from the Panel of Experts established pursuant to Resolution 1874 (2009) addressed to the President of the Security Council. S/2019/171 of 5 March.



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Guide 2

**Supporting effective implementation of
United Nations sanctions on North Korea**

**How to prevent North Korean sanctions
evasion through diplomatic channels**





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FTB	Foreign Trade Bank
GBAE	General Bureau of Atomic Energy
GPM	General Precious Metal
KOMID	Korea Mining Development Trading Corporation
KUDB	Korea United Development Bank
MANPADS	Man-portable air defence system(s)
SAENK	Strengthening Implementation and Enforcement of the Arms Embargo on North Korea
SCUD	Subsonic Cruise Unarmed Decoy
SPLA	Sudan People's Liberation Army
SSRC	Scientific Studies Research Centre
UAE	United Arab Emirates
UNSCR	United Nations Security Council Resolution



I. Risk typology of North Korean sanctions violations through diplomatic channels

The following products and services have been found to have been manufactured and exported or otherwise supplied through North Korean diplomatic channels.

Therefore, within the context of the United Nations Security Council Resolutions (UNSCRs), the sourcing or import of such products should be subject to appropriate levels of due diligence.



- Procurement and sale of weapons of mass destruction
- Sale and promotion of conventional weapons
- Training
- Sale and promotion of other services
- Acting on behalf of designated entities
- Luxury goods
- Commodities
- Financial activities
- Commercial activities
- Areas at risk



I. Risk typology of North Korean sanctions violations through diplomatic channels

Procurement and sale of weapons of mass destruction



Procurement and sale of nuclear-related items



Procurement and sale of ballistic missile-related items



Procurement and sale of chemical-related items

I. Risk typology of North Korean sanctions violations through diplomatic channels

Sale and promotion of conventional weapons



Sale and promotion of conventional weapons



Sale and promotion of small arms and light weapons





I. Risk typology of North Korean sanctions violations through diplomatic channels

Training



Sale and promotion of military training and technical cooperation

I. Risk typology of North Korean sanctions violations through diplomatic channels



Sale and promotion of other services



Sale and promotion of ballistic missile and military equipment repair/upgrade services



Sale and promotion of (military) radar systems, systems upgrades, and training



Sale and promotion of (military) communications systems



I. Risk typology of North Korean sanctions violations through diplomatic channels

Acting on behalf of designated entities



Acting on behalf of entities that have been designated by the UN and member states as subject to an assets freeze and travel ban

I. Risk typology of North Korean sanctions violations through diplomatic channels



Luxury goods



Procurement of luxury goods*, including but not limited to jewellery, watches, recreational sports equipment, and certain transportation items

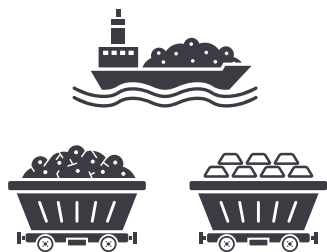


*The term 'luxury goods' includes, but is not limited to, the items specified in annexe IV of UNSCRs 2094 (UNSC, 2013b), 2270 (UNSC, 2016b), and 2321 (UNSC, 2016c).



I. Risk typology of North Korean sanctions violations through diplomatic channels

Commodities



Facilitating the sale, trans-shipment, and export of sanctioned commodities such as coal and iron

I. Risk typology of North Korean sanctions violations through diplomatic channels



Financial activities



Involvement in prohibited financial activities





I. Risk typology of North Korean sanctions violations through diplomatic channels

Commercial activities



Prohibited commercial activities of UNSCR 2321 (UNSC, 2016b, paras. 17–18) and forms of smuggling prohibited under the Vienna Conventions on Diplomatic and Consular Relations (UN, 1961; 1963)




I. Risk typology of North Korean sanctions violations through diplomatic channels

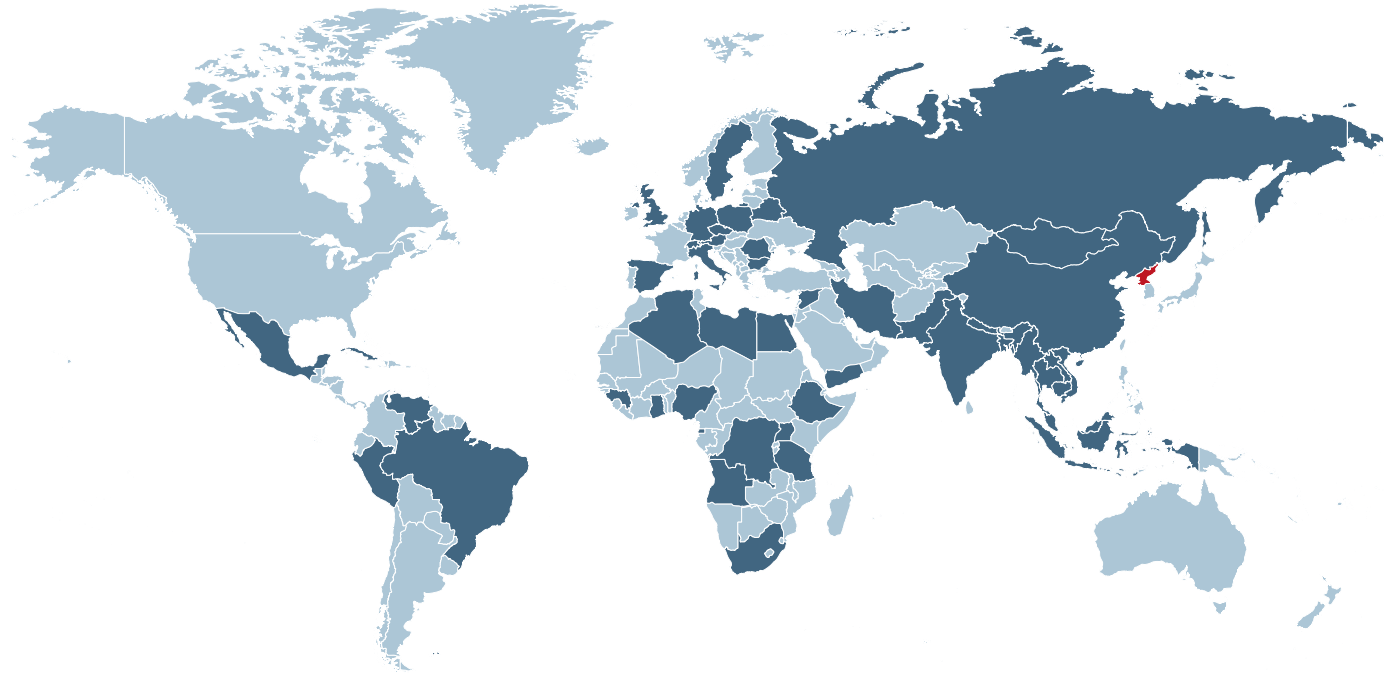


Areas at risk

North Korean embassy locations

 Areas at risk

These are 'at risk' due to the presence of North Korean diplomatic personnel and facilities.

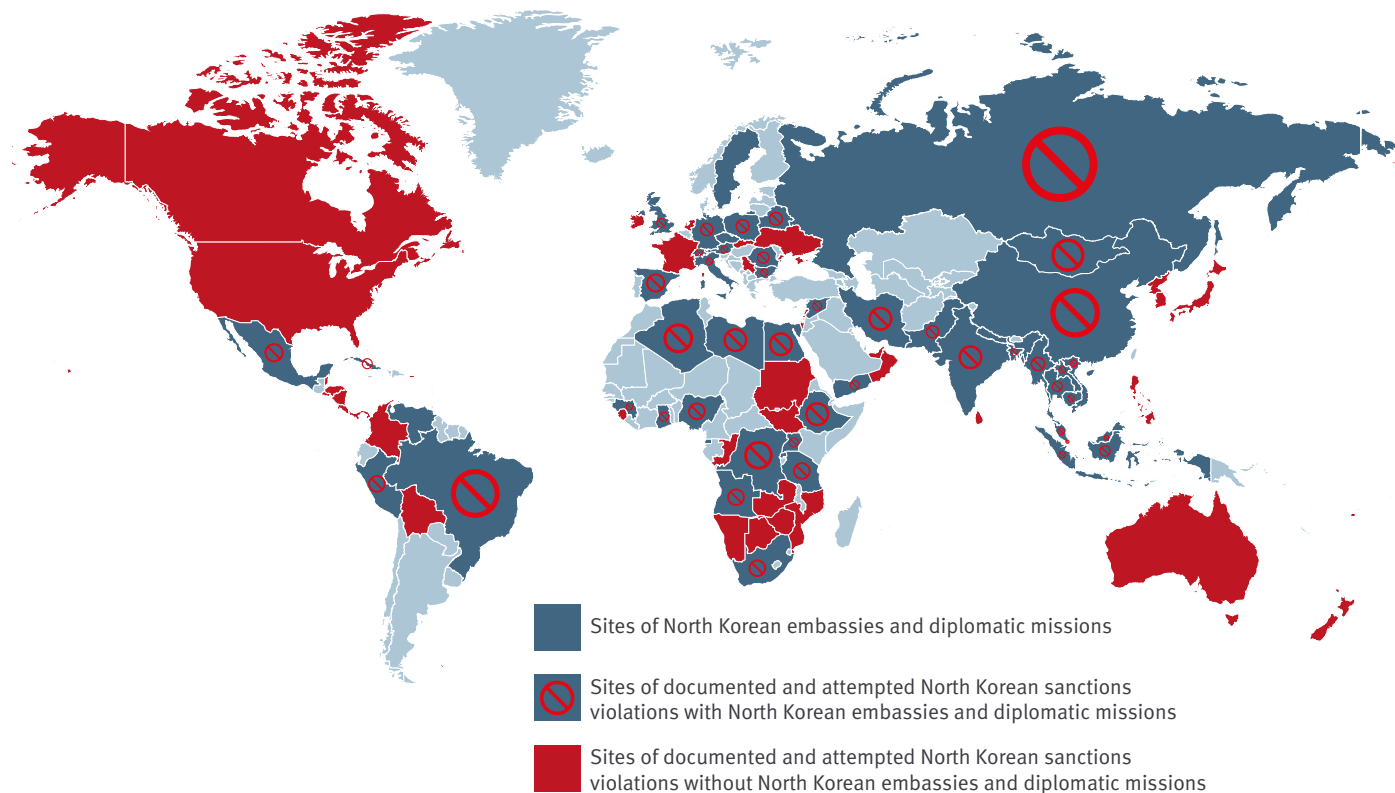




I. Risk typology of North Korean sanctions violations through diplomatic channels

Areas at risk

Documented and attempted sanctions violations



I. Risk typology of North Korean sanctions violations through diplomatic channels



Areas at risk

Types of risk and documented locations

Type	Documented locations
Procurement and sale of nuclear-ballistic-missile, and chemical-related items	Asia, Europe, Middle East*
Sale and promotion of arms-related equipment and services	Africa, Asia, Middle East, North America
Acting on behalf of UN-designated entities	Africa, Asia, Europe, Middle East, South America
Procurement of luxury goods	Asia, Europe, North America
Commercial activities prohibited under the Vienna Conventions and other smuggling activities	Africa, Asia, Europe
Facilitating the sale of sanctioned commodities such as coal, iron, iron ore	Africa, Asia, Europe, Middle East
Involvement in prohibited financial activities	Asia

