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## The Footprint of Chinese Private Security Companies in Africa

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# CHINA★AFRICA RESEARCH INITIATIVE

## The Footprint of Chinese Private Security Companies in Africa

Alessandro Arduino



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# ABSTRACT

**SAIS-CARI WORKING PAPER  
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## THE AFRICAN CONTINENT’S THREAT SPECTRUM

encompasses all the risks, from criminal to political violence, that public and private Chinese companies are going to experience throughout the Belt & Road Initiative. From Libya to South Sudan, China has witnessed how severely limiting the sole reliance on economic development to promote security and sustainable development can be. As such, security is an increasingly important priority, especially for Chinese companies operating in politically volatile areas. Compared to their American or Russian peers, Chinese private security companies (PSCs) are latecomers to the African security sector and their services are unrelated to the provision of military services or the delivery of military equipment. At present, China’s PSCs are still evolving from local security enterprises operating in low risk environments in Mainland China into international companies able to maneuver abroad in high-risk areas. Africa is the litmus test for Chinese PSCs, with tasks including assets protection from riots, theft, or terrorism to maritime anti-piracy missions. Therefore, local best practices and lessons that Beijing can extract from Cape Town to Cairo are not only of paramount importance for the Chinese African cooperation mechanism but also for a broader collaboration with local and international stakeholders.

## INTRODUCTION

SINCE THE LAUNCH OF ITS BELT & ROAD INITIATIVE (BRI) in 2013, China's engagement with the African continent has been scrutinized through a state-to-state economic and military lens. However, the China-Africa economic and security dimension requires a more complex perspective that takes into account the private security sector. In light of China's "going out" policy, the need to support China's State-Owned Enterprises (SOEs) and private companies that are investing in high-risk areas has expanded the Chinese market for security services provided by private companies. The West's preoccupation with the Chinese presence in Africa has focused on the BRI's infrastructure projects that have resulted in debt exposure for the receiving countries, or on the opening of new Chinese military bases. The lack of interest in the expansion of Chinese Private Security Companies (PSCs) throughout Africa is, however, a source of concern.

Several African countries are increasingly important for China's economic development, which explains why the security sector in Africa has become a source of anxiety for Beijing. The continent is riddled with a wide range of conflicts that involve state and non-state actors that have been ignited by religious tensions, tribal rivalries, political problems, unequal distribution of scarce resources, or natural disasters, some of which are linked with climate change.

Risk assessment and mitigation within the African countries participating in the BRI requires a wide range of security services, along both maritime and land routes. Compared to other areas where Chinese PSCs are operating, the African private security dimension is characterized by several peculiarities. First, the African continent still carries the stigma associated with mercenaries' actions during post-colonial conflicts. Heavily armed soldiers that wrought havoc over the last three decades are no longer the norm, but the stigma associated to their past actions still persist. Second, well before the launch of the BRI and Beijing's endorsement for PSCs to go abroad, several Chinese companies operating in Africa, in sectors ranging from natural resource extraction to small businesses, organized a sort of armed militia to protect their interests threatened by criminal or political violence. Third, while Chinese PSCs' footprint is limited to a handful of countries, Africa is witnessing the return of well-structured groups of international Private Military Companies (PMCs) who support local governments and international interests external to the African continent. The most recent example of this phenomenon is the growth of Russian para-military contractors.

Over the past two decades, the demise of the bipolar global order has ignited the rise of private corporations that offer military-style services as part of their core business model.<sup>1</sup> Modern-day mercenaries have become contractors, offering their services through legally incorporated entities. During the two Iraqi conflicts and the Afghan stabilization campaign the US army's reliance on contractors well illustrates the role of PMCs. The increasing trend to employ contractors is showcased by the fact that each US soldier deployed in a conflict zone was supported by at least one contractor. To put this into perspective, the ratio during the Vietnam War was one contractor to six military personnel. Several states are progressively privatizing their

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*The role of PSCs is quite different from the role played by PMCs, as PSCs provide passive security services, mainly guarding personnel and infrastructure against theft or acts of violence. The definitions become blurred when PSCs pre-emptively use an armed response or act as force multipliers providing security training. One of the several problems related to PSCs begins with the lack of an unambiguous and mutually agreed definition of what a private security firm really is.*

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monopoly on violence due to different needs, ranging from the perceived efficiency of the private sector versus the public to a structural lack of enforcement capabilities. The overall range of security services transferred by the state to the private sector is also known as the *market for force*.<sup>2</sup>

The role of PSCs is quite different from the role played by PMCs, as PSCs provide passive security services, mainly guarding personnel and infrastructure against theft or acts of violence. The definitions become blurred when PSCs pre-emptively use an armed response or act as force multipliers providing security training. One of the several problems related to PSCs begins with the lack of an unambiguous and mutually agreed definition of what a private security firm really is.<sup>3</sup> Unclear boundaries associate mercenaries with private security companies, private military corporations, or global corporations that provide hybrid services ranging from logistics support, intelligence gathering, Special Forces training, emergency evacuations, anti-piracy protections, fixed emplacements security, and tactical support involving the pre-emptive use of force.<sup>4</sup> Since enacting the International Convention Against the Recruitment, Use, Financing and Training of Mercenaries, the United Nations (UN) has actively been engaged in defining the evolution of the market for force from a legal standpoint.<sup>5</sup> Recent efforts spearheaded by the Swiss government are related to the Montreux Document which focuses on PMCs and pertinent legal obligations and good practices for States related to private military and security companies' operations during armed conflict. The International Code of Conduct Association (ICoCA) also focuses on PSCs' sector standards, to ensure that the actions of private security providers do not violate the norms of international humanitarian law and have a positive impact on the enjoyment of human rights by individuals affected by PSC's work.

Contemporary PSCs are making efforts to differentiate and distance their business model from the shameful acts perpetrated by mercenaries during Africa's post-colonial wars. Although during the post-colonial era the number of African registered PSCs surpassed the number of mercenaries operating in the continent, the stigma related to soldiers of fortune or guns for hire is still alive in the continent. Chinese PSCs are latecomers to the African market for force and their services are unrelated to the provision of military services or the delivery of military equipment. At present, China's PSCs are still evolving from local security enterprises operating in low-risk environments in Mainland China to international companies able to maneuver abroad in high-risk areas. At the same time, the definition of "private" itself in China requires taking into account the role of the Communist Party and government bureaucracy in shaping the private sector. Chinese domestic laws regulating the private sector are based on the socialist market economic structure and therefore, from a Western perspective, it can at times be difficult to distinguish when the state-owned ends and private begins.

