

Submission from Stop Killer Robots to the Committee on the Review of Ethical Guidelines for the Government Pension Fund Global (GPFG) October 2026

Stop Killer Robots (SKR) thanks the review committee for the opportunity to submit our views in light of the review of the ethical framework for the GPFG.

SKR is a global civil society coalition of more than 300 organisations that seeks to counter threats to humanity and human dignity through the adoption of a new international treaty to prohibit and regulate autonomous weapons systems (AWS). We support the development of legal and other norms that ensure meaningful human control over the use of force, counter digital dehumanisation, and reduce automated harm.¹

For the review of the ethical guidelines, the Campaign to Stop Killer Robots recommends that:

- 1) Companies that develop and produce autonomous weapon systems that target humans, or operate without meaningful human control, be excluded from investments under the weapons criteria.
- 2) Given the complexity and rapid pace of development, the GPFG should insist on enhanced due diligence and reinforce active ownership and engagement measures for companies developing military AI and autonomous weapons technologies. The threshold for exclusion should reflect the legal and ethical risks these developing technologies represent.

Autonomous weapon systems are systems that select and engage targets without a human being involved. This means that there is no human involved in the final decision about when, where and against whom or what force will be applied. Notably, this poses challenges to compliance with the international humanitarian law principles of distinction and proportionality, as well as the requirement to take feasible precautions in attack and to make these legal and moral judgements continuously.

The development of autonomous weapon systems (AWS) and military AI is advancing extremely rapidly. In SKR's submission from 2019 to the Mestad Committee, which was tasked to assess the ethical guidelines for the GPFG, we argued that autonomous weapons were still not in existence but could be developed within years. This understanding was also reflected in the 2020 Values and Responsibility report, arguing

¹ <https://www.stopkillerrobots.org/stop-killer-robots/>

that known weapon systems in 2020 would not meet the threshold of operating autonomously.² However, since then there have been numerous examples of rapid development^{3,4} and use of autonomous weapon systems on the battlefield.^{5,6,7,8}

Technological developments are outpacing regulatory development. However, a broad understanding of AWS already exists, and concepts such as meaningful human control should be applied when assessing the legal and ethical dimensions of investing in companies developing autonomous weapon systems.

The threshold should be meaningful human control

As the Mestad Committee wrote, autonomy is a function rather than a weapon system itself. Thus, instead of trying to define exactly what constitutes an autonomous weapon system, a more useful approach is to assess the level of human control over autonomous systems.

In a recent publication on how to prevent investments in autonomous weapons, the Dutch organisation PAX, one of the co-founding members of Stop Killer Robots, offers policy recommendations to financial institutions and also provides a definition of meaningful human control: “Meaningful human control requires that a person can make a moral and legal judgement on the effects of an attack, and fulfil their obligation to apply the law. It also means there is a human user who is morally, and legally, responsible for the effects of an attack”.⁹

Furthermore, the use of AI can create unpredictable and inexplicable effects. Systems that become too complex, opaque or fast-paced for human users to effectively understand the effects of using them should not be trusted with decisions over life and death. It is hard to imagine how systems with such characteristics would be compatible with requirements under international humanitarian law. Weapon systems that lack explainability, predictability and foreseeability should therefore be excluded from decisions over the use of force and have no place in the investment portfolio of a public pension fund.

A clear red line on anti-personnel AWS

² NOU 2020: 7, page 170:

<https://www.regjeringen.no/contentassets/86dac65c22384dda9584dc2b1a052a91/no/pdfs/nou2020200007000dddpdfs.pdf>

³ https://www.icrc.org/sites/default/files/2026-03/4896_002_Autonomous_Weapons_Systems_-_IHL-ICRC.pdf

⁴ <https://autonomousweaponswatch.org/weapons>

⁵ <https://www.newscientist.com/article/2529849-fully-autonomous-drones-have-killed-human-soldiers-for-the-first-time/>