* For the purposes of these guides, the Middle East and Asia are referred to as two distinct entities since they represent different markets for prohibited North Korean goods and services. Geographically, the 'Middle East' roughly corresponds to countries in Western Asia.



II. North Korean embargo evasion techniques through diplomatic channels

The following examples are documented instances of diplomatic personnel and entities facilitating sanctions violations.

II. North Korean embargo evasion techniques through diplomatic channels



Nuclear-related items

Documented examples



1) In 2017, Chol Yun, a diplomat at the Embassy of North Korea in Beijing, was advertising the sale of lithium-6 isotope, a UN-prohibited nuclear-related item, on the Internet. At the time, he was acting as the representative of General Precious Metal (GPM), designated by the European Union (EU) as an alias of Green Pine Associated Corporation which is responsible for approximately half of the arms exported by North Korea. It was put on the UN sanctions list in 2012 (UNSC, 2017a, paras. 24–25).



2) Chong Won Ryol, North Korea's official trade representative in Dalian, China, is also the representative of Namchongang Trading Corporation, Namhung Trading Corporation, and other associated front companies designated for nuclear-related procurement. Chong Won Ryol succeeded Kang Mun Kil who was documented as procuring items used for nuclear programmes using a variety of different bank accounts and front companies. These items include pressure transducers used at Yongbyong Nuclear Scientific Research Centre in its centrifuge cascades between 2013 and 2018 (UNSC, 2019, para. 65).



3) Kumsan Trading Corporation operated out of the Embassy of North Korea in Moscow as a nuclear procurement and sales company acting on behalf of the designated General Bureau of Atomic Energy (GBAE) until at least 2017. The trading company utilized the official address and phone and fax numbers of the embassy to advertise 'metals, minerals and mineral ore, including vanadium ore', all of which are prohibited according to UNSCRs (UNSC, 2017a, paras. 18–21).



II. North Korean embargo evasion techniques through diplomatic channels

Chemical-related items

Documented example

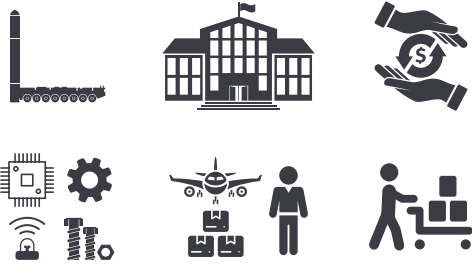


Ri Yun Thaek, a North Korean diplomat accredited in Germany in 2012 and 2013, attempted to purchase a prohibited dual-use item, namely a gas monitor that can be used in the production of chemical weapons. Germany prevented the procurement and expelled the diplomat, informing other EU member states about his activities, which prevented Mr Thaek's reassignment to both Austria and Bulgaria. Mr Thaek moved to the Embassy of North Korea in Moscow (UNSC, 2019, para. 71).

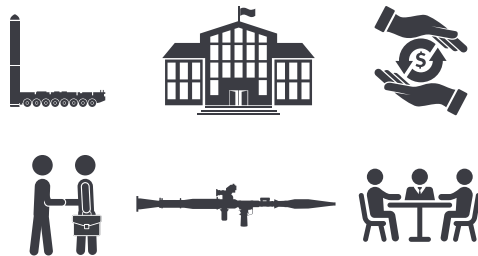
II. North Korean embargo evasion techniques through diplomatic channels

Ballistic missile and military cooperation

Documented examples



1) The Embassy of North Korea in Beijing was documented as financing and shipping via commercial airlines the transfer of Scud missile spare parts originating in North Korea to Egypt in 2013 (UNSC, 2016a, paras. 71–77; 2017a, paras. 88–89).



2) The Embassy of North Korea in Cairo as well as North Korean diplomats based there were identified as responsible for liaising on North Korean ballistic missile and small arms and light weapons programmes in Egypt. Pak Chun Il, the North Korean ambassador to Egypt, was designated as subject to sanctions by the UN for providing support to the Korea Mining Development Trading Corporation (KOMID) (Walsh, 2018; UNSC, 2016c, annex 1).





II. North Korean embargo evasion techniques through diplomatic channels

Ballistic missile, military equipment, and dual-use goods

Documented examples



1) Pak Gwang Il and other North Korean diplomats accredited in Syria have acted on behalf of a number of prohibited military cooperation projects, some of which involved Syria's Scientific Studies Research Centre (SSRC) and its front companies, responsible for the development of Syria's ballistic missile and chemical weapons programmes (UNSC, 2018, paras. 123–40; 2019, paras. 86–92).



2) The North Korean embassy in Damascus was the consignee for many of the 39 prohibited military goods-related shipments between North Korea and Syria, using the protection afforded to 'sealed diplomatic shipments' transported by a global logistics company (UNSC, 2018, paras. 123–40, annex 36; 2019, paras. 86–92).



3) The Embassy of North Korea in Damascus facilitated the travel of several dozen North Korean ballistic missile, surface-to-air missile, and other military technicians before and during the armed conflict in Syria. The technicians were based at SSRC sites later destroyed as part of a US–French response to ongoing chemical weapons use in Syria (UNSC, 2018, paras. 123–40; 2019, paras. 86–92).

II. North Korean embargo evasion techniques through diplomatic channels

Military cooperation projects

Documented example



Paek Song San, North Korea's official trade representative in Maputo, Mozambique, facilitated visa organization for three North Korean military technicians to travel to Mozambique to upgrade and repair Mozambique's surface-to-air-missile radar facilities (UNSC, 2017a, paras. 101–02).



These activities were part of a EUR 6 million (approximately USD 6.6 million) contract which included light weapons such as man-portable air defence systems (MANPADS) and anti-tank guided weapons, surface-to-air missiles, aerial bombs, tank and artillery repair, as well as military radios, GPS, and other communication and detection equipment (UNSC, 2017a, annex 11–1).



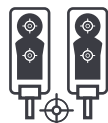
Diplomatic passport holders Ri Chong Su and Chung Su Ri were responsible for the projects between North Korean military company Haegumgang Trading Company and the Mozambique Ministry of Defence from 2014 to 2018. Their diplomatic passports stated that they were accredited diplomats at the Embassy of North Korea in Pretoria, South Africa. South Africa informed the UN Panel of Experts that the North Korean diplomatic passport accreditation was a 'misrepresentation'.



II. North Korean embargo evasion techniques through diplomatic channels

Military attaché offices

Documented examples



1) The North Korean military attaché office at the embassy in Kampala, Uganda, has facilitated a number of prohibited military cooperation projects, including the training of air force pilots, technicians, and special police forces from 2013 to 2018 (UNSC, 2015, paras. 90–91; 2016a, paras. 112–14, figure 25; 2017a, paras. 121–22; 2018, para. 142; 2019, paras. 93–94).



2) In 2016, the Embassy of North Korea military attaché's office in Kampala offered the Sudan People's Liberation Army (SPLA) prohibited military services including 'presidential guard and special forces training, tank crew training, tank repair, military strategic infrastructure construction' via the Embassy of South Sudan in Uganda. The above services were provided to Angola, Mozambique, Namibia, and Uganda between 2011 and 2018 and were facilitated by North Korean diplomats purportedly accredited in these or neighbouring member states (UNSC, 2017a, annex 12–8).

II. North Korean embargo evasion techniques through diplomatic channels

Acting on behalf of designated entities

Documented examples



1) Kim Hyok Chan and Jon Chol Young were two North Korean diplomats accredited at the Embassy of North Korea in Luanda, Angola, between 2011 and 2018. They were documented as representatives of the Green Pine Associated Corporation, which has been designated to be on the sanctions list by the UN. Kim Hyok Chan and Jon Chol Young managed prohibited military cooperation projects between Green Pine and the Angolan Ministry of Defence which included the repair of military patrol boats in Angola and the attempted construction and sale of such vessels in Sri Lanka. In 2018 both diplomats left Angola (UNSC, 2016a, para. 108, annex 1; 2017a, paras. 103, 175; 2018, para. 85; 2019, para. 62).



2) In 2013, An Jong Hyok, a North Korean diplomat in Egypt was certified as the general representative of the Ministry of Military Equipment and authorized to act on behalf of Saeng Pi'l Trading Corporation, an alias of the Green Pine Associated Corporation. In August 2016, An Jong Hyok returned to Egypt in an attempt to negotiate the release of the vessel *Jie Shun* and its cargo of 30,000 rocket-propelled grenades seized aboard the ship. An Jong Hyok left Egypt in 2018 (UNSC, 2017a, para. 182, annex 14–25; 2019, para. 69).