In this respect, promoting the adoption of international standards and clear guidelines to Chinese PSCs at this early stage is going to benefit not only the Chinese SOEs return on investment but also the local communities. At the same time, promoting interaction among local African PSCs, multinational PSCs that act as

mentors, and the Chinese security sector that supports Chinese SOEs' investments is going to promote best practices and long-term positive spillovers.

## BACKGROUND

### CHINESE PSCs FOOTPRINT IN AFRICA

UNTIL 2017 THE CHINESE PRESENCE IN AFRICA WAS ALMOST exclusively related to the promotion of economic development and trade. At the same time, the United States was carrying most of the weight in supporting Africa in regard to military and counterterrorism efforts. Now, this division is becoming progressively blurred.<sup>6</sup>

East Africa was home to the first Chinese military base established abroad. In 2017, the opening of the People's Liberation Army Navy (PLAN) base in Djibouti was China's concrete response to a changing security environment. It should be noted that China's military base in Djibouti might be perceived as a deliberate challenge to the status quo of older American, French, and even Japanese military bases. During the 2018 China-Africa Defense and Security Forum, Beijing actively promoted the discussion of capacity building of Africa's security forces, defense cooperation, and deepening of China-Africa military ties.<sup>7</sup> In the same year, both President Xi Jinping and Premier Li Keqiang made public speeches clearly illustrating how the Chinese perspective on Africa's security was closely intertwined with the continent's economic development. Therefore, as part of the African development-security nexus it is compelling to consider interactions between China's military and maritime engagement in the continent, peacekeeping missions, and the expanding presence of Chinese PSCs. The process of integrating security, conflict resolution, and economic development is, however, still plagued by major shortcomings and unintended consequences. From Libya to South Sudan, China has witnessed how severely limiting it is to rely solely on economic development to promote security and sustainable development.

From Ethiopia to Djibouti the Chinese private security sector is already extending feelers in the region to establish profitable business partnerships. These partnerships range from construction site protection to anti-piracy activity. With respect to anti-piracy operations, the combined efforts of the international coalition to contest the pirates that plague the coast of Somalia have reduced the activity but have not completely eradicated the problem.<sup>8</sup> Additionally, since the beginning of 2018 there has been a renewed increase in piracy activity off the coasts of both East and West Africa.<sup>9</sup> This trend has reignited the need for increased public-private cooperation in the security sector in the region.

A new wave of Chinese PSCs has found a profitable niche market in providing guard services for Chinese VIPs afraid of kidnapping and onboard Chinese commercial vessels transiting through high-risk waters. In this context a small number of Chinese PSCs, out of more than 5,000 companies that compose the Chinese mainland private security market, are showcasing specialized capabilities that offer insight into the future of Chinese PSCs as a whole.<sup>10</sup> In the maritime security sector, for example, the

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company Hua Xin Zhong An (HXZA) is one of the first Chinese security companies with personnel carrying weapons onboard commercial vessels transiting along African coasts.<sup>11</sup> HXZA, which employs foreign consultants, has also shown the ability to implement internationally-recognized standards to improve efficiency while simultaneously looking after the wellbeing of local stakeholders. HXZA and the Haiwei group are two of only a few Chinese companies, among the thousands registered in Mainland China, that have managed to achieve this milestone.<sup>12</sup> In several African countries, from Tanzania to Ethiopia, Haiwei provides local security for Chinese construction and logistic companies operating in the region.

Several organizations, from the International Organization for Standardization (ISO) to the ICoCA, offer internationally recognized certifications for PSCs. In Africa's conflict prone areas, such as the Sahel and South Sudan, the Swiss Government, the International Committee of the Red Cross (ICRC), and the Geneva Centre for Security Sector Governance promote toolkits to address security and human rights in complex environments, linked to the Montreux Document.<sup>13</sup> The African continent is an important area of action for ICoCA's members. An increasing number of Chinese PSCs are making efforts to promote transparency, avoid corruption, and minimize violence against local populations.

The small number of Chinese PSCs that have been able to acquire international certifications is due to several factors. While there are both language barriers and technical difficulties, the main hurdle in gaining a foreign certification is related to the costs associated with obtaining those certifications. The domestic Chinese market for PSCs is still anchored in a race to the bottom in terms of costs and profitability. This trend also reflects Chinese companies' lack of willingness to pay a premium for high-level security services. Since the beginning of 2019, and especially in the years to come, Mainland China's market for force is going to witness a reduction in the overall number of companies.<sup>14</sup> This reduction will result from an increasing demand for professionalism by Beijing and the central government's enforcement of a business law that requires payment of social security tax.<sup>15</sup> Although this law is not new, enforcement of the law in the mainland security sector has only recently begun. Until recently, it was common practice for small Chinese PSCs to avoid paying social security for their officers. As such, these PSCs were able to offer extremely low prices, driving out law-abiding competitors from winning possible contracts.

Mainland China's private security market also has a personnel turnover rate that can reach 65 percent during the Chinese New Year peak season.<sup>16</sup> One of the reasons for this turnover is that local security guards tend to perceive these jobs as temporary placeholders while they await better offers. The recent strict enforcement of the social security payment has already taken a toll on the companies that were pricing their services well below their operational costs. For several of these companies the BRI's perceived lucrative security contracts, especially in Africa and Southeast Asia, are a lifeline for their financial survival. Unfortunately, the lack of capacity that they have already showcased in Mainland China will be amplified when they take on overseas operations, even in safe African countries. For example, in 2018 five Chinese nationals



were arrested in Kenya while trying to set up and run a security company; not only did they lack proper local licenses, but they were also discovered utilizing tourist visas.<sup>17</sup>

Beyond China's borders, the BRI's security market's operational requirements are already imposing changes in the overall Chinese private security sector.<sup>18</sup> The BRI has highlighted the need for skilled personnel and increased PSCs' capacities, but at the moment fewer than a handful of Chinese PSCs are able to meet these higher requirements. The literature review reveals many references to the field of private military organizations in Africa.<sup>19</sup> The recent growth of Chinese PSCs, however, raises significant questions about previous assumptions:

- Are new Chinese PSCs able to operate efficiently on the continent without endangering the wellbeing of local populations?
- Are PSCs generating unintended negative spillovers, as has happened in the past (e.g. corruption, weapon smuggling, or poaching local talent that might have been employed by the local police or military forces)?
- Are Chinese PSCs acting under any sort of formal or informal supervision of, or taking instructions from, the Chinese military?

