

IN THE ADMINISTRATIVE COURT
KING'S BENCH DIVISION
ADMINISTRATIVE COURT

B E T W E E N :

**THE KING on the application of
AL-HAQ**

Claimant

-v-

SECRETARY OF STATE FOR BUSINESS AND TRADE

Defendant

-and-

**(1) OXFAM
(2) AMNESTY INTERNATIONAL
(3) HUMAN RIGHTS WATCH**

Interveners

SECOND WITNESS STATEMENT OF CHARLOTTE ANDREWS-BRISCOE

I, Charlotte Andrews-Briscoe, of 236 Gray's Inn Road, WC1X 8HB, WILL SAY:

1. I am a Consultant at Bindmans LLP, a Lawyer with the Global Legal Action Network, and a member of the legal team representing the Claimant in this matter. I make this statement to furnish the Court with factual information relevant to the 'F-35 Carve Out.' It is relevant *inter alia* to the repeated assertion by the Defendant in his Amended Detailed Grounds of Resistance that the "likelihood of UK manufactured components ending up in existing Israeli F-35 [sic] is very small",¹ and to any suggestion that the impact of the Carve Out is to be understood as minimal. I have also exhibited a paginated bundle of true copy documents marked **CAB2**. References to these documents are in the form '**CAB2-document/page number**'.

¹ See e.g. ADGR [28(a)], [31(c)] and [40(b)]

2. This statement will address the following:
 - i. Israel's reliance on F-35s in its attacks on Gaza
 - ii. Israel's use of the spare parts pooling system and expansion of its F-35 fleet
 - iii. The U.K.'s contribution to Israel's F-35 fleet

i. Israel's reliance on F-35s to attack Gaza

3. First, according to the Israeli military, F-35 squadron members, and mainstream Israeli media, Israel's F-35 fleet has been in near-constant use in its attacks on Gaza since October 2023, and has also been used to attack the West Bank.

4. In a press release dated 16 March 2025, the Israeli Air Force said the F-35 fleet had performed over 15,000 flight hours and 8,800 missions since 7 October 2023 (Exhibit CAB2-2/15):

"During the 'Swords of Iron' War, Adir [F-35I] aircraft served as a major force on all the combat fronts. The multi-mission [fighter] jet has accumulated over 15,000 flight hours across approximately 8,800 sorties throughout the war, and was instrumental in eliminating most senior officials within terrorist organizations during the conflict. Additionally, the Adir was the first aircraft to shoot down a cruise missile, carried out strikes deep within Lebanon, and even conducted an airstrike in Judea and Samaria [i.e. the West Bank]." (emphasis added.)²

5. The original press release on the Israeli Air Force website is in Hebrew and 'geoblocked' (i.e. not possible to access outside of Israel) so I have exhibited a pdf of the press release and a translation sent to me by a native Hebrew speaker who wishes to remain anonymous (Exhibit CAB2-2).
6. Similarly, Israeli newspaper Israel Hayom interviewed a number of F-35 pilots who spoke to frequent use of the fleet (Exhibit CAB2-3/23). This article included the following extracts:

² Available on the Israeli Airforce website here: <https://www.iaf.org.il/9781-62307-he/IAF.aspx>. This link is 'geoblocked' – see para [3] above.

“Lt. Col. D. demonstrates the intensity of activity in the [F-35] stealth squadrons. ‘He went and attacked in Lebanon alone, then returned and carried out a mission to protect the country's skies in the north from remotely piloted aircraft (UAVs). Then they needed him for an attack in Gaza, and he flew there, attacked, did some more protection of the country's skies in the south, and returned to base. It's not just him, it's everyone. This plane has amazing capabilities, but it's the people who bring them to life.’

...

‘In the first weeks of the war, the activity was intense and almost unimaginable. The pilots flew for long hours, carried out operations in theaters near and far, returned to base, slept for six hours or sometimes less, and then returned to the cockpit. When they landed, the technical crew was waiting for them, who armed the plane and checked its integrity. This was no small feat.’

...

‘We've been working around the clock for seven months and are doing our best to ensure that the plane can fulfill its mission,’ says Major Kobi.