II. North Korean embargo evasion techniques through diplomatic channels

Luxury goods

Documented examples



1) The Permanent Mission of North Korea to Geneva, including the permanent representative, were involved in the procurement of luxury goods such as snow groomers Pisten Bully 100 and Prinoth, banned for sale to North Korea by the EU member states in which they were manufactured. The manufacturer stated that it had ‘assumed that the transactions were legitimate because Switzerland had accredited these diplomats’. The items were transferred to North Korea (UNSC, 2015, paras. 99–100).

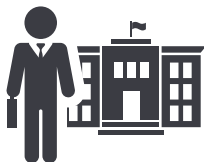


2) Han Son Ik, a North Korean diplomat in Bangladesh, was documented smuggling a luxury goods limousine in 2017. The car was seized and Han Son Ik was expelled (UNSC, 2017a, para. 125).

II. North Korean embargo evasion techniques through diplomatic channels

Property leasing and wildlife trafficking

Documented examples



1) The North Korean embassies in Bulgaria, Germany, Pakistan, Poland, and Romania have all been reported as illegally leasing their property to companies involved in the hospitality, media, advertising, real estate, and medical sectors in these member states. Some companies registered the North Korean Embassy property as their official operating address and made monthly payments to a North Korean diplomatic bank account or in cash, while other companies paid for the renovation of North Korean Embassy property and received lease agreements in exchange (UNSC, 2018, paras. 203–10).

2) North Korean diplomats have also been detained and expelled in African states for wildlife trafficking and bulk cash couriering (Rademeyer, 2015; 2017).





II. North Korean embargo evasion techniques through diplomatic channels

Facilitating the sale of sanctioned sectoral commodities

Documented example



North Korean diplomats operating from their embassy in Jakarta, Indonesia, facilitated the sale of prohibited North Korean coal. The diplomats had maintained regular contact with an Indonesian commodity trader who was already exporting products such as cooking oil to North Korea. At a North Korean diplomatic-cultural initiative, the commodity trader was introduced by the diplomats to a roving North Korean banker and coal salesman working on behalf of a designated entity in China, Indonesia, and Vietnam. An agreement was made and the prohibited coal was subsequently transported aboard the North Korean vessel *Wise Honest* from Nampo to Balikpapan in March and April 2018. The transfer was worth approximately USD 2.9 million (UNSC, 2019, paras. 34–36, annex 19).

II. North Korean embargo evasion techniques through diplomatic channels

Acting as bank representatives

Documented examples



1) Jon Myong Guk and Jang Bom Su are North Korean diplomatic passport holders in Syria and overseas banking representatives. They were designated by the Security Council in 2016 as ‘Tanchon Commercial Bank representative[s] in Syria’. Tanchon Commercial Bank was designated as working on behalf of KOMID to facilitate financial transactions relating to arms and ballistic missiles (UNSC, 2019, annex 41).



2) Han Jang Su is a North Korean diplomat accredited as Third Secretary of the Commercial Counsellor’s Section of the Embassy of North Korea in Moscow. He was designated by UNSCR 2371 (UNSC, 2017b) as chief representative of the Foreign Trade Bank (FTB). He remains in Moscow (UNSC, 2019, para. 125).



3) Choe Un Hyok, the Moscow representative of Korea United Development Bank (KUDB), used the address of the North Korean Embassy in Moscow for his overseas financial dealings (UNSC, 2017a, annex 14–27).





II. North Korean embargo evasion techniques through diplomatic channels

Gold and cash couriers

Documented examples



1) Son Young-nam, a diplomat at the Embassy of North Korea in Dhaka, Bangladesh, was detained with 26.7 kg of gold bars and jewellery worth USD 1.4 million in his hand luggage in March 2015. The diplomat had flown in and out of Singapore from Dhaka the same day, leaving the airport for three hours. On average, he had undertaken one such trip per month over the previous 15 months, from both Dhaka and Beijing, ‘suggesting that he was serving as a regular diplomatic courier smuggling gold and other items in evasion of sanctions’. He was accompanied by other North Korean diplomats on some of these trips. The invoice for the gold and jewellery had been issued by a trading company registered in the United Arab Emirates (UAE) and the goods had been collected from Singapore (UNSC, 2017a, para. 243).



2) Kim Yong Chol and Jang Jong Son were two North Korean diplomats in Iran who were designated as KOMID representatives in March 2016. KOMID was designated by the UN in April 2009 as North Korea’s primary conventional arms trading and ballistic missile sales company. Between 2013 and 2016, Kim Yong Chol and Jang Jong Son flew between Tehran and Dubai more than 262 times to transfer bulk cash on behalf of KOMID. These two diplomats departed Iran in 2016. They have been replaced by other cash couriers (UNSC, 2016a, paras. 171–77; 2017a, table 8; 2019, para. 72, annex 23).



- Pre-emptive cooperation and information sharing
- Post-facto cooperation and information sharing
- Military attaché vigilance
- Investigation(s)
- Monitoring
- Awareness-raising
- Reduction



III. Preventing and detecting North Korean sanctions violations through diplomatic channels

Pre-emptive cooperation and information sharing



Cooperate with the United Nations Panel of Experts investigating accredited North Korean diplomats and those travelling or transiting member states using diplomatic or service passports.



Use inter-agency working groups comprised of domestic security and foreign intelligence services, customs, border control, immigration agencies, and ministries of foreign affairs, justice, and defence to monitor accredited North Korean diplomats, visiting and transiting diplomatic and service passport holders, as well as related suspect activities on your territory.



Share information with other member states on North Korean diplomats expelled or suspected of sanctions violations and evasion practices.

III. Preventing and detecting North Korean sanctions violations through diplomatic channels

Post-facto cooperation and information sharing



Investigate North Korean diplomatic banking activities within and from your territory to ensure that North Korean diplomats are restricted to one bank account only as per UNSCR 2321 (UNSC, 2016c, para. 16).



Inform accredited North Korean diplomats of the various measures and obligations contained within UNSCR 1874 (UNSC, 2009), 2087 (UNSC, 2013a), 2094 (UNSC, 2013b), 2270 (UNSC, 2016b), 2321 (UNSC, 2016c), 2371 (UNSC, 2017b), 2375 (UNSC, 2017c), and 2397 (UNSC, 2017d). Warn of consequences of violations or evasion practices and in particular paragraph 13 of UNSCR 2270 (UNSC, 2016b) regarding the expulsion of individuals working on behalf or at the direction of a designated individual or entity.



In accordance with UNSCR 2270 (UNSC, 2016b), 2321 (UNSC, 2016c), 2375 (UNSC, 2017c), and 2397 (UNSC, 2017d), expel North Korean diplomatic and service passport holders based on grounded suspicion of sanctions violation, related evasion practices, or other behaviour incompatible with the Vienna Conventions on Diplomatic and Consular Relations (UN, 1961; 1963).





III. Preventing and detecting North Korean sanctions violations through diplomatic channels

Military attaché vigilance

Note that North Korean military attachés' activities are incompatible with the UNSCRs.



Investigate the military attaché office and any accredited diplomats operating in that role pursuant to paragraphs 6, 7, 8, and 9 of UNSCR 2270 (UNSC, 2016b) and paragraphs 11 and 15 of UNSCR 2321 (UNSC, 2016c).



Request the closure of the military attachés' office or others performing those roles in view of paragraphs 6, 7, 8, and 9 of UNSCR 2270 (UNSC, 2016b) and paragraph 11 and 15 of UNSCR 2321 (UNSC, 2016c).



Request the departure of military attachés or others performing those roles.

III. Preventing and detecting North Korean sanctions violations through diplomatic channels



Investigation(s)



Investigate accredited North Korean diplomats and others travelling or transiting within your territory on diplomatic or service passports to ensure they are not receiving specialized teaching or training as prohibited under paragraph 17 of UNSCR 2270 (UNSC, 2016b).



Investigate accredited North Korean diplomats and others travelling or transiting within your territory on diplomatic or service passports to ensure they are not engaged in the procurement, brokering, or acquisition of any item that could directly contribute to the development of the operational capabilities of North Korea's armed forces, or to exports that support or enhance the operational capabilities of armed forces of another member state (UNSC, 2016b, para. 8).



Investigate accredited North Korean diplomats and others travelling or transiting within your territory to ensure they are not engaging in the procurement of, sale of, or trade in gold. Share information with companies registered to trade in gold in your jurisdictions on the prohibitions applying to North Korean gold trading.



III. Preventing and detecting North Korean sanctions violations through diplomatic channels

Monitoring



Investigate those nationals and domestic entities that act as notaries or fiduciaries or otherwise have been granted power of attorney by North Korean diplomats or diplomatic missions present on your territory. Such individuals and companies have been used to channel, direct, or otherwise act as a repository for illegal funds or revenue generated from commercial or prohibited activities.



Monitor suspect activities of North Korean diplomats as well as commercial activities incompatible with the Vienna Conventions on Diplomatic and Consular Relations (UN, 1961; 1963).



Monitor suspect activities at North Korean embassies, consulates, and trade representative offices on your territory to better ensure compliance with the resolutions.



Record the identities, passports, and movements of North Korean diplomatic and service passport holders entering, transiting, or exiting your territory.



Screen North Korean diplomatic and service passports manually and using facial identification software and related databases to determine whether the passport holder is a designated individual, travelling under a new identity or a false passport.



Store passport information and imagery in nationally accessible databases, taking note of paragraph 23 of UNSCR 2371 (UNSC, 2017b) which requests Interpol to issue special notices with respect to designated individuals, and directs the UN Sanctions Committee to work with Interpol to develop the appropriate arrangements to do so.

III. Preventing and detecting North Korean sanctions violations through diplomatic channels



Awareness-raising



Sensitize customs and border control officials to paragraph 18 of UNSCR 2270 (UNSC, 2016b) and paragraph 13 of UNSCR 2321 (UNSC, 2016c) requiring the inspection of all cargo, including individual checked or personal hand luggage entering or exiting North Korea.



Sensitize customs and border control officials to the documented practice of North Korean diplomats of using the diplomatic post, bag, or protected luggage as a means of smuggling bulk cash, gold, and other prohibited items.