## FROM MERCENARIES TO PRIVATE SECURITY CONTRACTORS

### THE LEGAL CONUNDRUM

THE LEGAL CONUNDRUM IN HOW TO PROPERLY DIFFERENTIATE mercenary's with other security providers is still openly debated. The presence of different kinds of private security forces in Africa is a case in point. In the 1960s, during Africa's postcolonial wars, the role of PMCs was instrumental in several regimes' ability to maintain a strong grip on power.<sup>20</sup> Small groups of well-trained and heavily armed mercenaries managed to protect several African regimes from internal revolution and external threats. On more than one occasion, the mercenaries also managed to maintain a certain level of insecurity in their respective countries, which they deemed necessary to maintain these lucrative contracts.

In order to avoid further damage caused by these unaccountable mercenaries and to distinguish between the lawful and unlawful use of force by private companies, the Geneva Convention was updated in 1977 with the Additional Protocol I.<sup>21</sup> The aim of the update was related to an ongoing struggle to legally define the word mercenary. In addition to Additional Protocol I, Rule 108 re-enforced the concept that mercenaries do not have any rights to combatant or prisoner-of-war status.

Also, between the 1960s and the early 1990s the UN devoted increasing attention to mercenary activities by attempting to regulate the modern private security services industry and to make business enterprises accountable by expecting them to respect human rights. In 1990 the South African company Executive Outcomes (EO), which

**Rule 108 states a mercenary is defined as a person who:**

1. Is specially recruited locally or abroad in order to fight in an armed conflict.
2. Does, in fact, take a direct part in the hostilities.
3. Is motivated to take part in the hostilities essentially by the desire for private gain and, in fact, is promised, by or on behalf of a party to the conflict, material compensation substantially in excess of that promised or paid to combatants of similar ranks and functions in the armed forces of that party.
4. Is neither a national of a party to the conflict nor a resident of territory controlled by a party to the conflict.
5. Is not a member of the armed forces of a party to the conflict.
6. Has not been sent by a state which is not a party to the conflict to perform any unofficial duty as a member of its armed forces.<sup>22</sup>

became the poster child for the provision of highly trained mercenaries, was employed by international corporations that were profiting from the Angolan and Sierra Leone civil wars. Similarly, Sandline, a UK company with links to EO, provided direct combat personnel to support the Papua New Guinean government's efforts against rebels. In both cases, the small but efficient cadre of highly trained mercenaries, operating with advanced hardware and tactics, enabled local governments to overcome opposing forces. Even air support was provided, with EO deploying a privately-owned, heavily armed Russian Mi-24 Hind military attack helicopter.<sup>23</sup> The UN regulation at that time, anchored to the tragic events in Africa where mercenaries increased instability and hurt newly formed states' development, was focused on controlling and limiting the recruitment and employment of unaccountable mercenaries.<sup>24</sup> Following the increased employment of PMCs during the conflicts in Iraq and Afghanistan, the UN renewed its interest in supporting public and private stakeholders' dialogues on the role of private military security contractors.<sup>25</sup>

During the opening remarks of the February 2019 UN Security Council meeting, Secretary-General António Guterres called on governments to accede to the 1989 International Convention against the Recruitment, Use, Financing and Training of Mercenaries.

The strategically located and resource-rich Central African region has become fertile ground for groups operating as “guns for hire” for all kinds of subversive activities, speakers said, especially trafficking in small arms and light weapons, poaching, and terrorism. Weak State control over national territory, porous borders and the absence of coordinated measures to counteract their proliferation has only emboldened such groups to operate outside the law.<sup>26</sup>

The presence of Chinese investments in Africa, especially in the mining sector, predates the BRI. These investments were driven by the private sector more than by SOEs.<sup>27</sup> During that time, and even now, in several areas in Africa, small private Chinese firms and groups of small businesses contract with local militia or even arm

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themselves for protection. More often than not, this DIY approach to private security ends in tragedy, as the case of illegal miners shot in a Chinese owned mine in Zambia demonstrates.<sup>28</sup>

Nevertheless, the 20<sup>th</sup> century demand for private security forces differs considerably from Africa's post-colonial wars. Today, in the African context, the process of political and economic globalization has led several multinational companies, especially the ones related to energy and other natural resources extraction, to operate in international areas that are often unstable. In this regard, PSCs fill the vacuum of power where weak states are unable to provide proper security with their police and military forces. Currently, from the Chinese side the growth in the private security sector is unrelated to the provision of military services or the delivery of military equipment. This is in contrast to recent cases of Western Private Military Security Companies (PMSCs) operating in Iraq and Afghanistan where these factors are intertwined. While the definitions of PMC and PSC are still mired in grey areas of legal ambiguity, it is possible to divide the private security companies into two broad categories. As already mentioned, the first category (PMSCs & PMCs) includes the military-type private companies that are involved in tasks closely linked to combat operations.<sup>29</sup> The second category (PSCs) is related to security-focused companies with a passive stance and the possibility of using a certain degree of force to deter criminal and political violence. While the definition seems straightforward, the grey areas start to emerge during the provision of training, logistics support, or even maintenance of high-tech weapon platforms by unarmed contractors. The following examples illustrate this point.

On November 25, 2019 three Chinese miners were kidnapped at gunpoint in the Nigerian state of Osun.<sup>30</sup> Nearly a month before, five private Russian military contractors were allegedly killed in Mozambique during an ambush by ISIS militants that also cost the lives of 20 local soldiers.<sup>31</sup> Both incidents reveal a trend that in the near future will intensify. Protecting assets from criminal and political violence is a common task for both Chinese PSCs and Russian PMCs. However, while the former passively guard Chinese economic interests in Africa, the latter are actively involved in increasing the combat capabilities of governments that are integral to Russia's strategic vision for the African continent.

In this respect, Chinese PSCs' footprint in Africa is still limited to the passive stance of providing guarding services. This means, for example, unarmed guards who patrol buildings, parking lots, and factories. Nevertheless, the conceptual evolution in the employment of PSCs to guarantee the security of infrastructure and the safety of workers along the African part of the BRI requires new rules and regulations that cannot be found solely in existing laws. From the Chinese side, in addition to Beijing's awareness of the problem, a law related to the selection and deployment of Chinese PSCs abroad is still in the making. Since 1993, Chinese law has included the requirement for Mainland's PSCs in terms of licensing and light weapon controls.<sup>32</sup> However, there is an urgent need for proper licensing and regulation of PSCs operating abroad. Most African countries, even the fragile ones, have in place a system of control,

## THE AFRICAN MARKET FOR PRIVATE SECURITY

licensing, and regulation of security services. The South African Private Security Industry Association is at the forefront in providing guidelines, training, and certification for PSCs operating locally and internationally. Promoting and integrating best practices among African and Chinese regulators and practitioners is essential to increasing the benefits PSCs provide and at the same time avoiding negative spillovers.