...

‘You're dying to get the planes out as quickly as possible and work on automatic. You gather strength, bring in the people, check that the planes are ready and tested, and start distributing forces and missions. Since then, we've been working non-stop.’

...

‘If you had told me that I would attack in Baalbek, then defend the country's skies, and then attack in Gaza, all on the same flight, I would never have believed it.’”
(emphasis added.)³

7. Israeli newspaper Ynet published an article which attested to the same, and included the following extracts (Exhibit CAB2-4/37):

“The 140th Squadron of the powerful F-35 jets attacked hundreds of targets, including Hamas tunnels and shafts in the Gaza Strip during the war.

...

³ Israel Hayom ‘Over Gaza and Lebanon – F-35 Squadron Commanders Speak’ (16 March 2025), available here: <https://www.israelhayom.co.il/magazine/shishabat/article/15758444>. Translated via Google Translate.

Although the Air Force's newest and most advanced fighter jet is usually reserved for strategic missions in the northern or eastern arena, the army uses it constantly in the Gaza Strip, along with a constant presence of fighter jets in the skies over the Strip for immediate availability for the benefit of the brigades and battalions operating in the field - in addition to planned airstrikes.

...

'Planning a target for an attack can be done from the ground, from the air, within minutes in an explosive event, and this happens almost every day,' says a senior pilot from the squadron.

...

'On missions like this, I can find myself flying directly from the Eilat area to an attack in the Gaza Strip and from there to the Lebanon and Syria arena, and if necessary, more arenas in the same sortie - the longest of which in the war lasted six and a half hours on the Adir [F-35].'' (emphasis added.)⁴

8. Multiple other Israeli media sources similarly attest to the Israeli military's heavy use of F-35s in its attacks on Gaza – see for example those cited in the Fifth Witness Statement of Dearbhla Minogue at [26-27].
9. The UK's own data also demonstrates the same: based on a response to a Freedom of Information request submitted by Campaign Against Arms Trade ("CAAT") (see CAAT 'F-35 Briefing Update' published in December 2024), the NGO found that:
"In 2023, the F-35 'Open General Export Licence' (OGEL) [now revoked] was used to deliver equipment to Israel a total of 14 times, the most of any year since it was issued in 2016. (The next highest year was 5)... This only covers direct exports of material to Israel, not exports to the US of components to build new F-35s to go to Israel, nor exports of spares to the global stockpiles that were subsequently delivered to Israel." (Exhibit CAB2-5/43, 50).⁵

⁴ Ynet, 'The F-35 pilots who attacked north of Beirut, and signed world history: "I was excited to be in the cockpit"' (17 March 2024) available here: <https://www.ynet.co.il/news/article/ryl9vk706>. Translated through Google Translate.

⁵ The other years were as follows: 2017 (5); 2018 (2); 2019 (1); 2020 (2); 2021 (5); 2022 (5); 2023 (14). Campaign Against Arms Trade, "Arming Genocide" (December 2024) available at: <https://caat.org.uk/app/uploads/2024/10/CAAT-F35-briefing-update-v4.pdf>.

10. Second, the F-35 is a particularly lethal war plane, as described by Lockheed Martin:
“The F-35 delivers an unrivalled advantage for our pilots, nation and global partners as the most advanced node in the networked 21st Century Security vision... As the most lethal, survivable and connected fighter jet in the world, the F-35 gives pilots the critical advantage against any adversary, enabling them to execute their mission and come home safe.” (emphasis added.)⁶
11. Moreover, according to Israeli media, Israel has especially modified its F-35 fleet in order to be able to carry and drop one-ton bombs.⁷
12. According to Ynet, the Israeli military takes *“advantage of the stealth and most advanced capabilities of the F-35 aircraft.”* For example *“the [F-35] stealth fighters can also carry more ammunition than F-16s.”* (emphasis added.) In particular, one senior pilot from an F-35 squadron told Ynet (Exhibit CAB2-4/37):
*“The special sensors on the plane create a full battle picture for additional structures, even when it comes to a dense combat sector that is less threatening to us as aircraft, such as the Gaza Strip. On the screen in the cockpit we see which bomb has been selected - and launched. This is how we destroyed, with the mighty ones, among other things, a high-rise building in Gaza.”*⁸
13. Another F-35 pilot similarly told Israel Hayom (Exhibit CAB2-2/21):
“This is also the first war in the history of the [F-35] stealth aircraft, considered the most advanced fighter jet in the world. It has never faced such intense combat, never

