

Inside Job

Libya's Fuel Smuggling Escalation

November 2025



Table of Contents

Executive Summary	3
Old Scheme, Boosted to Unprecedented Scale	5
Saddam Haftar Consolidates Illegal Fuel Trade in Eastern Libya	11
Haftar's Southwest Grab: A Hub of Convergence	18
The Northwest's Disingenuous Efforts Against Smuggling	21
Russian and Sudanese Forces Receive Haftar-Diverted Fuel	26
Libya's Untouchable Thieves: The Great Fuel Heist Must Not	28
Recommendations	29
Endnotes	32

We are grateful for the support we receive from our donors who have helped make our work possible. To learn more about The Sentry's funders, please visit The Sentry website at www.thesentry.org/about/.



Executive Summary

Fuel smuggling in Libya has escalated into a major national crisis, costing the country about \$6.7 billion per year.¹ Although fuel smuggling has long been one of the North African nation's most persistent illicit activities, a few key Libyan actors—with foreign assistance—have significantly intensified the exploitation of Libya's bloated fuel subsidy program, whose dollar size surged to unprecedented levels from 2022 to 2024. The consequences both within and outside Libya have been numerous, including inflation and the further consolidation of power by the Haftar family in Benghazi and, to a lesser extent, the Dabaiba family in Tripoli, as well as the fact that foreign players—including Russian armed units and Sudan's Rapid Support Forces (RSF)—have benefited from the country's fuel crisis.

Despite steady oil production and favorable market conditions throughout 2023 and most of 2024,^{2, 3} the Central Bank of Libya (CBL) reported a hard currency deficit two years in a row.^{4, 5} The fiscal imbalance stems in large part from Libya's swapping of crude output for fuel imports, with more than half of the imported fuel siphoned off by criminal networks.⁶ Libya's outsized fuel subsidy program reduces the amount of crude that Libya can sell for dollars, depriving the CBL of the hard currency it needs for food, medicine, and other essential imports. By reducing the National Oil Corporation's (NOC) income, Libya's excessive fuel imports have also made paying government salaries more difficult.⁷ Thus, the rise in smuggling activities has contributed to the Libyan dinar's depreciation on the black market and added to consumer price inflation, hurting households across the country.⁸ Plus, as corrupt officials increasingly dominate the fuel subsidy program, legitimate consumers face fuel shortages, risks of electricity outages, and higher prices at the pump.^{9, 10, 11, 12, 13} As a result of the takeover by illicit networks, the fuel subsidy program has become less accessible to those it's meant to serve, exacerbating the economic strain on Libyan households.¹⁴

Smuggling not only deprives the CBL of crucial dollar revenues, it also undermines the integrity of the NOC, whose hydrocarbon exports account for virtually all of Libya's income. Years of gigantic illicit profits derived from the fuel scheme have enabled some corrupt networks not only to organize themselves better but also to expand their influence—across the NOC and other formal institutions alike—often causing lasting damage. Meanwhile, the surge in fuel smuggling means that a larger share of Libya's oil wealth is stolen, hurting the legitimate economy and worsening hardships for ordinary citizens.

Saddam Haftar, the primary force behind the surge in fuel smuggling, has reshaped the sector to be more coordinated. His influence over the NOC, particularly since 2022, as well as his increasingly integrated armed factions and expanded maritime capacity, has industrialized previously scattered activities. The Haftar coalition's armed dominance over most of eastern Libya and significant parts of the south has facilitated larger fuel flows into Mediterranean destinations by sea and sub-Saharan Africa by land, spurring even politically unaligned smuggling networks in Libya's northwest to adapt to the growth. Illicit operators in the northwestern cities Zawiyah and Misrata now channel increased fuel imports southward into Haftar-held areas, from which they are in turn funneled into Chad, Niger, and Sudan. Saddam Haftar's emergence as the sector's foremost leader has helped precipitate the professionalization of smuggling operations nationwide and the strengthening of illicit networks even in areas outside his direct control.

The effects of Libya's fuel crisis stretch beyond its borders. EU states such as Malta and Italy are affected by the infiltration of illegally diverted fuel from Libya into their economies. ¹⁶ Russia benefits in several ways, with Libya's fuel smuggling enabling Moscow's military activities in sub-Saharan Africa. The illicit flow of fuel from southern Libya to Sudan's RSF also facilitates the genocidal war waged in Darfur. Sudan. ^{17, 18}

Despite a series of pledges from Libyan leaders to lift or reform the fuel subsidies, ^{19, 20, 21} the swift growth in smuggling volumes in 2022-2024 would not have been possible without their tacit acceptance. In fact, some of Libya's leaders personally profited from this expanding illicit trade, which has triggered wide-ranging macroeconomic and political implications.

All in all, the 2022-2024 surge in fuel smuggling has cost the Libyan population about \$20 billion—an alarming figure that demands decisive international action. Libyans need support in safeguarding their country's primary revenue source, the NOC, which has been instrumentalized and made fragile by powerful figures—based in Tripoli and Benghazi alike—who lack any legitimate authority over the NOC's internal affairs. These politicians and security leaders who claim to serve the public and fight organized crime have, in fact, acted as the chief architects of Libya's fuel smuggling industry, often with backing from foreign states. Still in office, the same rulers will now likely use their vast ill-gotten wealth to entrench themselves even further. Without robust international intervention to hold culprits responsible, actors within and outside the NOC will continue undermining Libya's economic viability.

Old Scheme, Boosted to Unprecedented Scale*

Initially set up by Colonel Muammar Qadhafi's regime in the early 1970s, Libya's fuel subsidy program was designed to reduce costs for all domestic energy users—from individual consumers to industrial facilities, public services, and commercial operations.²³ It guarantees a sale price of \$0.03 per liter of refined petroleum product, mainly diesel and gasoline, for all buyers.²⁴

Brega Petroleum Marketing Company, the distribution arm of the National Oil Corporation (NOC), supplies subsidized fuel to authorized entities whenever they issue a request. Those recipients include the General Electricity Company of Libya (GECOL); security actors, such as the police and the armed forces, whose fuel consumption is not made public; and four special-status distribution companies — Rahla, Highway Services, Albarda and Golden Sharara. Brega Petroleum's tanker trucks typically transport fuel from maritime ports or domestic refineries to the country's principal storage facilities, such as the one in Sabha. From these depots, tanker trucks belonging to the four major distribution companies deliver the fuel to petrol stations. Brega Petroleum also sells fuel at low prices to some private oil services firms, such as Trust Group Oil Services and Black Gold Oil Services and Manufacturing. St. 36, 37

This system is widely abused, as many recipients inflate their requisitions, with GECOL being among the worst offenders, even though most of its electricity plants burn natural gas rather than liquid fuel.^{38, 39, 40} GECOL did not respond to a request for comment. To meet the demand, the NOC supplies Brega Petroleum in two ways: by operating four modest-sized domestic refineries and by procuring large quantities of foreign-refined fuel from the global market.^{41, 42, 43, 44} Origins of those imports include Russia and, to a lesser extent, Italy, Greece, Cyprus, and Belgium.^{45, 46} Libya's six entry points for foreign product are Zawiyah,⁴⁷ Tripoli,⁴⁸ Misrata,⁴⁹ Ras Lanuf,⁵⁰ Benghazi,⁵¹ and Marsa al-Harriqa,⁵² near Tobruk.⁵³

For many years, the entity responsible for funding such imports was the Central Bank of Libya (CBL), which paid the foreign fuel suppliers in dollars.⁵⁴ This system came to an end in 2021, when the CBL, faced with a surge in fuel import demands that far outstripped earlier allocations, stopped providing dollar funding for all fuel imports. The interruption prompted the NOC to switch to a crude-for-fuel swap mechanism.^{55, 56, 57, 58}

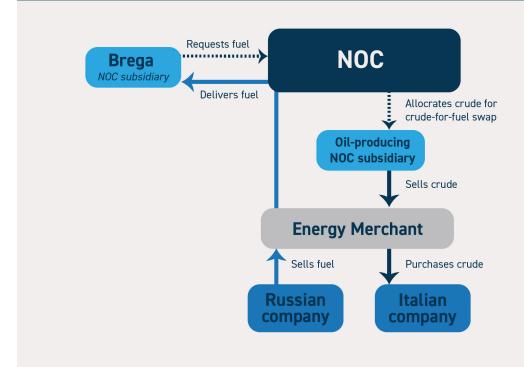
When it enters a swap, the NOC allocates premium-grade crude to a foreign energy merchant in exchange for payment in-kind via refined petroleum products.^{59,60} To make this happen, the foreign energy merchant markets the Libyan crude internationally and, on behalf of the NOC, uses the dollar proceeds to source the refined fuel.⁶¹ While this practice ensures Libya's fuel supply, it also bypasses public reporting. From 2021 through 2024, the NOC kept most of these swaps off the balance sheet, thus eluding an accounting of the outright sale of crude and the outright purchase of fuel.^{62,63}

^{*} Reports by The Sentry are based on interviews, documentary research, and, where relevant, financial forensic analysis. In some cases, sources speak to The Sentry on the condition that their names not be revealed, out of concern for their safety or other potential retaliatory action. The Sentry establishes the authoritativeness and credibility of information derived from those interviews through independent sources, such as expert commentary, financial data, original documentation, and press reports. The Sentry endeavors to contact the persons and entities discussed in its reports and afford them an opportunity to comment and provide further information.

Crude for Fuel



From 2021 to 2024, the NOC bought billions of dollars in refined fuel from abroad through crude-for-fuel swaps. In early 2025, the NOC said it had ended the practice.



Adopting this approach rendered the NOC's fuel subsidy program independent from the CBL, which in turn stopped reporting the costs associated with it in public expense reports.⁶⁴ The net result was a further increase in fuel imports by the NOC, which was able to purchase ever-larger quantities without having to depend on any other authority's willingness to provide dollar funding. Thus, unencumbered by previous financial constraints, the fuel subsidy program's expansion intensified throughout 2022—the year Farhat Benqdara replaced Mustafa Sanallah as chairman of the NOC—ushering in a period of drastic expansion in fuel smuggling activities.^{65, 66, 67} Surging from about 20.4 million liters per day in early 2021 to a peak of more than 41 million liters per day by late 2024, the NOC's fuel imports more than doubled.⁶⁸

In response to a request for comment, the NOC indicated that it is not legally authorized to determine the quantities of imported fuel, pointing instead to the Committee of Major Consumers.⁶⁹ This Committee, it said, consists of GECOL, Misrata's Iron and Steel Company (LISCO), the country's cement factories, and the main fuel distribution companies.⁷⁰ The NOC added that it was committed to providing the quantities specified by all major consumers, a process supervised by the government.⁷¹ The NOC also defended the legitimacy of the fuel allocations going to GECOL, invoking signs of economic recovery and arguing that GECOL maintained uninterrupted services in recent years thanks to the availability of the necessary fuel to operate its electricity plants.⁷² The NOC asserted that declines in its own natural gas output led to increased fuel imports meant for electricity production.⁷³ The NOC provided no numerical data to support its claims. Regarding the NOC's failure to systematically report fuel import costs,

the NOC maintained that those costs do not fall outside the scope of regular public reporting and that all related administrative contracts are subject to oversight by the Libyan Audit Bureau.⁷⁴ The NOC did not share any such reports to support its assertion.

Former NOC Chairman Farhat Benqdara (July 2022 through January 2025), in response to a request for comment, noted that, under his tenure, the NOC remained transparent and proactive in its cooperation with both national institutions and international organizations.⁷⁵ He also indicated that he had submitted a number of proposals to the Council of Ministers and the Supreme Council for Energy Affairs advocating for a comprehensive set of measures to reduce reliance on subsidized diesel in electricity generation.⁷⁶ These suggestions, Benqdara added, included increasing natural gas production, promoting gas and renewable energy for electricity generation, and initiating the gradual removal of fuel subsidies.⁷⁷

Long before the 2021 switch to swaps, Libya's fuel subsidy program enabled smuggling.^{78, 79, 80, 81, 82} By the early 1980s, Libya's fuel was already being smuggled into neighboring countries like Tunisia and Chad.^{83, 84} Such illicit activity was often deliberately overlooked by Qadhafi's regime, which viewed toleration of the practice as a means of placating some peripheral communities engaged in it—such as the Amazigh communities who populate the border area near Tunisia.^{85, 86, 87, 88}

Since the overthrow of Qadhafi in 2011, fuel smuggling in Libya has evolved, undergoing several phases. From 2012 to 2016, post-revolutionary anarchy and state profligacy yielded a spike in smuggling volumes, which then decreased. Later, when the civil war ceased in June 2020, armed groups focused more on illicit activities writ large, including fuel smuggling. This pronounced, deliberate push was made possible through firmer control over strategic parcels of territory, deeper penetration of various public administrations, a stronger presence in the private sector, and more brazen backing from foreign actors. The pivotal moment was when the current Tripoli government took office in March 2021. According to several Libyan officials knowledgeable about these negotiations, the current Tripoli government began its tenure with a firm intention to buy peace by channeling large amounts of public wealth to armed factions capable of disrupting stability—chief among them the Haftar family in eastern Libya.

Amid such arrangements, Libya's incumbent rulers deliberately laid the groundwork for the fuel smuggling surge seen between 2022 and 2024. Kleptocrats and organized crime networks—working along-side corrupt officials who wield influence over state bureaucracy, logistical hubs, distribution points, routes, and border crossings—orchestrated a drastic increase in illegal export of subsidized fuel. ⁹⁹ Destinations include Sudan, Chad, Niger, Tunisia, Albania, Malta, Italy, and Turkey. ^{100, 101, 102, 103} The transportation methods involve various categories of vessels, tanker trucks, and smaller vehicles—even rogue pipelines, depending on the geographical context and specific circumstances of the business model. ^{104, 105, 106} This illegal fuel exportation causes domestic shortages, forcing citizens to pay much higher prices at unofficial outlets, especially in Libya's peripheral areas. ¹⁰⁷



On land, Libya's fuel smuggling networks have grown more interconnected. The northwest sends fuel to Tunisia and to the southwest, which also receives fuel from Benghazi and distributes it to sub-Saharan Africa. The east supplies Egypt and Sudan.

While the NOC often claims to be a victim of fuel smuggling, ¹⁰⁸ it bears immense responsibility. The NOC has inspection rights and managerial privileges over its subsidiary, Brega Petroleum, which itself should investigate the dramatic ballooning of its distribution volumes. ¹⁰⁹ Yet there is no indication that the NOC's leadership scrutinized the inner workings of Brega Petroleum in 2022–2024.

While both Brega Petroleum and the NOC sometimes imply in public comments that legitimate and illegitimate demands are indistinguishable, ¹¹⁰, ¹¹¹ former NOC officials interviewed by The Sentry disagree. One of them pointed out that the Kufrah area's small population cannot justify the multimillion-liter daily fuel consumption associated with that geographic zone. ¹¹², ¹¹³, ¹¹⁴

Brega Petroleum, the NOC's wholly owned subsidiary, did not respond to a request for comment. The NOC, in its response, denied The Sentry's findings and stated that it held documented and legally substantiated responses that refute such findings. The NOC did not provide any such documentation to The Sentry. The NOC asserted that Brega Petroleum has fulfilled its duties in accordance with its legal mandate. Brega Petroleum, according to the NOC, operates through a board of directors and sells the entire fuel quantities to the designated beneficiaries. To Once the sale is completed, the NOC said, both ownership of the fuel and legal responsibility are transferred to the receiving parties, which include GECOL, the distribution companies, and strategic factories. Separately, former NOC chairman Farhat Bengdara told The Sentry that combating fuel smuggling did not fall within the NOC's jurisdiction, but rather within that of the government, security authorities, and military institutions. The determination of national fuel demand, Bengdara added, was a government responsibility.

This and many other examples illustrate Libyan decision makers' evasiveness and refusal to take accountability. As early as March 2021, then-incoming Prime Minister Abdelhamid Dabaiba of the UN-recognized Government of National Unity vowed to reform Libya's fuel subsidy program—but he did nothing. Dabaiba made similar empty promises in January 2024 about a profound overhaul of the country's fuel subsidy program. In August 2024, Dabaiba's government again appeared as though it might act decisively against fuel smuggling as he suspended Fuad Belrahim, the head of Brega Petroleum; 122, 123, 124, 125 three weeks later, he backpedaled and reinstated Belrahim. 126, 127 Throughout all of this, the Haftar coalition has been consolidating its power across eastern and southern Libya, acquiring greater control over the fuel economy. The Government of National Unity did not respond to a request for comment.

A \$6.7 Billion per Year Issue

Independent maritime data service Kpler indicates that in 2024, Libya imported an average of about 234,000 barrels of fuel per day, equating to roughly 37.2 million liters daily. ¹²⁸ In addition to the imported fuel, another 13.8 million liters a day is produced domestically. ^{129, 130}

Electricity generation in Libya, which relies on natural gas, crude oil, and fuel, requires about 5.8 million liters of fuel each day. $^{131,\ 132,\ 133}$ Beyond electricity generation, heavy industry, and transport activities—such as manufacturing, steel plants, agriculture, maritime, and aviation—likely consume 2.4 million liters per day. $^{134,\ 135}$

Aside from these categories, Libya has about 3.5 million motor vehicles, ^{136, 137} which consume roughly 15.7 million liters per day, assuming that each vehicle travels 20,000 kilometers per year on average. ^{138, 139}

All in all, the combined fuel consumption for electricity generation (5.8 million liters), other industrial activities (2.4 million liters), and motor vehicles (15.7 million liters) stands at around 23.9 million liters per day. Given the availability of roughly 50.9 million liters per day, this leaves 27 million liters per day likely diverted.

The fuel imports of 37.2 million liters per day cost the NOC \$9.46 billion worth of crude oil per year, which works out to be \$0.70 per liter. As for the fuel produced



domestically by the NOC, its fair valuation is \$0.62 per liter, based on average Mediterranean market prices in 2024.¹⁴¹ From these elements, one can deduce that approximately \$6.7 billion worth of fuel was smuggled out of the country in 2024.^{142, 143} This means that the national wealth presently lost to fuel smuggling would be sufficient for Libya to more than triple its spending on both healthcare and education.^{144, 145}

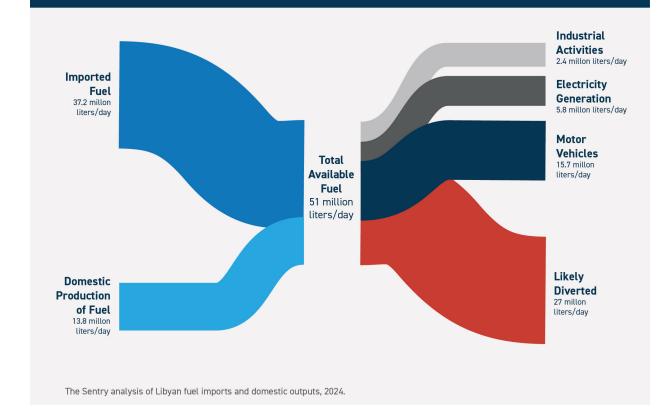
In fact, the cost to the Libyan population is even higher, given that many legitimate consumers in peripheral areas must pay inflated prices for what should be subsidized fuel—markups not reflected in any official statistics. Plus, even in cases where legitimate consumers do access the subsidized fuel and pay 0.15 dinars (\$0.03) per liter, most of the collected payments end up unaccounted for, leaving the state with virtually no revenue from fuel sales. 146, 147

In response to a request for comment, the NOC denied The Sentry's estimate of diverted fuel, adding that the NOC is not responsible for managing land or sea ports.¹⁴⁸

Fuel Diversion Outstrips Legitimate Use in Libya



Brega Petroleum's mandate is to supply fuel to legitimate buyers across Libya, but most of its deliveries are diverted, pushing total 2024 consumption to 51 million liters per day—far above the 13.8 million liters produced daily by Libya's refineries. To feed this dysfunctional system, the NOC must import large quantities of diesel and gasoline.



Saddam Haftar Consolidates Illegal Fuel Trade in Eastern Libya

Saddam Haftar and other actors aligned with the Libyan Arab Armed Forces (LAAF) utilize their territorial control to tax flows of fuel smuggled by others and to transport their own illicit cargo, thereby capturing revenue from the large-scale diversion of subsidized fuel. The Haftar coalition also cultivates select tribal groups, further solidifying control over smuggling networks in eastern Libya, which since 2021 has displaced western Libya as the country's epicenter of the illegal fuel trade. 149, 150, 151, 152, 153

Driving this shift is Saddam Haftar, operating through the LAAF, his father Field Marshal Khalifa Haftar's armed coalition. The young lieutenant general has reshaped parts of the NOC and other state organs to maximize his sway over fuel smuggling and other illicit activities. This strategy has enabled the Haftar coalition to grow a fuel smuggling network within the NOC and other legitimate institutions, blurring the lines between legitimate and illicit activities. As Saddam Haftar's Ground Forces division has strengthened, it has prioritized illicit profits, reducing the availability of subsidized fuel outside major eastern cities.

For years, northwestern Libya had been the epicenter for fuel smuggling, where contending armed factions alternated between clashes and tense cohabitation. This lack of unity resulted in smaller-scale, less efficient operations. After Libya's civil war ended in June 2020, the Haftar coalition concentrated on the eastern and southern regions, solidifying its hegemony there in ways unmatched in the more fragmented west.

The result: illicit fuel volumes in eastern Libya surged, hurting the country's economy. Beyond immediate profits, Saddam Haftar's big push in fuel smuggling since 2021 has yielded a self-reinforcing cycle that bolsters his sway on almost all fronts.

Guardians or Gangsters? The Inherent Duality of the Haftars' LAAF

Within the territories under its purview, the LAAF wields intimidation and brute force to suppress any form of dissent and intrude upon nearly every aspect of public life, frequently subjugating or overriding the authority of senior civilian decision-makers within state organs. 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169

Though it portrays itself as a national military and invokes security, the LAAF is not a regular army. 170, 171 From its inception, the LAAF has always defied Tripoli's authority — no matter which government claimed legitimacy — and has engaged in various illegal enterprises, including banking abuses. 172, 173, 174, 175, 176 In 2014, this fledgling force began absorbing more militias from northeastern Libya and recruiting more remnants of Qadhafi's army, growing in size but only sporadically attempting to tighten command structures. 177 Moreover, since seizing key oilfields and terminals between 2016 and 2019, 178, 179 the LAAF has repeatedly used the threat of oil blockades to pressure Tripoli. 180, 181, 182, 183 Thanks to foreign support from Russia, the UAE, Belarus, and other states, the LAAF has persistently bolstered its military capabilities in violation of the UN arms embargo. 184, 185, 186, 187, 188, 189

Personal loyalties often overshadow any clear chain of command. 190 This



ambivalence, combined with the Haftars' disregard for the law and their commitment to eliminating checks and balances, has prevented their armed coalition from becoming a transparent, accountable institution. While the LAAF undergoes periodic phases of partial consolidation, it does not evolve into a genuine national military. Instead, it restructures in ways that concentrate ultimate authority in the Haftar family's hands, with illicit activities remaining at the LAAF's core. The faction has imposed itself in eastern and southern Libya as an inescapable overseer — and tax collector — of organized crime, including various forms of smuggling, trafficking, and economic fraud. 191, 192, 193, 194, 195, 196, 197, 198, 199 LAAF units themselves have also become major participants in some of these illicit activities, mainly through Saddam Haftar's growing political sway, armed deterrence, and territorial dominance. 200

One telling example was the way the Haftar family disbanded a major component of its own coalition: Brigade 128. From 2016 until early 2025, Brigade 128 was a major unit in the LAAF, extending the Haftar family's influence into southwestern Libya. 201, 202, 203 Under the leadership of Hassan Zadma and his brothers, Brigade 128 controlled illicit trade routes, cultivated tribal arrangements, and projected military power from Sirte in the north to the Ghat area in the southwest, as well as in Ajdabiya and Kufrah in the east. 204, 205

Despite operating for years under the LAAF banner, the Zadma brothers bypassed Saddam Haftar's official channels by maintaining direct connections with foreign states — mainly the UAE and Russia — and kept entire chunks of their illicit activities, including fuel smuggling profits, hidden from him.^{206, 207,} ^{208, 209} Their reluctance to submit to Saddam Haftar seems to have prompted him to view them as a threat. In late 2024, he began dissolving Brigade 128, confiscating its heavy weapons, ousting its senior commanders, and placing some of its subunits under a new structure that answers directly to him. 210, 211, ²¹² In February 2025, Saddam Haftar ordered Battalion 87 and other loyal units to conduct an attack on elements affiliated with Brigade 128 in the southern city of Qatrun.²¹³ The move, which caused the deaths of about 30 fighters in Qatrun in February 2025, further consolidated Saddam Haftar's stature within the LAAF, removed potential rivals, and enabled him to somewhat reduce the overall volume of illicit activities under the LAAF at a time when doing so was politically judicious. 214 Plus, for the sake of its law-and-order narrative, the Haftar family portrayed its dismantling of Brigade 128 in Qatrun as an anti-crime operation. 215, 216, 217 A few weeks later, in April 2025, the flow of smuggled fuel into northern Chad resumed, returning to nearly the same levels as when Brigade 128 controlled the area.²¹⁸

To confront Brigade 128, Saddam had to deploy hundreds of armored vehicles and thousands of fighters from northeastern Libya into central and southwestern Libya. Such a buildup, which required significant time and resources, would not have been feasible a few years earlier, when he relied on Brigade 128 to project power in the southwest and lacked the manpower and materiel to replace it in the deep south. This episode illustrates the ongoing process by which the LAAF, and particularly Saddam Haftar's Ground Forces division within it, continually seeks to consolidate its internal structure and increase the personal power of Haftar family members. It also shows how, over time, the Haftar family tightens its control over the illicit economy — including fuel smuggling — throughout eastern and southern Libya.

The LAAF did not respond to a request for comment.



Maritime smuggling operations

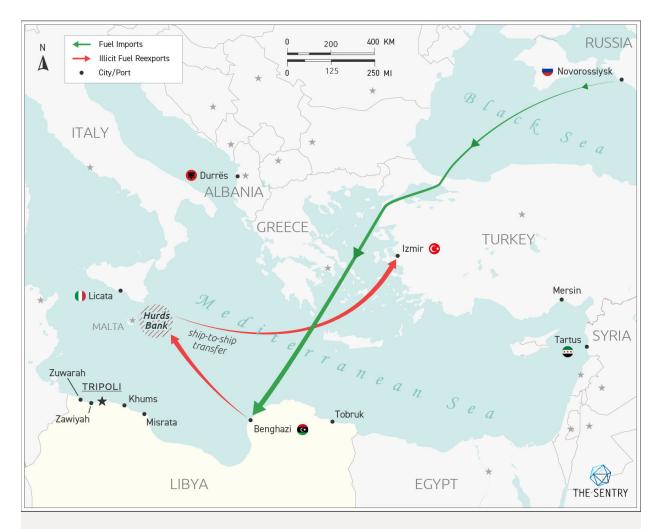
Saddam Haftar wields extensive authority over northeastern Libya, both on land and at sea. His sway encompasses ports, roads, storage facilities, customs, border police, key parts of the NOC and Brega Petroleum, and maritime operations ranging from authorizing ships to leave port to issuing official documents via administrators under his influence. As a result, Saddam Haftar controls almost all of eastern Libya's maritime smuggling, which forms a major component of the illicit fuel trade in the eastern province.²²¹

Unlike overland smuggling, which cannot easily move millions of liters at once, maritime smuggling involves entire vessels diverting massive shipments of subsidized fuel—often several million liters at a time.²²² It also involves processes designed to obscure the fuel's origin and destination to render detection and interception challenging for authorities abroad.²²³ These traits make maritime reexports the most efficient means of stealing fuel, responsible for an enormous chunk of the fuel diverted daily.^{224, 225}

Two main methods of diverting imported fuel by sea have flourished, especially since 2022: simple reexport and indirect reexport.

In simple reexport operations, fuel that was imported is subsequently loaded onto a separate vessel—often in Benghazi's old harbor or, more seldom, in Tobruk, about 440 kilometers further east—and then shipped directly to its final destination, such as Turkey.^{226, 227} The Queen Majeda incident is a prime example. Local authorities in Albania intercepted this ship in September 2022, just days after it had departed from Benghazi's old harbor carrying more than \$2 million in foreign-refined heavy marine fuel that was diverted to Albania.²²⁸

In indirect reexport, a vessel carrying the imported fuel departs from a Libyan port and sails to a location in the Mediterranean Sea, such as Hurds Bank just outside Maltese territorial waters, where the fuel is transferred to another vessel in a ship-to-ship transfer. Although this extra step adds cost, it helps conceal the connection to Libya. Consequently, the receiving vessel can reach its final destination with no trace that the product originated in Libya's subsidized fuel program. One well-documented example is the Aristo. In November 2023, Italian authorities intercepted the vessel near Licata, Sicily, as it was about to perform a ship-to-ship transfer.²²⁹ The Aristo, which had sailed from eastern Libya, was carrying about 670,000 liters of diesel picked up at Benghazi's old harbor.²³⁰ If the ship-to-ship transfer had occurred, the product would likely have been passed off as legitimate through a broker-arranged sale to Italian oil services company Saipem.^{231, 232}



Every day, millions of liters of imported fuel are illegally reexported via maritime routes to Malta, Albania, Italy, Turkey, and beyond. While some of that activity takes place in western Libya, it is far more extensive in the east—particularly through ship-to-ship transfers. In a typical example, the NOC legally imports fuel into Benghazi's modern port, but illicit actors load it onto a vessel at the city's old harbor. At sea, the fuel is transferred to another ship, which then delivers it to its final destination.