III. Preventing and detecting North Korean sanctions violations through diplomatic channels

Reduction



Reduce the number of accredited North Korean diplomats and staff at North Korean embassies and consulates, in line with paragraph 14 of UNSCR 2321 (UNSC, 2016c).

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Guide 3

**Supporting effective implementation of
United Nations sanctions on North Korea**

**How to prevent North Korean designated
entity sanctions evasion**





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DPRK	Democratic People's Republic of Korea
ESCAP	United Nations Economic and Social Commission for Asia and the Pacific
HCMC	Haeyang Crew Management Co. Ltd
IFC	International financial centre
KOMID	Korea Mining Development Trading Corporation
OMM	Ocean Maritime Management Company
SAENK	Strengthening Implementation and Enforcement of the Arms Embargo on North Korea
UN	United Nations
UNSCR	United Nations Security Council Resolution



I. Designations and documentation

Designations



United Nations Security Council



European Union



Australia, Canada, Japan, South Korea, United States

I. Designations and documentation

Documentation of individuals and entities working on behalf of designated entities



United Nations Panel of Experts





II. Risk typology of North Korean designated entity sanctions evasion

- Institutions
- Strategic and military activities
- State companies
- Acting on behalf of designated entities

II. Risk typology of North Korean designated entity sanctions evasion

Institutions



Government ministries and departments



Intelligence agencies



Units of the armed forces



Party organs, committees, or bureaus



National offices and administrations



National academies and research institutes





II. Risk typology of North Korean designated entity sanctions evasion

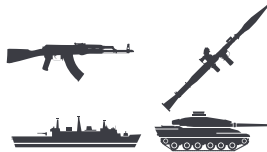
Strategic and military activities



Procurement of nuclear-related items



Procurement and sale of ballistic missile-related items



Procurement and sale of military equipment

II. Risk typology of North Korean designated entity sanctions evasion

State companies



Financial services (banks, insurance)



Shipping companies



Trading in sanctioned commodities such as coal, iron, oil, and petroleum products





II. Risk typology of North Korean designated entity sanctions evasion

Acting on behalf of designated entities



Acting on behalf of entities designated by the UN and member states for asset freezes and travel bans

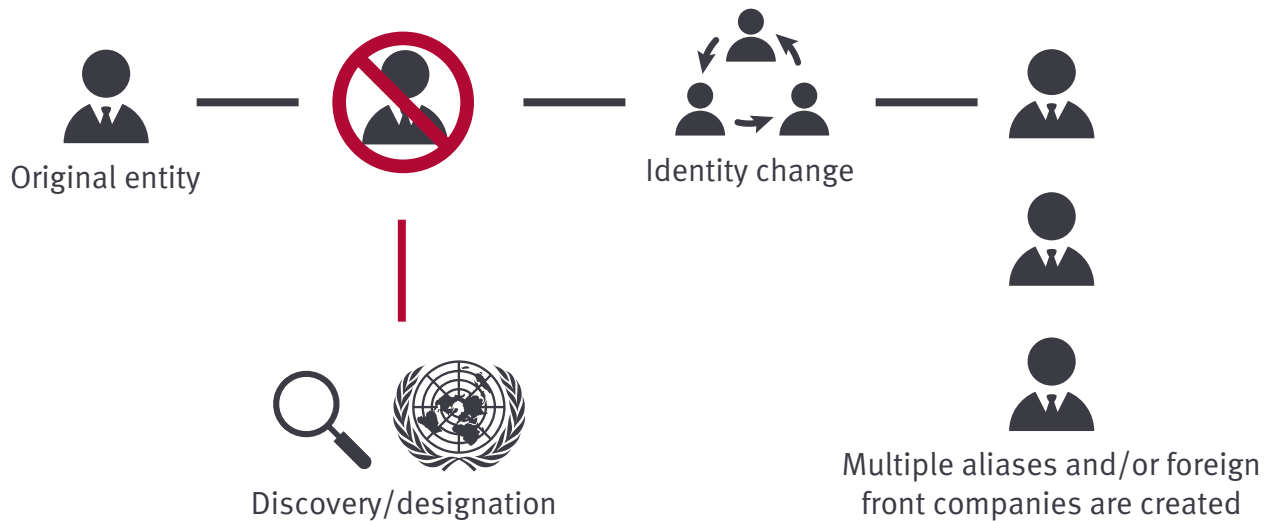


The following examples are documented instances of diplomatic personnel and entities facilitating sanctions violations.



III. North Korean designated entity embargo evasion techniques

Re-registration and company name changes, aliases



III. North Korean designated entity embargo evasion techniques

Re-registration and company name changes, aliases

Documented examples

Korea Mining Development Trading Corporation (KOMID)

- UN Security Council designation code: KPe.001
- This entity also goes under the names of:
 - a) Changgwang Sinyong Corporation
 - b) External Technology General Corporation
 - c) DPRK Mining Development Trading Cooperation
 - d) KOMID
- Formerly known as: N/A
- Address: Central District, Pyongyang, North Korea
- Listed on: 24 April 2009
- Main activities resulting in being designated: Primary arms dealer and main exporter of goods and equipment related to ballistic missiles and conventional weapons.

Korea Kumryong Trading Corporation

- UN Security Council designation code: KPe.014
- This entity also goes under the names of:
 - N/A
- Formerly known as: N/A
- Address: N/A
- Listed on: 22 January 2013
- Main activities resulting in being designated: Used as an alias by KOMID to carry out procurement activities. This alias was designated three years after the original KOMID designation.

Tosong Technology Trading Corporation

- UN Security Council designation code: KPe.015
- This entity also goes under the names of:
 - N/A
- Formerly known as: N/A
- Address: Pyongyang, North Korea
- Listed on: 22 January 2013
- Main activities resulting in being designated: Exists under KOMID which is its parent company





III. North Korean designated entity embargo evasion techniques

Re-registration and company name changes, aliases

Documented example

Green Pine Associated Corporation

- UN Security Council designation code: KPe.010
- This entity also goes under the names of:
 - a) Cho'ngsong United Trading Company
 - b) Chongsong Yonhap
 - c) Ch'o'ngsong Yo'nhap
 - d) Chosun Chawo'n Kaebal T'uja Hoesa
 - e) Jindallae
 - f) Ku'mhaeryong Company Ltd.
 - g) Natural Resources Development and Investment Corporation
 - h) Saeingp'il Company
 - i) National Resources Development and Investment Corporation
 - j) Saeng Pil Trading Corporation
- Formerly known as: N/A
- Address:
 - a) c/o Reconnaissance General Bureau Headquarters, Hyongjesan-Guyok, Pyongyang, North Korea
 - b) Nungrado, Pyongyang, North Korea
 - c) Rakrang No. 1 Rakrang District Pyongyang Korea, Chilgol-1 dong, Mangyongdae District, Pyongyang, North Korea
- Additional contact details:
 - Telephone number: +850-2-18111(ext. 8327)
 - Facsimile number: +850-2-3814685 and +850-2-3813372
 - Email addresses: pac@silibank.com and kndic@co.chesin.com
- Listed on: 2 May 2012 (amended on 5 June 2017)
- Main activities resulting in being designated: Green Pine Associated Corporation ('Green Pine') has taken over many of the activities of KOMID. Green Pine is responsible for approximately half of the arms and related materiel exported by North Korea. It specializes in the production of maritime military craft and armaments, such as submarines, military boats, and missile systems, and has exported torpedoes and technical assistance to Iranian defence-related firms.

