

2022



**CCM ARTICLE 3 EXTENSION
REQUEST
BY THE REPUBLIC OF
BULGARIA**



Republic of Bulgaria

April 2022, Sofia

CCM Article 3 Extension Request

Contents

INTRODUCTION	2
CONTACT	2
SECTION 1: EXECUTIVE SUMMARY	3
DURATION OF THE PROPOSED EXTENSION	3
RATIONALE AND RESOURCE MOBILIZATION: SUMMARY EXPLANATION OF THE PROPOSED EXTENSION, INCLUDING THE FINANCIAL AND TECHNICAL MEANS AVAILABLE TO OR REQUIRED BY THE STATE PARTY, AND, WHERE APPLICABLE, THE EXCEPTIONAL CIRCUMSTANCES JUSTIFYING IT	3
OUTLINE FOR HOW AND WHEN STOCKPILE DESTRUCTION WILL BE COMPLETED - SUMMARY WORK PLAN FOR THE PERIOD OF EXTENSION .	4
QUANTITY AND TYPE OF CLUSTER MUNITIONS AND EXPLOSIVE SUBMUNITIONS HELD AT THE ENTRY INTO FORCE OF THE CONVENTION FOR THAT STATE PARTY AND ANY ADDITIONAL CLUSTER MUNITIONS OR EXPLOSIVE SUBMUNITIONS DISCOVERED AFTER SUCH ENTRY INTO FORCE.....	5
QUANTITY AND TYPE OF CLUSTER MUNITIONS AND EXPLOSIVE SUBMUNITIONS DESTROYED DURING THE 8 YEARS AFTER THE ENTRY INTO FORCE OF THIS CONVENTION FOR THAT STATE PARTY	6
Private companies	6
QUANTITY AND TYPE OF CLUSTER MUNITIONS AND EXPLOSIVE SUBMUNITIONS REMAINING TO BE DESTROYED DURING THE PROPOSED EXTENSION AND THE ANNUAL DESTRUCTION RATE EXPECTED TO BE ACHIEVED	7
Cluster munitions (CMs) owned by the Bulgarian Armed Forces:	7
Retained CM and explosive submunitions:.....	7
SECTION 2: DETAILED NARRATIVE	8
ORIGINS OF THE ARTICLE 3 CHALLENGE TO MEETING THE DEADLINES	8
EXISTING NATIONAL STORAGE AND STOCKPILE DESTRUCTION CAPACITIES	9
NATURE AND EXTENT OF THE PROGRESS MADE TO DATE.....	10
AS DEMONSTRATED IN GRAPHIC 2, THE IMPLEMENTATION OF THE DESTRUCTION PROCESS OF THE ESS ALLOCATED IN LOT 1 HAS BEEN ALMOST FINALIZED WITH REMAINING LESS THAN 6 THOUSAND SUBMUNITIONS, MARKED IN RED, TO BE DESTROYED.	11
GRAPHIC 2	11
.....	11
RESOURCES MADE AVAILABLE TO SUPPORT PROGRESS MADE TO DATE.....	11
METHODS AND STANDARDS USED	12
NATURE AND EXTENT OF THE REMAINING CHALLENGES	13
HUMANITARIAN, ECONOMIC, SOCIAL, AND ENVIRONMENTAL IMPLICATIONS	13
INSTITUTIONAL, FINANCIAL, TECHNICAL, AND HUMAN MEANS AND RESOURCES AVAILABLE AND/OR NECESSARY IN ORDER TO MEET REMAINING CHALLENGES	14
AMOUNT OF TIME REQUESTED AND REASONING BEHIND THE AMOUNT OF TIME REQUESTED	14
DETAILED WORK PLAN COVERING THE AMOUNT OF TIME REQUESTED, WITH MEASURABLE BENCHMARKS, INCLUDING, BUT NOT LIMITED TO:	15
How much storage and stockpile destruction is planned for each year of the extension period?	15
What annual costs are projected, including a breakdown of costs?	19
What are the expected sources of funding necessary for implementation of the plan?	19
What are potential challenges and/or risk factors that may negatively affect the realization of the plan?	19
CIRCUMSTANCES THAT MAY IMPEDE THE ABILITY OF THE STATE PARTY TO DESTROY ALL STOCKPILES DURING THE PROPOSED EXTENSION	19

