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Federal Department of Foreign Affairs FDFA

State Secretariat STS

International Security Division ISD

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2024 Annual Report on the Implementation of the Federal Act on Private Security Services Provided Abroad (1 January–31 December 2024)

1. Introduction

International tensions continued to rise in 2024. These are particularly noticeable in Europe, where the war against Ukraine marked a fundamental break in the security architecture. Global instability has led to increased armament and favoured the influence of non-state actors. This dynamic has far-reaching consequences for the private security sector, which is adapting to these circumstances. In particular, an increase in the importance of services in the area of new technologies can be observed. The authority responsible for the Federal Act on Private Security Services Provided Abroad (PSSA)¹ monitors these developments on an ongoing basis and acts as Switzerland's central competence centre for private military and security companies (PMSCs). The presence of private actors in the security policy environment also raises important questions regarding regulation, responsibility and oversight.

Against this backdrop, the Montreux Document Forum (MDF)² plays a central role. As co-chair of the MDF, Switzerland works together with the International Committee of the Red Cross (ICRC) to promote dialogue between the Montreux Document's participating states and to further develop standards for the regulation of PMSCs.

At the national level, Switzerland pursues these objectives through the PSSA. As set out in Article 1 of the PSSA, the purpose of the law is to safeguard Switzerland's internal and external security, realise Switzerland's foreign policy objectives, preserve Swiss neutrality, and guarantee compliance with international law. In order to achieve this, the PSSA subjects private security services provided abroad by Swiss companies to a declaration requirement and, if necessary, to a review procedure.

In accordance with Article 3 of the Ordinance on Private Security Services Provided Abroad (OPSA)³, the FDFA's State Secretariat is responsible for implementing the PSSA. The Export Controls and Private Security Services Section (ECPS), within the International Security Division (ISD), is responsible for the operational implementation of the PSSA. The ECPS' main task is to carry out the administrative procedures set out in the PSSA, to help develop Swiss policy regarding private security services, and to participate in the debate on rules and standards for private security service providers at the national and international level. As set out in Article 37 of the PSSA, the competent authority must submit a report on its activities to the Federal Council each year. The report is published on the FDFA's website.

Since it was reorganised in March 2000, the ECPS has also been responsible for processing applications in relation to export controls which are submitted for consultation by the State Secretariat for Economic Affairs (SECO). In close collaboration with SECO, the ECPS also helps to prepare dossiers in the area of export controls and engages in national and multilateral dialogue in this regard. At operational level, some 256 cases were submitted to the ECPS in 2024. These cases involved the export of goods under the War Materiel Act (WMA)⁴ and Goods Control Act (GCA)⁵.

¹ SR 935.41

² <https://www.montreuxdocument.org/>

³ SR 935.411

⁴ SR 514.51

⁵ SR 946.202

2. Activities in 2024

2.1 National activities

In 2024, the ECPS continued its work on the implementation of the PSSA while also monitoring the further development of the private security market in order to adequately incorporate its dynamics and new challenges into its activities.

Effectiveness of the 2021 amendment of the Ordinance on the PSSA (OPSA): One focus of activities was the completion of the report on the effectiveness of the 2021 amendment of the OPSA⁶, three years after it came into force. This amended version introduced a more precise definition of the services covered, an exemption from the declaration requirement and a consultation mechanism. The review of the effectiveness of the amended OPSA was carried out by an interdepartmental working group (IDWG) comprising representatives from the FDFA, the SECO at the Federal Department of Economic Affairs, Education and Research (EAER), and the State Secretariat for Security Policy (SEPOS) at the Federal Department of Defence, Civil Protection and Sport (DDPS). The IDWG came to the conclusion that the amended OPSA has proven its effectiveness. The more precise definition of the security services covered and the exemption from the declaration requirement led to a decline in the number of declarations registered. This enabled the ECPS to further expand its oversight activities and focus more specifically on monitoring problematic activities. At the same time, the changes strengthened interdepartmental cooperation, enabling administrative practices to be made more coherent and efficient. The amendments to the OPSA ensure that services relating to exported goods are not assessed more strictly than the export of the goods themselves, thus fulfilling the corresponding mandates of the Federal Council and the two parliamentary motions⁷. The Federal Council took note of the IDWG report in August 2024 and requested that the two motions be cancelled.

