

## **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 is pleased to note that Bulgaria has complied with the recommendations of the Ninth Meeting of States Parties (9MSP) to provide a detailed project management and work plan in its updated extension request to be considered at the Second Review Conference (2RC). The Group is in agreement that the extension request submitted by Bulgaria is comprehensive and meets all the criteria set out by Article 3.4 of the Convention. The Group also commends Bulgaria for its success in securing the necessary funding to destroy all the cluster munitions held by the Bulgarian Armed Forces within the requested extension period.

While the Analysis Group acknowledges the high quality of the request, additional information or clarification on the following points could more enlighten the States Parties in their consideration of Bulgaria's request:-

1. Cluster Munitions in Lot 3

The request indicates that these cluster munitions are currently planned for destruction from March 2021 to April 2022 and that a detailed work plan for this Lot 3 will be provided at a later stage. Could Bulgaria advise when the work plan related to the destruction of these cluster munitions would be available? The Group would also appreciate if any additional information on the destruction of Lot 3 could be made available before or at the 2RC.

2. Cluster Munitions in Lot 4 and Lot 5

Though these are listed in the Statement of Work and Annex A, no comprehensive information is provided in the detailed narrative section of the request document. In the spirit of greater transparency and accountability, the Analysis Group recommends that Bulgaria provides clarification on the current status of cluster munitions contained in Lots 4 and 5.

3. The Analysis Group recommends that the request should include an acknowledgment that the PTM-3 AV mines that are listed as part of Bulgaria's stockpiles to be destroyed do not actually fall under the CCM as defined in Article 1 paragraph 3 of the Convention. This would clarify Bulgaria's recognition that the CCM does not apply to mines.

4. The Analysis Group welcomes Bulgaria's close and continued contact with the coordinators on stockpile destruction and the ISU. In this regard, the Analysis Group strongly encourages Bulgaria to inform States Parties as soon as possible should there be any impediment to the implementation of its work plan and to provide such information in a timely manner.