



Observations and Comments of the CCM Article 3 Analysis Group on the Extension Request submitted by Bulgaria in accordance with Article 3.3 of the Convention

The Analysis Group notes with regret that activities related to the destruction of Bulgaria's cluster munition stockpile were disrupted due to an explosion in December 2020 at one of the factories of the company contracted to undertake the destruction.

The Group notes with appreciation that the extension request submitted by Bulgaria is comprehensive and meets all the criteria set out by Article 3.4 of the Convention, thus making the request a model for other countries to follow. The Group also reiterates its compliments to Bulgaria for securing the necessary external funding needed to destroy all its cluster munitions, as well as its provision of a national capacity in the implementation of its obligations under CCM Article 3, both of which underscores its commitment and national ownership.

However, the Analysis Group registers its disappointment regarding the late submission of the current extension request. The Group wishes to reiterate that Article 3.5 of the Convention stipulates that *"A request for an extension shall be submitted a minimum of nine months prior to the Meeting of States Parties or the Review Conference at which it is to be considered."*

To inform the Analysis Group's further consideration of the extension request ahead of the Tenth Meeting of States Parties, the Group would welcome clarification of the following elements:

1. The Group requests clarification of the extension date requested by Bulgaria. The request document refers interchangeably to 31 December 2023 (eg. page 3) and 1 January 2024 (page 15).
2. With reference to the total number of cluster munitions in Lot 3 shown in Table 1 on page 15, the Group requests clarification whether this number amounts of 3,533 rather than 3,553.
3. Based on the explanation provided on page 16 that the transportation schedule involves "one or two convoys per month" with each convey consisting of "three or four trucks", the Analysis Group requests clarification on the actual number of trucks per convoy. The Group counts 35 trucks while page 16 indicates that the number of trucks for the transportation activities is 53.

4. The Analysis Group considers that Table 2 on Pages 17-18 would benefit from a legend to explain the colour codes used and to provide clarity for a non-technical readership. For instance, do the orange boxes indicate the trucks and number of submunitions already transported to the contractor's Demilitarization Plant, and the purple boxes the trucks and number of submunitions planned for transportation (activity not yet completed)? The Group would welcome clarification on this point.

5. The Analysis Group requests clarification whether Table 2 relates to the "Complete Contractual Program", covering both destruction and transportation activities, or only transportation activities. There is an inconsistency between the table – which indicates completion by December 2022 – and the statement at the top of page 17 that complete contractual program is expected to be completed by June 2023.

The Analysis Group would be grateful if Bulgaria could re-submit its extension request, with the above points amended or clarified, by Tuesday 17 May.