CCM Article 3 Extension Request

Introduction

The Republic of Bulgaria ratified the Convention on Cluster Munitions (CCM) in April 2011. For the Republic of Bulgaria the Convention entered into force on 1st October 2011. Under its provisions, the Republic of Bulgaria undertakes to destroy or to ensure the destruction of all cluster munitions (CMs) within eight years. Accordingly, the deadline for the destruction of the Bulgarian cluster munitions stockpiles was 1st October 2019. Nonetheless, the Republic of Bulgaria was not in position to complete the cluster munitions destruction within the aforementioned eight years period. Following a 2019 initial request, in April 2020 the Republic of Bulgaria submitted an updated extension request in accordance with Article 3.2 of the Convention including a detailed project management and work plan to be considered at the CCM Second Review Conference.

In February 2021, via silence procedure, the Conference agreed to grant the request of the Republic of Bulgaria for an extension until October 1, 2022.

Contact

Stoyan Karastoyanov

Chief expert, EU & International organizations Department

Defence Policy and Planning Directorate, Ministry of Defence of the Republic of Bulgaria

Tel: + 359 92 20 921, Mobile: + 359 886 51 78 84

e-mail: s.karastoyanov@mod.bg ; stoyan.karastoyanov@gmail.com

Section 1: Executive summary

Duration of the proposed extension

Based on the analysis of the current situation and recent developments, Bulgaria is on the opinion that the process of destruction of the cluster munitions stockpiles on the national territory could **not** be completed by October 1, 2022.

Hence, the Republic of Bulgaria would like to submit an extension request for a period of 15 months (***until December 31, 2023***) in order to meet its Article 3 obligations.

Rationale and resource mobilization: Summary explanation of the proposed extension, including the financial and technical means available to or required by the State Party, and, where applicable, the exceptional circumstances justifying it

For reasons explained in detail in the extension request, submitted in April 2020, the Republic of Bulgaria has not been able to meet its initial deadline of October 1, 2019 for destruction of its cluster munitions stockpiles.

In order to meet the CCM obligations under Article 3, in July 2019 a contract was signed between NSPA and the Italian company “Esploidenti Sabino” Srl. for the destruction of cluster munition stockpiles in possession of the Bulgarian Armed Forces. An estimate of the available at the time financial resources indicated that they suffice solely for the destruction of the cluster munitions listed under Lot 1 and Lot 2 outlined in Table 1 in ***Detailed narrative*** section of the Extension request.

To facilitate the transportation and destruction processes, the Ministry of Defence initiated in September 2019 three additional processes:

- A law amendment to allow the transportation of the CMs outside the territory of the Republic of Bulgaria, to a State Party to the Convention – adopted in December 2019;
- A tripartite agreement between the MoD, the project contractor and the transport subcontractor – signed in January 2020;

CCM Article 3 Extension Request

- A memorandum with the US Embassy in Sofia to secure additional funding of up to **USD 2 mln** for the destruction of the CMs allocated in Lot 3 – signed in February 2020.

The start of the destruction process was given in May 2020 with the transportation of the explosive submunitions (ESs) in Lot 2. By the end of 2020 all Lot 1 and Lot 2 explosive submunitions have been successfully transferred to the contractor's destruction facilities in Italy.

On December 21, 2020, an explosion erupted in one of the factories of the contractor company "Esplosenti Sabino" Srl.

Following the accident, an investigation conducted by the Italian authorities has begun and the contractor's license to operate has been temporarily revoked.

Since January 2021, all activities related to transportation and destruction of the explosive submunitions have been put on hold.

In November 2021, all of "Esplosenti Sabino" Srl. licenses and authorizations have been reactivated and reinstated as well as the site activities and the equipment set-up.

Upon obtaining all necessary transport licenses and permits and after being put **on hold** for 13 months, in February 2022 the project of destruction of the Bulgarian Army's cluster munitions stockpiles was resumed with the transportation of the first tranche of explosive submunitions, allocated in Lot 3.

Outline for how and when stockpile destruction will be completed - Summary work plan for the period of extension

According to SOW, the contractor should perform the safest and most cost-effective destruction of the cluster munitions within frameworks and conditions required by MoD and agreed with NSPA. The destruction process has been performing outside the territory of the Republic of Bulgaria, in Italy - a State Party to the Convention.

The Bulgarian cluster munitions and explosive submunitions (ES) of total number **6862** CMs and **186349** ESs have been divided into three (3) lots according to the priorities outlined in Table 1 in ***Detailed narrative*** section of the Extension request.

