



Additional Observations and Comments of the CCM Article 4 Analysis Group
on the Updated Extension Request and Responses by the Republic of Iraq
submitted on 23 January 2023

The Analysis Group thanks Iraq for providing responses and additional clarification along with its updated extension request on 23 January 2023, in response to the initial observations and comments made by the Analysis Group on 15 December 2022. The Analysis Group wishes to express its appreciation for the timely manner of Iraq's response. The Analysis Groups also appreciate the complex nature of the challenges faced in Iraq's implementation of Article 4 of the Convention.

However, the Analysis Group noted that there are still some information gaps on a number of key elements which require further elaboration by the requesting State in order for the process of considering the request to be concluded. As set out in Article 4.6 of the Convention, the request needs to contain information on the financial and technical means available to and required by the State Party, **including a clear work plan for survey, clearance and destruction of all cluster munition remnants** during the proposed extension period. The details on how to establish a clear work plan are elaborated in the Lausanne Action Plan (LAP) Action 18 which recommends States Parties to identify the precise location, scope and extent of cluster munition contamination. Action 20 requests States Parties to submit extension requests that are **substantiated, ambitious and clear, containing detailed, costed annual work plans for the extension period, that include appropriate provisions for Risk Education.**

The Analysis Group, after examining the updated extension request of 23 January 2023, expressed significant concern that a detailed work plan with measurable benchmarks, which justifies the requested extension period, has not yet been elaborated. The Analysis Group therefore recommends that Iraq provides **two separate work plans** – one for survey activities and one on planned clearance operations. The provision of two clear and detailed work plans would further strengthen the request and enable the Analysis Group to recommend – through the President of the Eleventh Meeting of States Parties – that the Eleventh Meeting of States Parties grants the extension of five years as requested by Iraq.

In this regard, the Analysis Group recommends some additional and clear information be included in the Extension Request on the following essential elements. This additional information can be submitted as an annex to the current Request:

1. Detailed work plans

The Analysis Group recommends that Iraq provides one work plan, broken down by governorate, on the areas in which it intends to conduct more surveys, in order to help establish a well-defined baseline of contamination. This plan should also clarify how many survey teams are there at present, whether there are plans to increase the survey capacity and what the cost of NTS and TS teams are.

The Analysis Group also recommends that Iraq provides a separate work plan outlining activities related to clearance and destruction of cluster munition remnants to be carried out during the extension period of 1 November 2023 to 31 October 2028. The multi-year work plan needs to be broken down into smaller time frames, i.e., by months or quarters as well as by governorate. Alongside the clearance work plan, Iraq should clarify the number of teams dedicated to clearance and destruction operations that are available at present and how these available human resources will be distributed. Thereafter, Iraq should provide an updated detailed annual clearance plan at each subsequent Meeting of States Parties.

Iraq informed that there are now no inaccessible areas; however, it also indicated that there were teams that previously used to work on cluster munitions clearance that were shifted to work with explosive devices in the liberated areas. Iraq could usefully clarify what the consequences on the work plan are if 2 (or 3) out of the 15 teams available are diverted from CM disposal/clearance to EOD.

2. Resource Mobilization Plan

As part of the request, Iraq should include a resource mobilization plan to demonstrate how it intends to secure the funding required for the implementation of its work plan, with respect to both survey and clearance efforts for cluster munition operations. This plan should detail the resource mobilization efforts being made, the external support received, and resources made available by the Government of Iraq to support implementation efforts.

In the request, the budget that is needed for implementation is clear. However, critical information is missing such as the gap between this need and what is already confirmed or can be reasonably expected to be obtained. In addition, information on ongoing discussions with specific partners would be useful, in addition to the already mentioned plan to organise a country coalition approach meeting.

3. Risk Education Plan

Tables 31-32 detail the distribution of risk education *materials*. However, the request currently has no text describing the planned risk education activities. The request should include a **more detailed and substantial risk education plan** containing information such as the activities planned, in addition to those already mentioned relating to the distribution of risk education materials, as well as the locations and targeted people groups.

4. Clarification of information on achievements and outstanding contamination

The level of known and suspected contamination (CHA and SHA) is presented in a clear manner. Table 2 indicates the grand total of contaminated land discovered by mid-2022; Table 3 details the land released by mid-2022. The remaining contamination is presumably calculated as the difference between the two. For clarity, it would be ideal to include with a **table showing this calculation**, although not required. The Analysis Group would also **recommend including Table 15 in the introductory chapter 3**, as it gives a clear overview of the identified contamination as at mid-2022. Could Iraq also clarify on the title of Table 15.

The Analysis Group would **strongly recommend Iraq to include a new chapter on the expected increase in contamination**. The chapter could explain why Iraq expects to discover more contamination; where it expects to discover it, including whether the increase is expected in previously non-surveyed areas; how much contamination that Iraq expects to discover in the extension period; what assumptions this rate of increase is based on; as well as Iraq's plans to survey these areas (NTS, TS), including timelines, current financial and technical resources, as well as future needs. It is recommended that the table on Page 3 of the Iraqi response to the AG feedback be included in the Request, as it helps to clarify how Iraq got to the totals presented in tables 16, 17 and 18.