CCW GGE on LAWS rolling text December 2025: Analysis and recommendations

As more and more reports emerge of the use of new weapons systems that incorporate AI and automation, the risks to civilian protection, human dignity and meaningful accountability are grave. States' work to agree on strong rules to prevent harm from autonomy in weapons systems and the use of force is more important and urgent than ever.

With the mandate of the GGE coming to an end in 2026 states' next step must be to start negotiations on a legally binding instrument on autonomous weapons systems (AWS).

There is a clear basis to move forward to negotiations. In 2025, over 40 states stated they believe the 'rolling text' of elements under discussion at the GGE gives a sufficient basis to negotiate an instrument; that they are ready to move forward towards negotiations; and that others should support this goal.[1] 130 states are now in favour of legally binding rules.[2]

All states must continue to develop and support the strongest possible 'rolling text,' if this is to serve as a starting point for negotiations.

In this briefing, Stop Killer Robots shares its observations on the latest version of the rolling text and provides recommendations for states ahead of the first session of the GGE on 2-6 March.

Key observations and recommendations:

States must negotiate international legal rules on autonomous weapons systems that ensure meaningful human control over the use of force and reject the automation of killing.[3] The rolling text has both strengths and shortcomings as a basis in this regard.

Overall, we believe states have now advanced their common understandings enough to start negotiating a legal instrument: the content of rules must ultimately be resolved there.

Our assessment of the current rolling text is that despite the loss of some useful text from previous versions, it remains a good basis for states to use to move forward to negotiations. It has been clarified and streamlined in many areas, and retains elements that reflect key components of meaningful human control. However, **the text still does not directly address the issue of anti-personnel autonomous weapons systems, which must be prohibited.**

Our general recommendations to states during the GGE are to: support moving forward to negotiations on the basis of the rolling text; support its positive elements and strengths; and continue to work to strengthen the text and highlight its omissions.

[1] See 'Joint statement to the September 2025 session of the CCW GGE LAWS' and working paper CCW/MSP/2025/WP.5
[2] See Automated Decision Research 'State Positions'
[3] See 'Our policy position'

Key policy issues:

Our assessment of how the text addresses key policy issues when it comes to prohibiting and regulating autonomous weapons systems is as follows:

The scope of autonomous weapons systems:

- For Stop Killer Robots a legal instrument on autonomous weapons systems must apply to the broad range of weapons systems that detect and apply force to a target based on sensor inputs rather than an immediate human command. **The current text's characterisation adequately covers this scope of systems**, ranging from existing and simpler automated weapons systems to new systems in development with more complex functions. **This whole scope must all be regulated, through prohibitions on systems that are fundamentally unacceptable, and positive obligations to ensure meaningful human control over other systems in practice.**
- Qualifying paragraph 1A in Box I is welcome towards ensuring that the addition of the term 'identify' to the characterisation does not result in unnecessarily narrow understandings of the scope of systems under discussion. However, further common ground will likely need to be built around the meaning of terms to ensure this.
- Current discussions on autonomous weapons systems exclude the standalone use of tools such as AI decision support systems that suggest targets for approval (even if human input and agency may be nominal in practice in their use). If these tools, which are already causing serious harm, are not addressed through an instrument on autonomous weapons systems, states should do so through other legally binding routes.

Meaningful human control:

- While they may continue to debate the wording of the concept, **states should support 'context-appropriate human judgment and control' as a principle, requirement, and set of measures. This concept, which is currently central to the rolling text,** must be at the core of future legal rules, both as a means to uphold international law and basic ethical principles, and as an imperative to prevent civilian harm from autonomous weapons systems.
- Whatever language is used, it is important to retain a term, and an elaboration of its key components, that expresses the crucial red line that operators must sufficiently understand and be able to limit the operation and effects of systems such that human deliberative decision-making, judgment, and accountability are preserved. The 'human element' has consistently been central to states' discussions and developing common ground on autonomous weapons systems: it must remain so.
- **States should support the retention of, inter alia, the elements in box III point 7, box IV point 4, and box V point 3 as starting points that can be developed into legal rules** to ensure that the effects of systems in their context of use are adequately understood and are sufficiently limited in practice to uphold basic ethical and legal principles.
- **States should also reinsert language from earlier 'rolling text' on the need for systems to be "adequately predictable, reliable, traceable and explainable to those**

responsible for their use," all characteristics that are essential to retaining meaningful human control over the use of force.