CCM Article 3 Extension Request

Subsequent to securing additional financial resources for the destruction of the CMs allocated in Lot 3, the contract between NSPA and the Italian company “Esplosenti Sabino” Srl encompasses the destruction of all of the Bulgarian Army’s cluster munitions stockpiles.

The transportation of the Lot 1 and Lot 2 explosive submunitions to the contractor’s facilities in Italy have been successfully completed by the end of 2020 as initially planned. In February 2022, the implementation of destruction process of Lot 1 and Lot 2 was resumed. As of April 1, 2022, the destruction rate is higher than 70 percent, as displayed in *Graphic 1* and *Graphic 2* in **Detailed narrative**. The Italian contractor is aiming to complete the Lot 1 and Lot 2 destruction process by June 2022.

The transportation activities of Lot 3 explosive submunitions should occur over the period of eleven (11) months and the destruction must be completed no later than six months after the collection of all cluster munitions.

The complete contractual program for the destruction of the Lot 3 explosive submunitions is to be implemented in the period February 2022 - June 2023.

Up to 6 months are scheduled for the verification processes of the project for the destruction of the Bulgarian Army’s cluster munitions and any contingencies (should they arise).

Quantity and type of cluster munitions and explosive submunitions held at the entry into force of the Convention for that State Party and any additional cluster munitions or explosive submunitions discovered after such entry into force

Cluster munitions and submunitions held at the entry into force of the Convention:

Table A

Name	Number of CM	Number of explosive submunitions	Gross weight (t)	Net weight (t)
Owned by the Bulgarian Armed Forces				
RBK 250 PTAB-2,5 M	478	20 076	160.13	118.54
RBK 250 ZAB 2,5 SM	60	2 880	15.6	12
RBK 500 ZAB 2,5 SM	86	25 542	45.58	37.41
RBK 500 SHOAB-0,5 M	36	19 656	19.08	14.76

CCM Article 3 Extension Request

RBK 500 SHOAB-0,5	3	1 695	1.59	1.23
RBK 500 AO-2,5 RT	201	12 060	92.46	76.179
BKF AO-2,5 RT	1647	19764	172.2	136.46
BKF AO-2,5 RTM	1431	17172	71.136	56.544
BKF PTM-3	740	8 880	61.05	48.1
BKF PTAB-2,5	1 965	23580	143.45	110.04
RBK 250-275 AO 1 SCh	214	32 100	78.11	58.85
Submunitions type ZAB-2,5		2 939	6.7597	6.7597
RBS 100 AO 25 33	1	3	0.1	0.1
9N123K	8	400	N/A	N/A
Owned by "EMKO" LTD				
RBK 250-275 AO-1 SCh	25	3750	N/A	N/A
RBK 250 PTAB-2,5 M	10	420	N/A	N/A
Total	6 905	190917	N/A	N/A

In April 2022 during an inspection a technical error in the initial reporting to the Convention (back in 2011) was revealed involving cluster munitions types BKF AO-2,5 RT and BKF AO-2,5 RTM. As disclosed, **512 CMs (6144 ESs)** BKF AO-2,5 RTM have mistakenly been introduced as CMs type BKF AO-2,5 RT. The error does not affect the timeframe of the implementation project for destruction of the Bulgarian Army's cluster munitions.

Explosive submunitions discovered after entry into force:

Table B

Name	Number of CM	Number of explosive submunitions	Gross weight (t)	Net weight
				(t)
Submunitions type PTAB-2,5		2	0.0037	0.0037

Quantity and type of cluster munitions and explosive submunitions destroyed during the 8 years after the entry into force of this Convention for that State Party

Private companies

In 2018, the Bulgarian private company "EXPAL BULGARIA" JCS managed to destroy all **52 000** explosive submunitions type DPM85 for artillery shells, cal. 155 mm, PAT794, owned by the Armed Forces of the Republic of Slovenia.

CCM Article 3 Extension Request

Another Bulgarian private company “EMKO” LTD has successfully completed the process of destruction of 25 Air bombs RBK 250-275 AO-1 SCh and 10 Air bombs RBK 250 PTAB-2,5 M, previous owned by the company, by April 2019.

By mid-2019 “EXPAL BULGARIA” JCS has finalized the destruction of **3760** 4.2 OF mines for mortar GRM 20, M20G, imported from Cyprus in 2014.