Training and outreach activities of the ECPS: In the year under review, the ECPS again organised various training and outreach activities in relation to the PSSA. Within the FDFA, training efforts focused in particular on the staff consulted as part of the administrative procedures set out in the PSSA. The ECPS gave several external guest lectures, including in 2024 at the Zurich University of Applied Sciences as part of the national security law CAS, focusing on the role of Swiss security service providers in international operations. Another lecture given at the Geneva Graduate Institute provided the opportunity to discuss with international students the regulatory challenges of overseeing private security service providers.

Revision of the PSSA guidelines: In the year under review, the PSSA guidelines were updated by the ECPS to take account of current developments. The guidelines specify the definitions contained in the PSSA and provide explanations regarding the declaration requirement and the review procedure for activities covered by the PSSA. As part of the latest review, the definitions were made more precise, particularly with regard to services in the area of intelligence activities. The revised third edition of the guidelines is due to be published in 2025.

Completion of the transfer of the 'Private Security Services Companies Information System' application: The Swiss Federal Audit Office (SFAO) audited the implementation of the PSSA in the first half of 2022⁸. The SFAO had noted that the 'Private Security Services Companies Information System' application, which is used to document procedures and archive the documents submitted by companies, had come to the end of its life cycle. It therefore recommended that this opportunity be taken to assess whether there was scope to increase efficiency using digital technologies. During the year under review, the ECPS completed the transferral of the application to the Federal Administration's electronic records management system (GEVER). The next step is to enable companies to submit declarations online, which will facilitate the procedure going forward, taking into account the needs of a digital society.

⁶ [IDAG report on the review of the amended Ordinance on Private Security Services Provided Abroad \(OPSA, in German\)](#)

⁷ [Motion 19.3991](#) and [Motion 19.4376](#)

⁸ [SFAO audit report on the Implementation of the Federal Act on Private Security Services Provided Abroad \(positions in German\)](#)

2.2 International activities

In 2024, the competent authority once again actively participated in international discussions and initiatives on the regulation of PMSCs. These activities help to realise the goals of the PSSA and promote the implementation of international standards.

Intergovernmental Working Group of the UN Human Rights Council (IGWG): A key part of the ECPS's international activities was its participation in the fifth meeting of the IGWG in April 2024 and the informal meeting in December 2024, in preparation for the next formal meeting in April 2025. The IGWG's mandate is to develop the content of an international regulatory framework for PMSCs without prejudging its legal nature (binding or non-binding). The overriding objective is to protect human rights, ensure compliance with international humanitarian law and improve accountability for violations and abuses in the context of the activities of PMSCs. In addition to the formal meetings, Switzerland took part in several informal bilateral and multilateral meetings with other countries. These meetings served to discuss contentious issues at an early stage and identify possible compromises in order to drive the formal negotiations forward.

Strengthening engagement in the MDF: Together with the ICRC, Switzerland co-chairs the MDF, which is dedicated to supporting the participating states of the Montreux Document. Within the MDF, the ECPS continued the work begun in the previous year to strengthen the level of engagement between national regulatory authorities. In 2024, greater focus was placed on technical support and the establishment of a network of national regulatory authorities. In September 2024, a new online platform was launched in cooperation with the ICRC and the MDF secretariat to enable the participating states of the Montreux Document to exchange information on the regulation and monitoring of PMSCs. The platform was developed as part of a community of practice to help address national challenges and foster discussions on technical issues. In October, the ECPS, the ICRC and the MDF secretariat held a thematic workshop that gave regulators the opportunity to exchange views on establishing, updating and enforcing training requirements for PMSCs. The workshop also provided insights into the relevant international standards as contained in the Montreux Document and the International Code of Conduct for Private Security Service Providers⁹. The year concluded with a technical panel discussion in December 2024, which was also organised under the auspices of the ECPS in conjunction with the ICRC and the MDF secretariat. The focus was on ways to promote the exchange of information and cooperation between national regulatory authorities. This format illustrates the MDF's increased focus on practical support and cooperation at the national level.