THE AFRICAN CONTINENT IS MADE UP OF MORE than 50 countries that are highly diverse and differentiated in natural resources, population, development patterns, and type of government. According to the *Regional Survey: Africa out to 2045*:

More than half of African states are still ‘fragile’ and this will remain a driver for instability and violence over the next 30 years. Criminal violence, conflict with and between non-state actors, and conflicts between states will remain significant risks and Africa will also continue to be influenced by conflict in the Middle East and globally.<sup>33</sup>

Challenges that can exacerbate local problems or even fuel new conflicts include the following:

- Growing population
- Lack of access to scarce resources
- Climate change and natural disasters
- Religious and political disputes
- Terrorist and criminal organizations
- Unequal distribution of wealth

During the past decade, violent deaths due to armed conflict in Africa has progressively declined, but the threat levels related to armed violence remain dangerously high. Despite the popular perception of terrorism as the main cause of violent death, criminal violence is actually the highest cause.<sup>34</sup> In Africa, transnational organized crime and the illicit trade of goods is on the rise. The increase of regional and international trade, coupled with weak and corrupt governments, is enabling the growth of new structured transnational criminal organizations that range from drug smuggling to wildlife poaching. Mark Shawn, expert on transnational criminal networks, stated:

The impact of organized crime on Africa’s development is severe, and although in some key markets the illicit economy provides opportunities for livelihood and a source of resilience, these opportunities are negated by the extent of environmental damage, the growth of drug use among the poor and marginalized, human rights abuses of migrants and those being trafficked, the violence engendered, and the economic distortions introduced.<sup>35</sup>

Therefore, the need for security and asset protection has prompted the private sector to enter the lucrative market for security services. The range of services and actors that encompass the contemporary African private security sector is differentiated and peculiar to the necessities and characteristics of each region, country, and sector. The types of groups providing private security services range from tribal militias to international PSCs and even combat-ready mercenaries. According to the South African Private Security Industry Association report, there has been an increase in the use of PSCs to fill the security gap weak states are not able to fill.<sup>36</sup> In South Africa alone, for the specific task of close protection (i.e., bodyguards), there are more than 2,000 registered companies.<sup>37</sup>

In this respect, the type of protection services required by Chinese SOEs and private companies in most African countries are quite basic and straightforward. However, in high risk areas such as Libya or South Sudan, the security services that are needed require a different level of sophistication. The complexities of these more challenging environments entail solutions that the average Chinese PSCs operating in Mainland China are not able to provide. These problems are not only more financially demanding in terms of additional security expenses but are also challenging in terms of human resources qualifications.<sup>38</sup> Operating in the African continent necessitates a higher level of training, more sophisticated capabilities, and specific local knowledge that most Chinese PSCs do not currently possess.

Commercial asset protection is considered the basic service PSCs provide, while more active services require different skill sets and equipment; some of these come hazardingly close to paramilitary activities. As already mentioned, most African countries, even the fragile ones, have a system in place to control, license, and regulate security services. The willingness or ability to enforce the law is another matter, however. When Chinese PSCs are restricted to the provision of basic asset protection services, there is no direct threat to the host country's national security. Nevertheless, interactions with the local community must be properly regulated and constantly monitored in order to avoid undesired friction or even open confrontation.

As previously mentioned, the stigma of heavily armed mercenaries operating in Africa is still very present in the continent. The image of EO engaged in offensive kinetic activities for profit in Angola is still vivid. At the same time, it is imperative to recall that while the bulk of attention is focused on the past actions of PMCs in Africa, most PSCs have been devoted solely to commercial asset protection. According to Sean Clearly, expert in conflict resolution:

[The] review of private military activities in Angola is necessarily dominated by an analysis of the performance of Executives Outcomes (EO). A number of other companies have also provided private security services in Angola: Defence System Limited (DSL), Gray Security Limited, Apha 5 Lda, (...) being the most prominent among them. None of these companies (...) appears to provide combat, military advisory or military training services of the sorts provided by EO. Among hundred PSCs present in Africa

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*Operating in the African continent necessitates a higher level of training, more sophisticated capabilities, and specific local knowledge that most Chinese PSCs do not currently possess.*

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(Isenberg) with almost 80 in Angola alone, provided only asset protection services.<sup>39</sup>

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*According to McFate, nowadays the African market for forces is a true free market in which a great number of smaller groups with loose affiliations operate in contrast with the private military security oligarchy that dominated the market in the past.*

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Today, Chinese PSCs are required to provide the same services ranging from mining and oil field protection to protecting the personnel working for embassies and corporations. Local regulations and Chinese law ban Chinese nationals from carrying weapons in China and outside China, with some notable exceptions; this prevents Chinese PSCs from following along EO's path down the road to becoming a private military force multiplier. The recent footprint left by Russian PMCs on the continent differs considerably from that of Chinese PSCs. From sub-Saharan Africa to Libya, Russian PMCs, spearheaded by the Wagner group, provide military support to Russia's allies without being considered part of the Russian armed forces. While Chinese PSCs fill a security gap in guarding Chinese investments, Russian PMCs main advantage is public deniability for Moscow.<sup>40</sup>

For practical reasons, the African continent's market for force can be divided into several regions that share common threats and thus require similar security solutions. That said, Africa's security dynamics must be understood at the root level in order to provide each specific security threat with a tailor-made solution, avoiding a "one size fits all" approach. Dividing the continent by threat and response sectors, it is possible to underline several countries that are characterized by specific risks and the related drivers for the growth of the local private security market. These regions include the following:

- **Egypt and part of North Africa:** Cooperation with local PSCs and government security forces for embassy protection, port and infrastructure guarding, and kidnapping for ransom (K&R) response.
- **Libya, the Sahel, and South Sudan:** PMCs are most dominant, although PSCs are primarily employed by the oil extraction industry to support the security of their operations. PMCs' contractors and even independent groups of mercenaries are employed in support of combat operations.
- **West Africa (especially Nigeria):** An increase in maritime insecurity in the delta area has led to a growing presence of antipiracy and K&R response PSCs.
- **Central Africa:** Ongoing conflicts promote a mixed presence of PSCs and PMCs, with blurred and fast changing definitions between the two typologies.
- **East Africa:** Especially in Somalia the threat of terrorism is the main driver for specialized PSCs in anti-kidnapping and security response.
- **Kenya:** Diffuse security but an exponential increase in private security services due to the looming threat posed by terrorist groups such as Al Shabab.
- **Southern African Development Community:** Evolving local private security sector where PSCs are legally required to employ local security personnel.
- **South Africa:** Presence of a high number of domestic PSCs and the export of high-level South African security expertise to the continent.