Prohibitions:

- For Stop Killer Robots, a legal instrument must contain prohibitions on autonomous weapons systems that target people (anti-personnel systems) as well as systems that do not allow for meaningful human control.

Anti-personnel AWS:

- The rolling text, and states' discussions, have not yet sufficiently addressed the specific issues raised by anti-personnel systems, despite discussion of related issues such as algorithmic bias and restriction of the types of targets systems can apply force to. **States must specifically prohibit anti-personnel systems in legal rules. Such a prohibition should be added to the rolling text.**

Systems that do not allow for meaningful human control:

- For Stop Killer Robots, systems that do not allow for meaningful human control would include **those whose scale and scope of operation are not limited, or whose mission parameters could change without meaningful review or approval**. Such systems could be excluded by the development of elements in box III into law.
- Systems that do not allow for meaningful human control also include **those that are not sufficiently predictable**: for example, systems whose target profiles are constructed using machine learning (a 'target profile' is a set of criteria, encoded in general or specific terms, that a system is tasked to apply force against on the basis of matching with sensor inputs). Or, systems that integrate machine learning in other ways when it comes to the identification, selection or engagement of targets. Such systems will produce errors that cannot be predicted or understood by users, due to the 'black box' nature of the technology - as states have heard in their technical discussions over the years. This type of unpredictability is unacceptable in the use of force. States should support a prohibition on unpredictable systems, as recommended by the ICRC, and build more common understanding around what types of systems and practices this prohibition would rule out.

On the following pages, we give further commentary on a reproduction of the latest version of the rolling text.

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Commentary and recommendations from Stop Killer Robots are given in red below

GGE on LAWS
Rolling text, status date: 18 December 2025

For the purposes of the work of the GGE and with the understanding that nothing has reached consensus until everything has reached consensus, the Group provisionally found consensus on the following formulations for the purpose of advancing its work on a set of elements of an instrument, without prejudging its nature, and other possible measures, in accordance with the Group's mandate.

I

1. [Within the scope of the application of the CCW and for the purpose of these elements of an instrument,] a lethal autonomous weapon system can be characterized as a functionally integrated combination of one or more weapons and technological components, that can identify, select, and engage a target, without intervention by a human operator in the execution of these tasks.

- For Stop Killer Robots a legal instrument on autonomous weapons systems must apply to the broad range of weapons systems that select and engage force to a target based on sensor inputs rather than an immediate human command. With the qualifier 1.A below (that states will likely need to discuss further), the current text's characterisation adequately covers this scope of systems, ranging from existing and simpler automated weapons systems to new systems in development with more complex functions.

A. The fact that a human operator sets the parameters of the target(s) does not exclude the system from the characterization.

- This is an important clarification: without this qualifier, which will likely need further discussion and elaboration, the characterisation (with the addition of 'identify' since the last rolling text) could risk being interpreted as only applying, for example, to complex systems that generate targets and apply force to them based on very broad mission parameters, and not to systems where generalised or more specific target profiles are set by human inputs. The latter will constitute the majority of AWS that are likely to be developed and used; the former would unlikely be permissible; all must be within the scope of the legal regulation of AWS, containing prohibitions and positive obligations. While we welcome the inclusion of 1.A towards ensuring collective understanding of the term 'identify' is not unnecessarily narrow and so excludes systems that must be within

the scope of regulation, we believe that further common ground will need to be built to make sure this is not the case.

B. The fact that a LAWS can be used in a way that does not result in loss of life, such as to damage or destroy objects or to cause injury, does not exclude it from this characterization.

- We welcome the retention of this clarification, which is important for ensuring that states' understanding of the systems under discussion is not unnecessarily restricted by different interpretations of the word 'lethal' (which Stop Killer Robots has noted before is unnecessary to include as 'lethality' is an effect rather than a characteristic of a system).