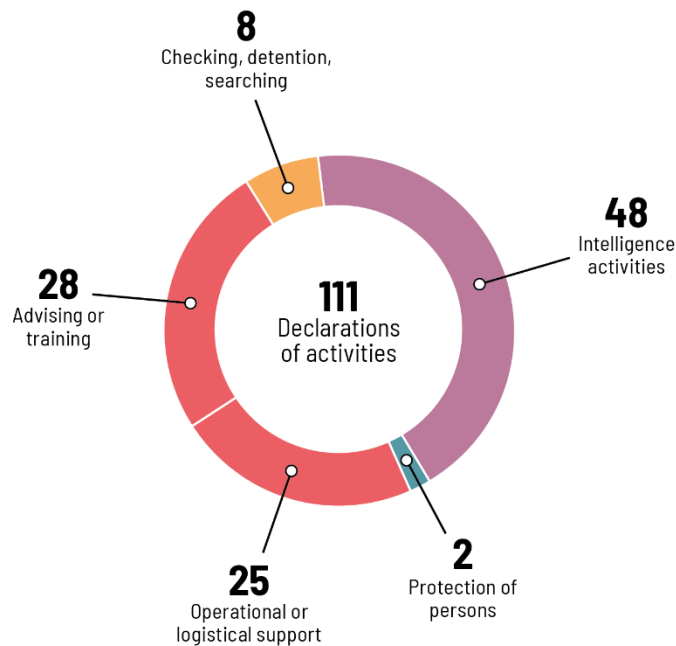
Participation in the NATO Advanced Research Workshop in Copenhagen: The ECPS was invited to take part in the NATO-funded Advanced Research Workshop in Copenhagen in March 2024. The workshop, organised by the University of Copenhagen and the Geneva Centre for Security Sector Governance (DCAF), brought together specialists from academia, government, international organisations and civil society to discuss legal and political challenges in dealing with mercenaries, PMSCs and related actors in today's conflicts. The ECPS presented the Swiss model for overseeing private security companies on the basis of the PSSA and emphasised the importance of an improved exchange of information between state authorities, research institutions and civil society for the national implementation of regulatory rules, also highlighting the corresponding initiatives within the framework of the MDF. The workshop provided valuable opportunities to share experiences and strengthen networks, especially in view of the work related to the MDF in autumn 2024.

⁹[FDFA: International Code of Conduct for Private Security Service Providers](#)

3. Statistics

3.1 Declarations, including figures for different security services provided in 2024

Between 1 January and 31 December 2024, 15 companies submitted 111 declarations to the ECPS regarding planned security activities¹⁰. As at 31 December 2024, the declarations submitted for 2024 to the ECPS for private security services, as defined in Article 4 letter a of the PSSA, break down as follows:



No activities related to guarding goods and properties.

No activities related to guarding, caring for prisoners, or operating prison facilities.

Declarations mainly fall into four groups of private security service providers:

- Companies that provide operational or logistical support for armed or security forces, operate or maintain weapons systems, and advise or train members of armed or security forces (Art. 4 let. a paras 6–8 PSSA, red segments) are predominantly companies in the industrial sector. Training also includes specialised consultants, for example in the training of police personnel. Some of the activities in this area are no longer subject to the declaration requirement since the OPSA was amended (Art. 1a, 1b, 1c and Art. 8a OPSA), i.e. as of 1 January 2021. Please refer to section 3.5 for figures on the impact of the exception introduced by the OPSA as amended.
- The field of intelligence activities (Art. 4 let. a para. 9 PSSA) mainly comprises investigation agencies that primarily provide private intelligence services in the economic sector.
- Services relating to the checking, detention, or searching of persons, searching of premises or containers, and seizure of objects (Art. 4 let. a para. 4 PSSA) are currently provided by a large company operating in the international aviation industry.
- Companies carrying out activities related to the protection of persons and the guarding or surveillance of goods and properties (Art. 4 let. a paras 1–2 PSSA) are generally small private security companies.

¹⁰ See section 3.5 for a chart showing trends in the number of declarations submitted since the PSSA came into force.