Quantity and type of cluster munitions and explosive submunitions remaining to be destroyed during the proposed extension and the annual destruction rate expected to be achieved

Cluster munitions (CMs) owned by the Bulgarian

As of April 1, 2022, the total number of CMs and explosive submunitions to be destroyed under the clauses of the contract with NSPA is **3593** CMs and **108269** ESs.

The implementation of the destruction activities in Lot 1 and Lot 2 has almost been finalized as shown in *Graphic 1* and *Graphic 2* with remaining less than 6000 explosive submunitions to be destroyed. The process is envisaged to be complete by June 2022.

The execution of the Complete Contractual Program for Lot 3 is envisaged for a period of **seventeen (17) months** and to be concluded by the end of June 2023. It encompasses both transportation and destruction activities.

Retained CM and explosive submunitions:

As stated in the 2017 CCM Article 7 Annual Report, the Republic of Bulgaria retained 400 explosive submunitions, 9N24, for training purposes of the Bulgarian Armed Forces.

Following the launch of first 50 explosive submunitions in 2019, another 50 ESs, 9N24, were fired during annual training and exercise of the Bulgarian Armed Forces in June 2021.

Section 2: Detailed narrative

Origins of the Article 3 challenge to meeting the deadlines

The Republic of Bulgaria ratified the Convention on Cluster Munitions in April 2011 and it entered into force on 1st October 2011. According to Article 3.2 each State Party undertakes to destroy or ensure the destruction of all cluster munitions as soon as possible but not later than eight years after the entry into force of this Convention for the country. For the Republic of Bulgaria the deadline was 1st October 2019.

As the Republic of Bulgaria has not been able to effectively launch the process of the destruction of the cluster munitions stockpiles within the aforementioned period, an initial extension request in accordance with Article 3 of the Convention was submitted to the 9th Meeting of States Parties for consideration. Subsequent to the recommendations of the 9th MSP, in April 2020 a revised extension request including a detailed project management and work plan was provided to be considered at the 2nd CCM Review Conference.

Meanwhile, on July 24, 2019 a contract was signed between NATO Support and Procurement Agency (NSPA) and the Italian company “Esplosenti Sabino” Srl. for the destruction of those cluster munitions stockpiles in possession of the Bulgarian Armed Forces allocated to Lot 1 and Lot 2 (out of three lots). However, the financial assessment showed that the funding at hand would not be sufficient for completion of the whole project and Lot 3 would be underfunded.

Therefore, in September 2019, the Ministry of Defence (MoD) launched a negotiation process with the United States to secure additional financial resources for the destruction of the cluster munitions allocated in Lot 3. The negotiations led to signing of a Memorandum of Understanding between the United States Department of State and the Ministry of Defence of the Republic of Bulgaria regarding Assistance for Destruction of Conventional Weapons in February 2020.

The implementation of the Bulgarian Army’s cluster munitions destruction project commenced in May 2020 with the transportation of the explosive submunitions in Lot 2. Within the calendar year, all of the ESs allocated in Lot 1 and Lot 2 have been successfully transferred to the contractor’s storage facilities in Italy.

CCM Article 3 Extension Request

In the meantime, every quarter as of July 2020, the Republic of Bulgaria began presenting to the Implementation Support Unit and the CCM Article 3 Analysis Group a chart of the latest developments in the process of destruction of the explosive submunitions allocated in Lot 1 and Lot 2.

On December 21, 2020, an explosion occurred at one of the factories of the contractor company leading to a consequent seizure of the whole plant. Following the accident the local government authorities have put on hold “Esploidenti Sabino” Srl.’s licenses for storage and demilitarization activities.

From December 2020 to July 2021 the Investigative and Local Authorities have carried out examinations and site inspection activities. In May and June 2021, the contractor successfully and in accordance with the local authorities’ request completed the implementation and restoration of environmental measures, safe measures and conditions as well as clean-up of the plant. Thus, in July the plant was released from seizure and returned to “Esploidenti Sabino” Srl.

Between July and November 2021 further examinations and site inspection activities have been conducted by the local authorities aimed at revoking the suspension of authorizations and their reactivation.

On November 3, “Esploidenti Sabino” Srl.’s licenses and authorizations were reactivated and returned. An action followed by reactivation of its activities and equipment set-up.

Thereafter, the contractor have managed to obtain all the requisite export and import licences and internal transport and transit permits. Thus, following 13-month delay, the way was paved for the recommencement of the implementation of the transportation and destruction activities of the cluster munitions in February 2022.