In both methods, foreign-refined fuel is delivered at a commercial port, stored in Brega Petroleum's local depot, and then moved by tanker trucks onto vessels for reexport. In the Benghazi area, Ali al-Mashay serves as Saddam Haftar's most trusted subordinate when it comes to overseeing illicit fuel transfers, from the moment imported fuel arrives at Benghazi's new commercial port until it is loaded onto a different vessel at the old harbor nearby. ^{233, 234, 235, 236, 237, 238} In this context, the use of tankers that can carry up to 50 million liters of liquid fuel makes it easier to illegally export vast quantities of fuel from the Benghazi area. ²³⁹ A Benghazi-based security official told The Sentry that no cargo—whether narcotics, migrants, fuel, or any other items—can pass through the ports of Benghazi without Ali al-Mashay's personal approval. ²⁴⁰

An even more brazen practice involves diverting the imported fuel at sea before it even reaches Libyan shores, transferring cargo from one ship to another, either within Libyan territorial waters or in international waters.^{241,242}

Outside Libya's territorial waters, maritime smugglers often use fraudulent paperwork for two reasons. Fraudulent paperwork helps deceive local authorities at the final destination, and carrying ostensibly valid documents helps evade international scrutiny under UN Security Council resolutions, which condemn unauthorized hydrocarbon exports.²⁴³ In this context, international actors such as the EU's Operation IRINI—tasked with upholding UN Security Council resolutions on Libya—can inspect fuel cargos.²⁴⁴ In addition to using fraudulent documentation, ships involved in smuggling often disable their automatic identification system (AIS) transponder, which allows public location tracking, to avoid maritime surveillance.²⁴⁵

Although these maritime methods are employed along Libya's western shores, corrupt actors on the country's eastern shores operate at a far larger scale. The stark disparity in volumes stolen arises from western Libya's more fractured security landscape, which makes it difficult for networks to secure the complicity and acquiescence of all other factions and bureaucrats—and thus keeps volumes much lower.^{246, 247}

On the administrative front, the active involvement and complicity of senior officials within Brega Petroleum, as well as the NOC's top leadership, is crucial for the large-scale diversion of fuel.^{248, 249} It ensures that the NOC remains publicly silent while its multimillion-dollar fuel cargos disappear at sea, representing a steady flow of fuel into illicit operations.

Such a level of coordination and corruption underscores the entrenched nature of the fuel smuggling sector and the significant obstacles in combating diversion schemes. In May 2022, the NOC chairman at the time alerted Libya's attorney general about an unprecedented surge in abnormal fuel exports from Benghazi. He lost his job two months after issuing this alert.^{250, 251} Another stark example is that of Faraj al-Jaedi who, in June 2023, was promoted by the NOC chairman from the operations and human resources director of Brega Petroleum to its board member responsible for finance. ^{252, 253, 254, 255} According to a senior Libyan technocrat familiar with Brega Petroleum's inner workings, Jaedi is close to Saddam Haftar. ²⁵⁶ Jaedi was Brega Petroleum's operations director when the Queen Majeda shipment to Albania occurred in September 2022, and the UN-recognized Libyan government vouched for the legality of the shipping documents that Brega Petroleum had issued. ^{257, 258} These facts strongly suggest that Jaedi actively helped divert the cargo.

Brega Petroleum, the NOC's wholly owned subsidiary, did not respond to a request for comment. The NOC, in its response to The Sentry's request for comment, denied that Jaedi played any role in the Queen Majeda incident and added that he has no relationship with Saddam Haftar.²⁵⁹ The NOC also asserted that none of its employees nor those of Brega Petroleum had been summoned by the attorney general in the context of fuel smuggling.²⁶⁰ Furthermore, the NOC said it provided relevant authorities with official reports pertaining to fuel smuggling cases and it cooperated with the United Nations Panel of Experts.²⁶¹

On the issue of large-scale fuel smuggling via maritime routes, the NOC told The Sentry that no smuggling incidents have been recorded from oil ports under its authority.²⁶² It added that the NOC controls



only oil ports and that the old Benghazi harbor is not an oil port and is therefore not under the control of the NOC or any of its subsidiaries.²⁶³ Reached separately by The Sentry, former NOC Chairman Farhat Benqdara noted that maritime smuggling of fuel in Libya occurred not at oil terminals but at commercial ports, where the NOC and its subsidiaries had no authority.²⁶⁴

Land-based smuggling operations

While maritime smuggling constitutes a major profit center for the Haftar camp, the coalition also oversees land-based routes for the transport of fuel, encompassing both legitimate fuel deliveries and fuel funneled into the parallel market, whether domestic or foreign.

Fuel exiting northeastern Libya departs from the Ras al-Manqar depot, a strategic storage facility east of Benghazi. From there, official tanker trucks travel south through Ajdabiya—a critical chokepoint—before branching onto three main roads. The first leads to Sirte, then continues to Jufrah and into the southwestern province. The second, the Ajdabiya–Kufrah corridor, is the primary artery for southeast Libya. The third follows makeshift tracks via Zillah and Umm al-Aranib, eventually reaching further south. The bulk of the fuel heading for the southwestern province passes through Zillah, with Umm al-Aranib serving as a major hub. The



A large portion of the foreign-refined fuel delivered to Benghazi's port is kept at a storage facility located in the northern outskirts of the city.

Photo: Maxar Technologies.

While all of these passages are under the control of Saddam Haftar-aligned brigades, tribal affiliations underpin fuel smuggling operations in logistically crucial areas. The Zway tribe, for example, dominates much of the Ajdabiya-Kufrah corridor through its ownership and operation of numerous petrol stations, the primary points of sale and diversion.^{271, 272} In leveraging its connections with the Haftar family, the Zway tribe has expanded its market control since 2016, creating a profitable environment for smuggling, with residents in Kufrah often paying over 6 dinars (\$1.20) per liter—40 times the official subsidized rate.^{273, 274}

Shepherding Tanks: Haftar's Double-Dip in Libya's Fuel Game

The LAAF's military might—which guarantees territorial dominance across eastern and southern Libya, including over ports and major roads, and the suppression of socio-political dissent—combined with its



covert influence over the NOC and its subsidiary Brega Petroleum has enabled the Haftar coalition to build a comprehensive system of control over the itinerary of subsidized fuel. Through this multi-faceted approach, rooted in force and bureaucracy, the Haftar family exploits the state's imprimatur to divert large volumes of fuel from the subsidy program.

On the surface, LAAF brigades act as legitimate authorities, supervising official fuel trucks operated by Brega Petroleum and the country's four authorized distributors.²⁷⁵ However, beneath this legal function, the LAAF operates a profitable scheme in two ways. First, rather than preventing fuel smuggling, it profits by allowing small-scale smugglers to operate and imposing levies on them at LAAF checkpoints.^{276, 277, 278} This taxation by the LAAF forces smugglers to raise their prices as they move fuel away from urban areas like Benghazi to peripheral territories in central and southern Libya.

Second, LAAF brigades manipulate the official fuel distribution by restricting how much subsidized fuel legitimate petrol stations can sell.^{279, 280} Thanks to these restrictions, the LAAF can divert official fuel trucks southward, selling the product at much higher prices to non-Libyan networks south of the border. This system, while appearing sound and legitimate on paper, creates chronic shortages in reality. When official petrol stations run low on fuel, local dealers can charge higher prices for their supplies.

Corrupt Libyan officials profit from large-scale fuel smuggling into sub-Saharan Africa; for that reason, they maximize transfers from northern to southern Libya for export. To justify these massive shipments, they inflate reported deliveries at southern petrol stations, creating the illusion of normal domestic demand. In reality, measures taken by the LAAF to ration fuel purchases by citizens and restrict petrol station opening hours severely limit the local population's ability to buy subsidized fuel. This curtailment of legitimate sales generates surpluses, which are easily diverted into illicit channels, going primarily to neighboring countries. As a result, southern Libya endures chronic shortages, which create an opportunity for small-scale operators who transport additional fuel from north to south outside official channels, pay informal taxes at checkpoints, and sell at higher prices to cover costs.^{281, 282, 283} As the LAAF and LAAF-affiliated officials oversee bulk exports, they also divert some of the fuel to rogue petrol stations at home, where ordinary Libyans pay an outsized premium in the absence of alternatives.^{284, 285} In southwestern Libya, much of this management of the fuel economy is performed by the LAAF's military police.^{286, 287}

The LAAF profits from this corrupt fuel trade in two ways: by taxing small-scale smugglers and through its own large-scale smuggling operations. In this way, the Haftar coalition exploits Libya's fuel subsidy program while maintaining the appearance of legal authority. It even keeps the option of periodically dismantling small-scale smuggling networks for the sake of its anti-crime image.²⁸⁸

Haftar's Southwest Grab: A Hub of Convergence

Armed groups affiliated with Field Marshal Khalifa Haftar, mainly Saddam Haftar's forces, exploit their control over strategic checkpoints and petrol stations across southwest Libya. They oversee the diversion of subsidized fuel into a parallel market that extends into the neighboring countries of Niger, Chad, and Sudan.

Imperfect rule over greater Sabha

Since 2021, Saddam Haftar has been increasing his control over the security sector in the Sabha area and, with it, the fuel smuggling operations in southwestern Libya.

Prior to that time, Sabha, a city of 130,000 and southwestern Libya's largest,²⁸⁹ harbored a disparate array of armed actors: some nominally pro-Haftar yet operating with autonomy from Benghazi's general command, others openly hostile to the Haftar family's dominance.²⁹⁰ This fractured makeup, rife with tension and petty criminality, made Sabha difficult to govern.²⁹¹ Various armed groups stubbornly guarded their illicit revenues and resisted the Haftar family's attempts to assert supremacy in the city.²⁹²

Following the seizure by rival forces of a large cannabis shipment in spring 2021,²⁹³ Saddam Haftar stepped up his military assertiveness, dispatching personnel, armed vehicles, and equipment to the Sabha area from Benghazi and Ajdabiya.^{294, 295, 296, 297} He used his main armed force, Brigade Tareq bin Ziyad, led by Brak al-Shatti native Omar Mrajae al-Maqarhi,^{298, 299, 300} to either subdue or co-opt local groups.³⁰¹ On the economic front, Saddam also used the National Development Apparatus, a reconstruction agency under his tacit control, to oversee infrastructure projects, agricultural initiatives, and other endeavors.^{302, 303} Until it was dismantled in early 2025, the LAAF's Brigade 128 also played a major role in projecting the Haftars' influence in the southwestern province, notably in Qatrun, Awbari, and Ghat.^{304, 305}

As the LAAF has strengthened its security presence in southwestern Libya, it has come to control almost all fuel flows entering Libya's southwest province, whether from the northwestern or northeastern coast. This consolidation has enabled the LAAF to dominate most fuel smuggling operations in the southwestern province. 306, 307 To further capitalize on this control and increase the amount of fuel diverted into the parallel market, the LAAF issues QR codes, which limit each civilian's vehicle to one tank refill every five days, and it restricts petrol stations' opening hours. 308 Thanks to this system, most tanker trucks appear to be delivering their cargo at genuine petrol stations, while legitimate buyers are indirectly prevented by the LAAF from accessing fuel from official outlets. 309 As a result, most of the fuel intended for legal sale is in fact diverted to southwestern Libya's parallel market at inflated prices. 310



The 101st Infantry Battalion, a unit of the LAAF's Brigade Tareq bin Ziyad, suppresses popular activism and perceived opposition across southwestern Libya. Known in this region as the long arm of Saddam Haftar, the battalion enforced a QR code system that allowed each civilian car owner to buy subsidized fuel only once every five days—one of several mechanisms that the LAAF has used to control both the legal distribution and illicit diversion of fuel. As fuel shortages grew more acute and public complaints mounted across southwestern Libya, Saddam Haftar eliminated the QR code system in the southern region in October 2025, a decision likely motivated by a desire to restore his deteriorating popular standing.

Photos: The Sentry.

The Umm al-Aranib municipality serves as the main transit point for fuel heading south through the greater Sabha area.^{311,312} In the town and its surroundings, checkpoints manned by LAAF units regulate the flow of millions of liters of fuel each day, fuel that travels along both official roads and sand tracks toward northern Niger and Kouri Bougoudi in northwestern Chad, a bustling gold-mining hub.³¹³ Once near the border, the fuel typically sells for \$1.20 to \$2.40 per liter, and sometimes for even more.³¹⁴ Most of the profit from this wide margin goes to the LAAF.

The Umm al-Aranib area, along with locations further south such as the strategic city of Qatrun near Chad's border, is dominated by the Tubu community. In recent years—especially since 2020—the Haftar family has shifted from an openly hostile stance to more pragmatic arrangements with this non-Arab community. Some of the Tubu's local armed units have joined Khaled Haftar's Security Units division within the LAAF, while others operate under a protection economy logic. In exchange for allowing fuel convoys to pass safely through their territory, Tubu-majority militias capture a share of the sizable profits that the LAAF derives from facilitating the sale of Libya's subsidized fuel at much higher prices abroad. Aside from Niger and Chad, some fuel leaving the greater Sabha area heads for Darfur via Chad's northeastern corner, traveling yet another corridor protected by local militias working closely with the LAAF.





The LAAF network profits from moving Libya's subsidized fuel to the southern borders in two main ways. First, its brigades impose taxes at checkpoints along north-south routes, collecting fees from small-scale smugglers, including large makeshift trucks driven by Tubu actors. Second, the LAAF diverts officially distributed fuel; by restricting operating hours at legitimate stations, it ensures that surpluses are rerouted south for illicit gain. (Left) Tubu smugglers driving a non-official fuel truck across the southern border. (Right) Under Haftar coalition protection, official fuel trucks head south.

Photos: Ibrahim Brakos, TikTok (left); Mohamed Mahmoud, TikTok (right).

The Northwest's Disingenuous Efforts Against Smuggling

In addition to illicit maritime exports, northwestern Libya sends large volumes of fuel from the coast to the southwest, with a significant portion of fuel handled by Saddam Haftar's brigades in charge of the southwest province. Haftar's forces and other LAAF brigades then pass those deliveries of fuel into Niger, Chad, and Sudan, capturing a profit in the process. Some of the northwestern Libya actors engaging in the illegal trade, such as Brigade 111, are directly linked to Prime Minister Abdelhamid Dabaiba, who has taken no genuine action to curtail their activities.^{326, 327}

The northwestern quadrant of Libya, the most diverse province of Libya and home to more than two thirds of the country's population, ^{328, 329} features a deeply ingrained web of smuggling routes linking it to Tunisia, southwestern Libya, and northern Mediterranean countries, including EU member states Malta and Italy. Faced with a reality in which distinct groups control their own territories and revenue streams through well-entrenched networks with deep social roots, Dabaiba and his government have been reluctant to engage in protracted confrontations in the northwestern cities of Zawiyah and Zuwarah. Along the coast west of Tripoli, Dabaiba has disrupted smuggling networks on several occasions but has consistently backed off before open conflict. ^{330, 331} Along the coast east of Tripoli, an area that includes Zliten, Khums, Misrata, and Abu Qrain, where local Dabaiba allies are strong, ever fewer measures have been taken against smuggling. In fact, in Misrata and its surroundings, the attitude of the Tripoli government is best described as active complicity.

Northwestern Libya's fuel smuggling operations differ from those overseen by the LAAF in the east and south. In the northwest, no single faction possesses the capacity to impose itself as a near-hegemon—unlike in the east and south, where the Haftar family dominates. Leveraging their quasi-monopoly on the use of force, the Haftars devote substantial resources to protecting, regulating, and overseeing both legitimate and illicit fuel supply chains across the vast territories under their purview. In contrast, the area stretching from Tripoli's western outskirts to the Tunisian border is home to multiple rival armed factions. 332, 333, 334, 335 Yet, despite the absence of a dominant party capable of policing the area, these actors essentially cooperate to maintain revenue streams from illicit activities. This seemingly paradoxical cohabitation among rival groups underlines a classic protection economy model in which smuggling thrives despite tribal differences and socio-political enmities. 336, 337

Zawiyah: No Cop on the Beat

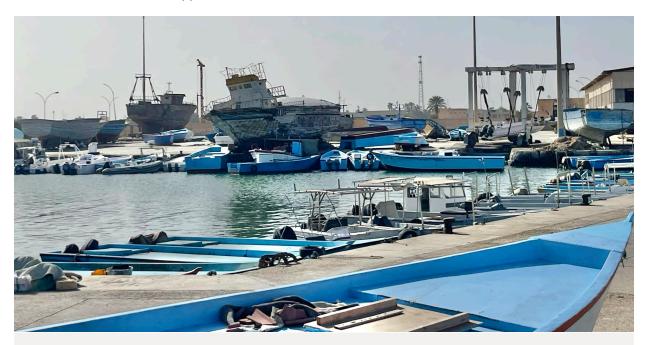
When it comes to fuel, Zawiyah—a fractious tribal city of around 250,000 inhabitants located about 45 kilometers west of the capital—serves as the main distribution hub for both the surrounding area and more distant parts of the country. 338, 339, 340 Inaugurated in 1974, the city's energy complex houses a large refinery and, more significantly, a maritime terminal that receives more than a billion dollars' worth of imported fuel each year. 341, 342

Since 2013, a local armed group leader named Mohammed Koshlaf has exercised de facto control over the Zawiyah energy complex, even obtaining official recognition as head of a Petroleum Facilities Guard unit under Libya's Defense Ministry. Despite being under international sanctions since 2018 for human smuggling, Koshlaf has, without interruption, maintained a tight grip on the inner workings of this strategic site. Thanks to his position, Koshlaf maximizes the throughput of subsidized fuel by sell-

ing it at prices above the official rate, capturing a modest margin that is multiplied by large volumes.³⁴⁷ In practical terms, he delegates most of the distribution logistics and related security problems to an array of smaller smugglers, as well as to private distribution companies willing to participate in the illicit fuel market under rules largely established by Koshlaf and his associates.

Although official records list roughly 750 petrol stations between western Tripoli and the Tunisian border, only around 300 can be physically verified, and of those, fewer than 200 are operational.³⁴⁸ In other words, the vast majority of these stations exist solely on paper; they provide a veneer of legitimacy to justify much larger allocations of subsidized fuel by Brega Petroleum for so-called "local" consumption.³⁴⁹ From an accounting perspective, Brega Petroleum appears as though it is supplying legitimate outlets, when in reality, most of the fuel leaving Zawiyah's energy complex is diverted to black markets rather than reaching bona fide pumps.

From Zawiyah's refinery, some smugglers move fuel westward, primarily to the coastal city of Zuwarah, an Amazigh municipality near the Tunisian border.³⁵⁰ In Zuwarah, actors connected to the city's military council export the diverted fuel by land or load it onto vessels, which typically carry between 400,000 and 750,000 liters, to be shipped toward the northern Mediterranean.^{351,352}



In the mid-2010s, Zuwarah—a coastal city near the Tunisian border—served as a major hub for reexporting subsidized fuel by land and sea. In 2023, an incident involving a ship called Serdar revealed that the city's seaport was still being used for illegal fuel exports. Despite security changes at the Ras Jdir border crossing in 2024, local sources told The Sentry that smuggling through Zuwarah continues, albeit at a lower rate than before.

Photo: The Sentry.

Other actors transport fuel from Zawiyah's energy complex into southwestern Libya—an inland journey that is complicated by fragmented territories and communities that are socially or politically opposed to one another.³⁵³ As a result, truck drivers sometimes must hand off their cargo mid-route if they belong to the "wrong" community for a particular stretch of territory, entrusting it to another driver for the next section.³⁵⁴ Every checkpoint requires payment to the militia or authority dominating that pocket of land.³⁵⁵ These additional costs accumulate, pushing the final sale price higher by the time the fuel reaches southwestern Libya.^{356, 357} Plus, drivers receive an extra bonus when the requested itinerary involves a clear deviation from official channels.^{358, 359}

Compared to makeshift transporters, the four authorized distribution companies enjoy added protection for their trucks, making their official convoys somewhat less vulnerable to extortion and checkpoint fees as they pass through rival-held zones.³⁶⁰

Misrata Joint Force: The PM's protégé

Misrata, a wealthy merchant city endowed with a major port, a free trade zone, and a vital fuel entry point, has long ensured the stable and sufficient distribution of fuel to itself and to neighboring cities such as Zliten and Khums.^{361, 362, 363} This stability has traditionally prevented major fuel shortages or disruptions, creating an environment relatively free from fuel smuggling networks.^{364, 365}

The situation worsened in 2021 when the Joint Force, a local brigade that had participated in Misrata's 2016 war on the Islamic State in nearby Sirte, aligned itself with the newly appointed prime minister.^{366, 367, 368} When Dabaiba assumed office in March 2021, he struck a deal with Joint Force leader Omar Bughdada, providing the armed group with access to Defense Ministry funds, equipment, and recognition.³⁶⁹ Empowered by its new status, the Joint Force assumed key security responsibilities in Tripoli, including guarding significant state facilities.^{370, 371}

The alliance between Dabaiba and the Joint Force enabled the brigade to assert control over parts of Misrata's airport and maritime port. 372, 373 Under the implicit protection of Dabaiba, the brigade expanded its involvement in illicit activities, including fuel smuggling. 374, 375, 376, 377

Joint Force smuggling ops

The Joint Force and the smugglers that it protects acquire fuel from specific petrol stations near Misrata. The Joint Force network also purchases fuel from petrol stations in neighboring cities like Zliten, Khums, and Tawergha. To move this fuel, Joint Force members, often serving as fuel truck drivers, use their military identification to bypass checkpoints. The Joint Force members is a fuel truck drivers, use their military identification to bypass checkpoints.



Misrata's fuel depot, located just south of the commercial port and connected to the sea by an underground pipeline, is one of the largest in Libya. From there, the product is transported by trucks to municipalities in the immediate vicinity, as well as to towns and cities in southwestern Libya. Smuggling networks tap into this transport network to move fuel into sub-Saharan African markets, such as Chad and Niger.

Photo: The Sentry.

The Joint Force runs fuel smuggling operations through the Misrata Free Trade Zone and the port of Khums using several tactics: manipulating shipping documents, using hidden tank capacity, concealing fuel in regular cargo containers, and conducting nighttime offshore transfers between large and small vessels. Their control over the free trade zone enables them to manipulate documents to mask these activities. 382, 383, 384, 385

While fuel is officially documented for distribution to Zliten, Khums, and Tawergha, the Joint Force diverts much of it via tanker trucks to the Jufrah area through Abu Qrain and, to a lesser extent, to Shwayref via Bani Walid. 386, 387 Once in these areas, the product is transferred further south by Haftar-aligned actors, including through official distribution networks. 388

Collaboration with Haftar's armed coalition, particularly in the Shwayref area, is a critical element in the transfer of fuel from Misrata to the south. However, the fluctuating state of relations between actors affects the fluidity and volume of fuel smuggling operations. When relations are strained, coordination weakens, leading to disruptions in these illicit activities.

An aura of legitimacy

Separate from fuel, the Joint Force has been suspected of facilitating the transit of illicit gold from sub-Saharan Africa through Misrata to destinations abroad, mainly Turkey, 389 as well as permitting Iranian vessels to access Misrata's port for various illicit activities, including arms trafficking. 390, 391, 392 Because Misrata seeks a reputation for legitimate commerce, some of the city's business magnates resent the Dabaiba family. 393 Yet Bughdada remains politically and technically shielded by Dabaiba, who pre-



serves a tight partnership with the Joint Force, lending it an aura of legitimacy despite scandals such as the May 2024 gold trafficking affair that pitted the Joint Force against the Attorney General's Office.³⁹⁴

The Joint Force is also present in Tripoli, where it has been securing the NOC's headquarters since July 2022, when Dabaiba ordered it to expel then-chairman Mustafa Sanallah and install Haftar ally Farhat Benqdara.^{395, 396} Though Benqdara was removed in January 2025,³⁹⁷ the Joint Force still controls the NOC's security, thus retaining leverage over the oil and gas sector.³⁹⁸

The End of NOC Bartering

In February 2025, shortly after taking office, incoming NOC chairman Masoud Suleiman announced the end of the oil barter system, effective March 1, 2025. The NOC had conducted billions of dollars in crude-for-fuel swaps annually between 2021 and 2024, apparently without transparent accounting. With his announcement, Suleiman committed the NOC to using public tenders to sell crude oil and purchase fuel through separate transactions — a policy he said aimed at achieving better governance. 400

This decision was an acknowledgment that the barter system used between 2021 and 2024 under two successive NOC chairmen lacked both transparency and competitiveness. The possibility that the NOC gave away excessive national wealth via these swaps underscores the need for a full investigation into the barter process used during that period. The period of the barter process used during that period.

In fact, data from high-volume years like 2023 and 2024 suggests that the NOC paid far above prevailing market rates in its fuel-for-crude swaps, with economically unjustifiable overpayments potentially reaching nearly \$1 billion annually. 403, 404 An inquiry must determine exactly why the NOC overpaid, and, crucially, it must identify the actors who profited from these overpayments.

Formally ending the oil barter system isn't enough to solve Libya's fuel smuggling problem, however. Although the NOC's fuel imports from January-September 2025 decreased by about 8% compared to the same period in 2024, their volume remains far above the country's legitimate needs. 405, 406 These excessive fuel imports continue to feed a resilient smuggling sector. Efforts are required to reduce imports further and increase transparency, including regarding how fuel imports are funded.

In response to The Sentry's request for comment about the transparency of its barter transactions from 2021 through 2024, the NOC stated that pricing committees had overseen the process. 407 The NOC added that these committees determined prices based on internationally recognized global bulletins and that the competition for the barter transactions was conducted transparently with major international companies submitting bids. 408



Russian and Sudanese Forces Receive Haftar-Diverted Fuel

To maintain dominance over eastern and southern Libya, the Haftar family relies on Russia's military support and the UAE's political backing. Although other countries also assist, these two stand out. In return for their crucial assistance, the Haftars grant them numerous concrete advantages, including the systematic diversion of subsidized fuel to Russian personnel in Libya and to the Emirati-backed RSF in Sudan. 409, 410

Inside the Russian entrenchment in Libya

Since 2020, Russia has maintained a significant military presence at four air bases in Libya: al-Khadim, east of Benghazi; al-Jufrah, in central Libya; al-Qardabiyah, near Sirte; and Brak al-Shatti, in the southwestern province. All There, hundreds of Russian personnel operate radar installations and air-defense systems. All Libya: Such an arrangement enables Moscow to enjoy a degree of operational autonomy while helping the Haftar family reinforce a de facto demarcation line between Haftar-held territories and northwestern Libya, where Turkish troops remain entrenched. All Field Marshal Haftar and his family view these Russian-operated air defenses as indispensable in protecting their territory against any potential advance from northwestern Libya, officials from France, the US, and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Egypt told The Sentry. All Field Marshal Haftar and Field Marshal Haftar and Haftar

In mid-2022, Saddam Haftar's Brigade Tareq bin Ziyad and Hassan Zadma's Brigade 128 ramped up fuel deliveries to Russian forces beyond what was needed for local operations. This arrangement, which has benefited Russian-controlled air bases such as al-Jufrah and Brak al-Shatti, has included deliveries of jet fuel in volumes that align with the operational needs of Russian helicopters and aircraft stationed there. Distinct from that, the quantities of diesel and gasoline supplied surpass what might be used locally by the Russians.

The surplus fuel is then directed toward two distinct activities. First, the Russians sell a portion of it to local traffickers for profit, which likely assists the Russians in covering their day-to-day expenses, such as food and other basic needs, in dinars. Second, there are regular cargo flights transporting fuel from al-Jufrah and al-Khadim to Gao Airport in Mali, a known Russian-controlled facility. Moreover, in the past, fuel was also sent by truck from al-Jufrah to Wagner units, which were active in Darfur until their exit in autumn 2023. These Russian-to-Russian transfers of fuel occurred through the greater al-Kufrah area under the protection of the LAAF. Also, 434

In 2023, the Russian Ministry of Defense asserted more direct control of the military mission in Libya previously implemented by the Wagner Group. Its intelligence directorate, the GRU, replaced the semi-private mercenary company and now coordinates operations directly with the Haftar family. 435, 436, 437, 438 This shift saw Russian state forces take over and bolster existing Wagner-dominated bases and tighten up direct ties with select LAAF brigades, reflecting a more formal, Russian state-directed presence. 439, 440, 441 Another such strengthening phase unfolded in Libya after the December 2024 collapse of Bashar al-Assad's regime in Syria. 442, 443, 444 Amid this expansion of the Russian presence in Libya, the LAAF has carried on delivering fuel for Russia's benefit. The Russian Federation did not respond to a request for comment.

The UAE, the Haftars, and the RSF

Since the start of Sudan's civil war, the Haftar camp has been a key fuel supplier to the RSF.⁴⁴⁵ This persistent flow of diesel and gasoline has enabled the RSF's mobility in Darfur and, therefore, its tactical operations there.⁴⁴⁶ By supplying fuel and other aid to the RSF amid the Sudanese war, the Haftar family has tightened its command structure and strategic control in southeastern Libya.

The transfer of fuel to the RSF reflects the Haftars' deep loyalty to the Emirati government, a crucial backer of the paramilitary force. He acause of the UAE's extensive ideological, diplomatic, financial, and political support for the Haftar family since 2014, the Emirati government occupies a privileged position in the eyes of Haftar's forces, leaving them beholden to Abu Dhabi. Between 2014 and 2019, the UAE was the most consequential foreign actor in Libya, intervening heavily on Haftar's behalf. To this day, it remains vital to the Haftar family, continuing to offer political and diplomatic backing and providing a banking platform for illicit financial flows. Because of this legacy, the UAE wields sway over the family. When the war in Sudan broke out in April 2023, the UAE used its influence over the Haftar family to ensure that they supplied RSF forces with support, including fuel. Neither the UAE nor the RSF responded to requests for comment.

Soon after fighting erupted in Sudan on April 15, 2023, Saddam Haftar traveled to southeastern Libya's Kufrah district, a long-standing hub for illicit activity, 454, 455 to oversee efforts to secure fuel supplies for the forces of RSF leader General Mohamed Hamdan Dagalo, or "Hemedti." In addition to reinforcing security, Saddam Haftar asserted personal command over the local LAAF-affiliated Battalion Subul al-Salam, even though it had previously shown a preference for business dealings with the RSF. The wartime context demanded more direct oversight by the LAAF leadership to transform existing commercial relationships into reliable wartime supply channels.

To maintain uninterrupted shipments of fuel and other goods across the border, Saddam's Brigade Tareq bin Ziyad increased its manpower and equipment in the Kufrah area by bringing in additional forces from Benghazi and Ajdabiya. ^{458, 459} This buildup enabled tighter control over key assets, most notably Kufrah airport, which served as a critical ground hub. ^{460, 461} Beyond supervising the flow of fuel, Saddam Haftar's forces also coordinated occasional arms transfers to the RSF in Darfur as part of a broader support policy that included regular deliveries of ammunition. ^{462, 463, 464} Due to concerns about potential ground incursions or air strikes from the Sudanese Armed Forces and its allies—and the treacherous conditions along the sand routes from Kufrah to Sudan—the LAAF required RSF-linked drivers to handle the final leg of fuel transportation. ⁴⁶⁵

Distinct from Subul al-Salam, other LAAF units play a role in the transfer of fuel to the RSF. They include Battalion 129 and other Tubu armed groups spearheaded by senior commander Mohammed Ali Sida, who is based in Rebiana, a Tubu-majority municipality near Kufrah. Formally reporting to Khaled Haftar since 2022, these Tubu forces are responsible for the Sarir refinery, located near the oilfield of the same name in the middle of eastern Libya. The Sarir refinery operates almost exclusively for southward smuggling purposes, with a current capacity of about 8,000 barrels (1.3 million liters) per day. Help and the LAAF's increased control, To part of the refinery's output is diverted to illicit channels, bypassing the NOC's regular circuit. As part of its pro-Emirati policy of supporting the RSF, the LAAF also protects the passage of military resources supplied by the UAE via eastern Libya and provides training camps for Hemedti's men in the greater Kufrah area.