The contemporary market for force in Africa started to diversify and proliferate during the early part of the new millennium. According to an interview with Sean McFate, leading expert on PMCs and specialist in national security strategy, 20 years ago there were few private security actors in the African market for force.<sup>41</sup> Most of these were Anglo-Saxon companies that could be referred to as the “EO alumni network.” Although today there is a presence of heavily armed mercenaries, their security footprint is much thinner than it was between the 1960s and 1990s. During these three decades, soldiers of fortune, recruited from the former colonial powers, became a brutal force multiplier in conflicts in the Congo, Angola, and Nigeria. Actions by guns for hire, like “Mad” Mike Hoare in Congo or the Frenchman Bob Denard’s power coup in the Comoros, well epitomize the role of white mercenaries in Africa during that period.<sup>42</sup> Compared to the beginning of 2000, the contemporary African market for force is now more mature and encompasses several actors that range from small groups of free market actors to multinational security companies like G4S or DynCorp. In this respect, Africa is still an important market for any security provider, not only for infrastructure and asset protection but also for law enforcement, prisons, and border security, among others. Chinese PSCs are latecomers to the market. The state-backed Russian PMCs appeared on the scene earlier, in more places, and in greater numbers.

In this respect PSCs can be differentiated not only by their motivations, whether market based or state led, but also by whether or not they share a military/security cultural background. The contractors’ command language commonalities are summarized in a few language groups that do not necessarily denote the origin of the contractor but the language in which the orders are communicated. For example:

- **English** speakers, mainly from multinational companies operating in support of the oil extractive industry but also by the international multilateral organizations and the NGOs.
- **Spanish** speakers, mainly South American contractors with former US Special Forces training.
- **Russian** speakers, with a sharp increase since a 2015 deployment into Nigeria and in Mozambique.
- **French and Hebrew** speaking contractors.
- **Chinese** speaking contractors are the late entrants in the African private market for force.

In the past, leading PMCs could be traced to a few groups with headquarters in Washington, D.C. or London. But according to McFate, nowadays the African market for force is a true free market in which a great number of smaller groups with loose affiliations operate in contrast with the private military security oligarchy that dominated the market in the past.<sup>43</sup>

More recently the market for force has witnessed not only an increasing presence of Russian PMCs and Chinese PSCs, but it has also experienced the mushrooming of small, independent, and very active PSCs. As an example, the conflicts in Chechnya, Iraq, Afghanistan, and Syria promoted the employment of local personnel in multinational PMCs ranks. Once dismissed, the most entrepreneurial among the former contractors established their own local private security firms. The new local PSCs benefitted from their local and international contacts cultivated during their previous working experience with multinational companies. A Kurd private security firm in northern Iraq protecting international oil companies, managed by a former British Royal Marine, is a notable example of this trend. Nonetheless, according to a United Nations Security Council report on Libya, the resurgence of civil war has attracted a new wave of mercenaries from Chad and Sudan fighting in Libya.<sup>44</sup>

New PSCs operating in Africa are coupled with new capabilities originating from the fusion of PMCs with private intelligence companies employing former intelligence officers from state agencies like MI6, the CIA, or the Mossad. Moreover, in Africa it is not uncommon to encounter investigative journalists turned fixers, who serve private sector interests in search of missing individuals or information.<sup>45</sup>

Compared to just two decades ago, the African market for force is bigger and more diverse. In addition, domestic and international perception of China's presence in Africa has also changed. Compared to the recent past, the perception of several African countries towards Chinese investments, and the perception in Mainland China of the Chinese presence in Africa, is changing rapidly. For example, as early as 2015 in a blog reposted from the *Global Times* there was a call to send the Chinese special forces to rescue kidnapped Chinese in Africa.<sup>46</sup>

Complaints about the Chinese government's supposed lack of attention to, and protection of, Chinese citizens overseas in Africa are not new. In previous decades the perceived lack of interest for Chinese migrant workers' security from Beijing was compensated by the creation of local militia to protect workers and businesses against criminal violence in the continent. The mining sector has been the main culprit with several high-level incidents that have ignited media uproar in Africa and China. From the shooting incidents in Zambia to the *galamsey* miner's deportation in Ghana, Chinese migrant workers' impact has been felt on both sides.<sup>47</sup> Since the 2015 terrorist attack at the Blue Radisson Hotel in Bamako, Mali's capital, where three Chinese China Railway Corp executives were killed along with other foreigners, the Chinese government has increased its awareness in protecting Chinese workers while overseas as well as closely monitoring its own netizen anger for a perceived lack of consular protection.<sup>48</sup> At the same time, Beijing is speeding up its game in dealing with the political instability and corruption of several African regimes.

While many Chinese PSCs are still flying under the radar, attention to the Chinese military and its peacebuilding presence in Africa is on the rise. China's security relations with Africa have advanced considerably over the last two decades. In 2015 a revised counter-terrorism law amplified the scope of Chinese military overseas deployments. This law was enacted the same year that China's Africa Policy Paper



## CHINA'S LAND AND MARITIME PSCs IN AFRICA

called for broader military-to-military engagement in terms of capacity building and security technology transfer with African states. Therefore, it is not by chance that just after the opening of the naval base in Djibouti, China started to train its military forces on African soil. The training ranged from live fire exercises to helicopter evacuation drills from a PLAN frigate off of Djibouti's coast. During 2018 alone, the People's Liberation Army (PLA) conducted training in Cameroon, Gabon, Ghana, and Nigeria. At the same time, army medical units operated in Ethiopia, Sierra Leone, Sudan, and Zambia.<sup>49</sup> Beijing's participation in UN Peacekeeping Operations in Mali, Sudan, and the PLAN's participation in international counter-piracy missions in the Horn of Africa and the Gulf of Guinea showcase the country's efforts to fight terrorism and piracy as part of the China-Africa Action Plan.

The development of the China-Africa Law Enforcement and Security Forum to improve African governments' capacity to guarantee the safety of Chinese nationals and assets is also underway. The forum is intended to establish, under the aegis of Interpol, closer security cooperation and intelligence sharing between Chinese and African security officials. Nevertheless, clear guidelines to establish communication channels and operational procedures to link the Chinese military and diplomatic missions with the presence of Chinese PSCs in Africa are still a work in progress.