Existing national storage and stockpile destruction capacities

In 2018, the private company “EXPAL BULGARIA” JCS managed to destroy all **52 000** explosive submunitions type DPM85 for artillery shells, cal. 155 mm, PAT794, owned by the Armed Forces of the Republic of Slovenia.

CCM Article 3 Extension Request

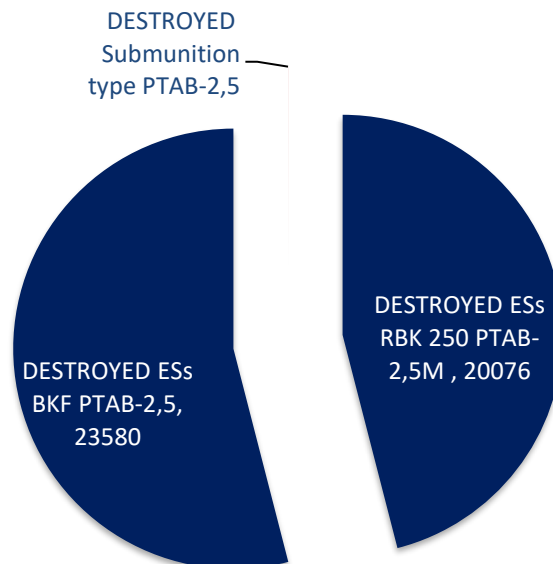
In December 2018, “EXPAL BULGARIA” JCS obtained a license, granted by the Bulgarian authorities, for the destruction of **3760** 4.2 OF mines for mortar GRM 20, M20G, imported from Cyprus in 2014. The process of destruction was finalized by mid-2019.

However, the private company does not have the required facilities to carry out the process of destruction of the cluster munitions and explosive submunitions owned by the Bulgarian Armed Forces, as the latter significantly differ in numbers and types from the Slovenian and Cypriot ones.

Nature and extent of the progress made to date

As of April 1, 2022, all of the explosive submunitions listed under Lot 2 have been destroyed as displayed below.

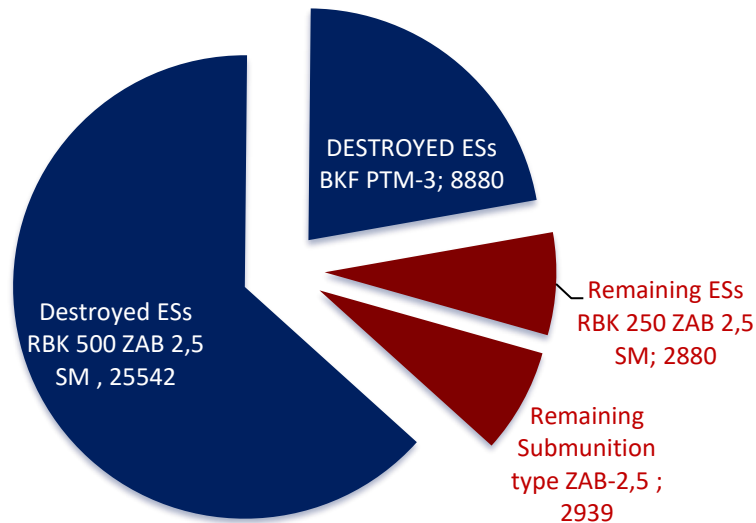
Graphic 1



CCM Article 3 Extension Request

As demonstrated in *Graphic 2*, the implementation of the destruction process of the ESs allocated in Lot 1 has been almost finalized with remaining less than 6 thousand submunitions, marked in red, to be destroyed.

Graphic 2



Resources made available to support progress made to date

According to the 2013 technical agreement signed between the Minister of Defence of the Republic of Bulgaria and the US Embassy in Sofia, the United States has provided financial resources worth **1, 8 mln USD** for the destruction of the cluster munitions stockpiles of the Bulgarian Armed Forces. When a contract with the Italian company “Esplosenti Sabino” Srl. was signed in July 2019, the financial assessment showed that the funding at hand would not be sufficient for completion of the whole project and Lot 3 would be underfunded.

Subsequently, a negotiation process was instigated. In February 2020 a Memorandum of Understanding with the US Department of State was signed to ensure the additional funding for the destruction of the CMs in Lot 3 of up to **USD 2 mln**.

As of April 2022, the project for the destruction of the cluster munitions stockpiles of the Bulgarian Army is fully funded.