Libya's Untouchable Thieves: The Great Fuel Heist Must Not Escape Justice

Amid the sustained kleptocratic boom that Libya has experienced since the end of its civil war in 2020, fuel smuggling quickly rose to become the most lucrative scheme. Once pursued by scattered operators, fuel smuggling has become a multi-billion-dollar enterprise pursued by the country's incumbent rulers—with international backing—that can further derail the nation's legitimate economy.⁴⁷⁵

Given its sheer scale, fuel smuggling can no longer be portrayed merely as a byproduct of weak governance. In 2021, Libya's top rulers effectively embraced it as part of a broader, systematic strategy to siphon massive wealth from the population. Between 2022 and 2024, approximately \$20 billion was diverted in this manner—funds urgently needed for health services, household essentials, infrastructure, education, and other social programs. Much of the wealth was moved abroad, while another portion was used to import weapons and cement the grip of unelected incumbents through repression and armed force, ultimately blocking any path to free and credible elections.

Libya's fuel smuggling crisis also has a geopolitical dimension. It has buoyed non-state actors such as Sudan's RSF in a genocidal war and helped foreign powers like Russia and the UAE deepen their involvement in Libya—and, by extension, in sub-Saharan Africa.

Ultimately, the crisis transcends the fuel trade. It reveals a shattered system of governance wherein public institutions are increasingly subordinated to a small handful of illegitimate rulers reliant on coercion. The reach of Libya's rulers now goes well beyond the realm of security. They have learned to penetrate the heart of the legitimate economy by installing loyalists in key administrative positions. And because Libya's current calm hinges on these very same factions coexisting without open warfare, any sudden shakeup may precipitate a broad conflagration.

The January 2025 removal of NOC Chairman Farhat Benqdara and the appointment of Chairman Masoud Suleiman signal a push toward greater transparency, including efforts to roll back opaque crude-for-fuel swaps. 476, 477 Yet entrenched profiteers will resist. While one notable player in the fuel smuggling sector—Brigade 128 within the LAAF—was forcibly dismantled in early 2025, more powerful brigades linked directly to Saddam Haftar, Dabaiba, and other leading figures remain active and continue to thrive.

Even if fuel smuggling recedes somewhat in 2025, its repercussions will persist. Armed group leaders and political figures, now accustomed to vast profits, can repurpose their accumulated wealth as seed capital for other ventures. A mere reduction in fuel imports is not enough. Fundamental questions must be answered: Where did the stolen billions go, and how can Libya deliver justice to those who stole from its population?

Recommendations

Fuel smuggling has become deeply entangled with Libya's security, political, and economic structures. Addressing this issue requires a carefully designed set of medium-term domestic policy initiatives, coupled with international targeted action against key perpetrators and facilitators.

Libya

Budget for all fuel-related expenses. The Presidency Council,⁴⁷⁸ the Government of National Unity (GNU), the House of Representatives, and the High Council for Energy Affairs,⁴⁷⁹ which includes the leaders of the National Oil Corporation (NOC), the General Electricity Company of Libya (GECOL), the Central Bank of Libya (CBL), and the Libyan Audit Bureau, should collaborate on a budget law that articulates an itemized breakdown of fuel consumption for the fiscal year. After three years of concealing its fuel-related expenditures from most official reports, Libya urgently needs a public, legislatively approved schedule that explicitly plans and accounts for all fuel-related spending.

Clarify and reduce GECOL's fuel consumption. The same actors should work closely with GECOL to establish a clear, public assessment of the legitimate fuel requirements for Libya's electricity plants. An accurate and transparent account of GECOL's true consumption is essential to end the misuse of electricity generation as a pretext for unjustifiably large fuel deliveries to armed groups and other participants in the fuel smuggling sector. Moreover, GECOL should reduce its reliance on fossil fuel.

Lift the fuel subsidy. The GNU should gradually phase out the fuel price subsidy and replace it with a cash stipend that is disbursed directly to households, thereby removing financial incentives to engage in fuel smuggling. Replacing the subsidy with direct cash payments would result in Brega Petroleum selling fuel domestically at prices in line with international market rates, eliminating the price gap that underpins Libya's fuel smuggling sector.

Forbid fuel exports until large-scale smuggling is eradicated. The NOC and associated companies should be formally prevented from exporting diesel, gasoline, and heavy marine fuel. Because Libya is a net importer of those refined petroleum products, their export should raise red flags.

Apply chemical marker on all fuel distributed. The NOC should initiate a program to mark both domestic and imported refined fuel with a unique chemical signature that would enable authorities to trace its origin, improving efforts to combat fuel smuggling.⁴⁸⁰

Increase transparency and competitiveness of all fuel imports. In February 2025, the NOC pledged to subject all foreign fuel purchases to open bidding and to buy only from energy merchants who own refineries, underscoring the importance of transparent reporting.^{481, 482} The measures announced by the NOC mark a step in the right direction and should be thoroughly implemented.

Remove top smuggling facilitators from the NOC's cadres. In April 2025, the Libyan Audit Bureau and the Administrative Control Authority established a committee to review certain contracts for irregularities in the oil and gas sector. The same committee—or one similar to it—should also recommend dismissing those NOC officials who have been significantly implicated in fuel-related abuses. Complicit



functionaries such as Brega Petroleum chief Fuad Belrahim should step down or be removed from their positions.

Regulate NOC dealings with traders. The Attorney General's Office, the Libyan Audit Bureau, and other relevant domestic institutions should regulate dealings with energy merchants and require rigorous financial reporting.

Enforce the Extractive Industries Transparency Initiative standards. The NOC should adopt Extractive Industries Transparency Initiative standards for all fuel transactions and strengthen in-house trading capabilities to reduce reliance on external energy merchants who do not own oil refineries.⁴⁸⁴

Investigate past swaps. The Attorney General's Office, the Libyan Audit Bureau, and other relevant domestic institutions should investigate the reasons the NOC acquired foreign diesel and gasoline at prices far above market levels in 2024 and, potentially, in the preceding years.

Build an additional refinery. The Libyan government should fulfill the existing pledge to build a new refinery in southwestern Libya, 485 as the oil-rich country needs to reduce its dependence on imported fuel. 486

US, EU, and UK

Investigate Ali al-Mashay and, if appropriate, designate him for sanctions. The US, the UK, and Canada should investigate senior LAAF officer Ali al-Mashay and, if appropriate, designate him under their respective Global Magnitsky-style sanctions regimes for his pivotal role in Saddam Haftar's multibillion-dollar fuel smuggling enterprise and the misappropriation of Libyan state assets on a massive scale. Als, Also Demonstrated US concerns over high-level LAAF corruption will also position Washington to demand tangible reforms as part of its broader diplomacy toward the Haftar family. The EU and other jurisdictions should investigate and designate Ali al-Mashay for his illicit activities.

Issue targeted sanctions on other key figures. The US,⁴⁹⁰ the EU,⁴⁹¹ the UK,⁴⁹² and other like-minded jurisdictions should investigate and, if appropriate, impose targeted sanctions on the principal perpetrators and facilitators of fuel smuggling. Such individuals should also be excluded from any cooperation with the US, the EU, and the UK. They include:

- ► Brega Petroleum Finance Director Faraj al-Jaedi
- ▶ Joint Force leader Omar Bughdada
- ► Brigade Tareq bin Ziyad leader Omar Mrajae al-Magarhi
- ► Battalion 87 officer Mohammed al-Mazughi
- ► Zawiyah Petroleum Facilities Guard leader Mohammed Koshlaf

Embrace a network approach to sanctions. US organs such as the Department of the Treasury's Office of Foreign Assets Control (OFAC) should revisit the case of Koshlaf, who, despite being sanctioned in 2018 for human smuggling, 493 has continued his organized crime activities, including fuel smug-



gling. The US and other like-minded jurisdictions should investigate the mechanisms that he has used to evade the 2018 sanctions, as this could inform stronger, more network-oriented measures against other top members of his group and family.

Help Libya investigate. Given the nexus linking Libya's vast fuel smuggling industry to the US dollar, ⁴⁹⁴ the Financial Crimes Enforcement Network (FinCEN) should assist the Libyan Attorney General's Office in investigating the swaps concluded from 2022 to 2024. This collaboration should be organized in the form of a task force that includes other jurisdictions, such as the UK and the EU.

Issue a business advisory. To inform and caution the American business community, the US Treasury Department and other relevant organs should issue a business advisory on the illicit networks exploiting Libya's fuel subsidy program, including suspicious energy merchants, brokers, intermediaries, and transporters potentially involved in those schemes.

International Banks

Know your customers. Correspondent banks processing dollar transfers initiated by the NOC for fuel imports should exercise heightened caution and require comprehensive documentation when payments go to energy merchants lacking proven track records or refineries.⁴⁹⁵

UN and Member States

Make the fuel crisis a priority in the economic track. The United Nations Support Mission in Libya (UNSMIL) should recognize the fuel crisis as one of its top agenda items in its political and economic discussions. When Libyan stakeholders or member states commit to measures, UNSMIL must act as the central coordinator to ensure these pledges are fulfilled, consistently reminding all parties of the urgency and importance of carrying out agreed-upon measures.

Issue sanctions. The 1970 Libya Sanctions Committee should utilize its authority to apply targeted UN sanctions under listing criteria including:

- ▶ Individuals or entities providing support for armed groups or criminal networks through the illicit exploitation of crude oil or other natural resources in Libya [Resolution 2174 (2014), para. 4(c) and Resolution 2213 (2015), para. 11(c)]^{497, 498}
- ► Individuals or entities threatening or coercing Libyan state financial institutions and the NOC or engaging in any action that may lead to or result in the misappropriation of Libyan state funds [Resolution 2213 (2015), para. 11(d)]⁴⁹⁹

Maritime forces deployed in the Mediterranean Sea, including but not limited to Operation EUNAVFOR MED IRINI, should prioritize enforcement of UN Security Council Resolution 2146 (2014)—most recently reauthorized with UN Security Council Resolution 2701 (2023)—regarding the maritime interdiction of vessels illicitly exporting refined petroleum products from Libya. ^{500, 501} IRINI should make its fuel-related maritime inspections public.



Endnotes

- 1 The Sentry analysis of the Libyan fuel sector, 2025.
- 2 Excluding gas condensate and natural gas, Libya exported an average of 989,000 barrels of crude oil per day in 2023 and 973,000 barrels per day in 2024. Brent crude oil prices averaged about \$83 per barrel in 2023 and \$81 per barrel for 2024. See:
 - Kuganiga Kuganeswaran, "Libyan Oil Exports Resilient in 2024," Argus Media, January 7, 2025, available at: https://www.argusmedia.com/en/news-and-insights/latest-market-news/2644555-libyan-oil-exports-resilient-in-2024
 - Matthew French, "Brent Crude Oil Prices Averaged \$19 per Barrel Less in 2023 Than 2022," US Energy Information Administration, January 2, 2024, available at: https://www.eia.gov/todayinenergy/detail.php?id=61142
 - Erik Kreil and William Walsh, "A Look Back at Our Forecast for Global Crude Oil Prices in 2024," US Energy Information Administration, January 17, 2025, available at: https://www.eia.gov/todayinenergy/detail.php?id=64304
- From August to October 2024, the Haftar family and actors aligned with it imposed an oil blockade on many NOC facilities. These disruptions, combined with a smaller shutdown caused by local protests in southwestern Libya in January 2024, cost the nation a total of \$2.9 billion. For the rest of 2024, however, the NOC maintained solid output volumes. See:
 - National Oil Corporation, Response to Ministry of Finance letter regarding oil revenue decline, February 11, 2025, reviewed by The Sentry.
 - Bloomberg, "Libyan Rival Government to Stop Oil Output Over Bank Row," August 26, 2024, available at: https://www.bloomberg.com/news/articles/2024-08-26/libyan-rival-government-to-stop-oil-output-amid-central-bank-row
 - Reuters, "Protests Shut Down Libya's Sharara Oilfield Engineers," January 3, 2024, available at: https://www.reuters.com/markets/commodities/output-libyas-sharara-oilfield-hit-by-protests-engineers-2024-01-03/
- According to the CBL's revenue and expenditure statement for the period from January 1 to December 31, 2023, the net foreign exchange deficit amounted to \$9.9 billion. See:
 - Central Bank of Libya, "Statement of Revenues and Expenditures for the Period From January 1 to December 31, 2023," January 7, 2024, available at: https://cbl.gov.ly/en/micifaf/sites/4/2024/01/Official-Statement-December-2023-2.pdf
 - Alnnas, "Central Bank of Libya Publishes Revenues and Expenditures From January 1 to December 31, 2023," January 7, 2024, available at: <a href="https://alnnas.ly/%D9%85%D8%B5%D8%B1%D9%81-%D9%84%D9%84%D9%86%D8%B1%D9%83%D8%B2%D9%8A-%D9%84%D9%86%D8%B1-%D8%A7-%D8%A7%D9%84%D8%A5%D9%8A%D8%B1%D8%A7%D8%AF%D8%A7%D9%8A%D9%88%D8%A7%D9%84/D8%A7%D9%88%D8%A7%D9%84/D8%A7%D9%88%D8%A7%D9%84/
- According to the CBL's revenue and expenditure statement for the period from January 1 to December 31, 2024, the net foreign exchange deficit amounted to about \$5.2 billion. See:
 - Central Bank of Libya, "Statement of Revenue and Expenditure From January 1 to December 31, 2024," January 13, 2025, available at: <a href="https://cbl.gov.ly/micifaf/2025/01/%D8%A8%D9%8A%D8%A7%D9%86-%D8%A7%D9%84%D8%A5%D9%86-%D8%A7%D9%84-%D9%88-%D9%86-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D9%96-%D
- 6 The Sentry analysis of the Libyan fuel sector, 2025.
- Faced with unusually low deposits of export proceeds from the NOC into the Ministry of Finance's dollar account at the Central Bank of Libya, the Tripoli government—through its Ministry of Finance—had to borrow billions of dinars from the CBL to pay public sector salaries in the final months of 2024 and early 2025. See:
 - The Sentry interview with a senior Libyan Foreign Bank official, December 2024.
 - Abaad News, "Suspension of Appointments and Contracts for Public Positions: What's Next?," January 28, 2025, available at: <a href="https://abaad.news/%D8%A5%D9%8A%D9%AA%D8%AA%D8%AA%D9%8A%D9%AA%D9%8A%D9%A



- <u>%D9%84%D8%B4%D8%BA%D9%84-%D8%A7%D9%84%D9%88%D8%B8%D8%A7%D8%A6%D9%81-%D8%A7/</u>
 Libya al-Ahrar, X (formerly Twitter) post, January 27, 2025, available at: https://x.com/libyaalahrarar/status/1883794864011403584?s=46
- 8 On the effect of smuggling on the weakness of the Libya dinar and consumer price inflation, see:

 Sada Economics, "Exclusive: Al-Zantouti to Sada: Central Bank Lacks Tools to Influence Exchange Rate," March 19, 2025, available at: https://sada.ly/%D8%AE%D8%A7%D8%B5-%D8%A7%D9%84%D8%B2%D9%86%D8%AA%D9%88-%D9%88-%D9%84-%D9%85%D8%B5%D9%8A-2/
 Sada Economics, "Al-Akkari: Despite Central Bank Spending 7 Billion Dinars, No Solution to Cash Crisis,"
 March 20, 2025, available at: https://sada.ly/%D8%A7%D9%84%D8%B9%D9%83%D8%A7%D8%B1%D9%88-%D9%85%D9%86-%D8%B5%D8%B1%D9%81-%D8%A7%D9%84%D9%85%D8%B1%D9%83%D8%B2%D9%8A-7-%D9%85%D9%84%D9%8A%D8%A7%D8%B1-%D8%A7%D9%84%D9%85%D8%B1%D9%83%D8%B2%D9%8A-7-%D9%85%D9%84%D9%8A%D8%A7%D8%B1-%D8%AF/
- 9 Libya al-Ahrar, "General Electricity Company Warns of Imminent Crisis Due to Fuel Shortage and Calls for Urgent Intervention From the Public Prosecution," September 8, 2024, available at: <a href="https://libyaalahrar.tv/2024/09/08/%D8%A7%D9%84%D8%B4%D8%B4%D8%B1%D9%83%D8%A9-%D8%A7%D9%84%D8%B9%D8%A7%D9%85%D8%A9-%D9%84%D8%A8MD8%AAMD8%AD%D8%B0%D8%B1-%D9%85%D9%86-%D8%A3%D8%B2%D9%85%D8%A9-%D9%88%D8%B4/
- Basem Sabri, "The Looting of Libyan Fuel," al-Araby al-Jadeed, August 24, 2024, p. 13, available at: https://www.alaraby.co.uk/sites/default/files/24-08-2024/Fullpaper.pdf
- 11 Alsaaa24, "Sabha Mayor: The South Suffers From Fuel Shortages and Weak Distribution," January 6, 2024, available at: <a href="https://www.alsaaa24.com/2024/01/06/%d8%b9%d9%85%d9%8a%d8%af-%d8%b3%d8%a8%d9%87%d9%87%d8%a7-%d8%a7%d9%84%d9%86%d9%88%d8%a8-%d9%8a%d8%b9%d8%a7%d9%86%d9%8a-%d8%b6%d8%b9-%d9%81-%d8%a7%d9%84%d9%88%d9%82%d9%88%d8%af-%d9%88%d8%a7%d9%84%d9%84/
- 12 Abaad News, "Fuel Smuggling... A Crisis That Haunts the State," November 23, 2024, available at: <a href="https://abaad.news/%D8%AA%D9%87%D8%B1%D9%8A%D8%A8-%D8%A7%D9%84%D9%88%D9%82%D9%88%D8%AF-%D8%A3%D8%B2%D9%85%D8%A9-%D8%AA%D9%82%D8%B6-%D9%85%D8%B6%D8%AC%D8%B9-%D8%A7%D9%84%D8%AF%D9%88%D9%84%D8%A9/
- Libya Review, "Why Is Libya Still Facing Fuel Shortages?," August 27, 2025, available at: https://libyareview.com/58579/why-is-libya-still-facing-fuel-shortages/
- Among the areas in Libya that suffer from chronic fuel shortages, the south has been hit particularly hard. A tragic incident in the summer of 2022 illustrates the desperation of southern Libyan communities. After a tanker truck overturned near the small municipality of Bint al-Biyyah—midway between Sabha and Awbari—inhabitants rushed to collect some of the fuel using small jerrycans. The truck then exploded, killing at least six people and injuring dozens more. This episode underscores the severe social toll that fuel smuggling takes across wide swaths of the country. See: Al-Taghier TV, "At Least Six Dead in Fuel Truck Explosion in Southern Libya," August 1, 2022, available at: <a href="https://altaghier.tv/2022/08/01/%D8%B3%D8%AA%D8%A9-%D9%82%D8%AA%D9%84%D9%84-M9889-%D8%B4-M9884-M99884-
- International Monetary Fund, "Libya: 2023 Article IV Consultation—Press Release; Staff Report; and Statement by the Executive Director for Libya," May 24, 2023, available at: https://www.elibrary.imf.org/view/journals/002/2023/201/article-A001-en.xml
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/
- Katharine Houreld, "U.S. Declares Genocide in Sudan, Sanctions Paramilitary Leader," The Washington Post, January 8, 2025, available at: https://www.washingtonpost.com/world/2025/01/07/sudan-genocide-rsf-hemedti/



- United Nations Security Council, "Final report of the Panel of Experts on the Sudan," S/2025/239, April 17, 2025, available at: https://undocs.org/S/2025/239
- 19 Al-Arabiya, "Dabaiba Insists on Lifting Fuel Subsidies: Decision Will Be Implemented in the Middle or End of the Year," February 14, 2024, available at: <a href="https://www.alarabiya.net/north-africa/2024/02/14/%D8%A7%D9%84%D8%AF%D8%A8%D9%8A8%D8%A8%D8%A9-%D9%8A%D8%AA%D9%85%D8%B3%D9%83-%D8%A8%D8%B1%D9%81%D8%B9-%D8%A7%D9%84%D8%B9%D9%85-%D8%B9%D9%86-%D8%A7%D9%84%D9%88%D9%82%D9%88MD8%AF-%D8%B3%D9%86%D8%AAD9%86%D9%91%D9%81%D8%B0-%D8%A7%D9%84%D9%82%D8%B1%D8%A7%D9%85%D9%86%D8%AAD8%B5%D9%81-%D8%A3%D9%88-%D9%86%D9%87%D8%A7%D9%8A%D8%A9-%D8%A7%D9%84%D8%B3%D9%86%D8%A9
- 20 Reuters, "Libya's Eastern-Based Government Agrees to Proposal to End Fuel Subsidies," December 25, 2024, available at: https://www.reuters.com/world/middle-east/libyas-eastern-based-government-agrees-proposal-end-fuel-subsidies-2024-12-25/
- Huna al-Aassima, "Dabaiba: Every Libyan Will Receive a Card and Get His Share of the Subsidy," X (formerly Twitter) post. April 22, 2025, available at: https://x.com/aleasima_17/status/1914804230193369212
- John Hamilton, "Bonfire of the Billions: How Libya Is Squandering Its Hydrocarbons Inheritance," African Energy, February 20, 2025, available at: https://www.africa-energy.com/news-centre/article/bonfire-billions-how-libya-squandering-its-hydrocarbons
- Abdelkrim Araar, Nada Choueiri, and Paolo Verme, "The Quest for Subsidy Reforms in Libya," World Bank Group, March 2015, available at: http://documents.worldbank.org/curated/en/344571467980552949
- International Monetary Fund, "After a Decade-Long Hiatus, IMF Surveillance Resumes in Libya," June 12, 2023, available at: https://www.imf.org/en/News/Articles/2023/06/12/cf-after-a-decade-long-hiatus-imf-surveillance-resumes-in-libya
- The Sentry interview with a former senior NOC official, November 2024.
- Rahla has a mixed ownership structure: It is a semi-public, semi-private enterprise. About 54% of Rahla is held by the Libyan Economic and Social Development Fund and the National Investment Company. The balance is owned by private investors, including former Brega Petroleum employees. See:
 - Ahmed al-Shukri, "Fuel Stations," Fuel Stations Design & Construction, March 29, 2012, available at: https:// ahmadrajabelshukri, blogspot.com/2012 03 29 archive.html
 - Sada, "Exclusive: 2019 Audit Report: Increased Amounts Withheld From the Economic Development Fund's Accounts Could Expose It to Bankruptcy," August 7, 2020, available at: <a href="https://sada.ly/%D8%AE%D8%A7%D8%B5-%D8%AA%D9%82%D8%B1%D9%8A%D8%B1-%D8%A7%D9%84%D8%B1%D9%82%D8%A7%D8%A8%D8%A9-2019-%D8%A7%D8%B1%D8%AA%D9%81%D8%A7%D8%B9-%D8%A7%D9%84%D9%85%D8%A8%D8%A7%D9%84%D9%85/D8%A7%D9%
- Libya's Highway Services Co. is a public joint-stock company founded in 2002. Its equity is held entirely by Libyan state-owned entities. The Economic and Social Development Fund, through its holding subsidiary al-Enma Industrial & Services Holding Co., owns a 19.25% stake. Another major shareholder is the National Investment Company, which owns 15.08%. The remaining 65.7% is divided among 16 Libyan public sector institutions, including the NOC and Brega Petroleum, Oilinvest (Tamoil) Company for Oil Investments Abroad, United Insurance Company (Libya), Libyan Arab Foreign Investment Company (LAFICO), the Social Security Fund, Libyan Foreign Bank, Libyan Automobile & Touring Club, World Islamic Call Society, Libyan Development Bank, and major state-owned banks such as the National Commercial Bank, al-Umma Bank, Jumhouria Bank, al-Wahda Bank, and Sahara Bank. No private shareholders are recorded, confirming that Highway Services Co.'s ownership is exclusively state-based. See:

 Al-Enma Industrial and Services Holding Company, "Highway Services Co.," available at: https://eihico.ly/quick-en.html

Al-Enma Industrial and Services Holding Company, "Highway Services Co.," available at: https://eihico.ly/quick-en.html (last accessed April 14, 2025).

National Investment Company Libya, "Investment Companies," available at: https://niclibya.com/investment-company (last accessed April 14, 2025).



Libyan Law Society, "Decision No. 11 of 2002 Authorizing the Establishment of a Joint-Stock Company," January 29, 2002, available at: <a href="https://lawsociety.ly/legislation/%D9%82%D8%B1%D8%A7%D8%B1-%D8%B1%D9%82%D9%85-11-%D9%84%D8%B3%D9%86%D8%A9-2002-%D9%85-%D8%A8%D8%A7%D9%84%D8%A5%D8%B0%D9%86-%D9%81%D9%8A-%D8%AA%D8%A3%D8%B3%D9%8A%D8%B3-%D8%B4%D8%B1%D9%83%D8%A9-%D9%85/D9%86-11-%D9%84-%D8%A3%D8%A3%D8%B3%D9%8A%D8%B3-%D8%B4%D8%B1%D9%83%D8%A9-%D9%85/D8%B1%D9%8A-%D8%B1%D9%8A-%D8%B1%D9%8A-%D8%B1%D9%8A-%D8%B1%D9%8B1%D9%8B1%D9%8B1%D9%8B1%D9%8B1%D9%8B1%D9%8B1%D9%D9%D9%D

OLA Energy is public: it is a subsidiary of the Libyan African Investment Portfolio, which in turn is a subsidiary of the Libya Investment Authority, the country's sovereign wealth fund. The Libyan African Investment Portfolio controls 55% of OLA Energy, while Libya Oil Holding Company owns the remaining 45%. OLA Energy was first established in 2007 as OilLibya amid attempts to commercialize the domestic fuel market and move towards privatization and diversification. Under CEO Mazen Ramadan, OilLibya was rebranded to OLA Energy in 2019. See:

Scoop Empire, "Oil Libya Unveils Its New Brand Identity, OLA Energy, To The Public," March 26, 2019, available at: https://scoopempire.com/oil-libya-unveils-its-new-brand-identity-ola-energy-to-the-public-01/

OLA Energy, "About Us," available at: https://olaenergy.com/about-us/

Ean Libya, "Libya Africa Investment Portfolio Follows Up Plans to Develop Libya Oil Company," July 1, 2024, available at: <a href="https://www.eanlibya.com/%D9%85%D8%AD%D9%81%D8%B8%D8%A9-%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D8%A3%D9%81%D8%B1%D9%8A%D9%82%D9%8A%D8%A7-%D8%AA%D8%A7-%D8%A8%D9%8A%D9%8F%D8%AA%D8%A7-%D8%A8%D8%B9-%D8%AE%D8%B7%D8%B7-%D8%AA%D8%B7-%D8%BAA%D8%B7-%D8%B4/

Golden Sharara is 100% privately owned. Since it was founded as a private sector venture in 2007, it has remained outside state ownership. See:

Al-Yassir, "Constitutional Appeal No. 3 of 60," December 23, 2013, available at: https://alyassir.com/%D8%A7%D9%84%D8%A7%D9%84%D8%B3%D8%AA%D9%88MD8%B1%D9%8A-%D8%B3%D9%86%D8%A9-60-%D9%82/

Golden Sharara, "About Sharara Al-Dahabiya Company for Oil Services," available at: https://web.archive.org/web/20170412144132/https://sharara.com.ly/about.php (last accessed March 2025).

- 30 The Sentry interview with a Brega Petroleum Marketing official, April 2024.
- Libyan News Agency, "Brega Petroleum Dispatches Second Convoy of Fuel to Sabha Depot at Dawn," May 31, 2021, available at: https://lana.gov.ly/art.php?id=202237&lang=ar
- Consisting of only a few major depots across the country, Libya's fuel storage capacity is modest. In 2019, during the war in the Libyan capital, Haftar's forces destroyed Tripoli's depot on the international airport road, which used to hold approximately 70 million liters. The operational facilities in the northwestern province are those in Zawiyah and Misrata, with about 40 million liters each. The major fuel depots in the eastern province are Benghazi's Ras al-Manqar district, Tobruk, and Sarir, with capacities of 80 million liters, 40 million liters, and 20 million liters, respectively. In the southwest, the fuel depot of Sabha holds about 20 million liters. See:

Libya Review, "Can Libya Overcome the Crisis of Fuel Queues in an Oil-Rich Country?" August 29, 2024, available at: https://libyareview.com/47781/can-libya-overcome-the-crisis-of-fuel-queues-in-an-oil-rich-countr/

IRIN News, "Fighting, Fuel Fires and Fear in Tripoli," The New Humanitarian, August 26, 2014, available at: https://www.thenewhumanitarian.org/analysis/2014/08/26/fighting-fuel-fires-and-fear-tripoli

Sami Zaptia, "Shelling Causes Fire at Airport Road Fuel Depot: NOC," Libya Herald, June 17, 2019, available at: https://libyaherald.com/2019/06/shelling-causes-fire-at-airport-road-fuel-depot-noc/

Bwaba al-Wasat, "78 Million Liters of Diesel and Gasoline Pumped Into Ras al-Manqar Depot in Benghazi," November 3, 2020, available at: https://alwasat.ly/news/libya/300142

Brega Petroleum Marketing Company, "Sabha Oil Depot Stock," Facebook post, January 2, 2024, available at: https://www.facebook.com/brega.company.bmc/posts/684188867237814/

The Sentry interview with a Benghazi source familiar with the inner workings of the NOC, June 2023.



The Sentry interview with an employee of Zawiyah's refining company, December 2023.

The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, July 2025.

The Sentry interview with a Sabha resident, April 2024.

- The Sentry interview with a Brega Petroleum Marketing official, April 2024.
- 34 The Sentry interview with a financial audit official within the National Oil Corporation, May 2024.
- 35 The Sentry interview with an employee of the Zawiyah Oil Refinery Company, December 2024.
- Brega Petroleum Marketing Company, Bulletin pertaining to the Sabha depot, February 11, 2024, reviewed by The Sentry.
- Brega Petroleum Marketing Company, "Sales Invoice No. 6076914 for Heavy Fuel Oil to Black Gold Oil Services and Manufacturing Company," September 11, 2024, reviewed by The Sentry.
- The Sentry interview with a senior GECOL engineer, January 2025.
- 39 The Sentry interview with a senior Turkish engineer based in Tripoli, February 2025.
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §102-105, pp. 36-37, available at: https://docs.un.org/en/S/2024/914
- Historically, several factors contributed to the shortage of refineries in oil-rich countries of the Global South, including Libya. In the first decades of the oil era, Western companies avoided building large refineries in producer nations, wanting to maintain control over the higher-value end of the industry and limit their exposure to political risks. Also, the oil-producing countries initially lacked the technical expertise to develop refining capacity, leading to concession agreements that favored crude exports over domestic refining. Moreover, tariffs and quotas in Western markets encouraged refining closer to consumer regions. Finally, in the oil-producing countries, political leaders often prioritized quick revenue from crude over long-term investments in downstream operations. Although Muammar Qadhafi's regime did invest in the construction of large refineries such as the ones at Zawiyah and Ras Lanuf—which were inaugurated in 1974 and 1984, respectively—Libya's refining capacity remained limited. See:

Daniel Yergin, The Prize: The Epic Quest for Oil, Money & Power, New York: Simon & Schuster, 1991, p. 236.