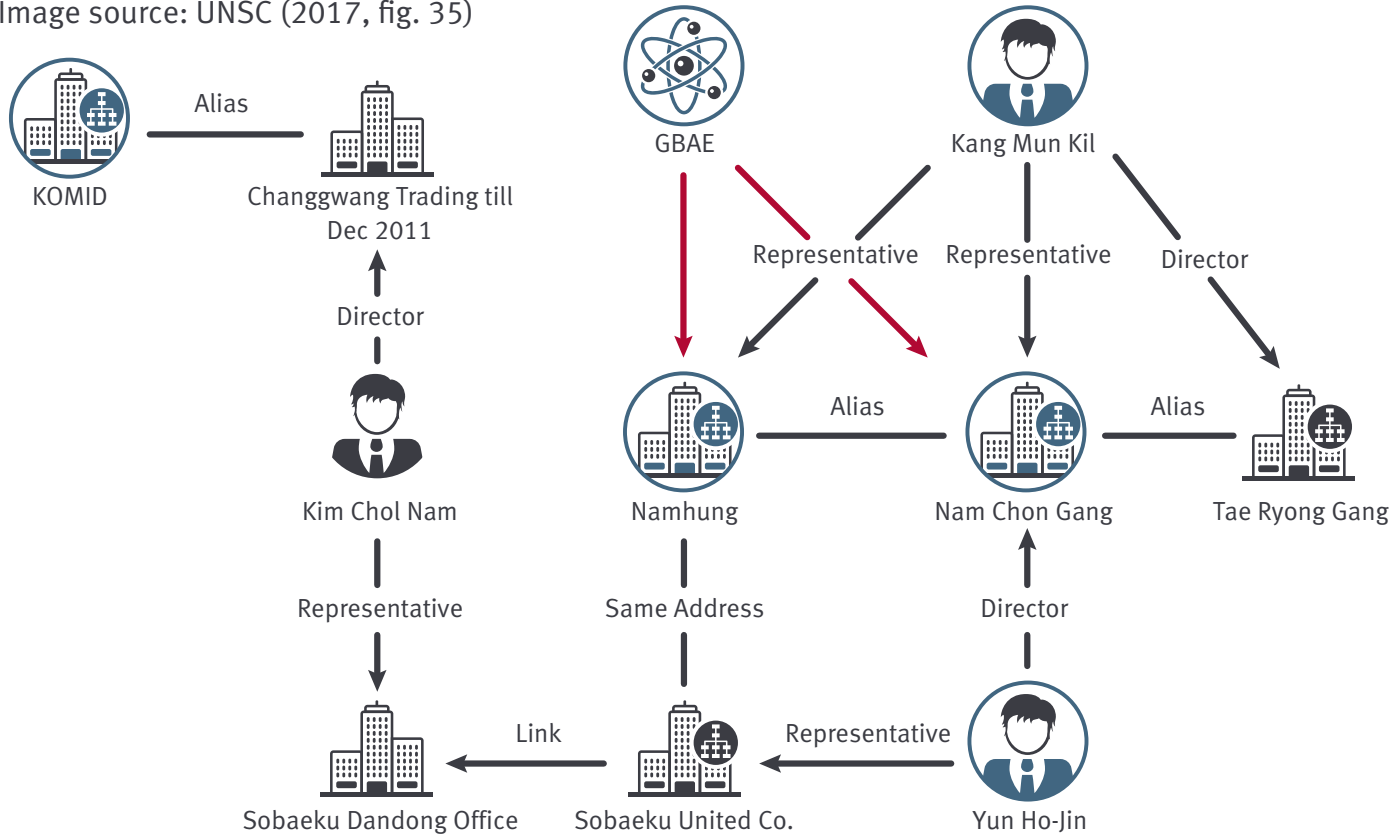


III. North Korean designated entity embargo evasion techniques

Re-registration and company name changes, aliases

Documented example

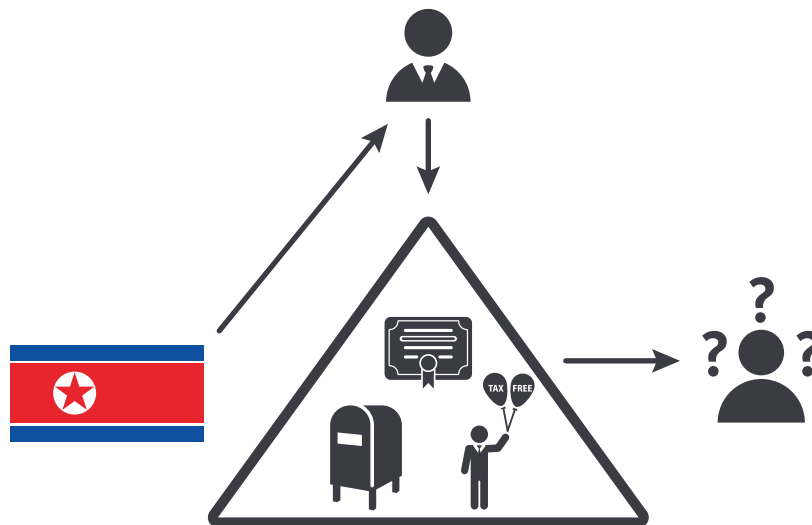
Image source: UNSC (2017, fig. 35)





III. North Korean designated entity embargo evasion techniques

Anonymization through offshore registration



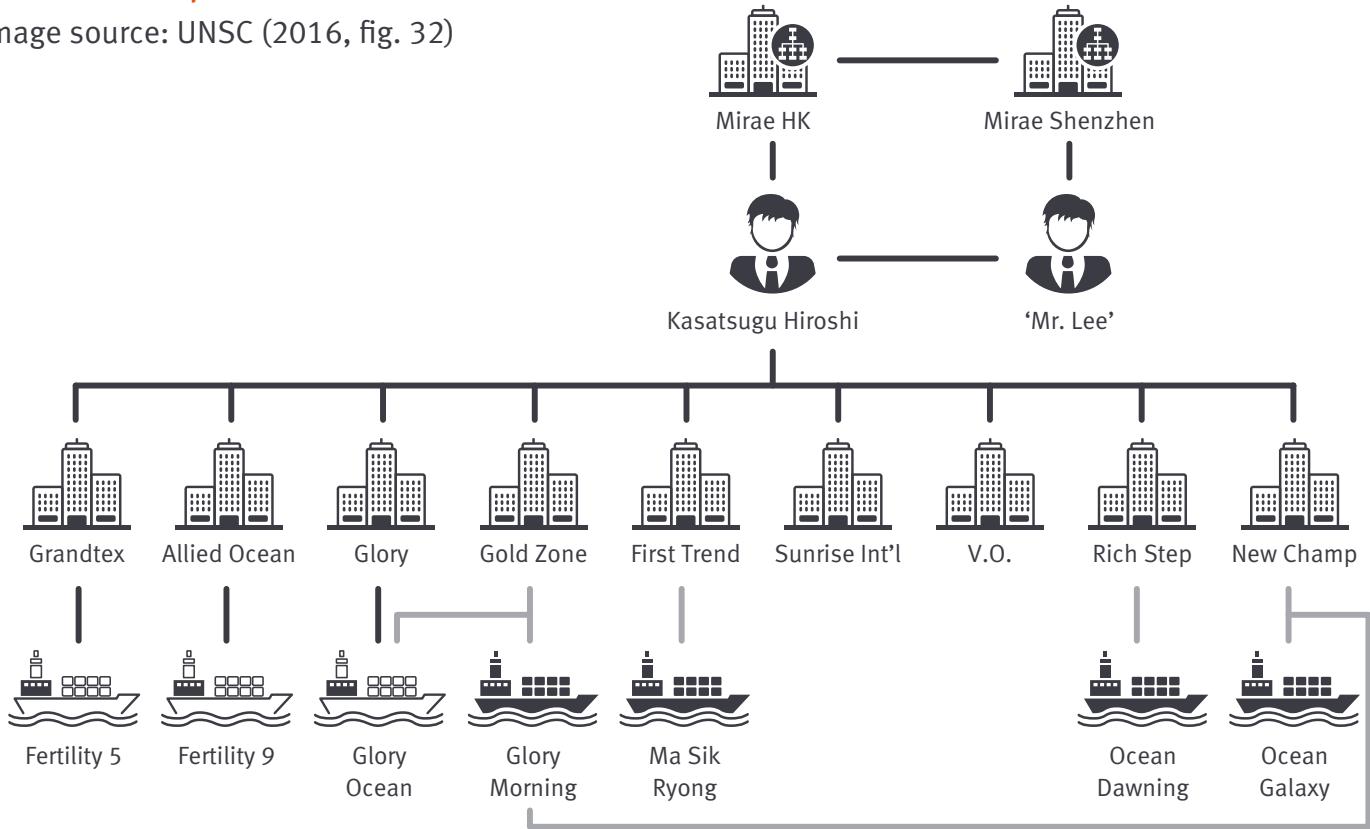
Corporate service providers and fiduciaries based in offshore and international financial centres register front companies for trusted foreign nationals operating on behalf of North Korea.

III. North Korean designated entity embargo evasion techniques

Anonymization through offshore registration

Documented example

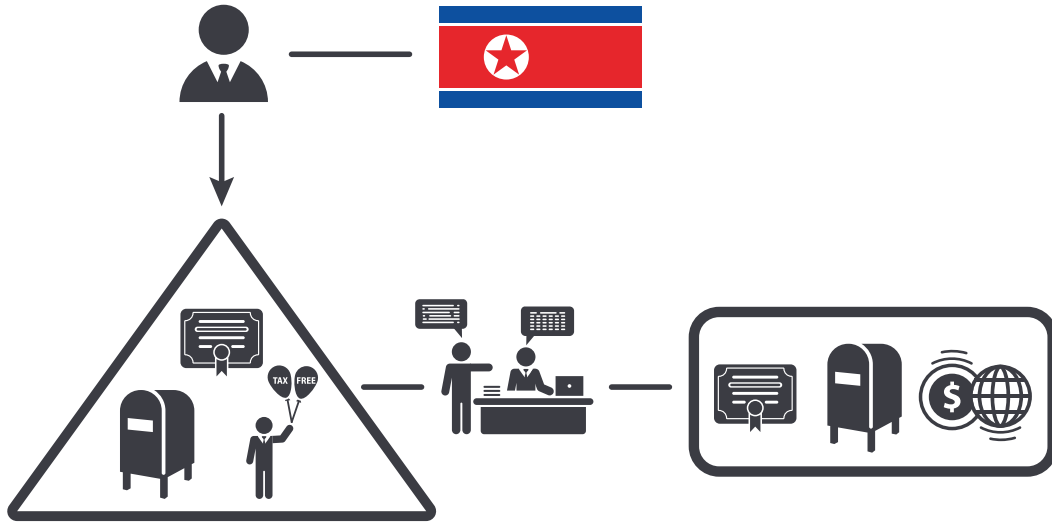
Image source: UNSC (2016, fig. 32)





III. North Korean designated entity embargo evasion techniques

Accessing an international financial centre (IFC)