CCM Article 3 Extension Request

Methods and standards used

According to the Statement of Work, the contractor shall complete the demilitarization operations associated with each consignment, as evidenced by the signed certificate of demilitarization (COD), within four months following the date on which the contractor collects the ammunition from the MoD nominated location. The contractor shall have sufficient processing capacity to process the ammunition, which is subject to this SOW within the agreed timeframe.

Demilitarization is defined as the process to achieve full destruction of the item such that the ammunition has been destroyed and that no part, material or explosives can be reused for its original intended purpose. Demilitarization of ammunition will be effected by applying procedures developed by the contractor, using tools and equipment provided and maintained by him.

The contractor shall demilitarize the ammunition and dispose of the residues following established industrial standards for the processes to be performed. Demilitarization is considered completed when all the residues from the demilitarization process have been recycled or destroyed.

Explosive materials shall be disposed of, where applicable, by cost-effective means consistent with the least possible negative impact on the environment. Explosives may be destroyed, converted into other products or recycled for civilian use. However, explosives shall not be recycled for military use.

The demilitarization operations shall make the optimum use of Resource Recovery and Reuse (R3) to ensure maximum environmental protection/benefit of recovered materials.

In the implementation of this SOW, the contractor shall not use destruction by Open Burning (OB) or Open Detonation (OD) methods.

Ammunition parts and components to be disposed of as scrap must be destroyed by permanent deformation and must be free of toxic and hazardous materials. No part shall be in a condition that will permit re-use for its original intended purpose.

CCM Article 3 Extension Request

More detailed information regarding the methods and standards to be used can be found in SOW Section 6 – DEMILITARIZATION.

Nature and extent of the remaining challenges

All the details, concerning the successful implementation of the whole project for the destruction of the cluster munitions stockpiles of the Bulgarian Army, have been specified. The process itself has been reinstated in February 2022.

The Russian military invasion in Ukraine constitutes a blatant violation of International Law and the UN Charter. The war in Ukraine represents the biggest challenge to the security environment of the European continent since the Second World War. As the war dynamic unfolds, the uncertainties regarding the continuance and the development of the military actions increase exponentially.

Contemplating the current state of affairs, a highlight must be thrown on the possibility the war in Ukraine to affect and/or lead to some consequent delays of the transportation and destruction activities.

Humanitarian, economic, social, and environmental implications

The cluster munitions are safely stored in military bases of the Bulgarian Armed Forces and do not pose a threat to the civilian population.

With regard to the environmental considerations during the implementation of the project for the destruction of the Bulgarian Armed Forces' cluster munitions stockpiles, the Statement of Work states that the contractor shall establish and maintain systems that protect the environment from contamination, pollution or other adverse impacts resulting from the demilitarization work. The contractor's environmental protection measures shall be, as a minimum, in accordance with national, regional and local laws and regulations.

Demilitarization techniques that involve uncontrolled emissions of the by-products deriving from the burning or detonation of explosive materials, including Open Burning/Open Detonation, are not permitted under this project, even if such techniques are permitted by the national regulations of the country in which the demilitarization takes place.

CCM Article 3 Extension Request

The contractor is responsible for all safety aspects and for the implementation of all European environmental standards and regulations.

Institutional, financial, technical, and human means and resources available and/or necessary in order to meet remaining challenges

The project for the destruction of the Bulgarian Armed Forces' cluster munitions is funded by the U.S. government, which already provided the sum of **USD 1, 8 mln** and is to provide additional **USD 2 mln**.

Points of Contact (POC) are listed in the Statement of Work to assist the transportation within and from Bulgaria. The POCs are from the following institutions: Ministry of Economy and Industry, Ministry of Transport and Communications, Ministry of Interior and Bulgarian Customs Agency.

The Bulgarian Military Police will escort the cluster munitions during movement on the territory of Bulgaria.

Further information regarding the institutional, financial, technical, and human means and resources available can be found in the Statement of Work.

Amount of time requested and reasoning behind the amount of time requested

As outlined above, by April 1, 2022, more than seventy (70) percent of the explosive submunitions allocated in Lot 1 and Lot 2 have been successfully destroyed. The process is envisaged to be completed by June 2022.

The transportation activities of Lot 3 explosive submunitions that began in February should occur over the period of eleven (11) months and the destruction must be completed no later than six months after the collection of all cluster munitions.