⁶ Lockheed Martin, “F-35 Lightning II” (accessed on 20 March 2025), available here: <https://www.lockheedmartin.com/en-us/products/f-35.html>

⁷ The Jerusalem Post, “Israel makes dramatic upgrades to military plans to attack Iran” (8 June 2022) available at: <https://www.jpost.com/arab-israeli-conflict/article-708875>. See also the following posts by the IDF and IAF as corroboration: <https://x.com/idfonline/status/1682284391916085249> ; <https://x.com/IAFsite/status/1901251089971679349>. As set out in the Fifth Witness Statement of Dearbhla Minogue at [25], Israel’s use of such bombs has specifically been condemned by the UN Office of the High Commissioner for Human Rights (“UNOHCHR”): such bombs can be lethal within a 300 meter radius and typically leave a 12 meter wide crater, they can “rupture lungs and sinuses and tear off limbs hundreds of feet from the blast site.”

⁸ Ynet, “The F-35 pilots who attacked north of Beirut, and signed world history: “I was excited to be in the cockpit” (17 March 2024) available here: <https://www.ynet.co.il/news/article/ryl9vk706>. Translated through Google Translate.

attacked in such close proximity to forces, never operated in so many arenas, and never proven itself in such a significant way.”⁹

14. According to the US Air Force, the following factors render the F-35 superior to other fighter jets: advance stealth technology, fast speed and long range, high weapons payload capacity and flexibility, and advanced sensors and targeting systems.¹⁰ An Israeli Colonel told Israel Hayom, “what [the F-35] does is beyond all our dreams.” (emphasis added.)¹¹ (Exhibit CAB2-2/29).

15. Third, the way in which Israel is deploying F-35s against Gaza renders them particularly lethal.

16. Israeli pilots assert that their targeting practices for airstrikes have changed for the purposes of the current Gaza offensive (as compared to previous offensives):

- a. An unnamed Airforce squad commander speaking to Channel 14 news said: *“I can tell you as someone who has taken part in all the operations in Gaza over the recent years – we are working differently this time. Like I said, the gloves have been taken off. Part of this is our modus operandi: if in the past every [high-rise] building which was attacked would have had to undergo a series of very strict approvals before it was struck – this time it's not like that, it's a different method. A much quicker, much more powerful one.”* (emphasis added)¹²
- b. In an interview with 13TV, another F-35 pilot was asked the following question: *“The parameters for [what constitutes permissible] collateral damage, have*

⁹ Israel Hayom, “Over Gaza and Lebanon – F35 Squadron Commanders Speak” (16 May 2024) available at: <https://www.israelhayom.co.il/magazine/shishabat/article/15758444> . Translated through Google Translate.

¹⁰ U.S. Air Force, “F-35A Lightning II” (accessed on 20 March 2025), available here: <https://www.af.mil/About-Us/Fact-Sheets/Display/Article/478441/f-35a-lightning-ii/>

¹¹ Israel Hayom, “Over Gaza and Lebanon – F35 Squadron Commanders Speak” (16 May 2024) available at: <https://www.israelhayom.co.il/magazine/shishabat/article/15758444> . Translated through Google Translate.