Michael Rettig, Mwangi S. Kimenyi, and Brandon Routman, "The Imperative of Boosting Africa's Oil Refinery Investments," Brookings, December 11, 2013, available at: https://www.brookings.edu/articles/the-imperative-of-boosting-africas-oil-refinery-investments/

Joe Stork, "Middle East Oil and the Energy Crisis: Part 1," MERIP Reports, 20, September 1973, pp. 3-20, 26, available at: http://www.jstor.org/stable/3011325

Stephen Duguid, "A Biographical Approach to the Study of Social Change in the Middle East: Abdullah Tariki as a New Man," International Journal of Middle East Studies, 1.3, July 1970, pp. 195-220, available at: http://www.jstor.org/stable/162327

US Energy Information Administration, "Libya Energy Data, Statistics and Analysis – Oil, Gas, Electricity, Coal," February 2011, available at: https://grist.org/wp-content/uploads/2011/03/pdf.pdf

Hatem Mohareb and Salma El Wardany, "Chevron, Total Vying in Libya's First Oil Tender Since 2011 War," Bloomberg, July 2, 2025, available at: https://www.bloomberg.com/news/articles/2025-07-02/chevron-total-vying-in-libya-s-first-oil-tender-since-2011-war

- As of March 2025, Libya possesses four operational oil refineries. Maximum capacities are: 120,000 barrels per day in Zawiyah; 20,000 barrels per day in Marsa al-Harriqa, near Tobruk; 10,000 barrels per day in Brega, west of Ajdabiya; and 10,000 barrels per day in Sarir, about 500 kilometers from the Sudanese border. See:
 - Energy Capital & Power, "Refineries in Libya by Capacity," August 13, 2021, available at:
 - https://energycapitalpower.com/refineries-in-libya-by-capacity/
- After being offline during the 2011 civil war, the Ras Lanuf, Libya's largest refinery, resumed operations in late August 2012 at roughly half its top capacity of 220,000 barrels per day. However, unrest and worker strikes in the Oil Crescent led to a final shutdown in 2013. The facility has remained offline ever since, owing to a protracted legal dispute between its co-owners: the NOC and UAE-based Trasta Energy, which is part of the al-Ghurair group. After so many years idle,



restarting Ras Lanuf would require hundreds of millions of dollars. See:

Reuters, "Libya's Largest Refinery Restarts After War Closure," August 31, 2012, available at: https://www.reuters.com/ article/business/finance/libyas-largest-refinery-restarts-after-war-closure-idUSJOE87U05I/

Aydin Calik, "Libya's Crippled Refining Sector Struggles to Meet Demand," Middle East Economic Survey, March 5, 2021, available at: https://www.mees.com/2021/3/5/refining-petrochemicals/libyas-crippled-refining-sector-struggles-to-meet-demand/01803f30-7dbf-11eb-af06-c34a4892d605

The Sentry interview with a former senior NOC official, November 2024.

- 44 Attaqa, "Brega Petroleum Marketing Company: The Main Gateway for Fuel Supplies in Libya," May 28, 2024, available at: <a href="https://attaqa.net/2024/05/28/%D8%B4%D8%B1%D9%83%D8%A9-%D8%A7%D9%84%D8%A8%D8%B1%D9%88MD9%88MD9%8A9-%D8%A7%D9%84%D8%A8%D9%81%D9%88MD9%8A9-%D8%A7%D9%84%D8%A8%D9%88MD9%8A%D8%A9-%D8%A7%D9%84%D8%A3/D9%8B7-%D8%A7%D9%84%D8%A8%D9%88%D8%A7%D8%A8%D8%A9-%D8%A7%D9%84%D8%A3/D8%B1%D9%88MD8%A8%D8%A8%D8%A8%D8%A8%D8%A8/D8%A
- The Sentry analysis of Kpler data on Libyan imports in 2024.
- In 2024, Libya sourced 36% of its imported fuel from Russia, up from just 4% in 2021. The jump was a boon for Russian hydrocarbon firms amid the Ukraine war and Western sanctions on Russian exporters in Europe. See: The Sentry analysis of Kpler data on Libyan imports in 2024.
 - K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
 - Financial Times, "Brazil's Imports of Russian Oil Products Soar," January 5, 2024, available at: https://www.ft.com/ content/7ebb679e-099e-49ac-a750-73ca46538dee
- 47 Agence France-Presse, "One of Libya's Main Refineries Shut Down After Fighting," December 15, 2024, available at: https://www.voanews.com/a/one-of-libya-main-refineries-shut-down-after-fighting/7902249.html
- 48 Sami Zaptia, "Three Fuel Tankers Docking at Libyan Ports Today to End Fuel Shortage Crisis," Libya Herald, August 22, 2024, available at: https://libyaherald.com/2024/08/three-fuel-tankers-docking-at-libyan-ports-today-to-end-fuel-shortage-crisis/
- 49 Oil News Agency, "Libya: 31,000 Tons of 95-Octane Gasoline Expected to Arrive at Misrata Port," April 15, 2015, available at: <a href="https://old.oilnewsagency.com/%D9%84%D9%8A%D8%A8%D9%8A%D8%A8AD8%A8-ND9%82%D8%A8-ND9%88%D9%88-ND9%88-ND9%84-31-ND8%A3%D9%84-ND9%85-ND9%86-ND8%A8-ND9%86-ND8%A8-ND9%86-ND8%A8-ND9%86-ND8%A8-ND9%86-ND8%A8-ND9%86-ND9%88-
- Libyan News Agency, "The Anwar al-Nasr Tanker Arrived at Ras Lanuf Port Carrying a Diesel Shipment," January 29, 2025, available at: https://lana.gov.ly/post.php?id=325451&lang=ar
- Ayman al-Warfalli, "Benghazi Port Bustling Again Despite Libya's Divisions," Reuters, September 3, 2019, available at: https://www.reuters.com/article/business/finance/benghazi-port-bustling-again-despite-libyas-divisions-idUSKCN1VN1CW/
- Karam Veysel, "Tobruk Port Welcomes First Gasoline Shipment After Years of Inactivity," Energy Circle, November 10, 2024, available at: https://www.energycircle.org/news/tobruk-port-welcomes-first-gasoline-shipment-after-years-of-inactivity
- The Sentry, "Libya's Kleptocratic Boom," November 2023, p. 18, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- 54 The Sentry interview with a former senior NOC official, November 2022.
- 55 The Sentry interview with a former senior NOC official, November 2022.
- The Sentry, "Libya's Kleptocratic Boom," November 2023, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- 57 The Sentry interview with a European energy merchant who has sold fuel to Libya, December 2023.
- Although the NOC's full switch to crude-to-fuel swaps occurred in 2021, Libya had executed such swaps on an occasional basis prior to 2021. See:
 - Al-Jazeera, "Qatar Delivers Oil Products to Benghazi," April 12, 2011, available at: https://www.aljazeera.com/economy/2011/4/12/qatar-delivers-oil-products-to-benghazi



- Libyan Audit Bureau, "Libyan Audit Bureau Report 2022," October 2023, p. 40, available at: https://www.audit.gov.ly/ar/reports/
- Natural Resource Governance Institute, "Inside NNPC Oil Sales: A Case for Reform in Nigeria, Annex B: NNPC's Oil-for-Product Swaps," 2015, p. B2, available at: https://resourcegovernance.org/sites/default/files/documents/nrgiinsidennpcoilsales annexb.pdf
- 60 Libyan Audit Bureau, "Libyan Audit Bureau Report 2022," October 2023, p. 40, available at: https://www.audit.gov.ly/ar/reports/
- K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- Before the full shift to crude-for-fuel swaps, then-NOC Chairman Sanallah wrote to the Dabaiba government. As a proposed response to the growing fuel demand and insufficient budget, he outlined the swap approach as one option but also presented alternatives—such as the NOC taking on dollar debt to purchase foreign fuel outright and increasing Libya's refining capacity, a long-term endeavor. The Dabaiba government, through its oil and gas minister, approved the use of crude-for-fuel swaps on the condition that financial reconciliations be performed. In its 2022 annual report, the Libyan Audit Bureau noted that the NOC's crude-for-fuel swaps violate the country's public finance law whenever the NOC keeps these transactions off its balance sheet, thereby bypassing standard financial oversight and operating outside the formal state budget. Swaps are legal in Libya; what makes them problematic is the lack of detailed reporting. See:

Mustafa Abdullah Sanallah, "Memorandum for the attention of the Minister of Oil and Gas Regarding Financial Shortfall for Fuel Imports," National Oil Corporation of Libya, April 13, 2021, reviewed by The Sentry.

Libyan Ministry of Oil and Gas, Memorandum from Minister Mohamed Amhamed Aoun to the Prime Minister, April 19, 2021, reviewed by The Sentry.

Libyan Audit Bureau, "Libyan Audit Bureau Report 2022," October 2023, p. 40, available at: https://www.audit.gov.ly/ar/reports/

- Office of the NOC's Chairman, "Memorandum No. 687: Discontinuation of the Barter System for Fuel Supply," February 5, 2025, reviewed by The Sentry.
- Central Bank of Libya, "Statement of Revenues and Expenditures for the Period From January 1 to December 31, 2023," January 7, 2024, available at: https://cbl.gov.ly/en/micifaf/sites/4/2024/01/Official-Statement-December-2023-2.
- The Sentry, "Libya's Kleptocratic Boom," November 2023, p. 20, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- International Crisis Group, "Getting Past Libya's Central Bank Standoff," October 1, 2024, available at: https://www.crisisgroup.org/middle-east-north-africa/north-africa/libya/b093-getting-past-libyas-central-bank-standoff
- Tom Wilson, "Libyan State Oil Chief Stresses Support Across Divided Country," Financial Times, March 26, 2023, available at: https://www.ft.com/content/6882752b-826f-4de7-bd1c-238b3c82df03
- The Sentry analysis of Kpler data on Libyan imports in 2021-2025.
- The NOC response to The Sentry, October 15, 2025.
- 70 The NOC response to The Sentry, October 15, 2025.
- 71 The NOC response to The Sentry, October 15, 2025.
- The NOC response to The Sentry, October 15, 2025.
- The NOC response to The Sentry, October 15, 2025.
- The NOC response to The Sentry, October 15, 2025.
- 75 Farhat Bengdara response to The Sentry, September 21, 2025.
- 76 Farhat Bengdara response to The Sentry, September 21, 2025.
- 77 Farhat Benqdara response to The Sentry, September 21, 2025.
- Peter Cole, "Borderline Chaos? Stabilizing Libya's Periphery," Carnegie Endowment for International Peace, October 2012, available at: https://ciaotest.cc.columbia.edu/wps/ceip/0026585/f 0026585 21700.pdf



- Ann Marlowe, "Why Does EU Tolerate Libya's Smuggler Kingpin as Migrants Drown?," Asia Times, October 16, 2015, available at: https://asiatimes.com/2015/10/eu-turns-blind-eye-to-fuel-for-arms-smuggling-as-migrants-drown/
- Dan Stewart, "Blood and Human Trafficking in the Dustbowl of Libya," Time, September 17, 2015, available at: https://time.com/4015398/blood-and-human-trafficking-in-the-dustbowl-of-libya/
- Chris Scott, "M is for Marlboro Piste: Libya to Agadez 1999," Sahara Overland, May 18, 2015, available at: https://sahara-overland.com/2015/05/18/libya-to-agadez-two-reports-from-1999/
- Africa Intelligence, "Scourge of Smuggled Gasoline," June 16, 2010, available at: https://www.africaintelligence.com/ west-africa/2010/06/16/scourge-of-smuggled-gasoline,83972595-art
- The Sentry interview with a local eyewitness in the Tunisian municipality of Ben Guerdane, near the Libyan border, June 2016.
- The Sentry interview with an eyewitness from northern Chad, December 2023.
- Libya's population is heavily concentrated along the Mediterranean coast, with around 85% of it inhabiting less than 10% of the country—primarily major cities like Tripoli, Benghazi, Misrata, and Zawiyah. Just a few dozen kilometers inland, the terrain gives way to desert, where population density plunges to fewer than one person per square kilometer. Even on the coast, certain municipalities face economic marginalization due to socio-political or ethnic factors. Examples include the Amazigh-dominated city of Zuwarah near the Tunisian border and eastern localities such as Sousa and Shahat. This creates a divide: a handful of large coastal cities benefit from a higher concentration of resources and services, while the rest—whether deep in the interior or in overlooked coastal enclaves—end up in effect part of "the periphery." See:

Yusuf Çelik and Adel El Taguri, "Reforming Health System in Libya," Statistical, Economic and Social Research and Training Centre for Islamic Countries, June 2021, p. 24, available at: https://binaprogram.org/wp-content/uploads/publications/health-system.pdf

John Law, "Can Libya's Universities Lead the Country to Stability?," British Council, June 4, 2014, available at: https://www.britishcouncil.org/voices-magazine/can-libyas-universities-lead-country-stability

Food and Agriculture Organization of the United Nations, "Agriculture and Rural Livelihoods Needs Assessment – Libya," 2016, available at: https://fscluster.org/sites/default/files/documents/fao-libya-agriculture-and-rural-livelihoods-needs-assessment.pdf

- Grégory Chauzal and Sofia Zavagli, "Post-Revolutionary Discontent and F(r)actionalisation in the Maghreb: Managing the Tunisia-Libya Border Dynamics," Clingendael, August 2016, available at: https://globalinitiative.net/analysis/post-revolutionary-discontent-and-fractionalisation-in-the-maghreb-managing-the-tunisia-libya-border-dynamics/
- Matteo Serra, "Beyond Migration: Assessing Libya's Smuggling Sector," April 8, 2021, available at: https://www.jadalivya.com/Details/42588
- Ali Bensaâd, "Luttes de pouvoir, réseaux transnationaux et reconfigurations territoriales dans le Fezzan, Libye" (Power Struggles, Transnational Networks, and Territorial Reconfigurations in Fezzan, Libya), Maghreb Machrek, 240, 2019/2, pp. 121-138, available at: https://www.cairn.info/revue-maghreb-machrek-2019-2-page-121.htm
- Tim Eaton, "Libya: Rich in Oil, Leaking Fuel," Chatham House, March 30, 2021, available at: https://www.chathamhouse.org/2019/10/libya-rich-oil-leaking-fuel
- 90 Max Gallien, *Smugglers and States: Negotiating the Maghreb at Its Margins*, New York: Columbia University Press, 2024, pp. 205-206.
- 91 Matt Herbert, Rupert Horsley, and Emadeddin Badi, "Illicit Economies and Peace and Security In Libya," Global Initiative Against Transnational Organized Crime, July 18, 2023, pp. 4-5, available at: https://globalinitiative.net/analysis/illicit-economies-and-peace-and-security-in-libya/
- 92 Emadeddin Badi and Wolfram Lacher, "Agree to Disagree: Libya's New Unity Government," Carnegie Endowment for International Peace, February 8, 2021, available at: https://carnegieendowment.org/sada/83839
- Patrick Wintour, "Libya Gets New Unified Government as Corruption Allegations Swirl," The Guardian, March 10, 2021, available at: https://www.theguardian.com/world/2021/mar/10/libyan-parliament-approves-unity-government
- The Sentry interview with a former senior NOC official, November 2024.
- 95 The Sentry interview with a senior Libyan Audit Bureau official, November 2024.



- The Sentry interview with a senior Libyan Foreign Bank official, December 2024.
- 97 The Sentry interview with a senior CBL official, March 2024.
- The Sentry interview with a former member of the Libyan attorney general's team involved in investigating corruption in state institutions, August 2024.
- Libya's fuel smuggling is driven by a set of actors too diverse and intricate for a binary categorization. The eclectic array of culprits includes political and security leaders at the highest levels of the state, as well as chiefs of armed groups tasked with protecting subsidized fuel distribution. While some security personnel do deliver fuel to official petrol stations, they also abuse their remit to divert large amounts for illicit sale—often with tacit high-level approval. Other formal security actors—with no direct fuel-related authority—combine officialdom and intimidation to seize subsidized fuel, invoking national security or citing supply demands from entities such as the GECOL. Still others leverage seemingly legitimate private firms, blending formal cover with coercion to siphon off significant quantities. The misappropriation is further facilitated by corrupt administrators, customs officers, NOC insiders, and bankers who provide formal paperwork and authorizations or simply turn a blind eye. Lastly, small-scale smugglers are tolerated by security officials who tax them instead of stopping them. While some Libyan officials genuinely strive to curb fuel-related abuses, many more remain passive out of fear of reprisals. In short, no clear line can be drawn between state officials and criminals.
- The Sentry interview with a senior Libyan official formerly responsible for overseeing maritime transportation of hydrocarbons in and out of Libya, April 2024.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, December 2023.
- Simon Speakman Cordall, "Smuggler Paradise on Tunisia-Libya Border Hurts as Closure Strangles Trade," al-Jazeera, June 19, 2024, available at: https://www.aljazeera.com/news/2024/6/19/in-a-smuggler-paradise-on-tunisia-libya-border-closure-wrecks-livelihoods
- The Sentry interview with a Zuwarah seaport worker, March 2025.
- 105 Max Gallien, *Smugglers and States: Negotiating the Maghreb at Its Margins*, 2024, New York: Columbia University Press, pp. 205-206.
- 106 Matthew Vella, "Libyan Chief Investigator Points Finger at Maltese Fuel Smugglers," MaltaToday, March 28, 2018, available at: https://www.maltatoday.com.mt/news/national/85581/libyan attorney general malta fuel smugglers saddik alsour
- As Libya's fuel smuggling networks grow richer and more powerful, they siphon ever larger volumes from the subsidized supply chain for illegal exports. The resulting shortfalls at formal petrol stations in parts of Libya compel citizens to turn to the local black market, where prices far exceed the official subsidized price. Recognizing the high domestic profit margins, smugglers sell some of their diverted fuel inside Libya rather than exporting all of it. See:

 The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, July 2025.

The Sentry interview with a Sabha resident, July 2025.

Ahmed al-Khamisi, "Gasoline Crisis Worsens in Southern Libya; Families Cannot Bear Black Market Prices," Al-Araby al-Jadeed, January 23, 2023, available at: https://www.alaraby.co.uk/economy/%D8%AA%D9%81%D8%A7 %D9%82%D9%85-%D8%A3%D8%B2%D9%85%D8%A9-%D8%A7%D9%84%D8%A8%D9%86%D8%B2%D9%8A%D9%86%D9%86%D9%86%D9%88%D9%86%D9%86%D9%88%D9%84%D9%8A%D8%AA%D8%AA%D8%AA%D8%AA%D9%8A%D9%88%D9%88%D9%84-%D8%A3%D8%B3%D8%B3%D8%B3%D8%B1-%D9%84%D9%84%D8%A3%D8%B3%D9%88-AD8%A7%D9%84%D8%A7%D9%84%D8%B3%D9%88-AD8%A7%D9%84%D8%A7%D9%84%D8%B3%D9%88-AD8%A7%D9%84%D8%A7%D9%84%D8%B3%D9%88-AD8%A7%D9%84%D8%A7%D9%84%D8%B3%D9%88-AD8%A7%D9%84%D8%B3%D9%B3%D9%88-AD8%A7%D9%84%D8%B3%D9%



D8%B3%D9%88%D8%AF%D8%A7%D8%A1?amp

World Bank, "Libya Economic Monitor: Stabilizing Growth and Boosting Productivity," Fall 2024, p. 5, available at: https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/ https://documents1.worldbank.org/curated/en/099140012122442510/pdf/

In February 2024, in response to a Bloomberg investigation on fuel smuggling, the NOC condemned remarks by Libyan Audit Bureau chief Khaled Shakshak that highlighted Brega Petroleum Marketing Co.'s deliberate involvement in fuel diversion. The NOC called those remarks incitement and distortion, warning they could unnecessarily harm its reputation in the global oil market and potentially lead to an "embargo" against itself and its subsidiaries. See:

National Oil Corporation of Libya, "Important statement," X (formerly Twitter) post, February 9, 2024, available at: https://x.com/NOC Libya/status/1755980861244076348

K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/

Brega Petroleum has its own inspection department, responsible for examining any operational practices that appear irregular or suspicious. In addition, the NOC has demonstrated both the authority and the ability to investigate its subsidiary's operations. Moreover, the Audit Bureau—having offered its assistance—has urged Brega Petroleum to refine the identification of legitimate fuel needs and track fuel distribution so that spurious demands for large fuel allocations can be isolated and curtailed. None of these measures were attempted under the chairmanship of Bengdara. See:

Brega Petroleum Marketing Company, "Inspection Department at Brega Company: Strict Oversight to Protect Citizens and Ensure Company Rights," Facebook, February 15, 2025, available at: https://m.facebook.com/brega.company.
https://m.facebook.com/brega.company.
https://m.facebook.com/brega.company.
https://m.facebook.com/brega.company.
https://m.facebook.com/brega.company.
<a href="https://m.facebook.com/brega.company.com/brega.company.com/brega.company.com/brega.company.com/brega.company.com/brega.company.

National Oil Corporation, "NOC Condemns Attempt to Divide Brega Petroleum Marketing Company and Warns It Puts Libya at Risk of Partition," September 19, 2019, available at:

https://noc.ly/en/noc-condemns-attempt-to-divide-brega-petroleum-marketing-company-and-warns-it-puts-libya-at-risk-of-partition/

Libyan Audit Bureau, "Audit Bureau Discusses With Brega Petroleum Marketing Company Procedures for Determining Annual Fuel Requirements," February 16, 2023, available at:

https://www.audit.gov.ly/ar/%D8%AF%D9%8A%D9%88%D8%A7%D9%86-%D8%A7%D9%84%D9%85%D8%AD%D8%A7%D8%B3%D8%A8%D8%A9-%D9%8A%D8%A8%D8%AD%D8%AB-%D9%85%D8%B9-%D8%B4%D8%B1%D9%83%D8%A9-%D8%A7%D9%84%D8%A8%D8%B1%D9%8A%D9%82%D8%A9-%D9%84%D8%AA/

Al-Menassa, "Inspection Department at Brega Petroleum Marketing Company in Tripoli: Our Role Is to Monitor and Prevent Fuel Smuggling," October 25, 2024, available at:

https://almenassa.ly/2024/10/25/%D8%A5%D8%AF%D8%A7%D8%B1%D8%A9-%D8%A7%D9%84%D8%AA%D9%81%D8%AA%D9%8A%D8%B4-%D8%A8%D8%B4%D8%B1%D9%83%D8%A9-%D8%A7%D9%84%D8%A8%D8%B1%D9%8A%D9%82%D8%A9-%D9%81%D9%8A-%D8%B7%D8%B1%D8%A7%D8%A8%D9%84%D8%B3/

- 110 K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- 111 Sami Zaptia, "NOC Chairman Bengdara Says His Organisation Is Not a Security Force to Combat Fuel Smuggling," Libya Herald, November 28, 2023, available at: https://libyaherald.com/2023/11/noc-chairman-bengdara-says-his-organisation-is-not-a-security-force-to-combat-fuel-smuggling/



- As early as November 2022, a former senior NOC manager told The Sentry that more than 1.2 million liters of fuel were sent to Kufrah each day, even though its small population could not justify half that amount. This early reference to the systematic transfer of subsidized fuel from Libya to Darfur—made months before the Sudan war began in April 2023—shows that NOC cadres have visibility into the volumes Brega Petroleum distributes to each region. They also have the ability to distinguish abnormal allocations of fuel from justifiable ones. See:
 - The Sentry interview with a former senior NOC manager, November 2022.
- 113 The Sentry interview with an NOC engineer familiar with the Sarir refinery in eastern Libya, November 2024.
- In recent years, several social protests have shaken the municipality of Jalu. Situated south of Ajdabiya, Jalu lies at the heart of the oil-rich oases area, on the main road between Ajdabiya and Kufrah. Residents who help produce the nation's oil see tanker trucks move southward through their community while still suffering from periodic fuel shortages. Angry inhabitants have occasionally blocked Brega Petroleum's convoys. In one such incident in December 2023, a Jalu resident, speaking to the Libyan press, deplored the relentless southward flow of diesel during local shortages, hinting that the product heads for Sudan. See:

Abaad News., "Watch: In Protest Over Lack of Fuel in the Area, Residents of Jalu Stop Fuel Trucks Heading to Kufrah," X (formerly Twitter) post, December 13, 2023, available at: https://x.com/abaadnews_ly/status/1734663158860825017

Ain Libya, "Severe Fuel Shortage in Jalu; Protests Spread Across the City," March 23, 2024, available at: <a href="https://www.eanlibya.com/%D8%A3%D8%B2%D9%85%D8%A9-%D9%88%D9%82%D9%88%D8%AF-%D8%AD%D8%A7%D8%AF%D9%91%D8%A9-%D9%81%D9%8A-%D8%AC%D8%A7%D9%84%D9%88-%D9%88%D8%A7%D9%84%D8%A7%D8%AD%D8%AA-%D8%AC%D8%A7%D8%AC%D8%A7%D8%AA/D8%

Libya Panorama, "Fuel Transport to the South Halted Due to Assaults on Haulage Vehicles in Brak al-Shatti," Facebook post, December 25, 2024, available at: https://m.facebook.com/lpc.ly/videos/835593520436535/

- 115 The National Oil Corporation response to The Sentry, October 1, 2025.
- 116 The NOC response to The Sentry, October 15, 2025.
- 117 The NOC response to The Sentry, October 15, 2025.
- 118 The NOC response to The Sentry, October 15, 2025.
- 119 Farhat Bengdara response to The Sentry, September 21, 2025.
- On March 20, 2021, Dabaiba issued a decree forming a committee to propose replacing fuel price subsidies with direct financial support. The committee, headed by the minister of economy and including the ministers of finance and state for economic affairs, was tasked with determining the dinar amount of this support. See:

Government of National Unity, "Resolution No. 7 of 2021 AD Regarding the Formation of a Ministerial Committee to Develop a Proposal to Lift Fuel Subsidies and Replace Them With Cash Support," March 20, 2021, available at: <a href="https://lawsociety.ly/legislation/%D9%82%D8%B1%D8%A7%D8%B1-%D8%B1%D9%82%D9%85-7-%D9%84%D8%B3%D9%86%D8%A9-2021-%D9%85-%D8%A8%D8%B4%D8%A3%D9%86-%D8%B4%D8%B4%D9%83%D9%8A%D9%84-%D9%84%D8%AC%D9%86%D8%A9-%D9%88%D8%B2%D8%A7%D8%B1%D9%8A%D8%A9/

- In January 2024, Dabaiba denounced the immense cost of fuel subsidies, deploring that much of Libya's subsidized fuel was leaving the country. He announced an "irreversible" decision to end the subsidy program but added that he would first seek the Libyan public's approval through a survey of public opinion. Ultimately, he took no action: He arguably leveraged popular fears about rising living costs to leave the subsidies intact. See:
 - Libyan News Agency, "Al-Dabaiba: The Delay in Addressing the Issue of Fuel and Its Alternatives Is Unacceptable," January 8, 2024, available at: https://lana.gov.ly/post.php?id=299357&lang=en
 - Bwaba al-Wasat, "Dabaiba Government: No Decision Issued Regarding Lifting Fuel Subsidies," January 11, 2024, available at: https://alwasat.ly/news/libya/425896
- Libyan News Agency, "Dabaiba Suspends the Chairman of the Board of Directors of the Brega Company and Refers Him to Administrative Investigation," August 21, 2024, available at: https://lana.gov.ly/post.php?lang=en&id=313385



- 123 Libya al-Ahrar, "Acting Interior Minister Vows to End Fuel Smuggling and Take Strict Measures," August 24, 2024, available at: <a href="https://libyaalahrar.tv/2024/08/24/%D9%88%D8%B2%D9%8A%D8%B1-%D8%A7%D9%84%D9%84%D8%AF%D8%A7%D9%84%D9%84%D9%84%D9%84%D9%85%D9%83%D9%84%D9%81-%D9%8A%D8%AP-%D8%AP-%D8%A8%D8%A5%D9%86%D9%87%D8%A7%D8%A1-%D8%B8%D8%A7%D9%87/
- 124 Libya al-Ahrar, "In an Expanded Meeting, Trabelsi and Security Leaders Discuss Ending the Fuel Crisis," September 1, 2024, available at: <a href="https://libyaalahrar.tv/2024/09/01/%D9%81%D9%8A-%D8%A7%D8%AC%D8%AA%D9%85%D8%A7%D8%B9-%D9%85%D9%88%D8%B3%D8%B9-%D8%A7%D9%84%D8%B7%D8%B1%D8%A7%D8%A8%D9%84%D8%B3%D9%8A-%D9%88%D9%82%D9%8A%D8%A7%D8%AF%D8%A7%D8%AA-%D8%A3%D9%85%D9%86%D9%8A/
- Salma El Wardany, "Oil-Rich Libya Suspends Fuel-Supply Tsar as Filling Stations Run Dry," Bloomberg, August 22, 2024, available at: https://www.bloomberg.com/news/articles/2024-08-22/oil-rich-libya-suspends-fuel-supply-tsar-as-filling-stations-run-dry
- 126 Al-Shebka, X (formerly Twitter) post, September 13, 2024, available at: https://x.com/lsbk245941/status/1834632858306002962
- 127 In April 2025, Prime Minister Dabaiba publicly accused Brega Petroleum chief Fuad Belrahim of allowing the NOC subsidiary to serve as a major conduit for fuel smuggling. He criticized Belrahim for indiscriminately fulfilling all customer fuel requests without proper controls or verification. Alluding to fuel-based electricity production, Dabaiba added that GECOL should receive fuel allocations based on actual operational needs, not unlimited quantities based on wishes. See:
 - Libya al-Ahrar, X (formerly Twitter) post, April 30, 2025, available at: https://x.com/libyaalahrarar/status/1917492480192229673?s=46
- 128 The Sentry analysis of Kpler data on Libyan imports in 2024.
- 129 Central Bank of Libya, "Economic Bulletin Fourth Quarter 2024," March 2025, p. 87, available at: <a href="https://cbl.gov.ly/micifaf/2025/03/%D8%A7%D9%84%D9%86%D8%B4%D9%80%D9
- Libya imports most of the fuel it consumes, while the country's four domestic refineries produce the remainder. See: US Energy Information Administration, "Country Analysis Brief: Libya," December 3, 2024, available at: https://www.eia.gov/international/content/analysis/countries-long/Libya/pdf/libya.pdf
- The US Energy Information Administration indicated that Libya's total electricity output was around 30,000 GWh in 2022, while the website countryeconomy.com put production at 35,000 GWh in 2023. Since no new power plants came online in 2024, it is reasonable to assume that Libya generated about 35,000 GWh that year as well. Only 25% of that total relies on refined petroleum products, with most of the remaining output coming from natural gas and a much smaller share from crude oil (consumed by the Awbari plant). Consequently, Libya's electricity fuel consumption in 2024 amounted to roughly 8,750 GWh. If one assumes that the average thermal efficient of the country's power plants is 50%, the 8,750 GWh figure translates into the consumption of about 4.25 million liters of fuel per day. See:
 - Energy Information Administration, "Country Analysis Brief: Libya," December 3, 2024, available at: https://www.eia.gov/international/content/analysis/countries-long/Libya/pdf/libya.pdf
 - Countryeconomy.com, "Libya Electricity Consumption," available at: https://countryeconomy.com/energy-and-environment/electricity-consumption/libya (last accessed on March 20, 2025).
 - Enka İnşaat ve Sanayi A.Ş., "Awbari 640 MW Gas Turbine Power Plant," available at: https://www.enka.com/portfolio-item/awbari-640-mw-gas-turbine-power-plant/ (last accessed March 20, 2025).
- United Nations Department of Economic and Social Affairs, Statistics Division, "2022 Electricity Profiles," ST/ESA/ STAT/SER.W/42, December 2024, p. 121, available at: https://unstats.un.org/unsd/energystats/pubs/eprofiles/2022/pgl.
- 133 US Department of Transportation, Bureau of Transportation Statistics, "Energy Consumption by Mode of Transportation," available at: https://www.bts.gov/content/energy-consumption-mode-transportation-0 (last accessed June 9, 2025).



