



Observations and Comments of the CCM Article 4 Analysis Group on the Extension Request submitted by the Republic of Iraq in accordance with Article 4.5 of the Convention

The Analysis Group notes with appreciation that Iraq submitted its extension request more than nine months prior to the 11th Meeting of States Parties (11MSP), at which the request is to be considered, as required by Article 4.6.

The Analysis Group recognizes Iraq as one of the most heavily cluster munition contaminated countries, and hence acknowledges the complexities that come with this scale of contamination. The Group is grateful that the extension request provided by Iraq is of a good quality and meets many of the criteria outlined in the *Methodology for requests of deadline extensions under Articles 3 and 4 of the Convention on Cluster Munitions* (CCM/MSP/2019/12) that was adopted at the 9MSP.

Nonetheless, the Group has observed that several key elements require further elaboration by the requesting State to strengthen the request. In this regard, the Analysis Group requires additional information or further clarification to be included into Iraq's extension request by **Friday, 20 January 2023** on the following points:-

1. Well-defined **baseline of cluster munition contamination** – As Iraq has not established an accurate baseline of its cluster munition contamination, it must conduct an evidence-based survey of all areas suspected or known to contain cluster munition remnants, but that have not yet been surveyed. A list of areas already surveyed and that will not be surveyed again would be useful.

The Analysis Group recommends that Iraq:

- (a) Include a **detailed work plan**, broken down by governorate, for planned survey activities. Even if Iraq has not developed a 5-year survey plan, it could include one with a shorter time frame.
 - (b) Include information on how Iraq estimated that it would discover a total area of contamination of 25.0 km² by late 2023 and an additional 113.9 km² for the period of 2024-2028.
 - (c) Kindly clarify/confirm in which areas Iraq expects to discover further previously unknown contamination.
2. It is noted from Tables 28 and 29, that most of the risk education beneficiaries seemed to be from the **Kurdistan Region of Iraq** (KRI). In addition to that, in Table 32, cluster munition victims have been identified in that region. However, none of the governorates of the KRI are listed in the tables with cluster munition contamination.

In this regard, kindly clarify if there is any cluster munition contamination (either suspected or confirmed) in the KRI.

3. It would seem that Iraq's calculations on the estimated time required to comply with its Article 4 obligations are based only on releasing land through clearance, with a daily clearance rate of 5,000 m² per team.
 - (a) While Iraq indicates that it plans to continue with technical survey (TS) and non-technical survey (NTS) activities to release contaminated area, it has not provided disaggregated information on plans for reduction through TS, and cancellation through NTS, alongside clearance. It would be beneficial to include this information, including the estimated amount of cluster munition-contaminated area it plans to reduce through technical survey and cancel through non-technical survey.

It could also be useful for Iraq to include information on its integrated strategy to address all types of contamination as elaborated in its National Mine Action Strategy 2022-2028.
 - (b) The Request needs to clarify how many deminers there are in each team (for the purposes of Iraq's estimation of the average daily clearance rate of 5,000 m² per team).
 - (c) The Request states that Iraq has cleared, reduced and cancelled approximately 36 km² in the first 6 months of 2022. Therefore, to work out if the daily clearance rate of 5,000m² per team is broadly accurate, could Iraq indicate how much of the 36km² released in this period was through clearance?
 - (d) Provide a **land release work plan** that includes information on where (geographical areas), how (TS, NTS or clearance) and when (which month) activities are to take place.
 - (e) The extension request talks about the need for clearance teams, but there is no mention of plans to increase survey capacity in order to survey and confirm previously unknown contamination and develop a baseline of cluster munition-contaminated areas. How many survey teams are there at present and what is the cost of NTS and TS teams?
 - (f) It could be beneficial to include information on the prioritization criteria for clearance. What are the prioritization factors that Iraq takes into consideration and how does Iraq plan to address them?
 - (g) It would be useful to clarify the use of CMRS in Iraq's clearance operations. Is CMRS applied routinely whenever there is evidence of cluster munition remnants?
 - (h) It would be beneficial that Iraq considers correcting terminology to be in line with IMAS (i.e. refer to land cancelled through NTS, reduced through TS, and clearance through clearance).
4. Iraq is one of the countries most severely affected by landmines, cluster munitions and other explosive remnants of war (ERWs). The Analysis Group recommends that Iraq uses its extension request to highlight the importance of its CCM Article 4 obligations and how Iraq plans to address cluster munition remnants **alongside other contamination**.
5. Iraq highlights certain obstacles that could negatively impact its survey and clearance activities.
 - (a) Iraq indicates that the **unstable security situation** posed by the Daesh is an issue the country currently faces. Would these, or other security concerns, negatively impact Iraq's ability to conduct survey or clearance in certain regions of the country? If so, please