¹² Now14 post on Facebook, 9 October 2023, available at: <https://www.facebook.com/watch/?v=62213190135608>. At 2:18 in the video. Original Hebrew is: “אני יכול להגיד: כמי שהשתתף בכל המבצעים ברצועת עזה בשנים האחרונות: אנחנו עובדים בצורה שונה הפעם. כפי שאמרתי קודם - הכפפות הוסרו לך, כמי שהשתתף בכל המבצעים ברצועת עזה בשנים האחרונות: אנחנו עובדים בצורה שונה הפעם. כפי שאמרתי קודם - הכפפות הוסרו וחלק ממה שאני אומר זה שיטות הביצוע שלנו. אם פעם כל בניין שנתקף היה עובר סדרה של אישורים מאוד מאוד קפדניים, הפעם זה לא עובד ככה, זה עובד בצורה שונה - הרבה יותר מהירה, הרבה יותר עוצמתית.”

they changed following October 7th? to which the pilot responded “obviously those have changed. Significantly. I have never seen such a hand so easy...”¹³

- c. Speaking to Israel Hayom, F-16 Squadron Commander identified as ‘Lt. Col. T’ said: *“[I]n the past, before any attack on Gaza, we would give warning through the 'knock on the roof' procedure and even [at the cost of] not hitting the terrorists. Now it's a state of war against a murderous and cruel enemy that spares no means, so it's a different situation.”¹⁴*

17. Israeli officials have repeatedly confirmed the loosening of rules of procedure in relation to airstrikes on Gaza:

- a. Avi Dichter, a member of Israel’s Security Cabinet and former Director of Shin Bet said: *“[I]n the instructions [the Airforce] received and the orders it carries out, it understands very well that in the building where terrorists live, everyone who lives in that building is a "son of death." The era of innocent people being used as a human belt for terrorists is over.”* (emphasis added.)¹⁵
- b. Oren Tischler, Chief of Staff of the Airforce said: *“Our airstrikes are very broad, but [sic] not surgical. In all of these areas of terror there's substance.... Where there is an enemy and where you want to kill an enemy—you don't do a 'knock on the roof', Period”.* (emphasis added.)¹⁶
- c. Israeli military spokesperson Daniel Hagari said: *“Over the last 24 hours, we doubled the number of airstrikes conducted... The neighbourhoods Beit Hanoun, Shujaiya, Rimal – the luxury neighbourhoods at the center of Gaza city – al-Furqan, al-Tuffah – suffered a severe blow. A severe blow which has left*

¹³ 13Tv, “‘We are everywhere where there is a threat’: The only F-35 squadron in the Air Force speaks” (12 January 2024), available at <https://13tv.co.il/item/news/politics/security/kagg0-903889582/>. At 7:55 in the video. Original Hebrew is “אבל נגיד, ההגדרות של הנזק האגבי השתנו אחרי 7 באוקטובר”

”.” “טייסת”: ברור שהשתנו. מלא. אני בחיים לא ראיתי כזאת יד קלה

¹⁴ Israel Hayom, “‘One moment I'm busy with the wedding and the university, and the next I'm over Gaza, aiming bombs at Hamas’: Navigator Major A. sees Gaza from above,” 26 October 2023, available at: <https://www.israelhayom.co.il/magazine/shishabat/article/14754205>. Translated through Google Translate.

¹⁵ 103FM, “We will persecute these human animals until their last day,” <https://103fm.maariv.co.il/programs/media.aspx?ZrqvnVq=JGGKFK&c41t4nzVQ=FJE>. Translated through Google Translate.

¹⁶ Walla News, “Chief of Staff of the Air Force: ‘Knock on the roof? Where there is an enemy, you don't do it. Period,’” 11 October 2023, available at: <https://news.walla.co.il/item/3615229>. Translated through Google Translate.

hundreds of dead terrorists under the rubble. [These are] dense urban areas...” (emphasis added.)¹⁷

- d. Daniel Hagari also said: *“We’ve conducted today airstrikes that are setting the precedent, in terms of their scope, around Gaza. [...] We’ve switched to another attacking method, in waves. The continuation of the Air Force’s massive attacks over the last 36 hours come in blows, every 4 hours, of dozens of fighter jets [...] these are attacks of thousands of munitions fired at thousands of targets. [This method] creates the maximum damage to areas in the [Gaza] Strip. The attacks are carried out against areas [on the basis] of any fragment of intelligence...”* (emphasis added.)¹⁸