The complete contractual program for the destruction of the Lot 3 explosive submunitions is to be implemented in the period February 2022 - June 2023.

Up to 6 months are scheduled for the verification processes of the project for the destruction of the Bulgarian Army's cluster munitions and any contingencies (should they arise).

CCM Article 3 Extension Request

Therefore, the Republic of Bulgaria would like to submit an extension request in order to meet its Article 3 obligations for the timeframe of 15 months until December 31, 2023.

Detailed work plan covering the amount of time requested, with measurable benchmarks, including, but not limited to:

How much storage and stockpile destruction is planned for each year of the extension period?

Table 1

Priority/Lots	N ^o	Name	UN N ^o	Class or Division	All					Net weight of 1 cassette (kg)
					Number of CM	Number of explosive submunitions	Gross weight (t)	Net weight (t)	NEQ (t)	
1	1	RBK 250 ZAB 2,5 SM	0010	1.3G	60	2 880	15.60	12.00	*	200
	2	RBK 500 ZAB 2,5 SM	0010	1.3G	86	25 542	45.58	37.41	*	435
	3	Submunition type ZAB-2,5	0010	1.3G		2,939	6.76	6.76	*	2.3
	4	BKF PTM-3	0370	1.1E	740	8 880	61.05	48.10	23.70	65
		Subtotal:				886	40241	128.99	104.27	23.70
2	1	RBK 250 PTAB-2,5 M	0370	1.1E	478	20 076	160.13	118.54	12.60	248
	2	BKF PTAB-2,5	0370	1.1E	1,965	23580	143.45	110.04	14.90	56
	3	Submunition type PTAB-2,5	0370	1.1E		2	0.0056	0.0056	0.00126	2.8
		Subtotal:				2443	43658	303.58	228.59	27.50
3	1	RBK 500 SHOAB-0,5 M	0370	1.1E	36	19 656	19.08	14.76	2.10	410
	2	RBK 500 SHOAB-0,5	0370	1.1E	3	1 695	1.59	1.23	0.20	410
	3	RBK 500 AO-2,5 RT	0370	1.1E	201	12 060	92.46	76.18	9.80	379
	4	BKF AO-2,5 RT	0370	1.1E	1647	19764	*	*	*	63
	5	BKF AO-2,5 RTM	0370	1.1E	1431	17172	*	*	*	62
	6	RBK 250-275 AO 1 SCh	0370	1.1E	214	32 100	78.11	58.85	2.20	275
	7	RBS 100 AO 25 33	0370	1.1E	1	3	0.10	0.10	0.02	100
	Subtotal:				3533	102450	434.67	344.12	44.42	
	TOTAL:				6862	186349	867.25	676.98	95.62	

All of the Bulgarian Army's cluster munitions stockpiles are being destroyed under the contract between NSPA and the Italian company "Esploidenti Sabino" Srl. The contractor

CCM Article 3 Extension Request

company is skilled in environmentally friendly demilitarization activities since the 70's and has specialized in disposal of cluster munitions since 2003 acting as a prime contractor with its own storages and demilitarization plant placed in Italy.

The Italian company "Esploidenti Sabino" Srl. possesses all the requisite capabilities to successfully implement the process of destruction of the Bulgarian Army's cluster munitions stockpiles.

The cluster munitions of the Bulgarian Armed Forces have been divided into three (3) lots according to the priorities in the Table 1 above. As displayed in *Graphic 1* and *Graphic 2*, by April 1, 2022 the destruction rate of the explosive submunitions listed in Lot 1 and Lot 2 is higher than 70 percent. The completion of the destruction process for these two lots is scheduled for June 2022.

In February 2022, the transportation process of the explosive submunitions allocated in Lot 3 commenced.

For the execution of the Complete Contractual Program (see Table 2) for the destruction of Lot 3 explosive submunitions is envisaged a period of **seventeen (17) months**. All the transportation activities are to be concluded within **eleven (11) months** (February to December 2022) and will be executed by a subcontractor - the Bulgarian company "Tempus Link" LTD. According to the transportation schedule, the total quantity of trucks required to complete the transportation activities is 53 trucks, allocated in 16 convoys. One to two convoys, as appropriate, per month, each convoy consisting of three (3) to four (4) trucks, as appropriate, will transport the Lot 3 explosive submunitions from the Bulgarian depots to the contractor's Demilitarization Plant. As with the transfer of the explosive submunitions allocated to Lot 1 and Lot 2, the international transport to Italy will be crossing only countries members of both - the European Union and NATO.