⁶ <https://www.reuters.com/business/aerospace-defense/behind-killer-robots-ukraines-new-warfare-revolution-2026-09-11/>

⁷ <https://www.nature.com/articles/d41586-024-01029-0>

⁸ <https://www.nytimes.com/2026/08/24/world/europe/russia-drones-autonomous-ai-kill-ukraine-war.html>

⁹ https://paxforpeace.nl/wp-content/uploads/2026/08/Preventing-investments-in-autonomous-weapons_September-2026.pdf

Furthermore, the Fund should exclude weapon systems that select and engage humans as targets. As the International Committee of the Red Cross (ICRC) has put it: “In light of ethical considerations to safeguard humanity, and to uphold international humanitarian law rules for the protection of civilians and combatants hors de combat, use of autonomous weapon systems to target human beings should be ruled out”.¹⁰

Anti-personnel AWS would use algorithms and sensors to pick up and analyse data such as heat, sound or biometrics to create a category that corresponds to a human being. When killing or injuring people based on such data, there is a significant risk that the use of these systems would contravene the principle of distinction between combatants and civilians and a certainty that they would strip the killed and injured of their human dignity. ICRC writes that “...it is therefore difficult to envisage realistic combat situations where using AWS against persons would not pose a significant risk of IHL violations, since target selection is performed by the system, based on a generalized target profile that is unlikely to be able to account for the non-exhaustive range of contextual signals that a person is protected from attack”.¹¹

Anti-personnel AWS would further dehumanise wars and violence, reducing people to a set of data points. SKR’s call for a legal prohibition on anti-personnel autonomous weapons does in our view correspond to a rejection of killer robots, which is also supported by the general public, according to a recent global survey conducted among 6,000 adults in eight countries.¹²

Notably, anti-personnel landmines are already excluded from GPFG’s portfolio. While there are many differences between landmines and autonomous weapons targeting humans, a fundamental similarity is the lack of human control over the application of force to other humans.

Reducing human beings to just another piece of code that needs to be processed, and allowing machines to make life-and-death decisions is a dystopian and morally repugnant development that the GPFG should reject.

AI decision support systems used in warfare

While Stop Killer Robots is particularly focused on developing legal rules on autonomous weapon systems, the use of AI in military operations is now a reality of modern warfare and poses further risks resulting from the lack of human control over violence and killings.

¹⁰ <https://www.icrc.org/en/document/icrc-position-autonomous-weapon-systems>

¹¹ https://www.icrc.org/sites/default/files/2026-03/4896_002_Autonomous_Weapons_Systems_-_IHL-ICRC.pdf

¹² https://lexinternational.org/wp-content/uploads/2026/05/LI_RedLines-2.pdf

While AI decision support systems are not autonomous weapon systems that themselves apply force to a target, they present similarly important concerns. We warn against the use of AI in decision-making over the use of force and against over-reliance on algorithmic recommendations without the adequate scrutiny, understanding or time that is needed to make a meaningful ethical and legal judgement on whether to attack a target. These considerations relate to the role of the human in life-and-death decisions and are thus similar to our warnings about loss of human control in the use of autonomous weapon systems. The GPFG should not make profits from systems that dehumanise people and increase the speed and scale of death and destruction.

Conclusion

Autonomous weapon systems that operate without meaningful human control or target human beings raise serious concerns regarding compliance with IHL and international human rights law and ethics, as also reflected by the Mestad Commission.¹³

These concerns have been recognised by an increasingly broad range of actors, including the ICRC and National Red Cross/Red Crescent Societies, the United Nations Secretary-General, technical experts, faith leaders, and civil society organisations. A growing number of states now support negotiations on a legally binding international instrument to prohibit and regulate autonomous weapon systems.

As one of the world's largest sovereign wealth funds, the GPFG has influence over global investment practices and the ethical development of the sector. We therefore encourage the Fund to use its influence to ensure that its investments come with strong ethical standards.