3.2 Review procedures

In 2024, the ECPS initiated one review procedure in accordance with Article 13 PSSA (2023: 1; 2022: 2; 2021: 3; 2020: 3; 2019: 26; 2018: 16; 2017: 18; 2015–16: 6). The ECPS initiated the review procedure because it became aware of an undeclared activity (Art. 13 para. 1 let. c PSSA). However, in this instance the criminal prosecution for breach of the declaration requirement was time-barred, which is why the review procedure was also concluded.

Another procedure that had already been initiated in 2023 was concluded during the period under review. The ECPS came to the conclusion that in this procedure, there were insufficient grounds for prohibiting the activities in question.

Accordingly, no activities were prohibited in 2024 following a review procedure.

3.3 Sanctions

As in previous years, to the knowledge of the ECPS, no sanctions under Articles 21–27 of the PSSA were imposed by the Office of the Attorney General of Switzerland (OAG).

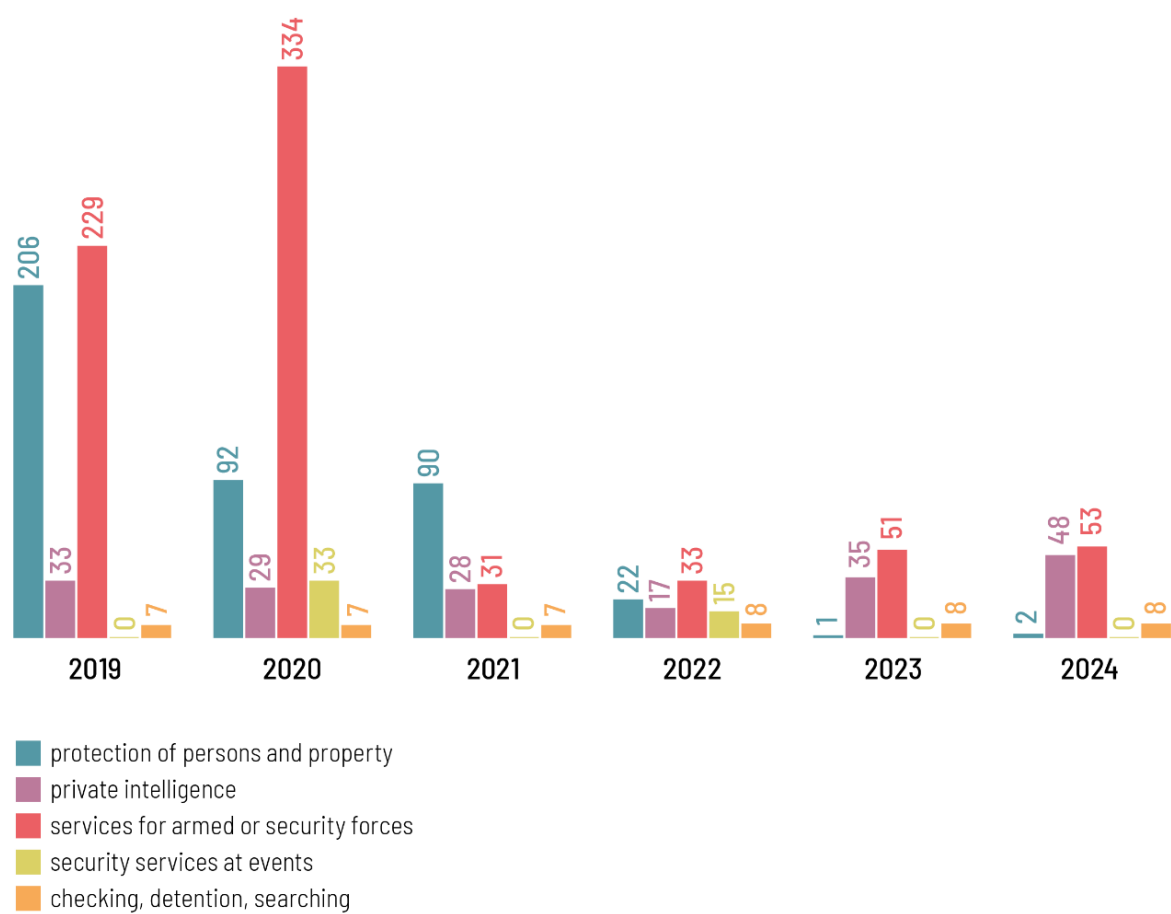
In the year under review, the inspections carried out by the ECPS did not result in any incidents being reported to the OAG under Article 27 paragraph 2 PSSA concerning violations of the declaration requirement under Article 23 in conjunction with Article 10 PSSA and/or any breach of the duty to cooperate under Article 24 in conjunction with Article 18 PSSA and Article 6 PSSA. However, to the knowledge of the ECPS, four cases from previous years were still pending with the prosecution authorities at the end of 2024.