- According to the Gas Exporting Countries Forum, Libya's industry consumes 1 billion cubic meters of natural gas per year (38,000 terajoules). According to the International Energy Agency, the petroleum consumption of Libya's industry amounts to 64.4% of its natural gas consumption, which suggests that Libya's industry consumes about 24,483 terajoules in fuel. This is the equivalent of 1.87 million liters per day. Separately, Libya likely consumes about 330,000 liters per day of fuel on aviation and maritime transport. See:
 - Gas Exporting Countries Forum, "Annual Statistical Bulletin 2024," December 16, 2024, p. 80, available at: https://www.gecf.org/ resources/files/events/release-of-the-annual-statistical-bulletin-2024/gecf_asb2024_16dec.pdf

 International Energy Agency, "Libya: Efficiency & Demand," available at: https://www.iea.org/countries/libya/efficiency-demand (last accessed March 20, 2025).
- 135 The Sentry interview with a senior CBL manager in Tripoli, December 2024.
- Because Libya boasts a notably high number of motor vehicles compared to other African nations, road transport dominates legitimate consumption of fuel, with smaller quantities being utilized for industry and electricity generation. See:
 - International Energy Agency, "Libya: Understanding energy end uses," available at: https://www.iea.org/countries/libya/efficiency-demand (last accessed March 7, 2025).
 - Solomon Ekanem, "Ranked: African Countries With the Highest Number of Vehicles Per 1,000 People," Business Insider Africa, November 5, 2024, available at: https://africa.businessinsider.com/local/lifestyle/african-countries-with-the-highest-car-ownership-rates/d233wxe
- With a population of 7.2 million, Libya has a car ownership rate of 490 per 1,000 inhabitants, according to the International Organization of Motor Vehicle Manufacturers. See:
 - Tanzania Times, "Only Six Countries In Africa Have Considerable Car Ownership Rates," November 27, 2024, available at: https://tanzaniatimes.net/african-countries-with-better-car-ownership-rates/
- 138 Yasser F. Nassar, Kais R. Aissa, and Samer Y. Alsadi, "Air Pollution Sources in Libya," December 4, 2017, Research & Reviews: Journal of Ecology and Environmental Sciences, 6.1, p. 70, available at: https://www.rroij.com/open-access/air-pollution-sources-in-libya.php?aid=86543
- This estimation is based on a fuel economy of 8.2 liters per 100 kilometers. See:

 International Energy Agency, "Africa Energy Outlook 2022: World Energy Outlook Special Report," June 20, 2022, p. 77, available at: https://www.iea.org/reports/africa-energy-outlook-2022
- National Oil Corporation, Response to Ministry of Finance letter regarding oil revenue decline, February 11, 2025, reviewed by The Sentry.
- Organization of the Petroleum Exporting Countries (OPEC), "Monthly Oil Market Report December 2024," December 13, 2024, p. 60, available at: https://www.opec.org/assets/assetdb/momr-december-2024-1.pdf
- Because both imported and domestically refined fuel are subject to smuggling in Libya, the 27 million liters diverted daily should be valued, approximately, using the same proportion as the NOC's full 50.9 million-liter procurement, with 73% at \$0.70 per liter for imports and 27% at \$0.62 per liter for domestic refining.
- In fiscal year 2023, when the NOC imported \$8.6 billion in fuel, the Central Bank of Libya estimated fuel smuggling losses at \$6 billion, while the Libyan Audit Bureau put them at \$5 billion. These rough figures are consistent with The Sentry's \$6.7 billion assessment for 2024, a year in which the NOC imported about 22% more fuel than the previous year, despite largely stagnant legitimate economic activity. Finally, according to an African Energy study, fuel smuggling cost Libya more than \$20 billion over the three years between 2022 and 2024, consistent with the \$6.7 billion estimate for 2024. See:
 - Bwaba al-Wasat, "Central Bank Official: 30 Billion Dinars Fuel Smuggling Bill," May 17, 2024, https://alwasat.ly/news/libya/399053
 - K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
 - John Hamilton, "Bonfire of the Billions: How Libya is Squandering Its Hydrocarbons Inheritance," African Energy, February 20, 2025, available at: https://www.africa-energy.com/news-centre/article/bonfire-billions-how-libya-squandering-its-hydrocarbons



- 144 Countryeconomy.com, "Libya Public Spending on Health," available at: https://countryeconomy.com/government/expenditure/health/libya (last accessed March 20, 2025).
- UNESCO, "Education Finance Watch 2023: Technical Note," October 24, 2023, p. 13, available at: https://gem-report-2023.unesco.org/wp-content/uploads/2023/11/EFW2023-Technical-Note-24-Oct-2023.pdf
- The recorded revenues from the sale of fuel throughout fiscal year 2024 amounted to about \$30 million—only a fraction of the \$500 million that should be collected through the sale of 45.8 million liters per day at the subsidized price of \$.03 per liter. See:
 - Central Bank of Libya, "Income and Expenditure From January 1, 2024 Through December 31, 2024," January 13, 2025, available at: <a href="https://cbl.gov.ly/micifaf/2025/01/%D8%A8%D9%8A%D8%A7%D9%86-%D8%A7%D9%84%D8%A7%D9%84%D8%A7%D9%84%D8%A7%D9%86-%D9%86%D9%81%D8%A7%D9%88-ND9%86%D9%86%D9%86%D9%86-ND9%86%D9%86-ND9%86%D9%86-ND9%86%D9%86-ND9%86-ND9%86%D9%86-ND9%
- Although this amount may be relatively small in the grand scheme of things, several hundred million dollars' worth of unaccounted-for sales receipts nonetheless reveal that Libya's fuel smuggling problem extends far beyond the simple act of buying fuel at 0.15 dinars per liter and reselling it at a higher price abroad. Years of large-scale abuse have warped the system's core mechanisms. Some corrupt officials have become so powerful that they seize the fuel outright, bypassing even the nominal 0.15 dinar payment. In other cases, even when that minuscule fee is collected, the proceeds never reach official coffers.
- 148 The NOC response to The Sentry, October 15, 2025.
- Bridget Diakun, "Libya's Lucrative Fuel Smuggling Operations Sustained by Small Tanker Network," Lloyd's List, October 21, 2024, available at: https://www.lloydslist.com/LL1151054/Libyas-lucrative-fuel-smuggling-operations-sustained-by-small-tanker-network
- In 2023, the port of Benghazi in eastern Libya received 40% of the country's diesel imports. This is disproportionate considering the population in the eastern half of Libya is less than a third of the national total. See:

 Libyan Audit Bureau, Non-public study of the NOC, April 2024, reviewed by The Sentry.
- According to the UN Panel of Experts on Libya, between March 2022 and September 2024, tanker vessels utilized to smuggle diesel from Benghazi's old harbor grew on average from 5,700 to 9,970 deadweight tons, a jump of 74.9%. See:
 - United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §106, p. 37, available at: https://docs.un.org/en/S/2024/914
- United States Mission to the United Nations, "Remarks at a UN Security Council Briefing on Libya," February 15, 2024, available at: https://usun.usmission.gov/remarks-at-a-un-security-council-briefing-on-libya-17/
- Bridget Diakun, "Libya's Lucrative Fuel Smuggling Operations Sustained by Small Tanker Network," Lloyd's List, October 21, 2024, available at: https://www.lloydslist.com/LL1151054/Libyas-lucrative-fuel-smuggling-operations-sustained-by-small-tanker-network
- Amnesty International, "Libya: Hold Commanders of Tariq Ben Zeyad Armed Group Accountable for 'Catalogue of Horrors," December 19, 2022, available at: https://www.amnesty.org/en/latest/news/2022/12/libya-hold-commanders-of-tariq-ben-zevad-armed-group-accountable-for-catalogue-of-horrors/
- One clear example of how Saddam Haftar has reshaped parts of the NOC was on display in spring 2023, when the NOC board removed the well-regarded oil professional Saleh al-Qatrani from his post at the Arabian Gulf Oil Company (AGOCO), a major subsidiary headquartered in Benghazi, after he showed insufficient enthusiasm for an initiative championed by Saddam. In his place, the NOC appointed another oil veteran from Benghazi, Mohammed Ben Shetwan, who was chosen for his staunch loyalty to Field Marshal Haftar. Under Ben Shetwan, day-to-day affairs at AGOCO, which operates two oil refineries in eastern Libya, have in effect been run by manager Awad Kwedir, who maintains direct ties to Saddam. In response to a request for comment, the NOC asserted that Kwedir had no relationship with Saddam Haftar. See:

The Sentry interview of a former senior AGOCO manager, July 2023.

The Sentry interview of a former senior NOC manager, November 2024.



Agenzia Nova, "Libya: Mohammed Ben Shetwan Returns to Lead Mellitah, the Joint Venture Between Eni and the National Oil Corporation," February 25, 2025, available at: <a href="https://www.agenzianova.com/ar/news/%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D9%85%D8%AD%D9%85%D8%AF-%D8%8A8%D9%86-%D8%B4%D8%B4%D8%B4%D8%B4%D8%B9%D9%88%D8%AF-%D9%84%D9%82%D9%8A%D8%A7%D8%A9-%D8%B4%D8%B1%D9%83%D8%A9-%D9%85%D9%84%D9%8A%D8%AA%D8%A9-%D8%A7%D9%84%D9%85%D8%B4%D8%B1%D9%88-%D8%B4%D8%B1%D9%88-%D8%A7%D9%84%D9%85%D8%B4%D8%B1%D9%88-%D8%A7%D9%84%D9%85%D8%B4%D8%B1%D9%88-%D8%A8%D9%86-%D8%A5%D9%8A%D9%8A-%D9%88%D8%A7%D9%88%D8%A7%D9%84%D9%85%D8%B4%D8%B3%D8%B3%D8%A9-%D8%A7%D9%84%D9%88%D8%B7%D9%86%D9%8A-%D9%86%D9%84%D9%84%D9%86%D9%81%D8%B7/D9%86%D9%8A-%D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D8%B7/D9%86%D9%84%D9%86%D9%81%D8%B7/D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D8%B7/D9%86%D9%84%D9%86%D9%84%D9%86%D9%81%D8%B7/D8%B

AAC News, "Chairman of the Arabian Gulf Oil Company Congratulates Field Marshal Haftar on the 10th Anniversary of the Dignity Revolution," May 20, 2024, available at: <a href="https://aac-news.com/%D8%B1%D8%A6%D9%8A%D8%B3-%D8%B1%D9%83%D8%A9-%D8%A7%D9%84%D8%AE%D9%84%D9%8A%D8%AC-%D8%A7%D9%84%D9%8A%D9%8A%D9%8A-%D9%A-%D9%A

Abdullah Al-Zaidi, "AGOCO Discusses Creating a Service Berth at Al-Hariga Oil Port," April 4, 2023, available at: https://alsabaah.ly/%D8%A7%D9%84%D8%AE%D9%84%D9%8A/ D8%A8%D9%8A/

Libyan News Agency, "Arabian Gulf Oil Company Seeks to Raise Electric Capacity for Operations at Al-Nafoora," August 30, 2023, available at: https://lana.gov.ly/art.php?id=286965&lang=ar

Al-Menassa, "Arabian Gulf Oil Company Discusses Cooperation With Belarusian Belneft Khim in Energy," March 10, 2025, available at: <a href="https://almenassa.ly/2025/03/10/%D8%B4%D8%B1%D9%83%D8%A9-%D8%A77%D9%84%D8%AE%D9%84%D9%8A%D8%AC-%D8%A7%D9%84%D8%B9%D8%B1%D8%A8%D9%8A-%D9%84%D9%86%D9%81%D8%B7-%D8%AA%D8%A8%D8%AD%D8%AB-%D8%A7%D9%84%D8%AA%D8%B9%D8%A7%D9%88%D9%86/

The NOC response to The Sentry, October 15, 2025.

- Abdelhadi Rabea, "Turkish Drones Bomb Fuel Trucks West of Tripoli," Al-Ain News, August 13, 2020, available at: https://al-ain.com/article/turkish-drones-fuel-trucks-west-tripoli
- David D. Kirkpatrick, "A Police State With an Islamist Twist: Inside Hifter's Libya," February 20, 2020, The New York Times, available at: https://www.nytimes.com/2020/02/20/world/middleeast/libya-hifter-benghazi.html
- Nissim Gasteli, "En Libye, des vidéos de torture dans la prison de Qarnada témoignent de la violence du système carcéral" (In Libya, Videos of Torture in Qarnada Prison Bear Witness to the Violence of the Prison System), Le Monde, January 15, 2025, available at: https://www.lemonde.fr/afrique/article/2025/01/15/en-libye-des-videos-de-torture-dans-la-prison-de-garnada-temoignent-de-la-violence-du-systeme-carceral 6499576 3212.html
- Driss Rejichi, "Libye: contesté dans son fief, le maréchal Haftar réaffirme son autorité par la force" (Libya: Challenged in His Stronghold, Field Marshal Haftar Reaffirms His Authority by Force), La Croix, November 14, 2023, available at: https://www.la-croix.com/international/Libye-conteste-fief-marechal-Haftar-reaffirme-autorite-force-2023-11-14-1201290761
- Human Rights Watch, "Libya: Discriminatory Restriction on Women," February 23, 2017, available at: https://www.hrw.org/news/2017/02/23/libya-discriminatory-restriction-women
- Human Rights Watch, "Libya: Incitement Against Religious Minority." July 20, 2017, available at: https://www.hrw.org/news/2017/07/20/libya-incitement-against-religious-minority
- Libyan Crimes Watch, "Report: Human Rights Violations in Libya During September 2023," October 1, 2023, available at: <a href="https://lcw.ngo/%D8%AA%D9%82%D8%B1%D9%8A%D8%B1-%D8%A7%D9%86%D8%AA%D9%87%D8%A7%D9%86%D8%AA%D9%82%D9%88%D9%82-%D8%A7%D9%84%D8%A5%D9%86%D8%B3%D8%A7%D9%86-%D9%81%D9%8A-%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-37/



- Arab News, "Benghazi Reopens International Stadium in Star-Studded Ceremony," February 20, 2024, available at: https://www.arabnews.com/node/2591031/sport
- Human Rights Watch, "Libya: Reveal Missing Politician's Whereabouts," July 17, 2020, available at: https://www.hrw.org/news/2020/07/17/libya-reveal-missing-politicians-whereabouts
- Amnesty International, "Libya: Internal Security Agency Must Be Held Accountable for Deaths in Custody, Enforced Disappearances and Arbitrary Detention," September 10, 2024, available at: https://www.amnesty.org/en/latest/news/2024/09/libya-internal-security-agency-must-be-held-accountable-for-deaths-in-custody-enforced-disappearances-and-arbitrary-detention/
- 166 Freedom House, "Libya: Freedom on the Net 2024," available at: https://freedomhouse.org/country/libya/freedom-net/2024
- US Department of State, "2023 Country Reports on Human Rights Practices: Libya," available at: https://www.state.gov/reports/2023-country-reports-on-human-rights-practices/libya/
- The Sentry, "Corruption Threatens Libya's Derna Again," December 2024, available at: https://thesentry.org/reports/corruption-libya-derna/
- The Sentry, "Libya's Kleptocratic Boom," November 2023, p. 18, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- Wolfram Lacher, "A Most Irregular Army," German Institute for International and Security Affairs, February 2020, available at: https://www.swp-berlin.org/en/publication/a-most-irregular-army
- The phrase "regular army" denotes a unified, nationwide military answering to the formal state. It is professional, hierarchical, and governed by impersonal institutional norms. Obeying a transparent chain of command, it operates under civilian authority and the rule of law. Such a force remains politically neutral, pledging loyalty to the nation's constitution and laws rather than to any individual, family, or faction. Unlike irregular militias or "praetorian guard" units—often marked by personal loyalty, nepotism, and ambivalent command structures—a regular army avoids partisan or illicit activities and maintains discipline through merit-based leadership and clear accountability mechanisms. The Haftars' LAAF is not a regular army because it does not comply with this definition: it lacks a unified, neutral leadership that impartially serves the civil state and Libyan society. See:

Cevik K. Demir, "Professionalization, Local Military Context, and Reconstruction of the Army in Afghanistan," All Azimuth, 0.0, 2020, pp. 81–97, available at: https://www.allazimuth.com/wp-content/uploads/2020/04/CK-DemirReconstruction-of-the-Army.pdf

Monica Duffy Toft, "A Legitimacy Chain Approach to Security Sector Reform: Working for Citizens and States," LSE—Oxford Commission on State Fragility, Growth and Development, April 2018, available at: https://www.theigc.org/sites/default/files/2018/04/Security-sector-reform.pdf

Dan Kuwali, "Oversight and Accountability to Improve Security Sector Governance in Africa," Africa Center for Strategic Studies, September 11, 2023, available at: https://africacenter.org/publication/asb42en-oversight-accountability-security-sector-governance/

Samuel P. Huntington, *The Soldier and the State: The Theory and Politics of Civil–Military Relations*. Cambridge, MA: Harvard University Press, 1957, pp. 7–17, 173–174.

Amos Perlmutter, *The Military and Politics in Modern Times: On Professionals, Praetorians, and Revolutionary Soldiers,* New Haven, CT: Yale University Press, 1977, pp. 1-17, 102, 281-288.

- 172 L'Express and Agence France-Presse, "Libye: l'armée choisit, seule, son chef d'état-major" (Libya: The Army Alone Chooses Its Chief of Staff), November 17, 2011, available at: https://www.lexpress.fr/monde/afrique/libye-l-armee-choisit-seule-son-chef-d-etat-major 1052337.html
- The LAAF's original concept and core anti-democratic doctrine trace back to the mid-1990s, when Qadhafi-era colonel Khalifa Haftar lived in exile. The LAAF as an actual armed group emerged in 2011, when a few civilian rebels joined with several dozen renegade regime soldiers in embracing Haftar—then back in Libya and reunited with his Benghazi-rooted sons—as their leader in the war against the Qadhafi regime. See:
 - Jalel Harchaoui, "Libya's Electoral Impasse," Noria Research, November 15, 2022, available at: https://noria-research.com/mena/libyas-electorial-impasse/



- Wolfram Lacher, Libya's Fragmentation: Structure and Process in Violent Conflict, London: I.B. Tauris, 2020, pp. 182-183.
- Armand Duchene, "Libya: 10 Things You Need to Know About Saddam Haftar," The Africa Report, September 4, 2023, available at: https://www.theafricareport.com/315005/libya-10-things-you-need-to-know-about-saddam-haftar/
- Jon Lee Anderson, "The Unravelling," The New Yorker, February 16, 2015, available at: https://www.newyorker.com/magazine/2015/02/23/unravelling
- United Nations Security Council, "Final report of the Panel of Experts on Libya established pursuant to resolution 1973 (2011)," S/2018/812, September 5, 2018, §85, p. 27, available at: https://digitallibrary.un.org/record/1640692?ln=en
- ERR News, "Pealtnägija: The Odd Case of the Literally Dirty Libyan Money Found in Estonia," April 4, 2024, available at: https://news.err.ee/1609302330/pealtnagija-the-odd-case-of-the-literally-dirty-libyan-money-found-in-estonia
- 177 Frederic Wehrey, "The War for Benghazi: Violence, Paramilitarism and Social Rupturing, 2014-18," in Virginie Collombier and Wolfram Lacher (eds.), *Violence and Social Transformation in Libya*, London: Hurst, September 2023, available at: https://doi.org/10.1093/oso/9780197756492.003.0007
- Al-Jazeera, "Khalifa Haftar Forces Seize Oil Port Brega in Libya," September 14, 2016, available at: https://www.aliazeera.com/amp/news/2016/9/14/khalifa-haftar-forces-seize-oil-port-brega-in-libya
- 179 Middle East Eye, "Haftar Forces Capture Libya's Sharara Oilfield," February 7, 2019, available at: https://www.middleeasteye.net/news/haftar-forces-capture-libyas-sharara-oilfield
- Heba Saleh, "Libya to Resume Oil Exports 'Within Hours," Financial Times, July 11, 2018, available at: https://www.ft.com/content/74db786c-84ed-11e8-96dd-fa565ec55929
- Salma El Wardany and Mohammed Abdusamee, "Haftar to Allow Limited Libya Oil Exports to Ease Power Gap," Bloomberg, August 18, 2020, available at: https://www.bloomberg.com/news/articles/2020-08-18/libya-s-oil-ports-allowed-to-reopen-to-tackle-power-crisis
- Reuters, "Explainer: What's Behind Libya's Oil Blockade," June 15, 2022, available at: https://www.reuters.com/markets/commodities/whats-behind-libyas-oil-blockade-2022-06-15/
- Karim Mezran, "The End of Libya's False Stability Period," Atlantic Council, September 20, 2024, available at: https://www.atlanticcouncil.org/blogs/menasource/libya-central-bank-kabir-dbeibah-haftar-oil/
- The Maritime Executive, "EUNAVFOR Seizes Dozens of Armored Trucks Bound for Libya," November 10, 2022, available at: https://maritime-executive.com/article/eunavfor-seizes-dozens-of-armored-trucks-bound-for-libya
- Tom Kington, "Italian Authorities Seize Chinese Drones Bound for Libya," The Times, June 30, 2024, available at: https://www.thetimes.com/world/europe/article/italian-authorities-seize-chinese-drones-bound-for-libya-xpqqxvxqq
- 186 Conor Gallagher, "Irishmen Training Army of Libyan Strongman Khalifa Haftar in Apparent Breach of UN Embargo," The Irish Times, April 3, 2024, available at: https://www.irishtimes.com/ireland/2024/04/03/irishmen-training-army-of-libyan-strongman-khalifa-haftar-in-apparent-breach-of-un-embargo/
- Africanews and AP, "Libyan Nationals Arrested at Military Camp Appear Before South Africa Court," Africanews, July 30, 2024, available at: https://www.africanews.com/2024/07/30/libyan-nationals-arrested-at-military-camp-appear-before-south-africa-court/
- 188 Crónica Global, "La escalada violenta en Libia amenaza el suministro de petróleo" (The Violent Escalation in Libya Threatens Oil Supply), February 9, 2024, available at: https://cronicaglobal.elespanol.com/business/20240209/la-escalada-violenta-libia-amenaza-suministro-petroleo/831416909 0.html
- Reform.news, "Haftar's Special Forces Undergo Training in Belarus," March 2, 2025, available at: https://reform.news/specnaz-haftara-proshel-podgotovku-v-belarusi
- Among other locales, the city of Ajdabiya offers proof of how personalized and blurred the LAAF's chain of command is. Several security incidents affected Ajdabiya in autumn 2023 and the following winter. Although all armed formations in the city have belonged to the LAAF, tensions sometimes escalated into small-scale skirmishes among three circles. The first circle comprises forces directly tied to the Haftar family: Brigade 166, led by the Field Marshal's son-in-law, Ayub al-Furjani, and Battalion 152, the Ajdabiya unit within Brigade Tareq bin Ziyad, Saddam Haftar's most reliable arm. Battalion 152 is commanded by Colonel Abdelhakim Maazeb al-Saadi, a member of the Zway tribe. The second circle, also native to Ajdabiya, is Battalion 302, rooted in the Magharba tribe, the city's largest demographic bloc.



Although Battalion 302 serves under the LAAF and sides with the Haftar family during acute crises, it lacks the familial or tribal bonds that characterize Brigade 166 and Battalion 152. Apart from some smuggling interests it controls west of the city, Battalion 302 focuses on maintaining security in the greater Ajdabiya area and generally does not participate in the Haftar family's illicit activities. The third and most contentious circle was Brigade 128, led by Hassan Zadma and headquartered in Harawa, near Sirte. It had few tribal or social roots in Ajdabiya but still maintained a presence there, which enabled it to participate in smuggling flows of fuel and other items, connecting Ajdabiya, Kufrah, Sirte, and Zillah. Competition for profits intensified whenever fuel supplies diminished, such as during the diesel shortage of February 2024. Because units with familial ties to the LAAF leadership typically secure their own share first, Brigade 128 often resorted to coercion in a bid to protect its revenue streams, sparking friction with the other groups. Fuel smuggling is not the only illicit trade—human smuggling, narcotics, stolen vehicles, and additional goods also traverse the same routes—but diesel shortages were a major trigger. Following security tensions in October 2023, the LAAF announced the dissolution of Battalion 302. However, it was not disbanded; instead, it was folded more tightly into Saddam Haftar's Ground Forces division. Battalion 302's commander, Colonel Issa Dawud al-Qabsi, retained his position and continued to help the LAAF secure routes from Ajdabiya to Benghazi in the north and Qariyat Basher in the west. By contrast, between December 2024 and February 2025, the Haftar family dismantled Brigade 128. See:

The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.

