

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

The Analysis Group is grateful for the efforts made by Lebanon in preparing its comprehensive Article 4 extension request and commends it for the transparency exhibited in detailing previous and current challenges encountered in complying with the Convention. The Analysis Group agrees that overall the Lebanese request has provided a lot of information with which it could make a preliminary assessment of the Request. While this density of information is appreciated, it would be beneficial, especially to non-technical readers and potential donors, if Lebanon could consider providing a one-page summary/infographic of the extension request (attached file), - comprising an overview of the background, the annual workplan and the funding requirements to provide an easy to comprehend snapshot of the Request.

However, the Analysis Group also observed a number of key elements which require further elaboration by the requesting State. In this regard, the Analysis Group requests additional information or further clarification from Lebanon on the following points:

1. The inclusion of a more detailed **work plan** for the extension period which would include:
  - (a) Clear year by year clearance targets for easy monitoring over the requested extension period indicating the allocation of assets per year to justify the 5-year extension requested; The conclusion of the study at page 36, states that we can end the known contamination with the same average of funds received in the past 3 years. In page 37, the time table sets the amount of m<sup>2</sup> needed to be cleared each year and the number of teams that should be working to achieve these goals.  
Another timetable suggest to readers, especially donors, to increase the funds in the first 2 years of extension, since the study is based on the costs of 2019, which we think guarantees better the release of all lands with CM.  
The priorities will be set by the Non-Technical survey according to the sites impact. The targets to be cleared is subject to the donors intentions and this in some cases restrict the clearance to specific requirements (specific village, next to refugees camps, Technical Survey...)
  - (b) the rationale and criteria for clearance priorities during the period;  
most of remaining contamination are priority 3. LMAC will use the updated information from NTS executed in 2020, to reprioritize lands, based of course on safety and socio-economic impact.  
**A new small paragraph** explaining this fact was inserted in page 26 under 'Search and Clearance Methodology'.
  - (c) Clear plans for TS and NTS during the extension period;  
NTS on pages 29-31, explain in detail the classification of lands, the number of teams available, the time needed to finish re-survey all sites in database (almost 7 months) and total cost for it (168,000\$). Do we need more details at this point?

As for TS, it is not easy to decide from the beginning which areas for TS. The section of TS on pages 31-32, explain that some areas are CHA and will be cleared directly. However, results of NTS will help define on a case by case the possibility of using TS (systematic or

targeted) in the others. Also EDD team which proved to be successful in Lebanon, will be deployed where possible.

Our point of view is that TS is actually clearing a percentage of a land instead of a 100% clearance. This is a speeding factor for clearance. This is why, when we calculated the time and funds for clearance, we understand by that the highest amount needed. Any site that was calculated under clearance and is released later by 'area reduction' is helping reducing the time and fund needed.

- (d) the most appropriate survey and clearance methodologies and plans.

Based on experience throughout the years in Lebanon and on evidence, LMAC has developed the clearance methodology for CM explained in pages 25-27: the fade out, the depths, the best detectors that works for Lebanon, the team structure, the average of clearance. This methodology will be applied for clearance.

2. The Request would benefit from the provision of additional information on Lebanon's **resource mobilization plan**, in particular:

- (a) how are the funding from the Government of Lebanon and the external funding requirements related?

Although the contribution of GoL is essential, the main part of funds comes from international donors. GoL is trying to fulfil its commitment to CCM so it declared the 50B LBP (33.3 M \$) dedicated for CM clearance exclusively.

- (b) Why is there a need for external funding if the funds required for operations during the extension period according to table 7 (page 38) are \$33 million and the Government of Lebanon has committed \$33.3 million?

Since its declaration of 50B LBP in 2017, it actually did not start yet. First there was the complication of finding the correct contracting method of public fund with not for profit organization. This took a lot of negotiations and time. Then, the economical and political situation in Lebanon prolonged the time to define the amount for the year 2019 in the GoL budget, which was 2.5 M \$, with a promise that the remaining of the 2019 budget was supposed to go to 2023. However because of escalation in internal situation, no money was given in 2019. Through discussion in NMAA, LMAC is expecting that an average of 3 M \$ will be given to CM clearance yearly. And this was the amount used in the study.

- (c) Can Lebanon provide an insight to the already secured and prospective donors for the extension period?

LMAC presented its new strategy and the CCM extension request plan, in the 2020 mine action forum. The donors were impressed. Some of them who decided to stop funding MA in 2020, wanted to reconsider for the future. Some of the donors declared commitment to fund MA in general. LMAC always stress the need for CM clearance and the CCM deadline. The interest is more toward minefields and IEDs, nevertheless, some donors are committed to CM also. We have not a clear view for the period of the extension, but what we are emphasizing on is that if donors continue with the same average of the past 3 years we can do it.

- (d) including the identification of sustainable national resources to be allocated to ensure completion of clearance by 2025;

chart 3 at page 40 presents the national resources and capacities to complete the clearance. With national capacities (LAF teams) only, it will take till 2048 to finish. Any decrease in the average of external fund will definitely extend the time needed to finish and force GoL to cover for the gap.

- (e) LMAC expects to exceed the 2018 output in each year of the extension request on the assumption that it will receive the USD 33mil additional funding from the government. Considering that this additional funding was initially planned for the period 2019-2023 a

and that as of 2019 it was still pending formal approval, it would be useful for Lebanon to provide an update on this matter;

The study was submitted before the end of 2019, no update could be done then.