18. Fourth, Israel uses the F-35s to clear the path for, and provide cover for, ground troops in Gaza. This is confirmed by multiple F-35 pilots speaking to Israeli media:

- a. In Israel Hayom, an F-35 Squadron Commander is quoted as saying: *“The main role [the F-35s have played] since the beginning of the ground invasion is assisting the manoeuvring forces – we are the pillar of fire [that gets there] before the forces arrive.”* (emphasis added.)¹⁹
- b. Speaking to Israel Hayom in another article, an F-35 pilot said: *“One of the most significant capabilities lies in the extraordinary use of aircraft, known for their stealthy ability, to provide fire support to the fighting forces from a very short distance... There are quite a few friends of mine who were and still are in Gaza, and I think that we are helping them from the air quite a bit.”* (emphasis added.)²⁰
- c. In an interview published by the IDF Spokesperson Unit, one F-35 pilot said: *“We are focusing the fighting in the Gaza arena... In recent days we have been working side by side with the ground forces and providing them with an aerial umbrella with enormous firepower.”* (emphasis added.)²¹

¹⁷ IDF Spokesperson’s updates, “IDF Spokesperson’s Updates, 10.10, evening,” available at: <https://www.youtube.com/watch?v=qOWsnFVp49c>.

¹⁸ The sound of my uncle beating, “IDF Spokesperson’s statement: Hundreds of Hamas operatives were killed in the air force strikes, we will reach them everywhere.” available at <https://www.youtube.com/watch?v=YcMeIjDd8jI>.

¹⁹ Israel Hayom, “The pilot who intercepted a missile from Yemen” (12 December 2023) available at: <https://www.israelhayom.co.il/news/defense/article/14942258>

²⁰ Israel Hayom, “Over Gaza and Lebanon – F35 Squadron Commanders Speak” (16 May 2024) available at: <https://www.israelhayom.co.il/magazine/shishabat/article/15758444> . Translated through Google Translate.

²¹ IDF Spokeperson Unit, “Sync of the Commander of the 140th Squadron, Lieutenant Colonel M,” available at: <https://www.youtube.com/watch?v=u3Zur3c58YY>. At 4 seconds and 17 seconds for in the video. Original

- ii. Israel use of the spare parts pooling system and expansion of its F-35 fleet**

20. F-35s require a significant degree of maintenance. As confirmed in a report presented by the U.S. Government Accountability Office to the Congressional Committees in 2023, “*the amount of support equipment needed to maintain the F-35 is by far greater than other aircraft platforms in their respective fleets.*”²³ Likewise, the defence news outlet The War Zone similarly confirms that the F-35 “*is complicated to manufacture and maintain.*”²⁴ As a result, F-35 users are by necessity heavily reliant on spare parts.²⁵

²⁵ See generally: The War Zone, “How the F-35’s lack of spare parts became as big a threat as enemy missiles” (13 April 2023) available at <https://www.twz.com/how-the-f-35s-lack-of-spare-parts-became-as-big-a-threat-as-enemy-missiles> ; United States Government Accountability Office, “F-35 AIRCRAFT DOD and the Military Services Need to Reassess the Future Sustainment Strategy” (September 2023) available at: <https://www.gao.gov/assets/gao-23-105341.pdf>

21. Aviation Week reported that Israel is using its F-35 fleet at five times the normal rate of peacetime operations.²⁶ In December 2023, Breaking Defense reported that the US was “*rushing*” spare parts for the F-35 to Israel to assist in their operations.²⁷ This was confirmed by US authorities who stated that they were working at “breakneck speed” to deliver more spare parts for the F-35 to Israel.²⁸
22. Second, Israel is vastly expanding its F-35 fleet. In June 2024, Israel signed a letter of acceptance with the U.S. to expand its F-35 fleet by 50%. A report to the U.S. Congress from November 2024, states:
- “Israel’s government on 4 June 2024, signed a letter of acceptance with the U.S. to buy 25 additional F-35s for \$3 billion, which would expand its fleet of 50 aircraft to 75. Israel, which received its first F-35I in 2016, added a custom open architecture system on top of the aircraft’s operating system. The aircraft also received electronic warfare and indigenous weapons updates.”* (emphasis added.)²⁹
23. On Thursday 13 March 2025, Israel received three new F-35s.³⁰ The Israeli Air Force put out a press release on 16 March 2025 which said:
- “Last Thursday [13 March], three new fighter jets landed at Nevatim Airbase, which will join the “Adir” (F-35I) fleet, which plays a significant role in combat operations across all theaters [of war] and in maintaining Israeli air supremacy over the Middle East... The expansion of the [F-35] Adir fleet constitutes a significant enhancement of the Israeli Air Force’s lethal capabilities.”* (emphasis added.) (Exhibit CAB2-2/15)

