

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, - 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;
 - (b) the rationale and criteria for clearance priorities during the period;
 - (c) Clear plans for TS and NTS during the extension period;
 - (d) the most appropriate survey and clearance methodologies and plans.

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?
 - (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?
 - (c) Can Lebanon provide an insight to the already secured and prospective donors for the extension period?
 - (d) including the identification of sustainable national resources to be allocated to ensure completion of clearance by 2025;
 - (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 and that as of 2019 it was still pending formal approval, it would be useful for Lebanon to provide an update on this matter;
 - (f) provide detailed plans of soliciting and implementing international assistance through it Mine Action Forum etc.;
 - (g) include a contingency plan in case of lack of sufficient resources.

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 1.15km² was cleared in 2018 but on pg. 11 it says 1.167km²;
 - (b) The amount of cluster munition contamination remaining (i.e. the current baseline) is inconsistently described throughout the Request;
 - (c) Need to clarify reporting data and fix discrepancies in the figures presented.

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.

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,
 - (b) clarify what is meant by CHAs located in inaccessible areas? How was Lebanon able to confirm that these areas are confirmed hazard areas?
 - (c) what plans are in place to address contamination in inaccessible areas, etc.?
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?