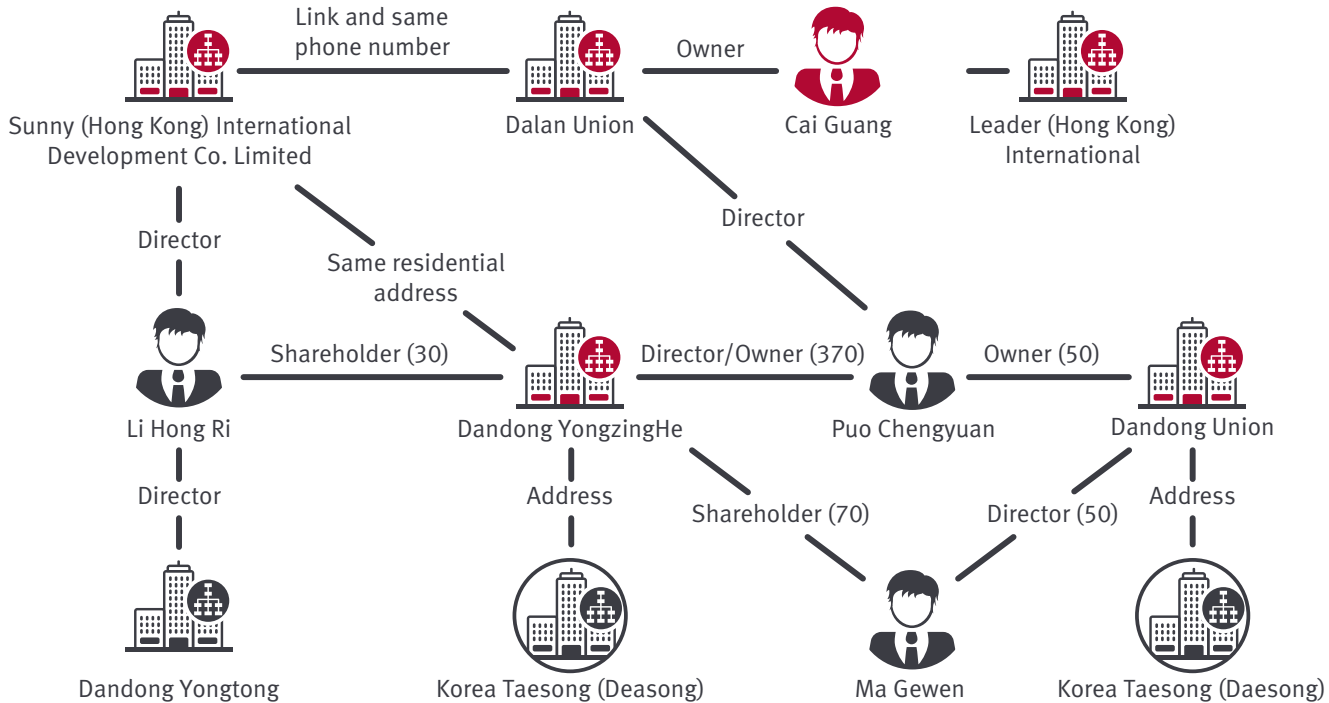
Foreign national establishes an entity through a fiduciary in an international financial centre (Hong Kong) that allows for the establishment of a dollar-denominated bank account.

III. North Korean designated entity embargo evasion techniques

Accessing an international financial centre (IFC)

Documented example

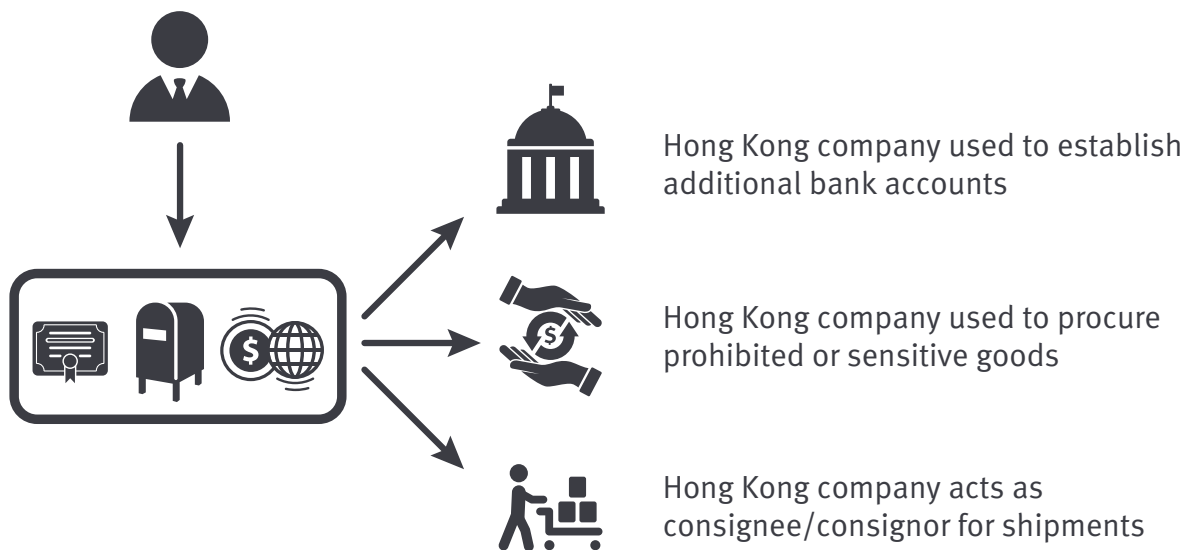
Image source: UNSC (2016, fig. 34)





III. North Korean designated entity embargo evasion techniques

Exploiting IFC registration

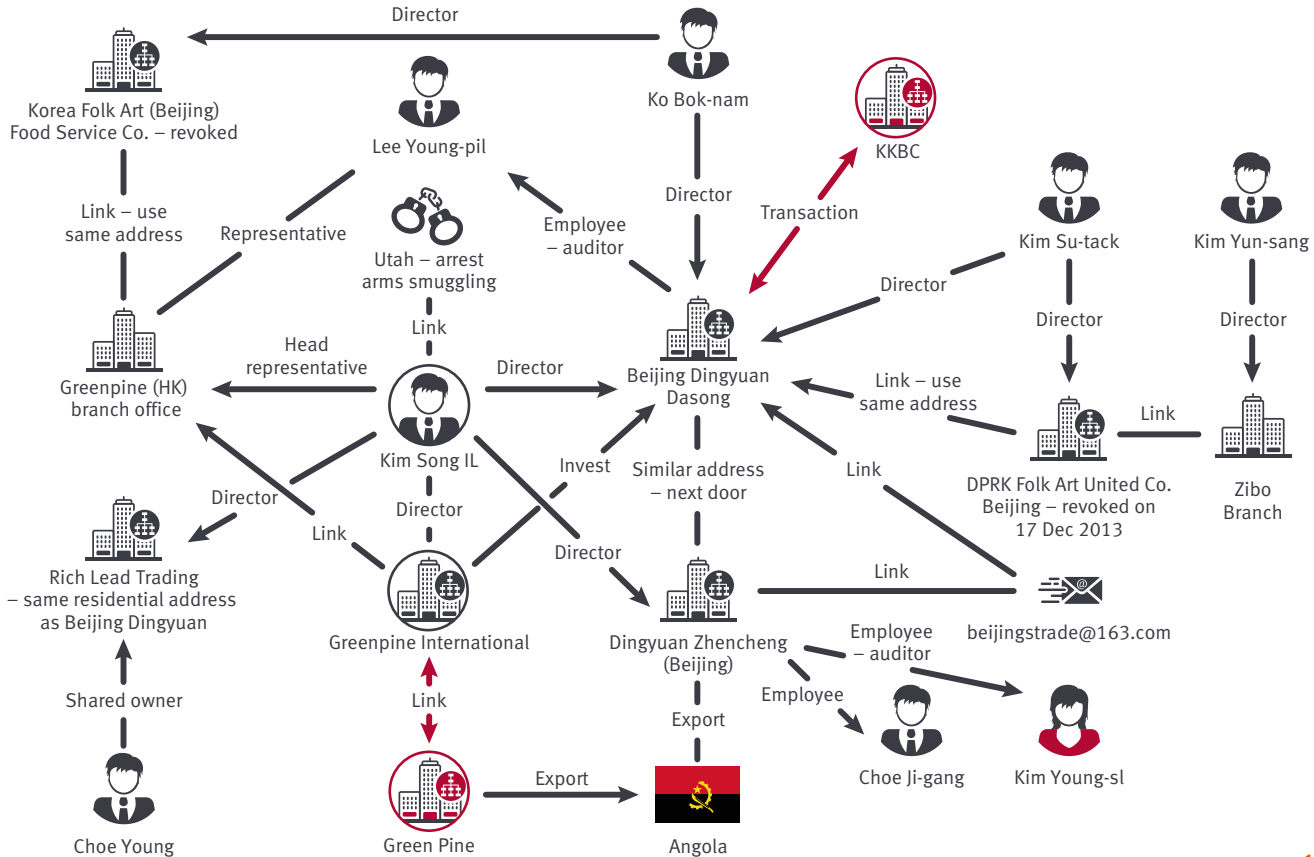


III. North Korean designated entity embargo evasion techniques

Exploiting IFC registration

Documented example

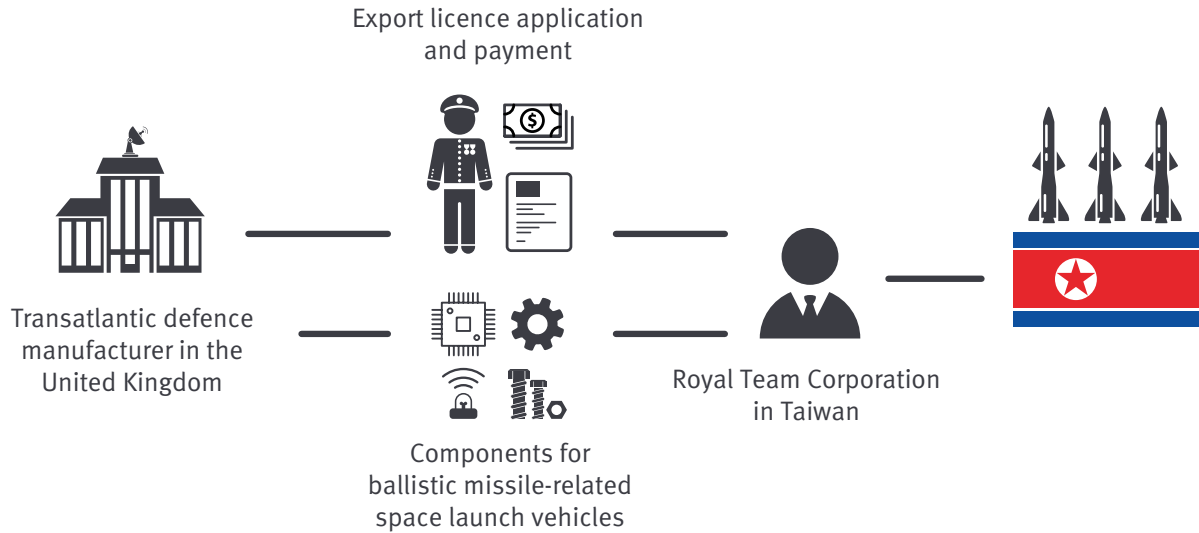
Image source: UNSC (2017, fig. 37)





III. North Korean designated entity embargo evasion techniques

Procuring through a trusted foreign intermediary to circumvent export control



III. North Korean designated entity embargo evasion techniques

Individuals working on behalf of designated entities



Individuals designated for working as representatives, on behalf, or at the direction of designated entities