THE RECENT ATTACKS AGAINST CHINESE AND FOREIGN FISHING vessels offshore of Somalia, the concerted attack on Asian registered tankers in the Middle East, armed robberies along the principal South East Asian shipping arteries, and, of course, the persistent piracy threat in the Gulf of Guinea, have re-ignited a growth in the provision of Chinese maritime security services.<sup>50</sup> Some pirates have found temporary, alternative employment in narcotics smuggling or onshore K&R to earn interim revenue before returning to criminal activities at sea. However, periodic surprise attacks and the continuous monitoring and probing of the defenses of transiting vessels are ominous signs that should not be underestimated. Just in August 2019, nine Chinese and eight Ukrainian seamen were abducted in attacks on two merchant ships off the coast of Cameroon. The Gulf of Guinea now accounts for 73 percent of kidnappings and 92 percent of hostage-takings at sea worldwide, particularly along the coasts of Benin, Cameroon, Guinea, Nigeria, and Togo.<sup>51</sup>

For example, the previously mentioned HXZA company is focused on maritime security, especially along the East African coast. HXZA's core services include armed maritime security, K&R response, executive protection, static site security, security training, risk assessment, and security technology integration. HXZA's expansion abroad was ignited by the requirement to follow their Chinese clients' internationalization process, especially the SOEs in the oil and gas extraction sectors. Subsequently, the BRI has increased the risk management requirements and size of the security market. Similarly, the major Chinese PSCs started following the internationalization pattern of their Chinese clients along the BRI. As Chinese client

companies go global, so must their security service providers. The BRI requirements are forcing Chinese PSCs to increase their service offers from static guards to include:

- logistics planning
- armed executive protection
- maritime security in hostile environments.

The land-based threats to Chinese personnel and infrastructure, with special reference to K&R, are increasing in Africa. The number one threat facing Chinese interests in complex environments is closely intertwined with the global growth and presence of Chinese companies and persons on the continent. Moreover, the media's attention generated by the BRI has increased the spotlight on China's overseas presence. Therefore, Chinese workers, diplomats, and businessmen have become a preferred target for criminals and terrorists.

## HAIWEI

EAST AFRICA'S CHINESE SECURITY FOOTPRINT ON LAND is heavily influenced by the Chinese group Haiwei Dui, also known by its Hong Kong spin-off as Overseas Service Guardian International Co., Ltd. The Haiwei group was founded in 2015 through the incorporation of several Chinese PSCs in response to the demand for the protection of Chinese investors overseas, mainly in BRI countries. Haiwei includes 18 overseas branches in Cambodia, Laos, Malaysia, Kyrgyzstan, Tanzania, Hong Kong, etc.; as well as 11 maritime escort bases.<sup>52</sup> Haiwei's first African branch was located in Tanzania, following the same pattern as all Chinese PSCs moving abroad in that the branch followed an important client investing in the region. The Haiwei group, which is one of the few Chinese companies that has achieved the ICoCA certification, is aiming to expand its overseas portfolio via several Chinese associates' security companies and international joint ventures.

In East Africa, Haiwei recently followed its Chinese clients that had acquired important fixed assets or long-term regular business. In Ethiopia, the majority of Haiwei's clients are Chinese construction and logistics companies. Usually, the main problem Haiwei is hired to face is theft. Also, according to the group's management, "the African countries where Haiwei has a presence are easier to handle if compared with some other countries and regions we set foot in."<sup>53</sup>

The company's manager for Africa mentioned during the interview that in many cases, although Haiwei approached local governments and communities through the help of local partners, presently the majority of Chinese investors were not operating in close contact with local communities. Also, Haiwei mentioned that it had not encountered severe terrorist threats in the countries in which it operated. However, there is an increasing alert regarding potential terrorist threats in BRI countries as a whole. "Collecting the intelligence related to terrorist threats through our own channels is part of our routine work, and we share the intelligence with the parties concerned for further processing and taking follow up actions against the source of the threats."<sup>54</sup>

Similar to HXZA, Haiwei recognizes the need for Chinese PSCs to have proper certification and training in order to internationalize. Chinese PSCs need to ensure that their behavior is in conformity with the standard and norms of international society. In addition, Chinese PSCs need to be recognized as global security service providers, based on the acknowledged standard prevalent in the majority of the countries in the world. Among Chinese private security practitioners, the notion is emerging that it is not viable to attain this goal alone, but it is possible through proper international cooperation.<sup>55</sup> Unfortunately, the unwillingness to pay a premium for high-level security services is still apparent in almost all sectors.

Although they're aware that there exists a certain degree of risk and danger in investing in the BRI countries, most of them are still not ready to allocate a reasonable portion of the budget of investment to security service. Price, rather than the level and value of the service, is still the chief factor to consider in their decision-making process of using professional security services.<sup>56</sup>

## **PERSONNEL TRAINING CHALLENGES**

ONE OF THE MAIN CHALLENGES THAT PSCs ARE EXPERIENCING in Africa is training personnel with the necessary local knowledge and security skills. The lack of lucrative contracts and the unwillingness to pay for premium services limits the quality of the security output. Only a few companies provide their staff members with internationally accredited external training certifications, such as the Close Protection Operative Level III certificate issued by the relevant European awarding bodies. This kind of certification provides the necessary training guidelines not only for public security but also for first aid, disaster relief, and firefighting.

Another main challenge is personnel retention over the long term. Talent poaching between PSCs is quite common in China due to the limited human resource pool. Also, in order to successfully operate abroad, today's globalized business environment requires the integration of qualified multi-lingual Chinese and foreign employees that are able to bridge cultures and understand each stakeholder's sensibilities and needs. Language is still a barrier for several Chinese PSCs that are venturing out of China's borders, especially in francophone Africa. Further, security officials must also be knowledgeable on the related laws, rules, and regulations which they have to abide by when they're abroad.

## **INTEGRATION: PSCS AND IT**

THE NEXT STEP IN THE EVOLUTION OF CHINESE PSCs in Africa and all over the BRI is the integration of the security industry with the IT and high-tech communities. Undoubtedly there is a growing tendency to replace manpower with machines in the security industry, driven by the advancement of new high-tech and A.I.-based security

technology. This trend is irreversible. Chinese PSCs, who are aware of the trend, are adapting to it as quickly as possible. The application of high-tech security technology, which has unquestionably lowered human cost, has increased the degree of automation and decreased the probability of errors made by people, thus rendering a more stable and better quality of service.