²⁶ Aviation Week Network, “U.S. F-35 Sustainment Lead Details Israel Fleet Ops Since October” (10 April 2024) available at: <https://aviationweek.com/defense-space/budget-policy-operations/us-f-35-sustainment-lead-details-israel-fleet-ops-october>.

²⁷ Breaking Defense, “After Hamas attack, US rushed new F-35 capabilities, parts to Israel: Officials” (12 December 2023) available at <https://breakingdefense.com/2023/12/after-hamas-attack-us-rushed-new-f-35-capabilities-parts-to-israel-officials/>.

²⁸ United States House Armed Services Committee, “TAL Hearing: F-35 Acquisition Program” (12 December 2023) available at : <https://armedservices.house.gov/calendar/eventsingle.aspx?EventID=3571>. At 1:04:04 in the video.

²⁹ Congress.Gov, “F-35 Lightning II: Background and Issues for Congress” (12 November 2024), available at: <https://www.congress.gov/crs-product/R48304>

³⁰ See para [20] above.

24. F-35s were visually identified by a journalist in Gaza as having been involved in the Israeli military assault on Gaza that took place five days later, on 18 March 2025, killing 436 Palestinians killed, including 183 children.³¹ Journalist Abubaker Abed reported:

*“The sky was filled with drones, quadcopters, helicopters, F-16 and F-35 warplanes... At 2 a.m., I tried to close my eyes. Once it happened, four explosions shook my home. The sky turned red and became heavily shrouded with plumes of smoke... Mothers’ wails and children’s screams echoed painfully in my ears. They struck a house near us. I didn’t know who to call. I couldn’t feel my knees. I was shivering with fear, and my family were harshly awakened...”*³²

25. Mr. Abed further explained that *“Israeli warplanes have gone so low in the sky of Dier al-Balah”*³³ and *“F-16 and F-35 warplanes are covering the sky space of Deir al-Balah and central Gaza.”*³⁴

26. While it is typically not possible to attribute individual strikes to individual types of fighter jets,³⁵ F-35s can visually be distinguished from other warplanes in certain circumstances.³⁶ In private correspondence shared with myself, Mr. Abed elaborated, through an interlocutor, that he *“personally saw the F-35 warplanes and recognised them as bigger and longer than the F-16s (or others).”*

iii. The U.K.’s contribution to Israel’s F-35 fleet

³¹ BBC News, “UN says worker killed in Gaza as Israeli air strikes resume” (19 March 2025) available at: <https://www.bbc.co.uk/news/articles/ce8mpl4mk4go>.

³² Dropsite News, “Massacre at 2 A.M.: Israel Resumes Indiscriminate Attacks Against Gaza, Killing Over 400 People” (18 March 2025) <https://www.dropsitenews.com/p/israel-resumes-bombing-gaza-death-toll>.

³³ Abubaker Abed posted on X, 18 March 2025 2:25 AM, available at: <https://x.com/AbubakerAbedW/status/1901822213839335682>

³⁴ Abubaker Abed posted on X, 18 March 2025 2:33 AM, available at: <https://x.com/AbubakerAbedW/status/1901824251809665521>.

³⁵ This is because most modern aircraft can carry a range of munitions and there are no known munitions that can be released *only* by the F-35. As such, even in circumstances where munition remnants are identified it is not possible to draw definitive conclusions about the aircraft used. Source: Joseph Dyke, Director of Programmes at Airwars.