indicate the location and size of areas that are currently **inaccessible** and how this could affect Iraq's work plans.

- (b) Iraq mentions challenges posed by **climatic and geographical factors**. Could Iraq include more information on these climactic factors and include these in its work plan broken down into months? Could Iraq kindly provide more information on its difficult terrain, where they are and how this could affect its work plans?
6. With regard to **national resources** dedicated to Iraq's clearance operations:
- (a) Iraq informs that it has 2 Ministry of Defense (MOD) teams and 1 Civil Defense (CD) team working in clearing areas contaminated with cluster munitions. Are these 3 teams dedicated only to cluster munition clearance, and not the clearance of other explosive ordnance, and are the three teams currently fully operational?
 - (b) Iraq also indicates that the Iraqi government covers the costs of 11 teams working in the field of survey, clearance and destruction – divided into 5 teams working in survey and clearance and 6 teams dedicated to destruction of cluster munition remnants. Are the 3 national clearance teams (2 MOD and 1 CD) included in this cost?
 - (c) Iraq provided the expected annual funding of the Directorate of Mine Action (DMA) for the extension period of 5 years. Does this funding cover the whole DMA funding or is it specific to cluster munition clearance? If USD3.89 million a year is the global figure for DMA funding, how much is dedicated specifically for activities related to cluster munition related activities?
7. The request would benefit from the provision of additional information on Iraq's **resource mobilization plan**, in particular:
- (a) Which additional potential international implementing partners and states has Iraq identified to be in a position to provide assistance to its cluster munition survey and clearance activities? How does Iraq intend to engage with the abovementioned partners and states?
 - (b) Iraq indicates its intention to establish a country coalition in the margins of the 11MSP. Could Iraq be more specific on how its plans in this regard?
 - (c) The Analysis Group recommends that Iraq provides clear and costed work plans (both for establishing a baseline survey of cluster munition contaminated areas and for land release (through NTS, TS, and clearance) of cluster munition contaminated areas already identified) in order to increase the likelihood of obtaining additional funding. The request should indicate how much survey and clearance activities would cost, what funding has been secured or is expected to continue, and what funding would be required.
8. In the request, Iraq has provided some information on risk education.
- (a) Due to the situation in Iraq with mixed contamination and where there are reports of population movements within the country, explosive ordnance risk education (EORE) is vital to reduce the risk of injury and death caused by explosive hazards. Therefore, the Analysis Group recommends that Iraq include a **risk education plan** in its extension request.

(b) Iraq's risk education plan should include information on its planned activities, who is conducting the activities, when and where the activities will be conducted, and what target groups will be the beneficiaries. It is also useful for Iraq to include a budget the national resources made available for EORE activities. If possible, could Iraq provide information related only to risk education on cluster munition remnants?

9. Iraq reports that **environmental pollution** is one of the harmful effects of cluster munition contamination and clearance.

Does Iraq have plans to mitigate the negative environmental impacts of cluster munition clearance? For example, does Iraq plan to develop a National Mine Action Standard (NMAS) on the environment?

10. Iraq informs that in cooperation with Norwegian People's Aid (NPA) and the United Nations Mine Action Service (UNMAS), it has trained and deployed **female teams** to carry out survey and clearance activities.

The Analysis Group recommends that Iraq provide more information on its plans to mainstream gender and diversity in its mine action programme more broadly.

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