More jobs in Chinese PSCs are gradually being eliminated as the result of the advancement and application of new technologies such as A.I., which makes it necessary for all Chinese PSCs to alter their strategies and update their know-how in order to keep pace with the trend and gain sustainable development capabilities. At the same time, while the Chinese security sector is flirting with new technology an Israeli security manager that provides training for Chinese PSCs in China asserted that, “in the security market boots on the ground are still essential.”<sup>57</sup>

### A POSSIBLE CHINESE HIDDEN AGENDA?

WITH REGARD TO THE QUESTION OF “HIDDEN AGENDAS”, at the present time, it appears that China’s PSCs, which are acting in a semi-autonomous manner, are focused on providing niche services such as the resolution of kidnappings, piracy prevention, and guarding Chinese investments in Africa. At the moment, the answer to the question of whether Chinese PSCs are an extension of the PLA is still negative. Chinese PSCs moving outside Chinese borders are business entities that are looking to make profits in the market for force. Due to close ties between Chinese PSCs’ CEOs and their evolution into internationally recognized security operators, it is not possible to exclude *a priori* that a closer interaction with the state security apparatus might be possible in the long run. Furthermore, besides being registered as fully private commercial entities, Chinese PSCs are operating in the so-called “market with Chinese characteristics” in which the interaction between public and private entities tends to be less transparent in terms of available open information and transparent business practices.

There is a history of these sorts of linkages between PSCs and governments. Several Western PSCs have, in the past, provided a range of sharp-end security services to their home-country governments or third-country governments directly. The Chinese government’s outsourcing of security services, especially armed solutions, is, however, in its infancy. In fact, the most recent law regulating PSCs still needs to be adapted in order to include a mechanism to regulate the interaction among state security actors and the local private security sector. At the same time, the Chinese private security sector maintains close links with the PLA, the People’s Armed Police (PAP), and the police. Most of the Chinese PSCs’ founders and senior managers are former public security officials. Also, in China the relationship between the private sector and SOEs is still debated and debatable. Although the most successful Chinese PSCs have close relationships with their state clients, they are not necessarily an extension of the state.<sup>58</sup>

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*The African continent threat spectrum encompasses all the risk that Chinese public and private companies, as well as diplomatic missions, are going to experience throughout the BRI. Therefore, the local best practices and lessons that Beijing can extract from Cape Town to Cairo are not only of paramount importance for the Chinese-African cooperation but also for the entire BRI.*

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With reference to Africa and the overall BRI, one of the first steps that Beijing could take during the next private security law update is related to more transparent and open procurement regulations. Such a move would not only promote efficiency and anti-corruption best practices, but also cast away some of the shadows that surround the public-private security sector relationship. Some of these steps are already underway, as several Chinese companies have begun to publish their tenders online for security services in Africa. In order to find the most suitable vendor with competitive bids that take into account cost, capability, and quality assurance, open online tenders are already increasing.

In terms of the availability of information on the presence of Chinese PSCs in Africa, it is not complicated to find necessary information, like incorporation documents, which are publicly available online with listed owners. As these companies are moving outside China and preparing to apply for international standards certifications, they are going to sustain financial audits by international accredited accounting firms, ISO certification by the competent certification bodies, human rights compliance certification by ICoCA, compliance conformity checks by Lloyd's underwriters, held accountable to US and UK regulatory agencies, and a myriad of other inspections and licensing audits by Chinese and foreign governments alike.

At the same time, it is important to remember that a 1993 Chinese law restricted the pool of possible Chinese PSCs' CEOs to former military or police officers. The 2009 Regulation on the Administration of Security and Guarding Services, ratified in January 2010, updated the obsolete 1993 guidelines for the mainland PSC market.<sup>59</sup> The new law still lacks a detailed set of procedures for the provision of outbound security services as well as a clear chain of command for accountability. Another constraint is that the law is intertwined with another older regulation promulgated in 2002, the Regulations on Administration of Use of Guns by Full-Time Guards and Escorts.<sup>60</sup> Both laws reflect the intent to regulate the Chinese national private market for force more so than Chinese PSCs' international operations. In this respect, the Public Security Department of the State Council is the sole entity responsible for supervising and administering security and guard services throughout the country.

As soon as Chinese PSCs started to operate abroad, the State Council, Ministry of Foreign Affairs, Chinese Supreme Court, State-owned Assets Supervision and Administration Commission, National Development and Reform Commission, and even the PLA began competing for a share of the supervisory authority.<sup>61</sup> The new regulations, nevertheless, facilitate the registration process for local PSCs. Stimulated by the BRI's demand for security, the perception of easy profits among the local security providers has skyrocketed. Only after 2010 was the requirement to obtain a proper license relaxed. Nonetheless, the Chinese private market for force is still dominated by former members of the Chinese security apparatus. As for recruitment, the practice of employing former military police personnel by Chinese PSCs is the norm much like it is among the rest of the global security industry. Training and discipline are highly appreciated by PSCs' CEOs. Nevertheless, flexibility and the ability to make a decision in a split second is one of the most important requirements

for a competent security manager. This requirement cannot always be developed within a Chinese company mentality, especially if the officer has a military background.

With the Pentagon ascribing China as the first threat to the US, even ahead of Russia, it follows that the presence of Chinese PSCs in Africa is increasing anxiety in Washington.<sup>62</sup> At the same time, the US's leading PMCs are concerned that in a not too distant future the Chinese market for force will shift from serving private business ventures to global competitors, as has already happened in several Chinese industrial sectors. In the past, several Chinese industrial conglomerates offered lucrative cooperation agreements to their Western counterparts in exchange for know-how transfer, which allowed them to become market leaders in the latter years.

One of the main differences between the UK and US standpoint towards Chinese PSCs is that London still perceives Chinese counterparts as second tier operators and possible clients for advanced services ranging from K&R special insurances to advanced risk management solutions. In Washington, from the private sector point of view, there is a massive confidence gap to overcome. The notable exception in the US is related to Eric Prince. Defined as “America’s foremost mercenary executive” Prince, Blackwater PMC’s founder, realized before most of his peers the opportunities in the lucrative Chinese market for force.<sup>63</sup> Frontier Services Group (FSG), founded in Hong Kong by Prince in partnership with the Chinese state financial conglomerate CITIC group and with an office in Beijing, was branded in 2014 as an advanced service and logistics company supporting the Chinese extractives sector in areas such as South Sudan. During 2018, FSG’s business scope was upgraded to include the intent to build training centers for the Chinese private security sector in China. While training camp projects seem to have been put on hold, FSG is set to capitalize on China’s economic expansion in Africa and on their related need for security. According to *Bloomberg*, the China-FSG cooperation model in Africa ranges from security protection in Somalia, to running air ambulances out of Kenya, and support for Chinese mining operations in the DRC and Guinea.<sup>64</sup>

## CONCLUSION

THREE DECADES OF UNINTERRUPTED CHINESE ECONOMIC growth and the capillary spread of Chinese commercial activities around the world have resulted in targeted attacks against Chinese nationals. Now, Chinese citizens fall into the same high threat category as their US, Israeli, and European counterparts. In the last five years, targeted attacks by criminal and terrorist organizations against Chinese tour groups, K&R of high value individuals, and even execution of Chinese workers, as well as frontal assaults against Chinese diplomatic missions abroad have been a loud statement. The frequency and intensity of such targeted attacks against Chinese interests is likely to increase in the coming years, in tandem with China’s growing role in international commerce—in particular against businesses resident in high-risk countries.