Abaad News, "Exclusive Source to Abaad: Dissolution of the 302nd Saiqa Battalion Due to Its Tribal Composition," October 25, 2023, available at: <a href="https://abaad.news/%D9%85%D8%B5%D8%AF%D8%B1-%D8%AF%D8%B5-%D9%84%D8%A3%D8%A8%D8%B9%D8%A7%D8%AF-%D8%AD%D9%84-%D8%A7%D8%B5-%D9%84%D9%84%D8%A3%D8%A8%D8%B9%D8%A7%D8%B9%D9%82%D8%A9-%D8%A8%D8%B3%D8%A8%D8%A8%D8%A8/D8%B3%D8%A8%D8%A8/D8%A8/D8%B3%D8%A8%D8%A8/D8%A8/D8%A8/D8%A8/D8%B3%D8%A8%D8%A8/D8%A8/D8%B3%D8%A8%D8%A8/D8%A8/D8%B3%D8%A8/

Jawhar Farhat, "Armed Groups in Benghazi: Unraveling the Complex Tapestry," Grey Dynamics, May 22, 2024, available at: https://greydynamics.com/armed-groups-in-benghazi-unraveling-the-complex-tapestry/

- Agence France-Presse, "Strongman Haftar and Sons Tighten Grip on Eastern Libya," France 24, June 15, 2024, available at: https://www.france24.com/en/live-news/20240615-strongman-haftar-and-sons-tighten-grip-on-eastern-libya
- Mohannad Alnajjar et al, "Smuggler, Warlord, EU Ally," Lighthouse Reports, July 20, 2023, available at: https://www.lighthousereports.com/investigation/smuggler-warlord-eu-ally/
- Wolfram Lacher, "Libya's Struggles Empower a Clan," New Lines Magazine, August 16, 2024, available at: https://newlinesmag.com/spotlight/libyas-struggles-empower-clan/
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §22, p. 9, available at: https://docs.un.org/en/S/2024/914
- 195 Reuters, "Libya's LNA Launches Operation Near Southern Border After Chad Clashes," August 25, 2023, available at: https://www.reuters.com/world/africa/libyas-lna-launches-operation-near-southern-border-after-chad-clashes-2023-08-25/
- The Sentry, "Libya's Kleptocratic Boom," November 2023, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- Maya Gebeily and Angus Mcdowall, "Illicit Banknotes in East Libya, Some Made by Russia, Hit Dinar," Reuters, July 24, 2024, available at: https://www.reuters.com/markets/currencies/illicit-banknotes-east-libya-some-made-by-russia-hit-dinar-2024-07-24/
- 198 Yousef Saba and Ahmad Ghaddar, "Libya's First Private Oil Firm Grows in Eastern Commander's Shadows," Reuters, February 17, 2025, available at: https://www.reuters.com/business/energy/libyas-first-private-oil-firm-grows-eastern-commanders-shadows-2025-02-17/
- The Sentry, "Corruption Threatens Libya's Derna Again," December 2024, available at: https://thesentry.org/reports/corruption-libya-derna/
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, pp. 2, 9, 10, 11, 85-86, 96, available at: https://docs.un.org/en/S/2024/914
- Tim Eaton, "The Libyan Arab Armed Forces: A Network Analysis of Haftar's Military Alliance," Chatham House, June



- 2, 2021, p. 21, available at: https://www.chathamhouse.org/sites/default/files/2021-05/2021-05-28-libyan-arab-armed-forces-eaton.pdf
- Jalel Harchaoui, "Libya's Fragile Deadlock," War on the Rocks, March 6, 2023, available at: https://warontherocks.com/2023/03/libyas-fragile-deadlock/
- Al-Mustaqbal News Agency, "The General Commander Issues a Decision to Rename the 128th Infantry Battalion," September 13, 2020, available at: https://w.almustaqbal.ly/archives/13394
- Until December 2024, Battalion 77 was nominally part of Brigade 128. Led by Ajdabiya native Muhammad al-Mazughi, this nimble, disciplined unit backed by the Haftar family has served as the RSF's key link in Libya since the Sudan war began in spring 2023. Mazughi has overseen logistical and material support in southeastern Libya, especially in Kufrah and along the strategic Ajdabiya-Kufrah road, facilitating the movement of military resources from the Haftar family and the UAE (via Benina Airport and Benghazi's commercial port) to RSF units. In March 2025, Battalion 77 was absorbed into Battalion 87, a key unit within the LAAF's Ground Forces division, where Mazughi assumed a senior leadership position and continued his existing responsibilities. See:
 - United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, Annex 12, p. 86, available at: https://docs.un.org/en/S/2024/914
 The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.
- Bwaba al-Wasat, "Officers Affiliated With the General Command Discuss Securing the Borders and Southern Areas in Awbari," August 17, 2023, available at: https://alwasat.ly/news/libya/408823
- The Sentry interview with a personal contact of Salem Zadma, the former Benghazi-based deputy prime minister and brother of former Brigade 128 chief Hassan Zadma, January 2025.
- The Sentry interview with a Sirte resident familiar with Brigade 128, February 2025.
- 208 The Sentry interview with a resident of Hun, near Jufrah, familiar with Brigade 128's activities, February 2025.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2025.
- Nabd, "Clashes in Sirte Between Brigade 128 and Battalion 77," December 30, 2024, available at: https://nabd.com/s/148499910-6b8765/
- 211 Nasreen Suleiman, "Libya: Haftar's Forces Launch Surprise Attack on 'Presidential Council' Camp in Southern Awbari Threatening Return of Clashes," Al-Quds al-Arabi, January 1, 2025, available at: <a href="https://www.alquds.co.uk/%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D9%87%D8%AC%D9%88%D9%85-%D9%85%D8%A8%D8%A7%D8%BA%D8%AA-%D9%84%D9%82%D9%88%D8%A7%D8%AA-%D8%AD%D9%81%D8%AA%D8%B1-%D8%B9%D9%84%D9%89-%D9%85%D8%B9%D8%B3%D9%83%D8%B1-%D9%84/
- 212 Agenzia Nova, "Libia: battaglia nel deserto del Sahara, almeno 20 morti in scontri tra uomini di Haftar e ribelli ciadiani" (Libya: Battle in the Sahara Desert, At Least 20 Dead in Clashes Between Haftar's Forces and Chadian Rebels), February 13, 2025, available at: https://www.agenzianova.com/news/libia-battaglia-nel-deserto-del-sahara-almeno-20-morti-in-scontri-tra-uomini-di-haftar-e-ribelli-ciadiani/
- 213 Usama Ali, "Libya: Clashes in Qatrun Between Haftar Militia and an Armed Faction," al-Araby al-Jadeed, February 13, 2025, available at: <a href="https://www.alaraby.co.uk/politics/%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A8-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A7-%D8%A8-%D8%A7-%D8%A8-%D9%8A-%D9%A-%D9%8A-%D9%A-%D9
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2025.
- Libyan News Agency, "Security Committee Uncovers Fuel Smuggling Sites and Equipment in Qatrun," February 17, 2025, available at: https://www.lananews.com/ar/?p=402123
- Usama Ali, "Libya: Clashes in Qatrun Between Haftar Militia and an Armed Faction," al-Araby al-Jadeed, February 13, 2025, available at: https://www.alaraby.co.uk/politics/%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D8%



- A7%D8%B4%D8%AA%D8%A8%D8%A7%D9%83%D8%A7%D8%AA-%D9%81%D9%8A-%D8%A7%D9%84%D9%82%D8%B7%D8%B1%D9%88-%D8%A8-%D8%A8-%D9%86-%D9%85%D9%85%D9%84%D9%8A%D8%B1-%D9%88-%D9%81%D8%B5%D9%8A%D9%84-%D9%85%D8%B3%D9%84%D8%AD
- The LAAF, like all major Libyan armed groups, makes use of the anti-crime narrative as a political tool. See:

 Matt Herbert, Rupert Horsley, and Emadeddin Badi, "Illicit Economies and Peace and Security In Libya," Global Initiative Against Transnational Organized Crime, July 18, 2023, p. 7, available at: https://globalinitiative.net/analysis/illicit-economies-and-peace-and-security-in-libya/
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, April 2025.
- The Sentry interview with a Sabha resident, February 2025.
- Bwaba al-Wasat, "Saddam Haftar Assigns Hassan Zadma as Head of the Inspection and Follow-Up Division at the Land Forces General Staff," July 20, 2025, available at: https://alwasat.ly/news/libya/483847
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2023/673, September 15, 2023, pp. 7, 117-119, available at: https://digitallibrary.un.org/record/4022306?ln=en&v=pdf
- In its December 2024 report, the UN Panel of Experts on Libya logs 185 tanker visits by 48 vessels involved in smuggling fuel from Benghazi. That sample of vessels exhibits an average size of 9,970 deadweight tons, which corresponds to a fuel capacity of approximately 12 million liters per vessel. See:
 - United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §106-108, p. 37, available at: https://docs.un.org/en/S/2024/914
- A meaningful example involves the vessel MT Istra (IMO 9632088), which was used to divert fuel from eastern Libya in November 2022 for sale in Turkey's official market under false documentation claiming Turkmenistan origin. The UN Panel of Experts on Libya determined that the Vanuatu-flagged, 4,500 deadweight ton vessel called at Benghazi old harbor on November 12, 2022, to load cargo. Twelve days later, Turkish customs filings recorded the vessel's arrival near Istanbul, at Poliport, the private terminal of Polisan Holding A.S. on the Gulf of İzmit. Upon arrival, the Istra was carrying about 3,300 tons of "distillate marine fuel (gasoil)." The accompanying commercial invoice, dated November 24, 2022, falsely listed the cargo's origin as "Turkmenistan," with the load port being "OPL Malta" and the discharge port "DAP Marmara, Turkey." The fuel, worth \$3 million, was subsequently stored in tanks at Poliport before release into the Turkish market. See:
 - Euro Asia News, "Azerbaijani Oil Trading Network Engaged in Lucrative Operation of Smuggling Fuel From Libya via Alkagesta Ltd Against UN, EU, USA Resolution," May 14, 2025, available at: https://euasia.news/2025/05/18/71891/ United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2023/673, September 15, 2023, Appendix B to annex 74, p. 247, available at: https://digitallibrary.un.org/record/4022306?ln=en&v=pdf
 - Poliport Kimya Sanayi ve Ticaret A.Ş., "Dangerous Goods Handling Guide Book," 2021, p. 9, available at: https://www.poliport.com/pdf/DangerousGuideBook Rev 202104.pdf
- Tanker vessels regularly visit Benghazi's old harbor for the purpose of illegally exporting refined petroleum products. While these ships often disable their transponders to "go dark" and avoid detection, methods exist to identify and track them despite these evasion tactics. The UN Panel of Experts on Libya documented such activity in its December 2024 report. It identified 184 vessel visits over 930 days (from March 2022 to October 2024), with a combined deadweight tonnage capacity of about 1.5 million tons. Using a standard cargo-to-deadweight ratio of 85%, this points to a daily volume of approximately 1.7 million liters of fuel being illegally exported through Benghazi. An independent maritime transport expert interviewed by The Sentry said that these UN figures are conservative. This expert utilizes an advanced database that correlates automatic identification system (AIS) vessel data with satellite imagery, enabling continuous tracking, even when ships go dark. Using this methodology, the independent expert estimated that actual daily fuel exports through Benghazi's old harbor likely exceeded 5 million liters in 2022-2024. A more recent example helps illustrate the scale of this trafficking: The MT Nobel (IMO registration number 9105114), with a deadweight tonnage of 46,000 tons, visited Benghazi's old harbor up to four times in the first half of 2025, in February, March, April,



and June. This suggests that one single vessel lifted approximately 184 million liters during that six-month period, averaging more than one million liters per day.

United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, Annex 62, pp. 243-248, available at: https://docs.un.org/en/S/2024/914

The Sentry interview with an independent maritime expert, June 2025.

The Sentry analysis of the MT Nobel's activities during the first half of 2025 near Benghazi.

- Because Libya imports massive quantities of refined products, the NOC should not be exporting any heavy marine fuel, diesel, or gasoline. Yet no legal framework empowers any foreign actor to stop it, since international law imposes no restrictions on NOC-authorized exports. The UNSC has not barred the NOC from exporting refined products. Instead, it has repeatedly affirmed the NOC's authority over all of Libya's hydrocarbon exports, including refined petroleum. Although UNSC Resolutions 2441 (2018) and 2701 (2023) raise concerns about illicit shipments and extend measures against unauthorized exports, they do not curtail the NOC's ability to export fuel—whether imported or locally produced. Such shipments are often endorsed by official paperwork from corrupt NOC administrators from within the corporation. See:
 - United Nations Security Council, "Resolution 2441 (2018) Adopted by the Security Council at its 8389th meeting, on 5 November 2018," S/RES/2441 (2018), November 5, 2018, available at: https://undocs.org/S/RES/2441(2018)
 United Nations Security Council, "Resolution 2701 (2023) Adopted by the Security Council at its 9445th meeting, on 19 October 2023," S/RES/2701 (2023), October 19, 2023, available at: https://undocs.org/S/RES/2701(2023)
- 226 The vessel Piero A, which departed Benghazi in June 2023, offers an example of fuel being illicitly exported to Turkey. See:
 - The Sentry, "Libya's Kleptocratic Boom," November 2023, p. 51, available at: https://thesentry.org/reports/libyas-kleptocratic-boom/
- In foreign markets, traffickers disguise subsidized Libyan fuel by claiming false origins. In Turkey, for example, some networks label fuel diverted from Haftar-held Libya as coming from Turkmenistan via Malta. See:
 - Miyase Ilknur, "Are We Selling Haftar's Petroleum?," Cumhuriyet, February 24, 2024, available at: https://www.cumhuriyet.com.tr/yazarlar/miyase-ilknur/hafterin-petrolunu-mu-satiyoruz-2178852
 - Levent Kenez, "Smuggled Oil from Libya Sold on Domestic Market in Turkey," Nordic Monitor, February 27, 2024, available at: https://nordicmonitor.com/2024/02/smuggled-oil-from-libya-sold-on-domestic-market-in-turkey/
 - Fox Haber Saati, "Documents of 'Fraudulent Shipment': According to Businessman Eraydın, Anar Alizade Is Behind Haftar's Oil," February 25, 2024, available at: https://foxhabersaati.com/76158/hileli-sevkiyatin-belgeleri-is-insani-eraydina-gore-hafter-petrolunun-arkasinda-anar-alizade-var/
- 228 K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/
- The Mediterranean market for refined petroleum product is, by default, US dollar-denominated. This means that, in all likelihood, if the transaction had taken place, the fuel diverted by the Aristo would have been sold against American dollars to Saipem. Moreover, the Aristo's insurance policy was denominated in dollars. See:
 - Argus Media, "Changes to Argus European Products Effective 31 December 2024," December 31, 2024, available at: https://www1.argusmedia.com/ArgusStaticContent/Resources/data/announcements/pdf/20241231epr.pdf (last accessed March 2025).



- S&P Global Platts, "European Marketscan, Volume 55, Issue 146," August 1, 2023, available at: https://www.spglobal.com/content/dam/spglobal/ci/en/documents/platts/en/productsservices/market-reports/European-Marketscan-030818.pdf
- The Aristo's insurance policy at the time of its November 19, 2023, interception off Licata, Italy, reviewed by The Sentry.

 al-Mashay heads the 20-20 Battalion, a special elite unit within Brigade Tariq bin Zayed known for its prominent role in coordinating the smuggling of migrants and in violent political repression. Brigade Tariq bin Zayed itself is one of Libya's most formidable armed groups; it is closely tied to Saddam Haftar and has often served as his shock force. See:

 Amnesty International, "'We Are Your Masters': Rampant Crimes by the Tariq Ben Zeyad Armed Group," December 19, 2022, available at: https://www.amnesty.org/en/documents/mde19/6282/2022/en/
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, pp. 20, 120-121, available at: https://docs.un.org/en/S/2024/914
- 235 Al-Jazeera, "Clashes and Assassinations in Benghazi: Harbingers of a New Conflict?," November 14, 2022, available at: https://www.aljazeera.net/politics/2022/11/14/%D8%A7%D8%B4%D8%AA%D8%AA%D8%AA%D8%AA%D8%AA-%D8%BA%D8%D8%AA-%D8%BA%D8%AA-%D8%BA%D8%AA-%D8%BA%D8%BA%D8%AA-%D8%BA%D8
- 237 The Sentry interview with a Libyan security official based in Benghazi, December 2024.
- Bwaba al-Wasat, "Calls for Investigation Into the Killing of Citizen Murad al-Warfalli in Benghazi," June 7, 2025, available at: https://alwasat.ly/news/libya/479291
- Between March 2022 and October 2024, the UN Panel of Experts on Libya recorded 184 tanker calls at Benghazi's old harbor. The median deadweight tonnage among these vessels was about 4,282 tons—equivalent to five million liters of diesel. The largest ship observed at Benghazi's old harbor during that same period was the MT MD Miranda (IMO 9198290), with a deadweight tonnage of 46,408 tons, or roughly 52 million liters of diesel. See:

 United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, Annex 62, pp. 243-248, available at: https://docs.un.org/en/S/2024/914
 - MarineTraffic, vessel characteristics associated with the MD Miranda, May 2025, reviewed by The Sentry.
- 240 The Sentry interview with a Libyan security official based in Benghazi, December 2024.
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/
- 242 Public Eye and TRIAL International, "Libyan Fuel Smuggling: A Swiss Trader Sailing Through Troubled Waters," March 2020, available at: https://trialinternational.org/wp-content/uploads/2020/02/Publication DirtyOil-DIRTO 20200302
 <u>EN.pdf</u>
- 243 United Nations Security Council, "Resolution 2701 (2023)," S/RES/2701(2023), October 19, 2023, available at: https://undocs.org/S/RES/2701(2023)
- Council of the European Union, "Council Decision (CFSP) 2020/472 of 31 March 2020 on the European Union military operation in the Mediterranean (EUNAVFOR MED IRINI)," March 31, 2020, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020D0472
- Giulio Rubino and Simone Olivelli, "Suspicions Over New 'Dark Fleet' Smuggling Diesel Fuel Into the Mediterranean," IRPI Media, September 11, 2024, available at: https://irpimedia.irpi.eu/dark-fleet-contrabbando-gasolio-mediterraneo-nave-aristo-normand-maximus/



- The Sentry interview with a senior Libyan official formerly responsible for overseeing maritime transportation of hydrocarbons in and out of Libya, April 2024.
- For more on how western Libya is more fragmented than eastern Libya, see:

 Wolfram Lacher, "Libya's New Order," New Left Review, January 26, 2023, available at: https://newleftreview.org/sidecar/posts/libyas-new-order
- The Sentry interview with a senior Libyan official formerly responsible for overseeing maritime transportation of hydrocarbons in and out of Libya, April 2024.
- The Sentry interview with a senior NOC official, September 2024.
- Letter from Mustafa Abdallah Sanallah, Chairman of the Board of the Libyan National Oil Corporation, to the attorney general regarding vessel TSM Dubhe, May 10, 2022, reviewed by The Sentry.
- 251 The Sentry interview of a senior NOC manager, November 2022.
- 252 The Sentry interview with a senior Libyan official familiar with maritime-based trade in Libya's main ports, March 2023.
- The Sentry interview with a Benghazi source familiar with the inner workings of the NOC, June 2023.
- Africa Intelligence, "NOC Boss Bengdara Appoints Haftar Loyalists to Run Subsidiaries," June 16, 2023, available at: https://www.africaintelligence.com/north-africa/2023/06/16/noc-boss-bengdara-appoints-haftar-loyalists-to-runsubsidiaries,109994576-ar2
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2023/673, September 15, 2023, Annex 75, pp. 256-259, available at: https://digitallibrary.un.org/record/4022306?ln=en&v=pdf
- The Sentry interview with a senior Libyan official familiar with maritime-based trade in Libya's main ports, March 2023.
- 257 Paperwork associated with the Queen Majeda incident of September 2022, reviewed by The Sentry.
- K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- 259 The NOC response to The Sentry, October 15, 2025.
- 260 The NOC response to The Sentry, October 15, 2025.
- The NOC response to The Sentry, October 15, 2025.
- The NOC response to The Sentry, October 15, 2025.
- 263 The NOC response to The Sentry, October 15, 2025.
- Farhat Bengdara response to The Sentry, September 21, 2025.
- 265 The Sentry interview with a Benghazi source familiar with the inner workings of the NOC, June 2023.
- The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2024.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2024.
- 269 Al-Alami, X (formerly Twitter) post, May 1, 2025, available at: https://x.com/fagnar0/status/1917976194160500824
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2024.
- 271 In Kufrah, in southeastern Libya, the Zway tribe constitutes the demographic majority. In Ajdabiya, in northeastern Libya, the Zway are numerically a minority, but they nevertheless wield greater economic and political influence there than the larger Magharba tribe. As a result, the Zway command the critical route leading from Ajdabiya down to Kufra and beyond. Their dominance is further underscored by the fact that Field Marshal Haftar—who grew up in Ajdabiya—was born to a Zway mother. See:
 - Frederic Wehrey, "The Struggle for Security in Eastern Libya," Carnegie Endowment for International Peace, September 19, 2012, available at: https://carnegieendowment.org/research/2012/09/the-struggle-for-security-ineastern-libya?lang=en



- Jalel Harchaoui and Mohammed-Essaid Lazib, *Proxy War Dynamics in Libya*, Blacksburg: Virginia Tech Publishing, 2019, p. 7, available at: https://publishing.vt.edu/site/books/m/10.21061/proxy-wars-harchaoui-lazib/
- The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.
- The city of Ajdabiya possesses 10 major petrol stations, almost all of them controlled by members of the Zway. Despite the adequate number of petrol stations for a city of 180,000, the city suffers from periodic shortages, sometimes going through a full week with no fuel available for the population. See:
 - The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.
 - United Nations Development Program, "Ajdabiya's First Public Space: A Place for Joy, Unity, and Community," May 24, 2023, available at: https://www.undp.org/libya/stories/ajdabiyas-first-public-space-place-joy-unity-and-community
- 273 The Sentry interview with an Ajdabiya resident close to Brigade 166 and other LAAF networks, August 2024.
- The Sentry interview with a Kufrah resident familiar with the local airport, May 2023.
- Libyan Arab Armed Forces, "128th Reinforced Brigade: Movement Orders, File No. L/128/157," March 28, 2023, reviewed by The Sentry.
- According to Bashir al-Sheikh, an activist from Ghat who heads the Fezzan Movement, LAAF-affiliated brigades collect informal taxes from trucks transporting fuel from northern Libya through the Jufrah area to Qatrun and then to sub-Saharan countries. Sheikh notes that fuel trucks are charged 3,000 dinars or more at every major checkpoint, while smaller vehicles pay 250 dinars. See:
 - Bwaba al-Wasat, "Levies and the Fuel Crisis in Southern Libya," Facebook video, December 14, 2023, available at: https://www.facebook.com/alwasatnewsly/videos/899001578252154
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, Annex 66, p. 264, available at: https://docs.un.org/en/S/2024/914
- 278 Ahmed Ahmed, "How Haftar's Focus on Southern Libya Relates to a Growing Regional Strategy," Kalam Chatham House, March 24, 2025, available at: https://kalam.chathamhouse.org/articles/how-haftars-focus-on-southern-libya-relates-to-a-growing-regional-strategy/
- The Sentry interview with a Sabha resident, April 2024.
- The Sentry interview with a member of Awbari's municipal council, December 2024.
- In southern Libya's municipalities, fuel shortages at official petrol stations are so acute and persistent that inhabitants have turned to Facebook groups to trade small quantities among themselves. These online communities typically trade at prices aligned with the local parallel market. In the last week of May 2025, gasoline prices in Sabha exceeded 5.8 dinars per liter, which is about 38 times more expensive than the official subsidized price. See:
 - Open Sabha Petrol Stations, "60 Liters of Gasoline Available But The Price Is 350," Facebook post, May 23, 2025, available at: https://www.facebook.com/share/p/1RpxavNKxK/?mibextid=K35XfP
- Bwaba al-Wasat, "Levies and the Fuel Crisis in Southern Libya," Facebook video, December 14, 2023, available at: https://www.facebook.com/alwasatnewsly/videos/899001578252154
- 283 K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, July 2025.
- 285 The Sentry interview with a Sabha resident, July 2025.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, July 2025.
- The Sentry interview with a Sabha resident, July 2025.
- Mughawir al-Qiyada (@IbnwatanLibya), X (formerly Twitter) post, April 25, 2025, available at: https://x.com/ibnwatanlibya/status/1915541727697416562
- UN-Habitat, "City Profile of Sebha, Libya," October 2018, available at: https://unhabitat.org/sites/default/files/documents/2019-04/rapid city profile sebha.pdf
- 290 The Sentry interview with a Sabha resident, April 2024.



- 291 The Sentry interview with a Sabha resident, April 2024.
- 292 The Sentry interview with a Sabha resident, April 2024.
- The Sentry interview with a former member of the Libyan Intelligence Services, February 2024.
- The Sentry interview with a Sabha resident, April 2024.
- 295 Abaad News, "Ceasefire Agreement in Sabha Removes Masoud Jedi from Command of Battalion
 116 and Transfers Its Affiliation to Haftar," December 16, 2021, available at: <a href="https://abaad.news/%D8%B9%D9%84%D9%89-%D9%88%D9%82%D8%B9-%D8%AA%D8%AD%D8%B4%D9%8A%D8%AF-%D9%84%D9%82%D9%88%D8%A7%D8%AA-%D8%AD%D9%81%D8%AA%D8%B1-%D9%81%D9%8A-%D8%B3%D8%A8%D9%87%D8%A7-%D8%A7%D8%AA%D9%81%D8%A7%D9%81-%D9%81%D8%AF%D9%8A%D9%86%20%D8%AF%D9%8A%D9%86%20%D8%AF%D9%8A%D9%AA%D9
- 296 Middle East Monitor, "Haftar Militia Surrounds Libyan Court Ahead of Gaddafi's Appeal," November 29, 2021, available at: https://www.middleeastmonitor.com/20211129-haftar-militia-surrounds-libyan-court-ahead-of-gaddafis-appeal/
- 297 Osama Ali, "Libya: Armed Clashes Between Haftar's Militias and Sabha Security Forces," al-Araby al-Jadeed, December 14, 2021, available at: https://www.alaraby.co.uk/politics/%D9%84%D9%8A%D8%A8%D9%8A%D8%A7-%D8%AA-%D8%AD%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D8%AB-%D8%A8%D9%8A-%D9%85%D9%86-%D8%B3%D8%AA-%D8%AA-%D8%AA-%D8%AA-%D9%81%D8%AA-%D9%88-%D9%88-%D9%85%D9%86-%D8%B3%D8%A8%D9%87%D8%A7
- 298 Independent Fact-Finding Mission on Libya, "Detailed Findings of the Independent Fact-Finding Mission on Libya," United Nations Human Rights Council, March 24, 2023, available at: https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session50/A HRC 52 CRP.8-EN.docx
- Amnesty International, "'We Are Your Masters': Rampant Crimes by the Tariq Ben Zeyad Armed Group," December 19, 2022, available at: https://www.amnesty.org/en/documents/mde19/6282/2022/en/
- The Sentry interview with a Brak al-Shatti resident familiar with the local airbase, August 2023.
- 301 The Sentry interview with a Sabha resident, April 2024.
- The National Development Apparatus serves as the economic arm of Saddam Haftar. Similarly, the Military Investment Authority serves as the economic arm of Khaled Haftar. See:
 - The Sentry, "Corruption Threatens Libya's Derna Again," December 9, 2024, available at: https://thesentry.org/reports/corruption-libya-derna/
 - The Sentry interview with a Sabha resident, April 2024.
- The Sentry interview with a former member of the Libyan Intelligence Services, February 2024.
- The Sentry interview with a Sabha resident, February 2025.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2025.
- The Sentry interview with a Sabha resident, April 2024.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, February 2024.
- 308 A Sabha resident's fuel QR code issued by the LAAF, April 2024, reviewed by The Sentry.
- 309 The Sentry interview with a Sabha resident, April 2024.
- As fuel shortages grew more acute and public complaints mounted across southwestern Libya, Saddam Haftar eliminated the QR code system in the southern region in October 2025, a decision likely motivated by a desire to restore his deteriorating popular standing. See:
 - Libya 24, "In Response to Citizens' Requests and the Deputy Commander's Directives, the Commander of the Southern Military Region Decides to End the Fuel Station Code System," October 11, 2025, available at: https://libya24.tv/2025/10/11/14160/



- 311 The Sentry interview with a Sabha resident familiar with the city's security sector, June 2024.
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, December 2023.
- The Global Initiative Against Transnational Organized Crime, "Chad's Largest Goldfield, Kouri Bougoudi, Is Central to Regional Stabilization Efforts," November 2021, available at: https://riskbulletins.globalinitiative.net/wea-obs-002/01-chads-largest-goldfield-central-to-stabilization-efforts.html
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders. December 2023.
- The Tubu are a traditionally nomadic group of African Muslims whose historical range spans Niger, Chad, and Libya. Although a small Tubu community has lived in northern Cyrenaica and other parts of modern-day Libya for more than five centuries, Muammar al-Qadhafi's government in the late 1980s welcomed thousands of Tubu originating from Chad. See:
 - Ronald Bruce St John, Historical Dictionary of Libya, 5th ed., Lanham: Rowman & Littlefield, 2014, p. 259.
 - Jérôme Tubiana and Claudio Gramizzi, "Tubu Trouble: State and Statelessness in the Chad–Sudan–Libya Triangle," Small Arms Survey, June 2017, p. 113, available at: https://www.smallarmssurvey.org/sites/default/files/resources/SAS-CAR-WP43-Chad-Sudan-Libya.pdf
 - Valerie Stocker, "Citizenship on Hold: Undetermined Legal Status and Implications for Libya's Peace Process," European Institute for Peace, July 2019, available at: https://www.eip.org/citizenship-on-hold-in-libya-an-eip-policy-paper/
- Cairo Institute for Human Rights Studies, "Libya: Haftar's Forces Should End Forced Displacement of Tebu Families in the South," September 4, 2023, available at: https://cihrs.org/libya-haftar-forces-should-end-forced-displacement-of-tebu-families-2/
- The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, December 2023.
- Mark Micallef et al., "Conflict, Coping and COVID: Changing Human Smuggling and Trafficking Dynamics in North Africa and the Sahel in 2019 and 2020," Global Initiative Against Transnational Organized Crime, April 2021, pp. 38–40, available at: https://globalinitiative.net/analysis/smuggling-trafficking-sahel-2020/
- Tim Eaton and Lubna Yousef, "How Migrant Smuggling Has Fuelled Conflict in Libya: A Systems Analysis of Key Transit Hubs," Chatham House, February 13, 2025, p. 37, available at: https://www.chathamhouse.org/2025/02/how-migrant-smuggling-has-fuelled-conflict-libya
- Tubu-majority armed groups in southern Fezzan such as Umm al-Aranib Martyrs' Battalion, the Khaled bin al-Walid Battalion, and the 634th Infantry Battalion belong to the LAAF's Security Units division, spearheaded by Khaled Haftar. See:
 - The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, September 2025.
 - The Sentry interview with a Sabha resident, September 2025.
- Tim Eaton and Lubna Yousef, "How Migrant Smuggling Has Fuelled Conflict in Libya: A Systems Analysis of Key Transit Hubs," Chatham House, February 13, 2025, p. 37, available at: https://www.chathamhouse.org/2025/02/how-migrant-smuggling-has-fuelled-conflict-libya
- Basem Sabri, "The Looting of Libyan Fuel," al-Araby al-Jadeed, August 24, 2024, p. 13, available at: https://www.alaraby.co.uk/sites/default/files/24-08-2024/Fullpaper.pdf
- 323 The Sentry interview with a member of Qatrun's municipal council familiar with the trade traversing Libya's southern borders, December 2023.
- The Sentry interview with a Qatrun-based businessman involved in trade traversing the Libya-Chad border, October 2024.
- The Sentry interview with a Murzuq resident familiar with the local trade flows, June 2023.
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §97-105, pp. 34-36, available at: https://docs.un.org/en/S/2024/914



- Bwaba al-Wasat, "Abdelsalam al-Zewbi Appointed Undersecretary of the Ministry of Defence in Dabaiba's Government," July 17, 2024, available at: https://alwasat.ly/news/libya/445456
- 328 Ronald Bruce St John, Historical Dictionary of Libya, 5th ed., Lanham: Rowman & Littlefield, 2014, p. 259.
- Sean Kane, "Barqa Reborn? Eastern Regionalism and Libya's Political Transition," in Peter Cole and Brian McQuinn (eds.), *The Libyan Revolution and its Aftermath*, Oxford, UK: Oxford University Press, 2015.
- In late May 2023, Dabaiba, who also serves as defense minister, ordered drone strikes against several coastal targets west of Tripoli. He called these attacks the first phase of a campaign against organized crime networks, including operations tied to fuel smuggling. While Dabaiba's government announced a second phase—a ground offensive to arrest suspects wanted by the public prosecutor—that plan never materialized. Moreover, the airstrikes had little lasting effect: Once they ended, most smuggling activities resumed. See:

The Sentry interview with a Zuwarah resident close to the city's military council, June 2023.