C. The above description is without prejudice to any future understanding and the potential modification of this characterization, as well as the possible exclusion of certain types of systems.

- As we have noted before, the further negotiation of any definition of autonomous weapons systems should take place in the context of negotiations on a legal instrument.

II

1. The right of the parties to an armed conflict to choose methods or means of warfare is not unlimited.

2. IHL applies to armed conflict, whether international or non-international, and governs the use of all weapons, means and methods of warfare, those of the past, those of the present and those of the future, and is, consequently, applicable regardless of the technology used.

3. IHL imposes obligations on States, parties to armed conflict and individuals, not on machines.

- Stop Killer Robots welcomes the shifting of this text from box V to box II and the recognition this paragraph gives that legal obligations are addressed to people. This paragraph should inform how other elements in the rolling text are read.

4. IHL applies fully to the development and use of LAWS.

5. In cases not covered by the CCW and its annexed Protocols or by other international agreements, the civilian population and the combatants at all times remain under the protection and authority of the principles of international law derived from established custom, from the principles of humanity and from the dictates of public conscience.

- We welcome the continued retention of the Martens Clause in the text.

III

1. It is prohibited in all circumstances to use LAWS which are of a nature to cause superfluous injury or unnecessary suffering, which are inherently indiscriminate, or which are otherwise incapable of being used in compliance with IHL.

2. It is prohibited to use LAWS if their effects in attack cannot be anticipated and limited, as required by IHL in the circumstances of their use.

- Stop Killer Robots is concerned by the removal of paragraph 6A in the previous text which read: "Ensure the effects of LAWS are adequately predictable, reliable, traceable and explainable to those responsible for their use." Systems that are not adequately predictable could be inherently indiscriminate, including because their effects could not be anticipated and limited. States should therefore clarify that unpredictable systems should not be permitted and build more common ground around what this means in practice. Previous paragraph 6A should be restored. For Stop Killer Robots, systems that are not sufficiently predictable would include, for example, systems whose target profiles are constructed using machine learning, or systems that integrate machine learning in other ways when it comes to the identification, selection or engagement of targets. Such systems will produce errors that cannot be predicted or understood by users, due to the 'black box' nature of the technology

3. It is prohibited to make the civilian population as such, as well as individual civilians or civilian objects, the object of an attack by LAWS.

4. States shall refrain from manufacturing, otherwise acquiring, stockpiling, or transferring LAWS that cannot be used in compliance with IHL. The retention, acquisition, or transfer of LAWS that cannot be used in compliance with IHL shall be permitted solely for the purposes of training and the development of countermeasures, only in the minimum quantity necessary, and shall be destroyed once they are no longer required for the purposes for which they were retained.

- Stop Killer Robots supports a prohibition on developing autonomous weapons systems that cannot be used in compliance with IHL (nor in compliance with the legally binding instrument that states will negotiate on AWS). We are concerned by the second part of this paragraph. It does not appear easily applicable to autonomous weapons systems, which may be a dispersed array of components that might constitute an AWS when operated together, or a system that could be operated in either a directly controlled or an autonomous mode. AWS are not a discrete and fixed set of objects - it would be unclear what could be retained or not under this provision, which should be removed. Moreover, we would find the retention of systems that have been prohibited as abhorrent and dangerous to be unacceptable.

5. LAWS may only be used in accordance with IHL, including the principles and requirements of distinction, proportionality and precautions in attack.

- The ICRC has concluded that it is hard to envisage combat situations where the use of anti-personnel AWS would not pose a significant risk of IHL violations. Stop Killer Robots agrees with this conclusion. For example, when it comes to distinguishing between civilians and combatants, Stop Killer Robots notes that this is a complex, contextual and deliberative decision that must be made by a person who can apply human judgment and experience. As per paragraph 3, box II obligations in IHL are imposed on humans, not machines. Given these legal challenges - and, moreover, the dehumanisation and affront to human dignity posed by AWS that target people - states should include a specific prohibition on anti-personnel AWS in the rolling text, and in a future legal instrument.