The termination of the destruction activities of the cluster munitions listed under Lot 1 and Lot 2 will mark the beginning of those for the cluster munitions allocated to Lot 3. The destruction process is envisaged to start in June 2022 and must be finalized no later than **six (6) months** after the collection of all cluster munitions. Due to the current demilitarization

CCM Article 3 Extension Request

performances of the Lot 1 and Lot 2 cluster munitions, the contractor working lines are perfectly set-up for accepting the items and ready to continue with Lot 3 CMs.

The Complete Contractual Program (transportation and destruction activities) for Lot 3 explosive submunitions is envisaged to be concluded by June 2023.

The detailed Complete Contractual Program, presented by the contractor, for each typology of cluster munitions includes:

Table 2

Complete Transportation Program										
Month	Cal. Week	Date	Con voy	Lot 3						
				Line 10 ¹	Line 20 ²	Line 30 ³	Line 40 ⁴	Line 50 ⁵	Line 60 ⁶	Line 70 ⁷
FEB 2022	6	02.02.2022	1				300*			
	8	23.02.2022	2			17	200		45	
MAR 2022	9	02.03.2022	3				300			
	13	29.03.2022	4		3		72		110	
APR 2022	17	26.04.2022	5	4**		30			13	
	19	10.05.2022	6	17			200			

¹ Air Bomb RBK 500 (SHOAB 0,5 M)

² Air Bomb RBK 500 (SHOAB 0,5)

³ Air Bomb RBK 500 (AO-2,5 RT)

⁴ Air Bomb BKF AO-2,5 RT

⁵ Air Bomb BKF AO-2,5 RTM

⁶ Air Bomb RBK 250-275 AO 1 SCh

⁷ Air Bomb RBS 100 AO 25 33

* Orange boxes indicate the number of cluster munitions already transported to the contractor's facilities in Italy

** Purple boxes indicate the number of cluster munitions planned for transportation

CCM Article 3 Extension Request

MAY 2022	21	24.05.2022	7	15			200			
JUN 2022	23	07.06.2022	8			51				
	26	28.06.2022	9				100	300		
AUG 2022	34	23.08.2022	10				100	200		
SEP 2022	37	13.09.2022	11			17	80	120		
OCT 2022	40	10.04.2022	12					399		
	43	TBD	13				55	212		
NOV 2022	46	TBD	14			27		100	5	
	48	TBD	15			25	40	100		
DEC 2022	50	TBD	16			34			41	1
TOTAL			16	36	3	201	1647	1431	214	1

At the first day of every month, the contractor will be presenting Production Status Report that summarizes the demilitarization status, records the type and quantity of ammunition that has been received at the contractor's storage site as well as the type and quantity of scrap that has been generated.

Up to 6 months are scheduled for the verification processes of the project for the destruction of the Bulgarian Army's cluster munitions and any contingencies (should they arise).

CCM Article 3 Extension Request

The Republic of Bulgaria will continue to provide regularly national reports under Article 7 of the Convention which will demonstrate the progress made so far in the process of CMs destruction.

What annual costs are projected, including a breakdown of costs?

The current budget for the implementation of the project for the destruction of the Bulgarian Armed Forces' cluster munitions stockpiles is **USD 1,8 mln** plus the additional up to **USD 2 mln** as set the provisions of the 2020 Memorandum of Understanding between the United States Department of State and the Ministry of Defence of the Republic of Bulgaria.

The estimated breakdown of costs (including transportation) is as follows:

The total contract value for the destruction of the explosive submunitions (see Table 1) in Lot 1 and Lot 2 is **USD 1,4 mln**.

The estimate value for Lot 3 is **USD 1,29 mln**.

What are the expected sources of funding necessary for implementation of the plan?

As stated above in the Extension request, the U.S. Government has already provided **USD 1,8 mln** for the destruction of the Bulgarian Armed Forces' cluster munitions plus additional up to **USD 2 mln** as set in the 2020 Memorandum of Understanding.

What are potential challenges and/or risk factors that may negatively affect the realization of the plan?

The growing uncertainties revolving around the duration and the developments of the war in Ukraine may affect and/or delay the implementation of the transportation and destruction activities.

Circumstances that may impede the ability of the State Party to destroy all stockpiles during the proposed extension

See Detailed narrative's "Nature and extent of the remaining challenges" Part.