³⁶ For example, it is easily possible to distinguish an F-35 from another fighter jet if it is flying low enough, or slow enough. See example image here: <https://images.app.goo.gl/qpWEMgmZcc9TBsna9>

27. Outside of the U.S., the U.K. is currently the largest contributor of spare parts for F-35s to Israel. In January 2025 Project Ploughshares, a Canadian research institute, conducted in-depth research into the supply chain of F-35s going to Israel (Exhibit CAB2-6). Under the F-35 global programme, F-35s are typically ordered in batches, called “lots”³⁷ – Ploughshares identified nine lots which contain aircraft bound for Israel. In respect of those lots, Ploughshares found:

“By value, suppliers based in the United States were granted the majority (68.2 percent) of subawards under lots 8 through 17, followed by suppliers based in the United Kingdom (16.2 percent) and suppliers based in Italy (8.3 percent).”³⁸
(Exhibit CAB2-6/67).

28. It is noteworthy that the amount of money awarded to manufacturers based in other F-35 partner countries is dwarfed in comparison to that of the U.K.: the U.K.’s award was \$6.7 billion, whereas the next largest award (to Italy) was \$3.4 billion (Exhibit CAB2-6/67).³⁹

29. These findings by Project Ploughshares accord with the U.K.’s overall position within the F-35 global programme. Again, outside the U.S., the U.K. is the largest contributor. A report to the US Congress from November 2024 states:

“International participation in the F-35 program is divided into three levels, according to the amount of money a country contributes to the program—the higher the amount, the greater the nation’s influence on aircraft requirements, design, and access to technologies gained during development. Level 1 partner status requires approximately 10% contribution to aircraft development and allows for fully integrated office staff and a national deputy at the director level. The United Kingdom is the only Level I partner.”

The United Kingdom, which has said it plans to purchase 138 F-35s, is the most significant international partner in terms of financial commitment. The United Kingdom committed to spending \$2 billion, equating to about 8% of the estimated

³⁷ Ploughshares, “Report: Global Production of the Israeli F-35I Joint Strike Fighter” January 2025, available at https://cdn.prod.website-files.com/63e066081ef50cb16a3f4157/679ba3e22945449fe7a7167e_F35I%20Report%20Jan.25.pdf at p. 6

³⁸ *Id* at p. 11.

³⁹ *Id* at p. 11.

cost of SDD. A number of UK firms, such as BAE and Rolls-Royce, participate in the F-35 program.”⁴⁰

30. There are two distinct mechanisms via which the U.K. contributes to Israel’s F-35 fleet: (i) spare parts for existing F-35s; (ii) new F-35s. Every F-35 delivered to Israel will, by necessity, contain British components. Addressing Parliament in November 2024, Minister of Defence Maria Eagle said:

“Through Lockheed Martin and the Joint Program Office approximately 15% of every F-35 aircraft delivered globally is manufactured by UK companies. The UK is the design authority for a range of significant Lightning aircraft components, securing highly skilled jobs within the UK and providing significant economic benefit. For example, the rear fuselage, batteries, ejector seats and actuators are manufactured in the UK for the entire F-35 global fleet. This manufacturing and equipment support for the global fleet of F-35 includes over 100 UK-based Tier 1 suppliers and has created over 20,000 jobs in the UK.” (emphasis added.)⁴¹

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signature: 

Name: Charlotte Andrews-Briscoe

Date: 21 March 2025

⁴⁰ Congress.Gov, “F-35 Lightning II: Background and Issues for Congress” (12 November 2024), available at: <https://www.congress.gov/crs-product/R48304>. CAAT found that BAE Systems alone has contracts worth \$6.6 billion: Campaign Against Arms Trade, “Arming Genocide” (December 2024) available at: <https://caat.org.uk/app/uploads/2024/10/CAAT-F35-briefing-update-v4.pdf>.

⁴¹ United Kingdom Parliament, “F-35 Aircraft: Procurement: Question for Ministry of Defence” (11 November 2024) available at: <https://questions-statements.parliament.uk/written-questions/detail/2024-11-11/13659/>.