Asharq al-Awsat, "Dabaiba's Drones Strike Smugglers' Strongholds in Western Libya Again," June 2, 2023, available at: <a href="https://aawsat.com/%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D9%85-%D8%A7%D9%84%D8%B9%D8%B1%D8%A7%D9%84%D8%B1%D8%B1%D9%8A%D9%82%D9%8A%D8%A7/4361451-%C2%AB%D9%85%D8%B3%D9%8A%D9%91%D8%B1%D8%A7%D8%AA%C2%BB-%D8%A7%D9%84%D8%AF%D8%AF%D8%A8%D9%8A%D8%A9-%D8%AA%D9%82%D8%B5%D9%81-%D9%85%D8%AC%D8%AF%D8%AF%D8%AF%D8%AF%D9%8B-%D9%85%D8%B9%D8%A7%D9%82%D9%84-%C2%AB%D8%A7%D9%84%D9%85%D9%87%D8%B1%D9%91%D8%A8%D9%8A%D9%86%C2%BB-%D8%BA%D8%B1%D8%A8-%D9%84%D9%8A%D8%A7

Nissim Gasteli, "En Libye, le pouvoir de Tripoli recourt à des drones pour frapper des réseaux de « trafiquants »" (In Libya, the Authorities in Tripoli Use Drones to Strike at Networks of 'Traffickers'), Le Monde, May 31, 2023, available at: https://www.lemonde.fr/afrique/article/2023/05/31/en-libye-le-pouvoir-de-tripoli-recourt-a-des-drones-pour-frapperdes-reseaux-de-trafiquants 6175569 3212.html

Al-Quds al-Arabi, "Libya: Controversy Sparked by Airstrikes Claimed by Unity Government Against 'Crime Dens," May 26, 2023, available at: <a href="https://www.alquds.co.uk/%D9%84%D9%8A%D8%A8%D8%A8%D9%8A%D8%A8%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A8%D9%8A%D8%A9-%D-8%AA%D8%A8%D9%86%D8%AA%D9%87%D8%A7-%D8%AD%D9%83%D9%88%D9%85/

In early January 2025, forces nominally aligned with Dabaiba conducted a ground operation in Zawiyah and in Abu Surra, a smaller municipality on Zawiyah's eastern flank that hosts the headquarters of Hassan Buzeriba's armed group. Buzeriba is tightly and tribally allied with Mohammed Koshlaf, the local warlord who controls operations at the Zawiyah refinery. According to two eyewitnesses, both the refinery and Buzeriba's headquarters in Abu Surra were temporarily surrounded by the government's armed forces, which nevertheless refrained from taking any forceful action against the strategic facilities. The government's units later withdrew, leaving major fuel smuggling operations almost unscathed. See:

The Sentry interview with a Zawiyah resident who lives near the city's refinery, January 2025.

The Sentry interview with an Abu Surra resident who lives near Buzeriba's headquarters, January 2025.

Asharq al-Awsat, "Al-Wahda Launches Intensive Military Operation in the City of Zawiyah," January 4, 2025, available at: <a href="https://aawsat.com/%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D8%B1%D8%A7%D9%84%D8%B1%D8%B1%D9%8A%D9%82%D8%B1%D8%A8%D9%8A/%D8%B4%D9%85%D8%A7%D9%84-%D8%A7%D9%81%D8%B1%D9%8A%D9%82%D9%8A%D8%A7/5097974-%D8%A7%D9%84%D9%88%D8%AD%D8%AF%D8%A9-%D8%AA%D8%B4%D9%86-%D8%B9%D9%85%D9%84%D9%8A%D8%A9-%D8%B9%D8%B3%D9%83%D8%B1%D9%8A%D9%8A%D9%8A-%D9%85%D8%AF%D9%8A%D9%8A%D9%8A-%D9%A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%8A-%D9%A-

Ean Libya, "Western Coastal Military Region Assumes Security of Zawiya Oil Refinery," January 7, 2025, available at: <a href="https://www.eanlibya.com/%D8%A7%D9%84%D9%85%D9%86%D8%B7%D9%82%D8%A9-%D8%A7%D9%84%D9%84%D8%B3%D8%A7%D9%84%D8%B3%D8%A7%D9%84%D8%B3%D8%A7%D9%84%D8%B3%D8%A7%D9%84%D8%B3%D8%AA/D8%AA/D8%

Wolfram Lacher, "A Political Economy of Zawiya: Armed Groups and Society in a Western Libyan City," Small Arms



- Survey, March 2024, available at: https://www.smallarmssurvey.org/sites/default/files/resources/SAS-SANA-Report-2024-Zawiya-EN.pdf
- Ghaya Ben Mbarek, "Libya-Tunisia Border Crossing to Partially Reopen After Months of Closure," The National, June 13, 2024, available at: https://www.thenationalnews.com/news/mena/2024/06/12/libya-tunisia-border-crossing-to-partially-reopen-after-months-of-closure/
- Al-Bayan, "Libya: Sabratha Clashes Bring the Militias File Back to the Forefront," December 18, 2022, available at: https://www.albayan.ae/world/arab/2022-12-18-1.4582233
- Gerbert van der Aa, "How EU Support in Libya Is Used to Stop Migrants," Amnesty International Netherlands Wordt Vervolgd, July 22, 2024, available at: https://www.amnesty.nl/wordt-vervolgd/zo-wordt-eu-steun-in-libie-gebruikt-om-migranten-tegen-te-houden
- United Nations Secretary-General, "Report of the Secretary-General on the United Nations Support Mission in Libya (S/2025/223)," April 11, 2025, §20, p. 5, available at: https://unsmil.unmissions.org/sites/default/files/n2507883.pdf
- Mark Shaw and Fiona Mangan, "Illicit Trafficking and Libya's Transition: Profits and Losses," United States Institute of Peace, February 24, 2014, p. 3, available at: https://www.usip.org/publications/2014/02/illicit-trafficking-and-libyas-transition-profits-and-losses
- Mark Shaw and Fiona Mangan, "Enforcing 'Our Law' When the State Breaks Down: The Case of Protection Economies in Libya and Their Political Consequences," Hague Journal on the Rule of Law, 7.1, 2015, pp. 99-110, available at: https://link.springer.com/article/10.1007/s40803-015-0008-4
- The Sentry interview with a member of the Zawiyah municipal council, December 2021.
- The Sentry interview with an employee of the Zawiyah Oil Refinery Company, July 2025.
- 340 The Sentry interview with an Abu Surra resident who lives near Buzeriba's headquarters, July 2025.
- The New Arab, "Key Libya Oil Refinery Halts Operations After Clashes," December 15, 2024, available at: https://www.newarab.com/news/key-libya-oil-refinery-halts-operations-after-clashes
- Of the \$8.6 billion in foreign fuel imported by the NOC in 2023, about \$1.6 billion worth of diesel and gasoline came in through the Zawiyah terminal. See:
 - Libyan Audit Bureau, Non-public study of the NOC, April 2024, p. 79, reviewed by The Sentry.
- 343 Libya al-Mostakbal, "Oil Facilities Guard Withdraws From Zawiyah Refinery and National Oil Corporation Secures the Facility," January 7, 2017, available at: <a href="https://libyaalmostakbal.wordpress.com/2017/01/07/%D8%AD%D8%B1%D8%B3-%D8%A7%D9%84%D9%85%D9%86%D8%B4%D8%A3%D8%AA-%D9%86%D8%B3%D8%AD%D8%A8-%D9%85%D9%85%D9%85%D9%81%D8%A7%D8%A9-%D8%A7%D9%84%D8%B2%D8%A7%D9%88%D9%88%D9%88%D9%85%D8%A4/
- Wolfram Lacher, "A Political Economy of Zawiya: Armed Groups and Society in a Western Libyan City," Small Arms Survey, March 2024, available at: https://www.smallarmssurvey.org/sites/default/files/resources/SAS-SANA-Report-2024-Zawiya-EN.pdf
- Owing to his involvement in human smuggling and other illicit activities, Koshlaf, also known as "al-Qasab," is subject to international sanctions issued in 2018 by multiple bodies. Koshlaf is listed under United Nations Security Council Resolution 1970 (2011), which includes travel bans and asset freezes. He appears on the UK's Foreign, Commonwealth & Development Office (FCDO) sanctions list under the same UN resolution. The US Department of the Treasury's Office of Foreign Assets Control, as well, has imposed sanctions on Koshlaf for his involvement in migrant smuggling and human trafficking. See:
 - HM Treasury Office of Financial Sanctions Implementation, "Financial Sanctions Notice: Libya," November 30, 2023, available at: https://assets.publishing.service.gov.uk/media/656896c82ee693001360cb85/Notice_Libya_301123.pdf
 US Department of the Treasury, "Treasury Sanctions Six Migrant Smugglers for Threatening Libya's Peace, Security, or Stability," Press Release, June 11, 2018, available at: https://home.treasury.gov/news/press-releases/sm0409
 - United Nations, "Security Council Committee Concerning Libya Adds Six Individuals to Its Sanctions List," Press Release, June 7, 2018, available at: https://press.un.org/en/2018/sc13371.doc.htm
- Although, as part of an anti-crime narrative, government-aligned forces claimed to have seized the strategic Zawiyah refinery on at least two occasions, they only ever entered the outer gate before withdrawing. At no point did they



attempt to breach the inner gate, which has consistently remained under Koshlaf's control. See:

The Sentry interview with an employee of Zawiyah's refining company, December 2023.

The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.

Libya al-Ahrar, "Commander of Military Unit Guarding Zawiyah Refinery Jailed on Fuel-Smuggling Charges," August 13, 2023, available at: <a href="https://libyaalahrar.tv/2023/08/13/%D8%A8%D8%AA%D9%87%D9%85-%D8%AA%D8%AA%D8%B9%D9%84%D9%82-%D8%A8%D8%AA%D9%87%D8%B1%D9%8A%D8%A8-%D8%A7%D9%84%D9%88MD9%82%D9%88%D8%AF-%D8%B3%D8%AC%D9%86-%D8%A2%D9%85%D8%B1-%D9%81%D9%82%D8%A9/

Alessandro Scipione, "Libya: The Riots in Zawiya Risk Triggering the Hunt for Migrants," Agenzia Nova, April 28, 2023, available at: https://www.agenzianova.com/en/news/libia-disordini-a-zawiya-la-52esima-brigata-di-fanteria-costretta-a-ritirarsi-dalla-citta/

According to a Zawiyah resident familiar with Koshlaf's fuel trade, Koshlaf keeps his margins at current levels because he lacks local dominance. Attempts to grab a bigger slice would likely spark retaliation from rival armed groups near the refinery, who could attack if they deemed the new conditions unacceptable. By moving high volumes at a modest margin, Koshlaf preserves an equilibrium that keeps these rivals content. See:

The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.

- The Sentry interview with an employee of Zawiyah's refining company, December 2023.
- The Sentry interview with an employee of Zawiyah's refining company, December 2023.
- The Sentry interview with a Zuwarah seaport worker, March 2025.
- With regard to the illicit flow of fuel and other goods along the Tunisia-Libya coast, the city of Zuwarah has long dominated the Ras Jdir border crossing. But in March 2024, Dabaiba's forces disrupted that arrangement, resulting in a three-month closure. When the crossing reopened, Zuwarah's influence had diminished somewhat, which caused a reduction of land transfers of diesel and gasoline from Zawiyah to Zuwarah. Although smuggling into Tunisia became more difficult, it did not cease altogether. The volume of fuel passing through the Dehiba Wazin border crossing farther south has grown since the changes at Ras Jdir. This relatively modest shift is arguably the most significant action the Dabaiba government has taken against fuel smuggling thus far in northwestern Libya. See:

The Sentry interview with a Zuwarah seaport worker, March 2025.

The Sentry interview with a Zuwarah native familiar with the illicit trade traversing the Tunisia-Libya border, April 2025.

The Sentry interview with a Ben Gardane native familiar with the illicit trade traversing the Tunisia-Libya border, April 2025.

- 352 The Sentry interview with a Zuwarah seaport worker, March 2025.
- The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.
- The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.
- 355 The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.
- The Sentry interview with a Zawiyah resident familiar with Koshlaf's fuel trade, March 2025.
- The Sentry interview with a Zawiyah resident who lives near the city's refinery, January 2025.
- The Sentry interview with a Zawiyah resident who lives near the city's refinery, January 2025.
- 359 The Sentry interview with a Brak al-Shatti resident familiar with the local airbase, August 2023.
- The Sentry interview with a Misrata armed group member, July 2024.
- The Sentry interview with a Misrata activist, November 2024.
- Libya Observer, "Misrata Chamber of Commerce Lays Foundation Stone for the New Investment Building," February 21, 2021, available at: https://ar.libyaobserver.ly/article/12191
- 363 Sada, "The Ministry of Economy and Trade Follows Up on Preparations for the Misrata International Free Zones Forum," May 21, 2022, available at: <a href="https://sada.ly/%D8%A7%D9%84%D8%A7%D9%82%D8%AA



- 364 The Sentry interview with a Misrata armed group member, July 2024.
- 365 The Sentry interview with a Misrata activist, November 2024.
- 366 In 2011, amid the uprising against the Qadhafi regime, many revolutionary militias formed in Misrata. After the regime's collapse, these groups remained active. To preserve impartial security in their city and its surroundings, Misrata's leaders kept the Joint Operations Room framework used in 2011 and drew personnel from each militia as part of a collective and balanced arrangement. This worked for several years. After a while, however, an armed group calling itself the Joint Force—led by Omar Bughdada—came out of the Joint Operations Room, turning into a conventional militia with its own agenda. In 2016, the Joint Force participated in the campaign against the Islamic State in Sirte, but after the extremist group was uprooted in December of that year, the Joint Force's relationship with the then-UNrecognized Government of National Accord in Tripoli proved mediocre. Nonetheless, Bughdada managed to secure formal recognition of the Joint Force from Prime Minister Fayez al-Sarraj in a 2020 decree. See:

The Sentry interview with a Misrata native who dealt with the Joint Force in 2015. July 2024.

Brian McQuinn, "History's Warriors: The Emergence of Revolutionary Battalions in Misrata," in Peter Cole and Brian McQuinn (eds.), The Libyan Revolution and its Aftermath, Oxford, UK: Oxford University Press, 2015, p. 248.

Al-Marsad, "Al-Bunyan al-Marsous Operations: Artillery and Air Strikes, Fighting in Districts 3 and 1 in Sirte to Liberate Them From ISIS," August 29, 2016, available at: https://almarsad.co/2016/08/29/%D8%B9%D9%85%D9%84%D9%8 A%D8%A7%D8%AA-%D8%A7%D9%84%D8%A8%D9%86%D9%8A%D8%A7%D9%86-%D8%A7%D9%84%D9%8 <u>5%D8%B1%D8%B5%D9%88%D8%B5%D9%82%D8%B5%D9%81</u>-%D9%85%D8%AF%D9%81%D8%B9%D9%8A-%D9%88%D8%AC%D9%88%D9%8A/

- 367 The Sentry interview with a Misrata armed group member, July 2024.
- 368 The Sentry interview with a Misrata activist, November 2024.
- 369 The Sentry interview with a Misrata activist, November 2024.
- 370 The Sentry interview with a Misrata activist, November 2024.
- 371 Human Rights Watch, "Libya/US: Rights Concerns in Lockerbie Suspect's Extradition," February 13, 2023, available at: https://www.hrw.org/news/2023/02/13/libya/us-rights-concerns-lockerbie-suspects-extradition
- 372 The Sentry interview with a Misrata armed group member, July 2024.
- 373 The Sentry interview with a Misrata activist, November 2024.
- 374 The Sentry interview with a Misrata armed group member, July 2024.
- 375 The Sentry interview with a member of the Khums municipal council, July 2024.
- 376 The Sentry interview with an Interior Ministry official based in Tripoli, July 2024.
- 377 The Sentry interview with a Misrata activist, November 2024.
- 378 The Sentry interview with a Misrata armed group member, July 2024.
- 379 The Sentry interview with a Misrata armed group member, July 2024.
- 380 The Sentry interview with a member of the Khums municipal council, July 2024.
- 381 The Sentry interview with a Misrata armed group member, July 2024.
- 382 The Sentry interview with a Misrata armed group member, July 2024.
- 383 Plastic tanks—each typically holding about 1,000 liters—are often placed inside standard steel shipping containers, concealing them amid ordinary cargo. See:
 - The Sentry interview with a Misrata native familiar with the activities related to the city's port, April 2025.
- 384 As part of illicit maritime activities off Misrata, some small vessels—including fishing boats—transport fuel to nearby Libyan coastal areas. They also transfer fuel to international buyers waiting offshore, often bound for Malta or Italy. See: The Sentry interview with a Misrata native familiar with the activities related to the city's port, April 2025. The Sentry interview with a Misrata armed group member, July 2024.
- 385
- Two independent sources told The Sentry that a passenger ship known as the Kevalay Queen often buys more fuel than it needs for its journey between Misrata and Turkey. They suspect that the surplus is sold once the ferry arrives in Turkey, although there are no confirmed details as to where or how this extra fuel is offloaded in Turkish ports. See:



The Sentry interview with a Misrata native familiar with the activities related to the city's port, April 2025.

The Sentry interview with a Misrata armed group member, July 2024.

Ibrahim Senusi, "The Kevalay Queen Ferry Inaugurates Tripoli-Istanbul Sealine," Libya Herald, May 12, 2023, available at: https://libyaherald.com/2023/05/the-kevalay-queen-ferry-inaugurates-tripoli-istanbul-sealine/

- The Sentry interview with a Misrata armed group member, July 2024.
- When it comes to official security provision in the Bani Awalid area and farther south, the Joint Force has a limited presence. Instead, Brigade 444, another formation affiliated with the Tripoli Defense Ministry, tends to control the Bani Walid area and its southern vicinities. Although Brigade 444 plays a relatively subdued role in the local fuel smuggling trade, some of its mid-level commanders engage in small-scale fuel smuggling. See:
 - The Sentry interview with a Misrata native familiar with the activities related to the city's port, April 2025.
 - The Sentry interview with a former military officer from southern Tripoli familiar with the inner workings of Brigade 444, April 2024.
- Mohammad Ibrahim, "Libya: Brega Petroleum Marketing Company Announces Daily Transfer of 2.5 Million Liters of Gasoline to the Sabha Depot," Libya Witness, January 6, 2024, available at: https://lywitness.com/68758/
- In December 2023, a scheme to transfer 26 tons of illicit gold from Libya to Turkey through Misrata International Airport came to light, with the Joint Force suspected of involvement. In May 2024, after the attorney general ordered the arrest of customs chiefs and other officials tied to the case, Joint Force fighters stormed the attorney general's office in Misrata. See:

The Libya Update, "Pro-Dbeibeh Militia Accused of Smuggling Gold to Turkey," December 17, 2023, available at: https://libyaupdate.com/pro-dbeibeh-militia-accused-of-smuggling-gold-to-turkey/

Attorney General Office – State of Libya, "Statement on Detention of Customs Officials in Misrata Over Gold Smuggling," Facebook post, May 12, 2024, available at: https://www.facebook.com/attorneygeneral.ly/ posts/909652984296170

Akhbar Libya 24, "Armed Elements Storm the Attorney General's Office in Misrata," May 15, 2024, available at: https://akhbarlibya24.net/2024/05/15/%D8%B9%D9%86%D8%A7%D8%B5%D8%B1-%D9%85%D8%B3%D9%84%D8%AD%D8%A9

Salma El Wardany, "Libya Arrests Customs Officers for Smuggling \$2 Billion of Gold," Bloomberg, May 14, 2024, available at: https://www.bloomberg.com/news/articles/2024-05-14/libya-arrests-customs-officers-for-smuggling-2-billion-of-gold

- 390 The Sentry interview with an Interior Ministry official based in Tripoli, July 2024.
- The Sentry analysis of calls by Iranian-linked vessels at Misrata port since 2023: Arezoo (9165786), Azargoun (9283019), Daisy (9270684), Kashan (9270696), Shiba (9270646).
- In March 2025, the US sent a diplomatic note urging the Foreign Affairs Ministry of the Government of National Unity to address the Office of the Minister of Transport. The Foreign Affairs Ministry's Muftah Abukhris then issued a memorandum requesting that all Libyan authorities refrain from providing any services through Libyan ports or maritime service providers to vessels associated with the Islamic Republic of Iran Shipping Lines (IRISL). The note added that IRISL has been under US sanctions since 2020, and it highlighted recent port calls made by the IRISL vessel Shiba to Misrata, Tripoli, and Benghazi in February 2025. See:

Ministry of Foreign Affairs, Government of National Unity, Libya, "Urgent Letter to the Office of the Minister of Transport Regarding US Embassy Request to Avoid Providing Services to Islamic Republic of Iran Shipping Lines (IRISL)," Facebook post, March 4, 2025, available at: https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ https://www.facebook.com/100068048598026/ <a h

Asharq al-Awsat, "Has Libya's Unity Government Head Lost Misrata's Support?," June 12, 2024, available at:

https://aawsat.com/%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D9%85-%D8%A7%D9%84%D
8%B9%D8%B1%D8%A8%D9%8A/%D8%B4%D9%85%D8%A7%D9%84-%D8%A7%D9%81%D8%
B1%D9%8A%D9%82%D9%8A%D8%A7/5030245-%D9%87%D9%84-%D9%81%D9%82%D8%AF%D8%B1%D8%A6%D9%8A%D8%B3-%D8%A7%D9%84%D9%88%D8%AD%D8%AF%D8%A9%D8%A7%D9%84%D9%84%D9%8A%D8%A8%D9%8A%D8%A9-%D8%AF%D8%B9%D9%85%D9%85%D8%AF%D9%8A%D9%86%D8%A9-%D9%85%D8%B1%D8%A7%D8%AA%D8%A9%D8%9F



- 395 Al-Mustaqbal Center for Advanced Research and Studies, "The Sacrifice of Bashagha Changes the Internal Alliances Map in Libya After the Dismissal of Sanallah," July 21, 2022, available at: https://futureuae.com/ar-AE/Mainpage/ltem/7456
- 396 The Sentry interview with a former senior NOC official, November 2024.
- Eva Levesque, "Exit of Libya's Oil Chief Is a Sign Change Must Come, Say Analysts," Arabian Gulf Business Insight, January 20, 2025, available at: https://www.agbi.com/analysis/oil-and-gas/2025/01/libya-oil-chief-Inoc-farhat-bengdara-exit-sign-change-must-come-say-analysts/
- 398 The Sentry interview with a former senior NOC official, November 2024.
- Office of the NOC's Chairman, "Memorandum No. 687: Discontinuation of the Barter System for Fuel Supply," February 5, 2025, reviewed by The Sentry.
- Office of the NOC's Chairman, "Memorandum No. 687: Discontinuation of the Barter System for Fuel Supply," February 5, 2025, reviewed by The Sentry.
- Office of the NOC's Chairman, "Memorandum No. 687: Discontinuation of the Barter System for Fuel Supply," February 5, 2025, reviewed by The Sentry.
- A 2015 scandal in Nigeria illustrates how an oil-rich nation can end up overpaying for fuel imports when barter deals are opaque. Nigeria's national oil company had relied on a single energy merchant for crude-for-fuel swaps, lacking competition and transparency. As a result, Nigeria paid prices inflated by more than \$700 million annually. See:

 Andy Hoffman, "Trafigura Said to End Nigerian Oil-Swap Deal on Tighter Scrutiny," Bloomberg, January 16, 2015, available at: https://www.bloomberg.com/news/articles/2015-01-16/trafigura-said-to-end-nigerian-oil-swap-deal-on-tighter-scrutiny
 - Tim Cocks and Joe Brock, "Special Report: Anatomy of Nigeria's \$20 Billion 'Leak," Reuters, February 6, 2015, available at: https://www.reuters.com/article/world/us/special-report-anatomy-of-nigerias-20-billion-leak-idUSKBN0LA0X7/
- Throughout 2024, the NOC imported 234,000 barrels of fuel daily—mainly gasoline and diesel—spending \$9.46 billion for the year. This works out to roughly \$0.70 per liter. Yet the average fuel price in 2024 was only \$0.62 per liter. This means that the NOC paid about \$0.08 more per liter than it should have. The NOC therefore appears to have bartered away too much of its valuable crude oil in exchange for the fuel it received from abroad. Based on market prices, it overpaid by approximately \$1 billion. See:
 - The Sentry analysis of Libya's 2024 fuel imports.
 - The Sentry analysis of Kpler data on Libyan imports in 2024.
 - Organization of the Petroleum Exporting Countries (OPEC), "Monthly Oil Market Report December 2024," December 13, 2024, p. 60, available at: https://www.opec.org/assets/assetdb/momr-december-2024-1.pdf
- In 2023, Libya bartered \$3.98 billion of crude oil for 4.4 million tons of diesel and \$4.49 billion of crude oil for 4.7 million tons of gasoline, equating to \$0.75 per liter for diesel and \$0.71 per liter for gasoline. By comparison, Mediterranean market prices averaged \$0.69 per liter for diesel and \$0.65 per liter for gasoline. Libya thus paid \$0.06 per liter above market for diesel and for gasoline, resulting in overpayments of \$318 million for diesel and \$381 million for gasoline—a total loss of approximately \$700 million. This is in line with comments made by the Libyan Audit Bureau, which calculated that the swap mechanism cost the NOC an extra \$940 million in 2023. See:
 - Libyan Audit Bureau, "Libyan Audit Bureau Report 2023," December 2024, pp. 81-82, available at: https://www.audit.gov.ly/ar/reports/



- Organization of the Petroleum Exporting Countries (OPEC), "Monthly Oil Market Report December 2023," December 12, 2023, p. 57, available at: https://www.opec.org/assets/assetdb/opec-momr-december-2023.pdf
- During the first three quarters of 2025, Libya imported an average of 33.5 million liters per day, compared to about 36.2 million per day in the same period in 2024. See:
 - The Sentry analysis of Kpler data on Libyan imports in 2025.
- 406 The Sentry analysis of the Libyan fuel sector, 2025.
- The NOC response to The Sentry, October 15, 2025.
- 408 The NOC response to The Sentry, October 15, 2025.
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, §24, p. 9, available at: https://docs.un.org/en/S/2024/914
- 410 On the UAE's military support for the RSF amid the Sudanese civil war since 2023, see:

Declan Walsh, Christoph Koettl, and Eric Schmitt, "Talking Peace in Sudan, the U.A.E. Secretly Fuels the Fight," The New York Times, September 29, 2023, available at: https://www.nytimes.com/2023/09/29/world/africa/sudan-war-united-arab-emirates-chad.html

Declan Walsh and Christoph Koettl, "How a U.S. Ally Uses Aid as a Cover in War," The New York Times, September 21, 2024, available at: https://www.nytimes.com/2024/09/21/world/africa/uae-sudan-civil-war.html

Benoît Faucon, Gabriele Steinhauser, Kejal Vyas, and Summer Said, "The Global War Machine Supplying Colombian Mercenaries to Fight in Sudan," The Wall Street Journal, December 11, 2024, available at: https://www.wsj.com/world/africa/sudan-colombian-mercenaries-global-security-services-9ff2a201

Carlos Gonzales, "Colombian Mercenaries in Transit to Sudan via Libya - What Do We Know?," Bellingcat, December 13, 2024, available at: https://www.bellingcat.com/news/2024/12/13/colombian-mercenaries-in-transit-to-sudan-via-libya-what-do-we-know/

The Sentry, "The RSF's Business Network in the UAE," October 2025, available at: https://thesentry.org/wp-content/uploads/2025/09/SudanRSF-TheSentry-Oct2025.pdf

During the final months of Haftar's 2019-2020 offensive against Tripoli, Turkish drones and electronic warfare overwhelmed his forces. In the campaign's final weeks, the Wagner Group—a Russian private military company—took almost full control of four key air bases, introduced warplanes, and established a defensive system that remains in place to this day. See:

Michael R. Gordon, "Russia Sends Warplanes to Libya, Escalating Its Involvement, U.S. Says," The Wall Street Journal, May 26, 2020, available at: https://www.wsj.com/articles/russia-sends-warplanes-to-libya-escalating-its-involvement-u-s-says-11590512914

Benoit Faucon and Jared Malsin, "Russian Oil Grab in Libya Fuels U.S.-Kremlin Tensions in Mideast," The Wall Street Journal, July 26, 2020, available at: https://www.wsj.com/articles/russian-oil-grab-in-libya-fuels-u-s-kremlin-tensions-in-mideast-11595772000

Jalel Harchaoui, "The Pendulum: How Russia Sways Its Way to More Influence in Libya," War on the Rocks, January 7, 2021, available at: https://warontherocks.com/2021/01/the-pendulum-how-russia-sways-its-way-to-more-influence-in-libya/

Jalel Harchaoui and John Lechner, "How Russia's War in Ukraine Affects Its Meddling in Africa," Lawfare, May 1, 2022, available at: https://www.lawfaremedia.org/article/how-russias-war-ukraine-affects-its-meddling-africa

Sophia Yan, "Pictured: How Russia Is Expanding Its Military Foothold in Africa," The Telegraph, December 3, 2024, available at: https://www.telegraph.co.uk/world-news/2024/12/03/russia-expands-military-presence-libya-pictures/

- The Sentry interview with a Brak al-Shatti resident familiar with the local airbase, August 2023.
- The Sentry interview with a former LAAF soldier who was stationed in Waddan, near al-Jufrah Airbase, in 2023, January 2024.

The Sentry interview with a member of the LAAF who was stationed at al-Jufrah Airbase several times from 2021 to 2023, November 2023.

The Sentry interview with a senior intelligence officer within United States Africa Command, Stuttgart, December 2020.



- The Sentry interview with a member of the LAAF who was stationed at al-Jufrah Airbase several times from 2021 to 2023, November 2023.
- 415 The Sentry interview with a senior intelligence officer within United States Africa Command, Stuttgart, December 2020.
- David Kenner, "Russia's Ghost Ships Haunt Libya," International Consortium of Investigative Journalists, March 13, 2025, available at: https://www.icii.org/news/2025/03/russias-qhost-ships-haunt-libya/
- 417 Sophia Yan, "Pictured: How Russia Is Expanding Its Military Foothold in Africa," The Telegraph, December 3, 2024, available at: https://www.telegraph.co.uk/world-news/2024/12/03/russia-expands-military-presence-libya-pictures/
- Jalel Harchaoui, "A Dysfunctional Peace: How Libya's Fault Lines Were Redrawn," War on the Rocks, February 24, 2022, available at: https://warontherocks.com/2022/02/a-dysfunctional-peace-how-libyas-fault-lines-were-redrawn/
- The Sentry interview with an American diplomat, February 2023.
- The Sentry interview with a senior intelligence officer within United States Africa Command, Stuttgart, December 2020.

 The Sentry interview with a French diplomat, June 2024.