3.4 Enquiries concerning activities which do not need to be declared, inter alia, under Article 1a, 1b, 1c or Article 8a OPSA

In the year under review, 33 activities were submitted for assessment to the ECPS, which concluded that the reported activities did not need to be declared under the PSSA. Some of these activities did not correspond to the more precise definition of 'operational and logistical support for armed or security forces' (Art. 1a OPSA), 'operating and servicing weapons systems' (Art. 1b OPSA) or 'advising or training members of armed or security forces' (Art. 1c OPSA), as set out in the Ordinance amended in 2021. The other cases qualified for the exemption from the declaration requirement, i.e., under Article 8a OPSA.

The further reduction in the number of enquiries in the reporting year (2023: 44) shows that the amended OPSA has proven its effectiveness and that companies are becoming increasingly familiar with the definitions (see section 2.1: Effectiveness of the 2021 amendment of the Ordinance on the PSSA [OPSA]) and are able to judge for themselves whether an activity falls under the PSSA and must be declared or not.

3.5 Main groups of services: trends



The chart above illustrates trends in declarations in the main groups of services for the years 2019–24.

The number of declarations relating to private intelligence services (Art. 4 let. a para. 9 PSSA) was higher in 2024 than in 2023. The ECPS believes that the surveys it has conducted for many years with known companies operating in the private intelligence sector have borne fruit.

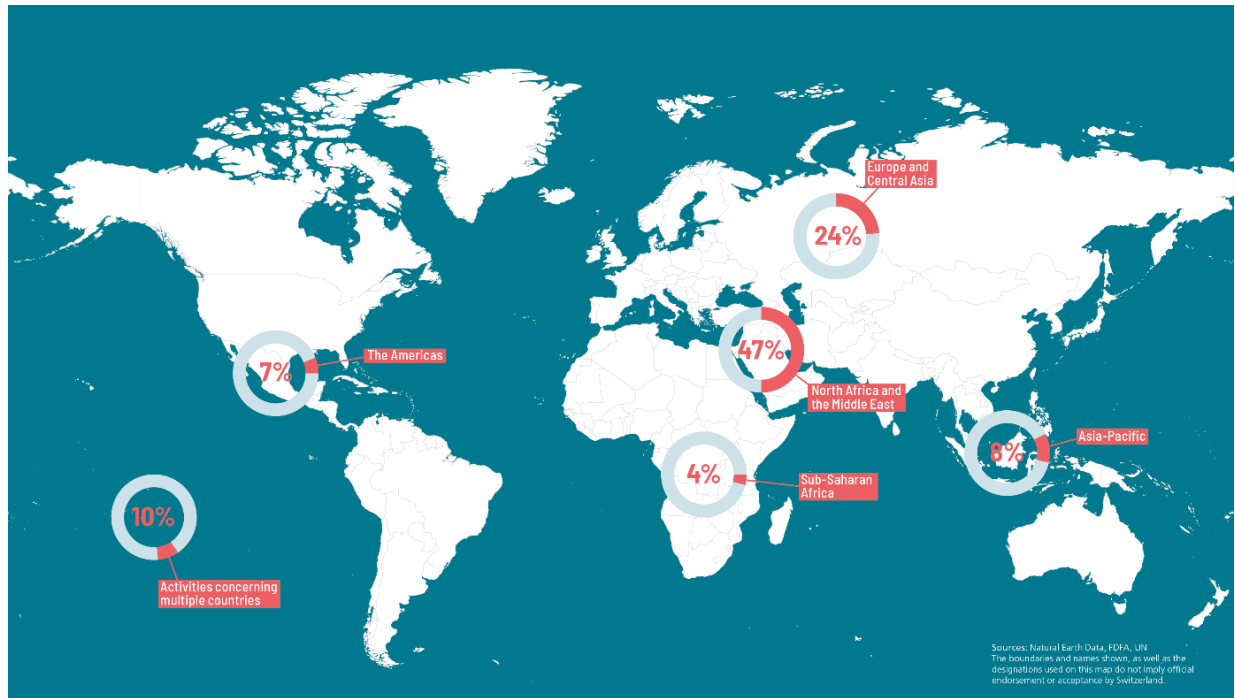
The number of declarations relating to services for armed or security forces (Art. 4 let. a para. 6–8 PSSA) also rose slightly in 2023.