CM clearance in 2019 resulted in 1.25 km<sup>2</sup> cleared and 4034 CM destroyed. The total number of working days is less by 31 days than 2018 because of the internal unrest.

- (e) provide detailed plans of soliciting and implementing international assistance through it Mine Action Forum etc.;
  - most of international donors has multiple years projects to support humanitarian mine action. The most common is a 4 year project. In 2020, these projects need to be renewed and LMAC is working hard with donors to keep Lebanon on their lists. This will guarantee the first 3 to 4 years of the extension. Some of the donors have expressed their willingness to do so. Others still not decided. The transparency and professionalism of LMAC is the key to convince them.
  - (f) include a contingency plan in case of lack of sufficient resources.
  - In case of lack of funds, GoL has to cover for that, as mentioned in the study pages 39-40 'Worst Case Scenario'. It is not easy for GoL especially with current financial situation to take on its own the completion of clearance. This is why, I explained the case without giving a plan. I wanted to clarify to donors that it is not possible to comply to the convention on time without your support.
3. It noted the **need for consistency** in the presentation of figures throughout the Request. Specifically,
- (a) In providing updated figures on, for example, areas cleared so far, remaining areas of contamination to be addressed, etc. ( e.g. the table on pg. 9 says 1.15km<sup>2</sup> was cleared in 2018 but on pg. 11 it says 1.167km<sup>2</sup>;
  - This is a typing mistake on page 11: in the previous draft, the table did not contain separate rows for NTS and TS. The total value of released land was 1.167 km<sup>2</sup>. When asked by ISU NTS and TS were inserted and the value of cleared should have become **1.147** km<sup>2</sup> . (reference Annual Report 2018, page 10 -11)
  - (b) The amount of cluster munition contamination remaining (i.e. the current baseline) is inconsistently described throughout the Request;
  - The remaining contamination is a variable that is related to time. When specified at a certain paragraph it comes directly with the time of this specification. In the executive summary, page 3 it is clear that it is at beginning of 2019. However in page 4 where it talks about the plan, I added clarification explaining that we are taking the remaining contamination after removing the cancelled lands during the first 5 months of 2019 when this study started. The purpose is to get as close as possible to the real contamination and make the study more accurate. I did the same at page 24.
  - (c) Need to clarify reporting data and fix discrepancies in the figures presented.
  - All figures were reviewed. Needed explanation was inserted.
4. Need to clearly define the **terminology** used in the Request for uniform understanding by all readers.

The Analysis Group notes that some of the (national) terminology used in the extension request could benefit from further clarification. E.g. the term baseline is used throughout the document to indicate 'contaminated land to be released' and the figures vary from year to year due to progress in TS and NTS over the past years. Since the term baseline is often used for a starting point, the varying numbers could lead to misunderstanding by the reader. Therefore, the Analysis Groups suggests to either change the terminology or explain its use in the document.

Totally agree, the baseline is the start point in our terminology also. However, one of the main challenges for LMAC in the past was to determine a fixed baseline. The study includes a lot of explanation about the causes of fluctuation in the baseline and what measures were taken to reach the final point of a fixed one. The baseline is the start point and the one adopted for Lebanon and used in the study is = 54.78 km<sup>2</sup> (page 10).

5. The Analysis Group cautiously notes the need for further elaboration on the matter of “**inaccessible areas**” which must be presented and dealt with in a manner that is consistent in complying with Article 4.2 of the Convention. It is important that States Parties recognize that this means that all cluster munition contaminated areas, regardless of how difficult they are to access, fall under the scope of CCM Article 4.

Specifically,

- (a) Lebanon should provide additional information on how these areas are determined to be inaccessible,

These inaccessible areas are a real challenge for LMAC in CM and MF clearance. For transparency in our planning they were inserted in the study. LMAC at present does not have the right answer to how to deal with those. One thing is for sure: they need to be released (NTS, TS, CL) in order to comply with the convention.

The paragraph presented in the study, clarify the difficulties (geographical features) that make them inaccessible, difficulties with MedEvac, extra risks working on steep cliffs...

- (b) clarify what is meant by CHAs located in inaccessible areas? How was Lebanon able to confirm that these areas are confirmed hazard areas?

Having the location of CM strikes, the footprint of the strike may cover in part a difficult terrain. This terrain is registered in the database as CHA and needs clearance.

- (c) what plans are in place to address contamination in inaccessible areas, etc.?

The 2 presented scenarios require special study to define the best approaches to release these inaccessible areas. No actual plan at present, but the study shall come out with a solution to be adopted and that satisfy the requirements of the CCM.

6. Lebanon could provide information about risk education and reduction plans (the only reference to risk reduction education is on pg. 19 which refers to a plan. However, there is need to demonstrate how this plan linked to the request. Will activities be enhanced as part of the extension plan, if so how and where?

One of the essential works of LMAC is risk education. The MRE section has a strategy that covers the whole population, based on priorities and needs, and taking into consideration the updated information from operations section, the LAF rapid response and also the IAs inputs. A small paragraph mentioned MRE section as one of the strength for LMAC. Further explanations were omitted thinking that the focus was on how to complete the clearance and that MRE will obviously continue. However, a new paragraph was inserted explaining more about the MRE during the extension period (page 42-43).