6. Context-appropriate human judgement and control is needed to ensure the use and effects of LAWS are in compliance with international law, in particular IHL, including the principles and requirements of distinction, proportionality and precautions in attack.

- This is a central provision in the rolling text which states should support. The provision, however, should be complemented by a prohibition on systems that operate without ‘context-appropriate human control and judgment’. While perhaps implicit in the current text, which seeks to ensure such control, an explicit prohibition would be stronger.
- Stop Killer Robots welcomes the recognition that meaningful human control is needed to ensure compliance with international law in general, not just IHL. We also believe that the purpose of establishing international rules to ensure meaningful human control in the use of force, goes beyond ensuring compliance with existing law. The pursuit of increasing autonomy raises broader questions than IHL compliance; it represents a fundamental shift in the use of force. Therefore, enshrining meaningful human control as a clear principle in international law going forward is crucial for drawing red lines to protect people and our humanity.

7. States should ensure such context-appropriate human judgement and control through, inter alia, the following measures:

- As noted above, previous paragraph 6A ("Ensure the effects of LAWS are adequately predictable, reliable, traceable and explainable to those responsible for their use") should be restored.

A. Ensure that LAWS are operated under a responsible chain of command and control. This includes ensuring assessment of legal obligations by a human, in particular with regard to the effects of the identification, selection and engagement functions, as well as ensuring due regard for ethical considerations;

- We welcome the retention of 'regard for ethical considerations' in this paragraph, but regret that this component has been weakened compared to the previous rolling text, given the centrality of ethical issues to states' consideration of AWS.

B. Ensure the effects of LAWS can be adequately anticipated and controlled by those responsible for their use, including by limiting or otherwise restricting the scale of the operation, which includes the types of targets, duration, geographical scope and the number of engagements that LAWS can undertake autonomously;

- We welcome that the key elements of limiting or otherwise restricting the scale of operation (types of targets, duration, geographical scope, number of engagements) have been retained. States should support the retention of this full list.

C. Ensure that mission parameters of LAWS cannot significantly be modified by the system without human intervention including through real-time machine learning;

- Stop Killer Robots recommends removing the qualifier 'significantly', which could be interpreted unnecessarily permissively. As detailed above, integrating machine learning into the critical functions of AWS would be unacceptable because it would render any system insufficiently predictable. Regarding the inclusion of the term 'machine learning', we would caution against referring to specific computational techniques in the text, in the interest of formulating future-proof rules.

D. Ensure that LAWS can be deactivated in a timely manner and/or incorporate self-destruct, self-deactivation or self- neutralization mechanisms;

- We note that though these could be important measures for helping to ensure that the effects of systems can be sufficiently limited, we urge states not to rely on such

mechanisms to avoid unanticipated effects and ensure the protection of people: from experience with weapons systems such as landmines and cluster munitions, states will be aware that such mechanisms are not an adequate safeguard in themselves.

E. Limit the operation of LAWS to a defined perimeter and restrict their use to military objects to minimize the likelihood of harm to civilians or damage to civilian objects.

- A requirement to restrict the use of AWS to military objects is welcome, as this would reduce the risk to civilians and to people in general.
- Limiting the operation of systems to defined perimeters as part of limiting geographical scope could potentially contribute to civilian protection from AWS, but is not a substitute for ensuring it: again from experience with other weapons systems, exclusions and perimeters have proved insufficient to protect civilians from harm, and can put them at even greater risk if they cannot escape or accidentally enter such defined zones.

8. The formulated prohibitions, requirements and measures must be taken into account in the design, development, and use of LAWS.

- This is a valuable point and we welcome its change in order in the text (where it now rounds off and applies to this whole box), and the addition of 'requirements and measures'

IV

Prior to potential deployment and as applicable throughout the entire life cycle of LAWS, States, in addition to their legal obligations, should:

- We recommend the text 'in addition to their legal obligations' be deleted: we believe this text should be negotiated into a legally binding instrument, and its requirements become legal rules.

1. Conduct legal reviews to determine, in the study, development, acquisition, or adoption of LAWS, whether their employment would, in some or all circumstances, be prohibited by international law. In this context, the voluntary exchange of relevant practices between States is encouraged, bearing in mind national security considerations or commercial restrictions on proprietary information.