In contrast to the previous year, two services in the area of personal protection (Art. 4 let. a para. 1 PSSA) were declared to the ECPS in 2024.

In 2023, the number of declarations concerning the control, detention or searching of persons, searching of premises or containers, and seizure of objects (Art. 4 let. a para. 4 PSSA) remained at the same level as in 2023.

3.6 Geographical distribution of activities (01.09.2015–31.12.2024)

In terms of geographical distribution, the activities subject to the PSSA continue to be mainly concentrated in North Africa and the Middle East, where approximately half of the activities declared since the PSSA came into force were carried out, followed by Europe and Central Asia.



4. Use of security companies by federal authorities for protection tasks abroad

The PSSA stipulates that Swiss representations located in a region categorised as a complex environment may only contract security services providers that are members of the International Code of Conduct Association (ICoCA). The FDFA is keen to encourage private security service providers in regions with few or no ICoCA members to join the association.

By proactively informing potential suppliers that cooperation in a complex environment is only possible with companies that are members of ICoCA, a number of companies have been persuaded to join ICoCA in recent years.

When utilising security services, FDFA representations in countries that are not considered complex environments are also advised to give preference to private security companies that are members of ICoCA.

In conjunction with the FDFA's Crisis Management Centre (KMZ) and Contracts, Procurement, Compliance Division, the ECPS provides support and advice to the representations and other federal offices or delegations that use security guard services abroad. To this end, various tools are made available and continuously enhanced, such as a guide developed specifically for the procurement of security services, model contracts and model performance specifications in several languages that meet the legal requirements.

During its regular security missions abroad, the KMZ provides support to the FDFA's representations by verifying that the companies contracted to provide security services are meeting their contractual obligations, particularly in terms of training and equipment.

The FDFA digitalised its security and crisis management in 2023, rolling out a platform with a separate security guard services module. This was enhanced in 2024 and will further promote the exchange of information and standardisation in dealing with private security companies abroad.

5. Conclusion and outlook

The ECPS reports a positive result for 2024. The number of declared activities remaining largely stable compared with the previous year. The evaluation of the amended OPSA of 2021 confirmed its effectiveness, in particular thanks to its more precise definition of services subject to the declaration requirement and more efficient administrative practices. The guidelines, which are due to be published in 2025, have been revised with the same aim in mind. In addition, training courses and guest lectures have been held to raise awareness of the regulation of private security companies among a wider audience. The transfer of the 'Private Security Services Companies Information System' application to the Federal Administration's electronic records management system (GEVER) has been completed, eliminating duplication in the administration of procedures. At the international level, Switzerland has continued to actively campaign for better international regulation of private security services – be it through its role in the Montreux Document Forum or its participation in the UN working group on the regulation of PMSCs.

It can be assumed that the security situation will remain tense in 2025, which is why the regulation of PMSCs will remain a key issue both domestically and internationally. Switzerland will continue to advocate for clear standards in this area. In September 2025, the PSSA will have been in force for 10 years. The ECPS will capitalise on this opportunity to re-establish contact with various domestic actors and increase its information and awareness-raising activities and will continue to closely monitor national developments in the regulation of private security services, as these will influence the implementation of the PSSA in the future.