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*With notable exceptions in the natural resources extraction sector, in both the African land and maritime security sectors, there has been a race-to-the-bottom. Driven by falling offer-prices and squeezed margins, quality in security services provision has dropped over recent years.*

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The African continent threat spectrum encompasses all the risk that Chinese public and private companies, as well as diplomatic missions, are going to experience throughout the BRI. Therefore, the local best practices and lessons that Beijing can extract from the Cape Town to Cairo are not only of paramount importance for the Chinese- African cooperation but also for the entire BRI.

From the land security operations legal standpoint, Chinese regulators face a daunting task. As already mentioned, the African threat spectrum ranges from armed conflict and states with weak enforcement power to states with clear guidelines and regulations. In principle, any Chinese PSC that operates within an African state's borders is subject to that state's laws. While South Africa is at the forefront of the development of a PSC operational and legal framework, several states in the continent are also willing to follow the lead. Even in the most fragile state there is no complete legal vacuum. In order to keep the BRI promise of win-win sustainable development it is a priority for Chinese PSCs to ensure the wellbeing of local stakeholders that might be affected by their operations. Especially in complex environments, the interaction between PSCs and local communities might generate negative socio-economic spillovers if not continuously monitored and managed properly.

On the other hand, international maritime law remains a stable foundation for the maritime security sector to operate. In this respect, Chinese PSCs that are adept in maritime security services do not perceive a need for the legal landscape to change. From the African maritime standpoint, the international legal framework currently provides sufficient latitude to guarantee a necessary operational range and to mitigate the threats faced at sea. From the land-based operation standpoint, the fragmentation of national laws or even the lack of proper regulations increase the grey area in which PSCs operate. Nonetheless, there is a compelling need not only to improve these laws but also to promote industry-led and multi-stakeholder standards, to further professionalize the industry and enhance quality assurance. As previously mentioned, with notable exceptions in the natural resources extraction sector, in both the African land and maritime security sectors, there has been a race-to-the-bottom. Driven by falling offer-prices and squeezed margins, quality in security services provision has dropped over recent years.

While Beijing's international relations policy is still informed by the development security nexus, several African countries have already showcased that although sustainable development is necessary, if left alone it is not the panacea to the continent's problems. Since 2012, after the first general election in Libya, the country has been drawn into a civil war. The ongoing conflict coupled with heavy armed tribal militias, unwilling to surrender their power, has ruled out further investment in the region. Several other African countries plagued by local conflicts need foreign investment to develop, but Chinese SOEs as well as international companies need guarantees that their personnel and infrastructure will be protected. Therefore, PSCs are currently filling the security gap which the state military and police are unable to fill. In this respect, PSCs are the answer to several threats, but if not handled correctly, PSCs might attract other actors that risk igniting additional and unexpected conflicts.

In the recent conflicts in Iraq and Afghanistan, a too rapid expansion of the private market for force led to an uncontrolled enlargement of the contractors' pool that spiraled out of control. Additionally, negligent hiring procedures coupled with a lack of transparency and accountability have also led to disasters such as the Nisour square bloody Sunday massacre in Iraq and a series of similar tragedies that did not reach media spotlight.<sup>65</sup> However, this series of incidents generated a wide range of negative ripple effects that affected the overall course of war waged by the US-led coalition. In the short term, the employment of unaccountable private security contractors in Iraq and Afghanistan increased the chances for corruption and illegal arms smuggling. In the medium term it reduced the pool for valuable candidates for police or military positions. And in the long term, it negatively affected the strategy of winning the hearts and minds of the local populations.

According to Jordan Link's blogpost:

It is reasonable to expect security ties between China and African countries to grow. The Belt and Road Initiative, marshalled by CCP General Secretary Xi Jinping, is likely to make inroads across the continent due to local infrastructure needs. As such, Chinese economic and strategic interests will continue to coalesce.<sup>66</sup>

The decision to deploy private security force outside China's borders carries wider implications for the African continent and the international community. China's continuously increasing role in the African economy is accompanied by a growing number of challenges concerning security policy. At the moment, the increase in military-to-military aid, more effective cooperation, and the provision of private security services could shield Beijing from being forced to forego the principle of non-interference and to engage in a political or even military intervention. The shelf life of China's decade old principle of non-interference, however, is running out.

Dominique Loye, Deputy Director of International Law and Policy at the ICRC, in his keynote address at the Second International Forum on Security and Law, mentioned that:

According to the ICRC's experience, PMSCs can play an important role in providing security in situations in which the State's law enforcement capacity is limited. At the same, we have also witnessed that PMSCs can contribute to or even directly cause humanitarian concerns. In order to ensure that PMSCs strengthen security and do not undermine it, State regulation of these companies is key.<sup>67</sup>

The prerequisites for African states in developing national regulations that reflect the increasing presence of a new wave of PSCs are related to a mix of local necessities and international obligations. The UN and the African Union are actively working on a continental framework for the supervision of private security companies in order to promote cooperation on intelligence sharing and increase the criminal prosecutions' enforcing capabilities.



In this respect, China's role as a new actor in the private market for force in Africa could support the initiative while at the same time it could benefit from good practices stemming from international organizations such as the ICRC and ICoCA. Beijing's state-driven approach, forcing Chinese SOEs to increase their risk management and security capabilities, is fundamental in addressing the various challenges linked with the deployment of PSCs abroad. At the same time, several Chinese national and provincial associations, starting with the China International Contractors Association and China Security Association, are fundamental in providing the needed feedback to Beijing in terms of past and present crisis as well as first hand data reporting including even minor incidents affecting Chinese workers and security personnel overseas.<sup>68</sup>

The best practice, under the ICoCA in Kenya, is represented by the interaction between local African PSCs, international PSCs acting in the mentor/trainer role, and a client that is willing to pay the right price for the provision of high-quality security services. This formula could be a viable way for the Chinese private security sector to operate in Africa. Beijing's top down approach is favorably suited to implement these directives quickly with the support of previously discussed internationally recognized legal frameworks. Led by the state and in close cooperation with the private sector, the entire Chinese security sector is in dire need of reforms. In this respect, national and internationally recognized certifications could be the most efficient starting point to filter out professional operators from the substandard that uniquely rely on low bidding prices. The saying that you get what you pay for is very much alive in the private market for force. ★

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