Eighty individuals designated for a travel ban for working on behalf of designated entities by the UN alone

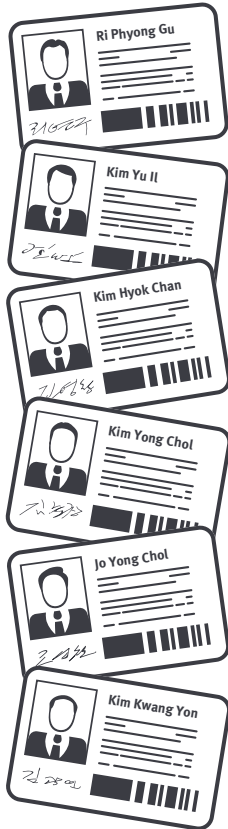




III. North Korean designated entity embargo evasion techniques

Individuals working on behalf of designated entities

Documented examples



1) Ri Phyong Gu is a North Korean national who works on behalf of the UN-designated Ocean Maritime Management Company (OMM). Ri Phyong Gu was officially employed by a Thailand-registered front company, Mariner's Shipping and Trading Company. Ri Phyong Gu worked on behalf of the vessel *Chong Chon Gang* that was interdicted in 2013 by Panama for smuggling military equipment from Cuba, detained by Mexico in 2014 as an economic asset of OMM. Ri Phyong Gu arranged payments through multiple foreign USD-denominated bank accounts for multiple OMM ships, including the vessel *Mu Du Bong*. Ri Phyong Gu left Thailand in 2015 following Thailand's closure of Mariner's office and revocation of his Thai work visa.

2) Kim Yu Il is an OMM representative who was based in Singapore from May 2007 until at least March 2014. Kim Yu Il assumed the title of Vice President of Haeyang Crew Management Co. Ltd (HCMC) established by OMM in July 2014. In May 2016 Australia included HCMC in its national sanctions list. He now travels under the title of Head of External Economic Cooperation Department (Ministry of Land and Maritime Transport), which he used to attend the Third Session of the Third ESCAP Ministerial Conference on Transportation held in Moscow in December 2016.

3) Kim Hyok Chan is a North Korean diplomat accredited at the North Korean Embassy in Luanda, Angola, until 2018. He was a documented representative of the UN-designated entity Green Pine Associated Corporation, managing prohibited military cooperation projects between Green Pine and the Angolan Ministry of Defence which included the repair of military patrol boats in Angola and the attempted construction and sale of such vessels in Sri Lanka (UNSC, 2016, para. 108, annex 1; 2017, paras. 103, 175; 2018, para. 85; 2019, para. 62).

4) Kim Yong Chol is a UN-designated representative of KOMID and a North Korean diplomat formerly accredited in Iran. Between 2013 and 2016 Kim Yong Chol flew more than 100 times between Tehran and Dubai to transfer bulk cash on behalf of KOMID. He departed Iran in 2016. He was replaced by another KOMID representative (UNSC, 2016, paras. 171–77; 2017, table 8; 2019, para. 72, annex 23).

5) Jo Yong Chol is a North Korean state security officer stationed in Syria who facilitates KOMID business in Syria.

6) Kim Kwang Yon is a North Korean government official and a representative for KOMID's southern African interests.

Source: UN Panel of Experts



- Identifying front companies
- Identifying front companies through shared directorships
- Identifying front companies following interdiction
- Identifying an entity through its assets
- Diplomatic and consular facilities and personnel of designated entities



IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying front companies



Integrate UN lists of designated individuals and entities together with European Union and unilateral lists into national watchlists and financial alerting systems.



Extract and integrate names of companies and individuals identified in UN Panel of Experts' reports as working on behalf of designated entities and individuals into national watchlists and financial alerting systems.



Monitor North Korean diplomats, and visiting and transiting diplomatic and service passport holders, as well as related suspect activities on your territory.



Cooperate with the UN Panel of Experts investigating North Korean designated entities and individuals and those working on its behalf.



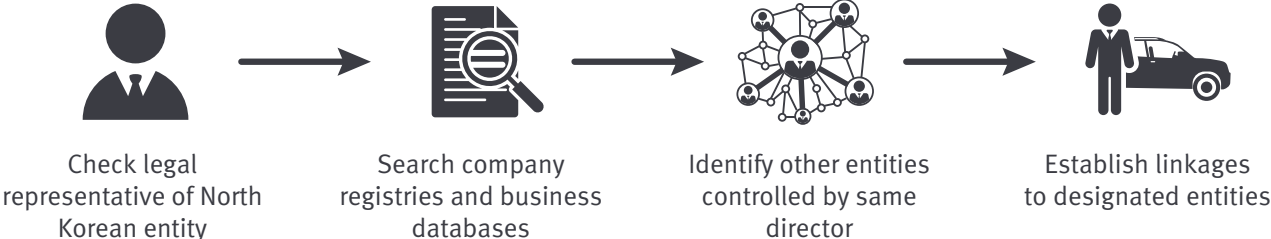
Share information with other member states on North Korean entities and suspected front companies.



Collect beneficiary ownership information on all companies, trusts, and other entities registered within your jurisdiction and make this ownership information available through a central registry.

IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying front companies through shared directorships



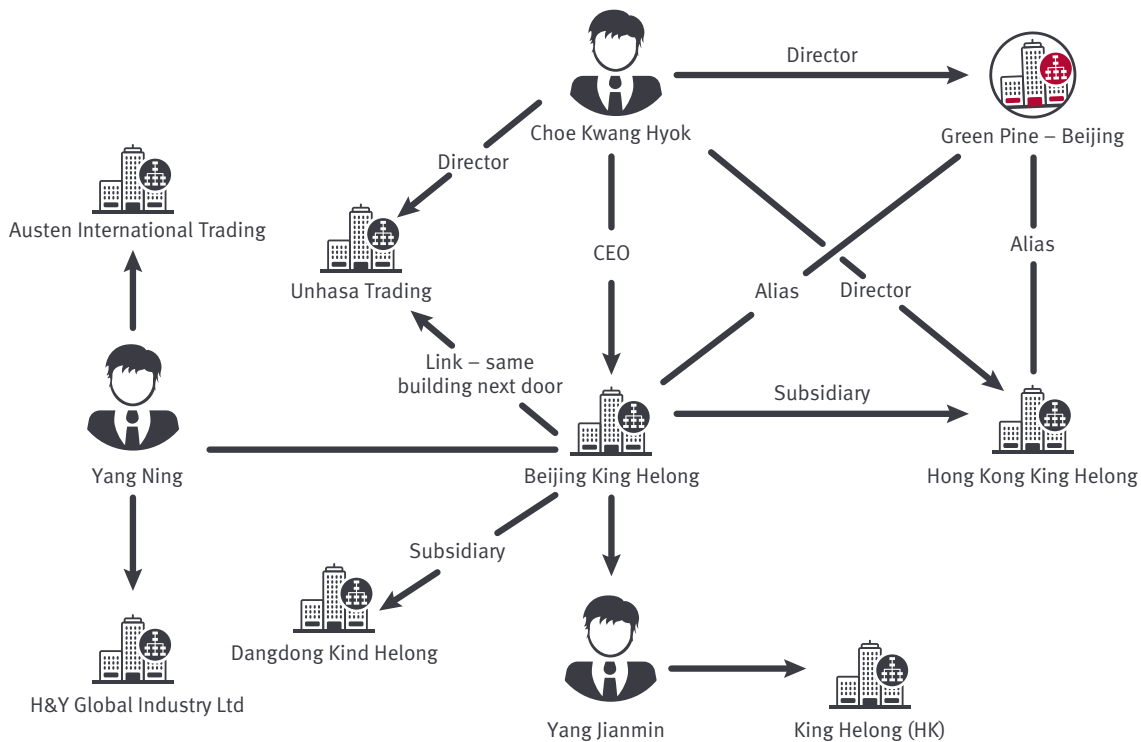


IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying front companies through shared directorships

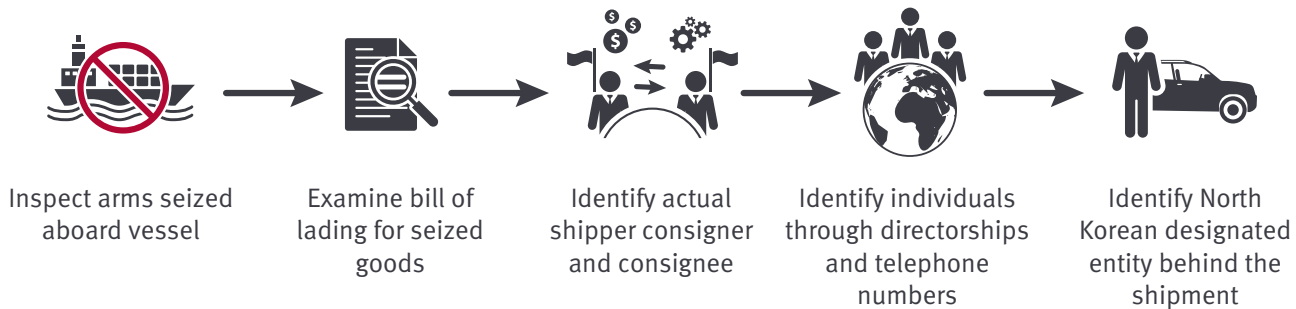
Documented example

Image source: UNSC (2017, fig. 38)



IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying front companies following interdiction