- Weapons reviews are a legal obligation for states under article 36 of Additional Protocol I to the Geneva Conventions. In a legal instrument on AWS, all provisions set out to prevent harm should become legal requirements.

2. Ensure that any further development of, or modifications to, existing LAWS that have a significant impact on their target identification, selection, and engagement functions or on their anticipated effects, are reviewed to ensure compliance with IHL.

- We recommend removing the qualifier 'significant' that has been added back into the text, to avoid unnecessarily permissive interpretations

3. Ensure there is context-appropriate human judgement and control across the lifecycle of LAWS.

- International rules to ensure meaningful human control over weapons systems in the use of force must be negotiated for the core purposes of protecting people, human dignity, and to make sure that responsibility and accountability in the use of technologies is not undermined. Overarching recognition of and requirements for meaningful human control are therefore welcome.

4. Ensure that the capabilities and limitations of LAWS, in their expected use, and their anticipated effects in different circumstances, are understood by:

- Ensuring that the effects of systems in their context of use are adequately understood is a key component of meaningful human control - this recognition should be retained. Adequately understanding the effects of a system also depends on predictability, reliability, traceability and explainability.

A. Conducting testing and evaluation, including realistic simulations of their use in operational environments.

- We would caution that testing and evaluation based on 'realistic simulations' will only be able to give indications of how simpler, deterministic AWS will behave. Systems looking to incorporate more complexity - many of which we believe could not be subject to meaningful human control - could not reliably be tested in this way.

B. Ensuring appropriate guidance, training and instructions for those in the responsible chain of command and human operators of LAWS.

- This is a necessary baseline activity towards ensuring users have a functional understanding of systems that they use

5. Implement measures to prevent and mitigate, as much as possible, unintended bias, including bias in data sets.

- ‘Algorithmic bias’ would be a better term to describe the problem being addressed in this point. Steps can be taken to mitigate bias - but it cannot be eliminated. If biased systems are used in life and death decisions, the consequences for groups that are already marginalised and discriminated against are extremely grave. Racism, sexism, ableism and other societal biases will be lethally reproduced and reinforced. One key reason to adopt a specific prohibition on anti-personnel autonomous weapons systems is to remove the possibility of such biased automated killing.

6. Implement measures to prevent and mitigate, as much as possible, automation bias.

- Automation bias is a threat to meaningful human control over weapons systems, and as such a recognition of the need to prevent it is welcome. States should engage in further discussion regarding the points at which this risk would feature in the use of AWS, and the measures that could be taken to prevent it.

V

1. States, parties to armed conflict, and individuals remain at all times responsible and accountable in accordance with applicable international law for their decisions with regard to LAWS since responsibility and accountability cannot be transferred to machines. This should be considered across the entire life cycle of the weapon system.

- Stop Killer Robots welcomes the continued inclusion of this principle.

2. States must ensure individual accountability for the means or methods of warfare involving the use of LAWS in accordance with their obligations under IHL, including through the operation of such systems within a responsible chain of human command and control.

- We note that the chain of command and control will (and must) always be human.

3. To promote human responsibility and accountability in the use of LAWS and to mitigate the risk of unintended engagements, States should provide:

- Ensuring meaningful human control - including through the elements elaborated in the rolling text above - is the only way that meaningful responsibility and accountability can be a possibility when it comes to increasing autonomy in weapons systems. The elements elaborated in point 3 here add further content to the measures that can be taken to ensure meaningful human control and so responsibility and accountability.

A. Understandable human-machine interfaces;

B. Guidance and instructions (e.g., policies, doctrine, and procedures), consistent with applicable IHL, for personnel regarding the use of LAWS;

C. Training of personnel to understand such guidance and instructions and the capabilities and limitations of the autonomous functions of LAWS in the anticipated circumstances of their use.

4. States must take all appropriate steps to prevent and suppress violations of international law, including IHL, relating to LAWS by persons or on territory under their jurisdiction.

5. States must ensure effective internal mechanisms for the investigation, reporting and appropriate action in response to incidents with the use of LAWS that may involve violations of IHL.