 The Sentry interview with an Egyptian officer responsible for covering eastern Libya, March 2024.
- The Sentry interview with a French diplomat, June 2024.
- 422 The Sentry interview with an Egyptian officer responsible for covering eastern Libya, March 2024.
- 423 Russian military protection for the Haftar camp never came for free. A mercenary logic has dictated the partnership between the Haftar family and various Russian security groups active in Libya, including Wagner. Russian outfits active in Libya have consistently demanded compensation for their services and the deployment of materiel. In 2020, the US Department of Defense said that Wagner's support for Haftar appeared to have been funded in part by the UAE. The same year, a French newspaper alleged that Wagner's support for Haftar had been funded in part by Saudi Arabia. In an August 2021 interview with The Sentry, the French leader of a UAE-based private military company active in Africa, including in Libya and the Sahel, indicated that, based on his familiarity with eastern Libya, Khalifa Haftar's camp, and Russia's military footprint in the country, the Haftars were likely required to pay Wagner about \$200 million a year. This sum would cover approximately \$100 million per year for maintaining the Russian warplane fleet and another \$100 million per year for the Russian ground presence, including the manning and upkeep of air defense systems and radars. In summer 2023, Haftar paid the Wagner Group \$200 million, the Wall Street Journal reported. Even with Wagner gone and the Russian state fulfilling a more direct role, an eastern Libyan security official indicated in a December 2024 interview that the Haftar family still compensates Moscow for maintaining its military footprint. See: US Lead Inspector General, "East Africa Counterterrorism Operation and North and West Africa Counterterrorism Operation: Lead Inspector General Report to the United States Congress," December 2020, p. 37, available at: https:// media.defense.gov/2020/Dec/04/2002546287/-1/-1/1/LEAD IG EAST AFRICA AND NORTH AND WEST AFRICA COUNTERTERRORISM OPERATIONS.PDF

Marie Jégo, Benoît Vitkine, and Frédéric Bobin, "En Libye, le grand marchandage entre Moscou et Ankara" (In Libya, the Great Bargaining Between Moscow and Ankara), Le Monde, January 24, 2020, available at: https://www.lemonde.fr/international/article/2020/01/24/en-libye-le-grand-marchandage-entre-moscou-et-ankara 6027114 3210.html

Benoît Faucon, Drew Hinshaw, and Alan Cullison, "The Last Days of Wagner Group's Yevgeny Prigozhin," The Wall Street Journal, August 24, 2023, available at: https://www.wsj.com/world/russia/prigozhin-wagner-plane-crash-last-days-2c44dd5c

The Sentry interview with a UAE-based French PMC executive familiar with eastern Libya, August 2021.

The Sentry interview with a Libyan security official based in Benghazi, December 2024.

- The Sentry interview with a member of the LAAF who was stationed at al-Jufrah Airbase several times from 2021 to 2023, November 2023.
- 425 K. Oanh Ha, "The Odyssey of the Queen Majeda," Bloomberg, February 6, 2024, available at: https://www.bloomberg.com/features/2024-libya-russia-oil-smuggling/
- The Sentry interview with a former LAAF soldier who was stationed at al-Jufrah Airbase from 2022 to 2023, January 2024.
- 427 The Sentry interview with an Ajdabiya source close to Brigades Tareq bin Ziyad and 166, June 2023.



- The Sentry interview with a former LAAF soldier who was stationed in Waddan, near al-Jufrah Airbase, in 2023, January 2024.
- 429 The Sentry interview with a former LAAF soldier who was stationed inside al-Jufra Airbase in 2021-2023, January 2024.
- The Sentry interview with a Brak al-Shatti resident familiar with the local airbase, August 2023.
- The Sentry interview with a Malian eyewitness in the Gao area, August 2023.
- The Sentry interview with a Tuareg fighter from southwest Libya who served as a mercenary for the RSF during the first year of the Sudanese civil war, April 2025.
- 433 The Sentry interview with an Ajdabiya source close to Brigades Tareg bin Ziyad and 166, August 2024.
- 434 The Sentry interview with an Ajdabiya source close to Brigades Tareg bin Ziyad and 166, August 2024.
- 435 The Sentry interview with an advisor of the Usama Hammad government based in Benghazi, July 2024.
- Mohamed Ahmed, "Russian Deputy Defense Minister Arrives in Benghazi," The Libya Observer, June 1, 2024, available at: https://libyaobserver.ly/inbrief/russian-deputy-defense-minister-arrives-benghazi
- In November 2024, senior GRU officer Andrei Averianov accompanied Russia's deputy defense minister in a visit to the Haftar family in the Benghazi area. See:

 Libya Today 24 (@Libyatoday24), X (formerly Twitter) post, November 26, 2024, available at: https://x.com/libyatoday24/status/1861439845110800770?s=46
- Sébastian Seibt, "Notorious Russian General, Master Spy Duo Organize in Africa After Prigozhin's Demise," France 24, September 20, 2023, available at: https://www.france24.com/en/africa/20230920-notorious-russian-general-master-spy-duo-organise-in-africa-after-prigozhin-s-demise
- 439 Al-Watan News, "Major General Khaled Haftar: Our Relations With Russia Are Strong and Our Cooperation in Training and Development is Ongoing," August 14, 2024, available at: https://www.alwatan-ly.com/2024/08/131634/
- During the second half of 2023, most employees of the Wagner Group were transferred to another private entity called Redut, which is likely controlled by the GRU. See:

 The Sentry interview with a former LAAF soldier who was stationed at al-Jufrah Airbase in 2022-2023, January 2024.

 Pierre Emmanuel Ngendakumana, "The New Wagner? Russian Mercenary Group Recruits Prigozhin's Ex-Fighters," Politico, October 16, 2023, available at: https://www.politico.eu/article/new-wagner-russian-mercenary-group-recruits-prigozhins-ex-fighters-redut/
- All Eyes on Wagner, "Mediterranean Sea Objective for the African Corps," May 10, 2024, available at: https://alleyesonwagner.org/2024/05/10/mediterranean-sea-objective-for-the-african-corps/
- Agence France-Presse, "Russia Eyes Libya to Replace Syria as Africa Launchpad," January 11, 2025, available at: https://www.france24.com/en/live-news/20250111-russia-eyes-libya-to-replace-syria-as-africa-launchpad
- 443 Benoit Faucon and Lara Seligman, "Russia Withdraws Air-Defense Systems, Other Advanced Weaponry From Syria to Libya," The Wall Street Journal, December 18, 2025, available at: https://www.wsj.com/world/russia-air-defense-bases-syria-libya-25810db0
- Tom Kington, "Italy Bristles at Prospect of Russia Moving Ships From Syria to Libya," Defense News, December 19, 2024, available at: https://www.defensenews.com/global/europe/2024/12/19/italy-bristles-at-prospect-of-russia-moving-ships-from-syria-to-libya/
- United Nations Security Council, "Final report of the Panel of Experts established pursuant to resolution 1973 (2011) concerning Libya," S/2024/914, December 13, 2024, pp. 10, 86, available at: https://docs.un.org/en/S/2024/914
- Eliott Brachet, "Le Soudan déchiré par une année de guerre" (Sudan Torn By A Year of War), Le Monde, April 15, 2024, available at: https://www.lemonde.fr/afrique/article/2024/04/15/le-soudan-dechire-par-une-annee-deguerre 6227890 3212.html
- Hager Ali, "The War in Sudan: How Weapons and Networks Shattered a Power Struggle," German Institute for Global and Area Studies, February 2024, available at: https://www.ssoar.info/ssoar/bitstream/handle/document/92638/ssoar-2024-ali-The War in Sudan How.pdf
- Frederic Wehrey, "This War Is Out of Our Hands': The Internationalization of Libya's Post-2011 Conflicts From Proxies to Boots on the Ground," New America, September 2020, available at: https://www.newamerica.org/international-security/reports/this-war-is-out-of-our-hands/



Although Egypt was Haftar's main foreign backer prior to Operation Karama in May 2014, the UAE's influence surged that August when it carried out airstrikes in Tripoli against Haftar's adversaries and, from western Egypt, launched special forces operations against radical Islamists in the city of Derna. Beginning in October 2014, the UAE lobbied other countries to support Haftar, supplied weapons, facilitated the use of UAE banking, and even tried to help Haftar export oil independently from the UN recognized government. By 2016, Abu Dhabi was financing and overseeing the refurbishment of key air bases—most notably at al-Khadim—while also providing warplanes for Haftar's forces. In 2019, the UAE conducted 1,000 air strikes in support of Haftar's offensive against Tripoli. See:

The Sentry interview with a French diplomat, June 2018.

The Sentry interview with an Italian diplomat, November 2024.

David D. Kirkpatrick and Eric Schmitt, "Arab Nations Strike in Libya, Surprising U.S.," The New York Times, August 25, 2014, available at: https://www.nytimes.com/2014/08/26/world/africa/egypt-and-united-arab-emirates-said-to-have-secretly-carried-out-libya-airstrikes.html

Jeremy Binnie, "UAE's Forward Operating Base in Libya Revealed," IHS Jane's Defence Weekly, October 28, 2016, available at: https://middleeasttransparent.com/15606-2/

Jalel Harchaoui, "Libya's Looming Contest for the Central Bank," War on the Rocks, April 1, 2019, available at: https://warontherocks.com/2019/04/libyas-looming-contest-for-the-central-bank/

Emadeddin Badi, "Russia Isn't the Only One Getting Its Hands Dirty in Libya," Foreign Policy, April 21, 2020, available at: https://foreignpolicy.com/2020/04/21/libyan-civil-war-france-uae-khalifa-haftar/

In mid-2022, the UAE brokered a US-approved agreement between Saddam Haftar and Ibrahim Dabaiba, ensuring open oil terminals under Haftar's control in exchange for a share of the oil wealth. This deal consisted of installing Farhat Benqdara—a Libyan-Emirati dual citizen and former Haftar advisor—as NOC chairman, highlighting Abu Dhabi's sway in both Libya and Washington. See:

The Sentry interview with a former American diplomat, May 2024.

International Crisis Group, "Getting Past Libya's Central Bank Standoff," October 1, 2024, available at: https://www.crisisgroup.org/middle-east-north-africa/north-africa/libya/b093-getting-past-libyas-central-bank-standoff

Al-Araby al-Jadeed, "Libyan Court Cancels Decisions by Farhat Benqdara, Says He Holds Emirati Citizenship," December 1, 2024, available at: <a href="https://www.alaraby.co.uk/economy/%D9%85%D8%AD%D9%83%D9%85%D8%A9-%D9%84%D9%84%D9%8A-%D9%82%D8%MA9-%D9%84%D9%8A-%D9%8A-%D9%82%D8%MA9-%D9%8A-%D9%A-%D9

- 451 Many of the businesses benefiting the Haftar family rely on the UAE's banking hospitality. As a result, if the Haftar family and Abu Dhabi were to have a falling-out, the repercussions for the Haftars would be considerable, given their longstanding dependence on the UAE as a financial platform. See:
 - Yousef Saba and Ahmad Ghaddar, "Libya's First Private Oil Firm Grows in Eastern Commander's Shadows," Reuters, February 17, 2025, available at: https://www.reuters.com/business/energy/libyas-first-private-oil-firm-grows-eastern-commanders-shadows-2025-02-17/
- The RSF's method of warfare is largely predicated on fuel, as battlefield outcomes are often decided by ground force mobility and endurance. The tactics used by Hemedti's units are inherited from the Darfur rebels of the early 2000s, who in turn drew inspiration from Chad's victory in the "Toyota Wars" of the 1980s. In that conflict, Chadian forces defeated a better-equipped Libyan army by leveraging the speed and surprise of armed pickup trucks to outmaneuver a conventional military. Since erupting in April 2023, the ongoing war in Sudan has similarly featured fuel-dependent combat. Massive quantities of diesel from the Haftar family have powered the RSF's relentless attacks in Darfur, including against civilians. Without access to diesel, the Sudanese belligerents' entire model of mobile warfare would collapse. See:

Marielle Debos, Living by the Gun in Chad: Combatants, Impunity and State Formation, London: Zed Books, 2016, p. 131.

Nathaniel K. Powell, France's Wars in Chad: Military Intervention and Decolonization in Africa, Cambridge, UK:



Cambridge University Press, 2021, pp. 201 and 211.

Daniel Rothbart and Adeeb Yousif, "Ideology and Cultural Violence in Darfur," Conflict Trends, 2016, 3, pp. 36-41, available at: https://journals.co.za/doi/epdf/10.10520/EJC196782

The Sentry interview with a Qatrun-based businessman involved in trade traversing the Libya-Chad border, October 2024.

Hager Ali, "The War in Sudan: How Weapons and Networks Shattered a Power Struggle," GIGA Focus Middle East, February 2024, available at: https://www.giga-hamburg.de/en/publications/giga-focus/the-war-in-sudan-how-weapons-and-networks-shattered-a-power-struggle

453 Before April 2023, Battalion Subul al-Salam—the LAAF-aligned brigade then controlling Kufrah and its cross-border trade—already favored RSF-linked commercial partners but did not exclude others. This changed with the outbreak of Sudan's war. Under pressure from the UAE and Saddam Haftar, Subul al-Salam and several other LAAF brigades tightened both security and oversight of fuel shipments into Sudan. As a result, the political preference for RSF-aligned actors deepened over time until it became exclusive. See:

The Sentry interview with a local analyst based in Kufrah, July 2024.

The Economist, "The War in Sudan Is Spilling Over Its Borders," June 19, 2025, available at: https://www.economist.com/middle-east-and-africa/2025/06/19/the-war-in-sudan-is-spilling-over-its-borders

Hassan Alnaser, Mashair Idris, Mohamed Alagra, and Omar al-Faroug, "Sudan Nashra: War Spills Into Sudan-Egypt-Libya Border Triangle | RSF Shells Obeid Following Threats | Fasher, Camps Hit Again | Surge in Cholera, Mass Graves in Khartoum," Mada Masr, June 14, 2025, available at: https://www.madamasr.com/en/2025/06/14/news/u/sudan-nashra-war-spills-into-sudan-egypt-libya-border-triangle-military-accuses-haftars-forces-of-backing-rsf-obeid-under-rsf-fire-following-hemedtis-threats-new-attacks-on-fas/">https://www.madamasr.com/en/2025/06/14/news/u/sudan-nashra-war-spills-into-sudan-egypt-libya-border-triangle-military-accuses-haftars-forces-of-backing-rsf-obeid-under-rsf-fire-following-hemedtis-threats-new-attacks-on-fas/

- Jérôme Tubiana and Claudio Gramizzi, "Lost in Trans-Nation: Tubu and Other Armed Groups and Smugglers Along Libyas Southern Border," Small Arms Survey, December 2018, available at: https://www.smallarmssurvey.org/ resource/lost-trans-nation-tubu-and-other-armed-groups-and-smugglers-along-libyas-southern-border
- 455 Rupert Horsley and Jessica Gerken, "Libya: Stability Fuels Rebound in Human Smuggling," Global Initiative Against Transnational Organized Crime, July 2022, available at: https://globalinitiative.net/wp-content/uploads/2022/06/Human-smuggling-and-trafficking-ecosystems-LIBYA.pdf
- The Sentry interview with a Kufrah resident familiar with the local airport, May 2023.
- Before Sudan's war, Battalion Subul al-Salam was nominally part of the LAAF, but it still enjoyed enough autonomy and opacity to capture revenues from the trafficking of goods and human smuggling without fully sharing them with the Haftar family. The armed group essentially imposed its own non-state tax regimen on local trade, shaped power dynamics, and profited from illicit activities. Rooted in the Zway tribe, Subul al-Salam rose out of ethnic conflicts between 2012 and 2015 to dominate formal and informal economies in southeastern Libya. In 2016, it aligned with the LAAF, tightening its grip on cross-border smuggling routes. Between 2019 and 2022, the LAAF tried repeatedly to assert direct authority over Kufrah but failed. At last, in 2023 and 2024, Saddam fully integrated Subul al-Salam into his Ground Forces division, giving him complete oversight of its smuggling operations—including fuel—between Kufrah and Sudan. See:

The Sentry interview with a local analyst based in Kufrah, February 2022.

The Sentry interview with a Kufrah native acting as advisor to the LAAF's headquarters on civilian affairs, February 2022.

Frederic Wehrey, "Insecurity and Governance Challenges in Southern Libya," Carnegie Endowment for International Peace, March 30, 2017, available at: https://carnegieendowment.org/2017/03/30/insecurity-and-governance-challenges-in-southern-libya-pub-68451

Rebecca Murray, "Libya's Tebu: Living in the Margins," in Peter Cole and Brian McQuinn (eds.), *The Libyan Revolution and its Aftermath*, Oxford, UK: Oxford University Press, 2015, pp. 303-320.

Frederic Wehrey and Anouar Boukhars, *Salafism in the Maghreb: Politics, Piety, and Militancy*, New York: Oxford University Press, 2019, pp. 122-124.

General Command of the Libyan Arab Armed Forces, "Decision No. (442) of the year 2023 regarding the reassignment



- of a battalion's affiliation," Facebook post, December 27, 2023, available at: https://www.facebook.com/photo.php?fbid=391991003351460&set=pb.100076216903205.-2207520000&type=3&locale=ko KR
- The Sentry interview with a Kufrah resident familiar with the local airport, May 2023.
- 459 The Sentry interview with an Ajdabiya source close to Brigades Tareq bin Ziyad and 166, June 2023.
- The Sentry interview with a Kufrah resident familiar with the local airport, May 2023.
- 461 The Sentry interview with an Ajdabiya source close to Brigades Tareg bin Ziyad and 166, June 2023.
- Benoît Faucon, Summer Said, and Jared Malsin, "Libyan Militia and Egypt's Military Back Opposite Sides in Sudan Conflict," The Wall Street Journal, April 19, 2023, available at: https://www.wsj.com/articles/libyan-militia-and-egypts-military-back-opposite-sides-in-sudan-conflict-87206c3b
- 463 The Sentry interview with an Ajdabiya source close to Brigades Tareq bin Ziyad and 166, June 2023.
- The Sentry interview with an Egyptian officer in charge of the Libyan file, May 2023.
- The Sentry interview with a Kufrah resident familiar with the local airport, December 2023.
- 466 The Sentry interview with an Ajdabiya source close to Brigades Tareq bin Ziyad and 166, March 2025.
- 467 Al-Saaa 24, "Murzuq Elders and Wise Men: We Support Battalion 129 in Enforcing Security and Call for the Return of the Displaced," May 16, 2022, available at: <a href="https://www.alsaaa24.com/2022/05/16/%D8%A3%D8%B9%D9%84%D9%85%D8%A7%D9%86-%D9%88%D8%AD%D9%83%D9%85%D8%A7%D8%A1-%D9%85%D8%B1%D8%B2%D9%82-%D9%86%D8%AF%D8%B9%D9%85-%D8%A7%D9%84%D9%83%D8%AA%D9%8A%D8%A8%D8%A9-129-%D9%81%D9%8A-%D9%81%D8%B1%D8%B6/
- 468 The Sentry interview with an Arabian Gulf Oil Company employee based in Sarir, August 2024.
- Libyan Audit Bureau, Non-public study of the NOC, April 2024, p. 102, reviewed by The Sentry.
- Jason Burke and Zeinab Mohammed Salih, "Libyan Warlord Could Plunge Sudan Into a Drawn-Out 'Nightmare' Conflict," The Guardian, April 23, 2023, available at: https://www.theguardian.com/world/2023/apr/23/libyan-warlord-could-plunge-sudan-into-a-drawn-out-nightmare-conflict
- The Sentry interview with an Arabian Gulf Oil Company employee based in Sarir, August 2024.
- Several LAAF-supervised camps across eastern Libya provide training and logistical support to RSF fighters before their return to the conflict in Darfur. These camps include Nafura, located on the premises of the Arabian Gulf Oil Company, a wholly owned subsidiary of the NOC, and al-Shaala, west of the Sarir refinery. Al-Shaala stands out due to its fuel storage and distribution capacity. It is regularly resupplied by truck convoys originating from both the Sarir refinery and the Benghazi area, passing through Ajdabiya and Jalu to reach the small depot of al-Shaala. RSF vehicles regularly refuel there. Security for both the Sarir refinery and the al-Shaala camp is provided by LAAF units reporting to Khaled Haftar's Security Units division. Composed of Tubu fighters from the Rebiana municipality and led by Mahmud Sida, these units have guarded Sarir since 2011 but were formally incorporated into the LAAF only in 2022. Sida's nephew, Mohammed, commands Battalion 129, which operates within this Tubu-led security framework, in coordination with Hussein Abdulhadi Haftar, one of the Field Marshal's great-nephews. By contrast, Nafura and Point 400 are protected by Battalion 152, rooted in Ajdabiya and under Saddam Haftar's Brigade Tareq bin Ziyad within the Ground Forces division. Shibani Farm is overseen by Battalion Subul al-Salam, also subordinated to the same Ground Forces division. Collectively, these forces enable the LAAF to maintain oversight of RSF training activities and resource collection across all four camps. See:
 - The Sentry interview with an Ajdabiya source close to Brigades Tareq bin Ziyad and 166, March 2025.
 - The Sentry interview with a General Intelligence Services officer within the Sudanese Arab Forces, March 2025. The Sentry analysis of satellite imagery, March 2025.
- 473 Elitsa Gadeva and Quentin Peschard, "European Weapons in Sudan (1/5): Bulgarian Mortar Shells in Darfur's Desert," France 24, April 17, 2025, available at: https://www.france24.com/en/africa/20250417-investigation-european-weapons-sudan-part-1-mortar-shells-bulgaria
- Sudan Witness, "How We Found an RSF Military Camp in the Libyan Desert," Centre for Information Resilience, July 31, 2025, available at: https://www.info-res.org/articles/how-we-found-an-rsf-military-camp-in-the-libyan-desert/
- 475 In 2024, more than a third (36%) of the crude oil Libya exported was used to pay for fuel imports, instead of being sold



- for foreign currency. See:
- National Oil Corporation, Response to Ministry of Finance letter regarding oil revenue decline, February 11, 2025, reviewed by The Sentry.
- 476 Reuters, "Head of Libya's National Oil Corporation Resigns," January 16, 2025, available at: https://www.reuters.com/business/energy/head-libyas-national-oil-corporation-has-left-role-sources-say-2025-01-16/
- 477 Yousef Saba, "Exclusive: Libya's State Oil Firm Looks to Boost Output, Transparency, New Chairman Says," Reuters, January 31, 2025, available at: https://www.reuters.com/business/energy/libyas-state-oil-firm-looks-boost-output-transparency-new-chairman-says-2025-01-31/
- 478 Akhbar Libya 24, "Menfi Announces Formation of Committee to Monitor Oil Marketing and Fuel Procurement Operations," November 30, 2024, available at: <a href="https://akhbarlibya24.net/2024/11/30/%D8%A7%D9%84%D9%85%D9%86%D9%81%D9%8A-%D9%8A%D8%B9%D9%84%D9%86-%D8%AA%D8%B4%D9%83%D9%8A%D9%8A-%D9%84-%D9%84-%D9%86-%D8%AA-%D9%82%D8%A8%D8%A9-%D8%B9%D9%85%D9%84%D9%8A-%D8%AA/D9%85%D9%84%D9%8A-%D8%AA/D9%8A-%D8%AA/D9%85%D9%84%D9%8A-%D8%AA/D9%8A-%D8%AA/D9%85%D9%8A-%D9%8A-%D8%AA/D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%8A-%D8%AA/D9%8A-%D9%A-%D9%A
- Libyan News Agency, "Al-Dabaiba Chairs the First Meeting of the High Council for Energy Affairs," October 18, 2022, available at: https://lana.gov.ly/post.php?lang=en&id=258175
- David Soud, Ian Ralby, and Rohini Ralby, "Downstream Oil Theft: Countermeasures and Good Practices," Atlantic Council, May 16, 2020, available at: https://www.atlanticcouncil.org/in-depth-research-reports/report/downstream-oil-theft-countermeasures-and-good-practices/
- Office of the NOC's Chairman, "Memorandum No. 687: Discontinuation of the Barter System for Fuel Supply," February 5, 2025, reviewed by The Sentry.
- Bwaba al-Wasat, "Government Source Confirms Formation of Audit Bureau and Administrative Control Authority Committee to Review 'Arkenu' Contracts," April 29, 2025, available at: https://alwasat.ly/news/libya/475036
- Extractive Industries Transparency Initiative, "EITI Requirement 4.3: Infrastructure Provisions and Barter Arrangements: Guidance Note," February 2021, available at: https://eiti.org/sites/default/files/2022-01/en_eiti_gn_4.3_08.2021_0.pdf
- Ahmed Elumami, "Libyan Unity Govt, NOC Say They Will Build New Refinery," Reuters, October 3, 2021, available at: https://www.reuters.com/business/energy/libyan-unity-govt-noc-say-they-will-build-new-refinery-2021-10-03/
- Algeria's Sonatrach ended its crude-for-fuel swap deal with Vitol in April 2019 as its newly acquired 175,000 barrels per day Augusta refinery in Sicily—purchased from ExxonMobil—returned from maintenance, boosting Algeria's fuel output and enabling it to meet domestic demand without having to resort to swaps. See:
 - Ahmad Ghaddar and Lamine Chikhi, "Algeria Won't Extend Crude-for-Products Deal With Vitol Beyond April: Sources," Reuters, April 24, 2019, available at: https://www.reuters.com/article/markets/currencies/algeria-wont-extend-crude-for-products-deal-with-vitol-beyond-april-sources-idUSKCN1S0242/
- 487 Ali al-Mashay's full legal name is Ali Adulsalam Ahmed Bsabsa. See: Ali Adulsalam Ahmed Bsabsa's passport, reviewed by The Sentry.
- Brad Brooks-Rubin, "Fighting the 'International Thief Thief' With Global Magnitsky Sanctions," Just Security, April 15, 2021, available at: https://www.justsecurity.org/75707/fighting-the-international-thief-thief-with-global-magnitsky-sanctions/
- 489 Such sanctions would highlight Mashay's personal culpability in grand corruption and signal to Saddam Haftar that the US will freeze assets and deny visas to those implementing his kleptocratic schemes. By targeting Saddam Haftar's close subordinate, Washington will demonstrate that further unlawful exploitation of Libya's fuel subsidy system may incur escalating consequences.



- 490 US Executive Orders 13566 and 13726, issued under the International Emergency Economic Powers Act, block the property of persons undermining Libya's security. Specifically, EO 13726 authorizes the freezing of assets of any foreign person determined to be "engaging in the illicit production, refining, brokering, sale, or export of Libyan oil" or financing armed groups through such activities. See:
 - US President (Barack Obama), Executive Order 13566, "Blocking Property and Prohibiting Certain Transactions Related to Libya," February 25, 2011, available at: https://www.federalregister.gov/documents/2011/03/02/2011-4753/blocking-property-and-prohibiting-certain-transactions-related-to-libya
 - US President (Barack Obama), Executive Order 13726, "Blocking Property and Suspending Entry Into the United States of Persons Contributing to the Situation in Libya," April 19, 2016, available at: https://www.federalregister.gov/documents/2016/04/21/2016-09483/blocking-property-and-suspending-entry-into-the-united-states-of-persons-contributing-to-the
- 491 EU Council Decision (CFSP) 2015/1333 and EU Council Regulation (EU) 2016/44 offer a framework under which the EU can impose asset freezes and travel bans on individuals and entities identified as destabilizing Libya's peace or security. See:
 - European Union, "Council Decision (CFSP) 2015/1333 of 31 July 2015 concerning restrictive measures in view of the situation in Libya, and repealing Decision 2011/137/CFSP," Official Journal of the European Union, August 1, 2015, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015D1333
 - European Union, "Council Regulation (EU) 2016/44 of 18 January 2016 concerning restrictive measures in view of the situation in Libya and repealing Regulation (EU) No 204/2011," Official Journal of the European Union, January 19, 2016, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0044
- The UK's Regulation 6 of the 2020 law (S.I. 2020/1665) sets broad designation criteria, targeting persons involved in serious human rights abuses or "any other activity that threatens the peace, stability and security of Libya." See:

 United Kingdom, "The Libya (Sanctions) (EU Exit) Regulations 2020, No. 1665, December 29, 2020, Regulation 6, available at: https://www.legislation.gov.uk/uksi/2020/1665/regulation/6
- Owing to his involvement in human smuggling and other illicit activities, Koshlaf, also known as "al-Qasab," is subject to international sanctions issued in 2018 by multiple bodies. Koshlaf is listed under United Nations Security Council Resolution 1970 (2011), which includes travel bans and asset freezes. He appears on the UK's Foreign, Commonwealth & Development Office (FCDO) sanctions list under the same UN resolution. The US Department of the Treasury's Office of Foreign Assets Control, as well, has imposed sanctions on Koshlaf for his involvement in migrant smuggling and human trafficking. See:
 - HM Treasury Office of Financial Sanctions Implementation, "Financial Sanctions Notice: Libya," November 30, 2023, available at: https://assets.publishing.service.gov.uk/media/656896c82ee693001360cb85/Notice_Libya_301123.pdf
 US Department of the Treasury, "Treasury Sanctions Six Migrant Smugglers for Threatening Libya's Peace, Security, or Stability," Press Release, June 11, 2018, available at: https://home.treasury.gov/news/press-releases/sm0409
 United Nations, "Security Council Committee Concerning Libya Adds Six Individuals to Its Sanctions List," Press Release, June 7, 2018, available at: https://press.un.org/en/2018/sc13371.doc.htm
- While many participants in Libya's fuel smuggling scheme go to great lengths to avoid the US dollar, the American currency remains integral. Even crude-for-fuel swaps designed to achieve a zero net dollar exchange often involve the US dollar—whether for selling crude to, or buying fuel from, international counterparties. If some of those swap transactions are found to have been undertaken for the deliberate purpose of servicing criminal networks, all of their associated dollar flows become tainted. Separately, fuel emanating from illicit origins often seeps into legitimate Mediterranean markets, which default to dollar-based transactions. The November 2022 sale involving the vessel MT Istra (IMO 9632088) was denominated in US dollars. Alkagesta Ltd. seems to have sold the 3,300-ton batch, which had been illicitly diverted from Libya, for about \$3 million in Turkey. In response to a request for comment, Alkagesta indicated that neither itself nor its subsidiaries ever transacted any cargo involving the vessel MT Istra. As for the documentation that became public in May 2025, Alkagesta asserted that it was fabricated, with no factual basis. See: The Sentry interview with a senior Libyan Foreign Bank official, December 2024.
 - Euro Asia News, "Azerbaijani Oil Trading Network Engaged in Lucrative Operation of Smuggling Fuel From Libya via Alkagesta Ltd Against UN, EU, USA Resolution," May 18, 2025, available at: https://euasia.news/2025/05/18/71891/



- Alkagesta response to The Sentry, October 12, 2025.
- The Sentry interview with a senior Libyan Foreign Bank official, December 2024.
- Given the fuel crisis's magnitude and its wide-ranging effects—even on seemingly unrelated areas—addressing it requires robust coordination at every level.
- 497 United Nations Security Council, "Resolution 2174 (2014)," S/RES/2174(2014), August 27, 2014, para. 4(c), available at: https://undocs.org/S/RES/2174(2014)
- 498 United Nations Security Council, "Resolution 2213 (2015)," S/RES/2213(2015), March 27, 2015, paras. 11(c), available at: https://undocs.org/S/RES/2213(2015)
- 499 United Nations Security Council, "Resolution 2213 (2015)," S/RES/2213(2015), March 27, 2015, paras. 11(d), available at: https://undocs.org/S/RES/2213(2015)
- 500 United Nations Security Council, "Resolution 2146 (2014)," S/RES/2146(2014), March 19, 2014, para. 11, available at: https://undocs.org/S/RES/2146(2014)
- 501 United Nations Security Council, "Resolution 2701 (2023)," S/RES/2701(2023), October 19, 2023, available at: https://undocs.org/S/RES/2701(2023)