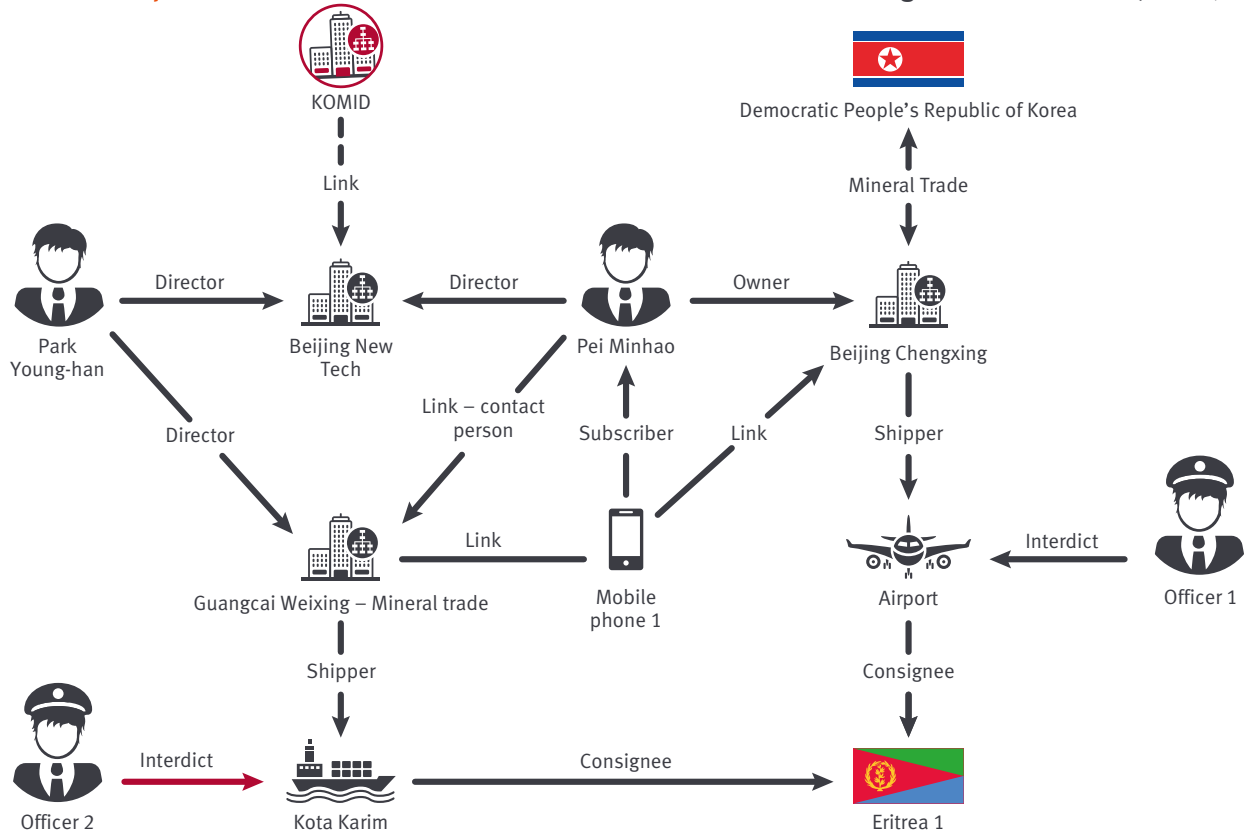


IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying front companies following interdiction

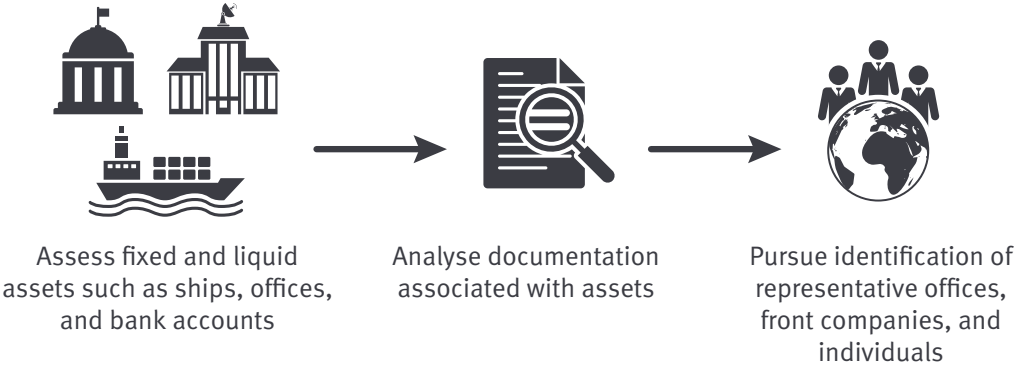
Documented example

Image source: UNSC (2017, fig. 36)



IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying an entity through its assets





IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Identifying an entity through its assets

Documented example

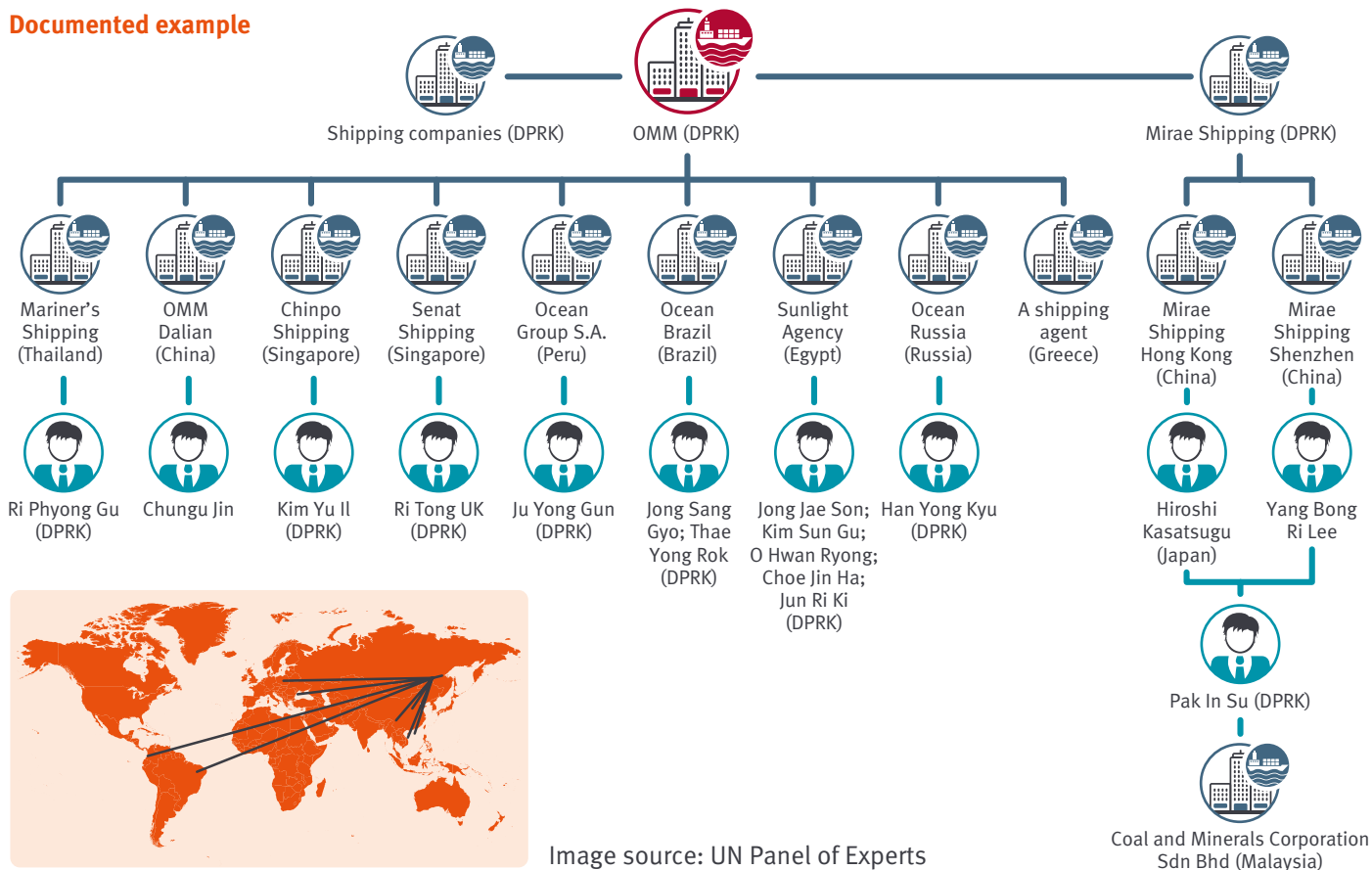


Image source: UN Panel of Experts

IV. Preventing and detecting North Korean designated entity embargo evasion techniques

Diplomatic and consular facilities and personnel of designated entities



Investigate those nationals and domestic entities that act as notaries or fiduciaries or otherwise have been granted power of attorney by North Korean diplomats or diplomatic missions present on your territory. These individuals and companies have been used to channel, direct, or otherwise act as a repository for illegal funds or revenue generated from commercial or other prohibited activities.



Monitor suspect activities at North Korean embassies, consulates, and trade representative offices on your territory to better ensure compliance with the UNSCRs.



Screen North Korean diplomatic and service passports manually and using facial identification software and related databases to determine whether the passport holder is a designated individual, travelling under a new identity or a false passport.





V. References

UNSC (United Nations Security Council). 2016. Letter dated 22 February 2016 from the Panel of Experts established pursuant to resolution 1874 (2009) addressed to the President of the Security Council. S/2016/157 of 24 February.

—. 2017. Letter dated 17 February 2017 from the Panel of Experts established pursuant to resolution 1874 (2009) addressed to the President of the Security Council. S/2017/150 of 27 February.

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—. 2019. Letter dated 21 February 2019 from the Panel of Experts established pursuant to resolution 1874 (2009) addressed to the President of the Security Council. S/2019/171 of 5 March.



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About the Small Arms Survey

The Small Arms Survey is a global centre of excellence whose mandate is to generate impartial, evidence-based, and policy-relevant knowledge on all aspects of small arms and armed violence. It is the principal international source of expertise, information, and analysis on small arms and armed violence issues, and acts as a resource for governments, policymakers, researchers, and civil society. It is located in Geneva, Switzerland, and is an associated programme of the Graduate Institute of International and Development Studies.

The Survey has an international staff with expertise in security studies, political science, law, economics, development studies, sociology, and criminology, and collaborates with a network of researchers, partner institutions, non-governmental organizations, and governments in more than 50 countries.

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