

## ICBL Comments on the Extension Request of Ukraine.

*ISC meetings, 30 June – 2 July 2020*

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Thank you, Mr. Chair,

We thank Ukraine for submitting this extension request under the continued challenging circumstances.

Ukraine is asking for two years to complete its clearance but notes it is dependent on the cessation of hostilities in the occupied territories of Donetsk and Luhansk. The request is short and does not give much explanation on what progress has been achieved since 2018 and what is hoped to be achieved within the two years requested. However, it does contain a number of important updates.

Among positive points we see the following:

- Ukraine has made some good progress in terms of organizing its response to contamination by developing a management system for mine action. This includes the adoption of legislation; the allocation of national authority functions to the Ministry of Defence (MOD); and the accreditation of the Demining Center of the Armed Forces as a certification body for demining operators.
- Ukraine has also developed basic national standards to guide mine action operations, which it states are in accordance with international mine action standards. It is setting up IMSMA with the support of OSCE and GICHD, which should support the collection of data and planning processes;
- It appears that a significant portion of funding for mine clearance comes from the national budget.

Among the points that require additional clarification and further work we note the following:

- The request states that *“Preliminary estimates show that about 8% of the lands (totalling to 7 000km<sup>2</sup>), which were liberated from the occupying authorities”* is suspected to be contaminated. However, there is no information in the request regarding the amount of non-technical and technical survey, as well as clearance that has been completed and how this has modified the estimated 7000km<sup>2</sup> of area suspected to be contaminated. Ukraine should provide a clear update on the amount of land surveyed and cleared by all operators between 2014 and 2020 and show the progress that has been made since the original estimate of 7000km<sup>2</sup>;
- Ukraine should also provide information about what can be done in terms of clearance if hostilities do not cease, including clarity over what clearance can be completed in the areas that are already liberated;
- There is no plan or calculation within the request that indicates how the 2-year time frame was decided in terms of amount of land contaminated - versus - resources and clearance capacity available - versus - speed of current survey and clearance. Ukraine should provide details as to why 2 years is considered long enough and how it intends to

establish a baseline for and address the contamination within the 2 years of the extension request.

- The request does not contain a workplan for the period of the extension request, and it remains unclear what exactly Ukraine intends to achieve within the two requested years. Ukraine needs to develop a detailed workplan, outlining how much of the accessible land will be surveyed and cleared by each of the operators (including the state institutions and international and national NGOs), where it will be done, the timeframe and the cost;
- Rates for survey and clearance, given current capacity and deployment, need to be estimated so a realistic timeframe can be established for clearance of remaining contamination. Does Ukraine have the capacity required to complete the clearance in two years?
- It would be useful to receive information in regard to clearance prioritisation, the nature of contamination and the type of team deployment that will be required to address it;
- Ukraine should provide information on the impact of the contamination on local population and on MRE provided. A costed and detailed MRE action plan should be included as part of the extension request, as required under the Oslo Action Plan.
- The request does not include an overall or annual budget, nor resource mobilization strategy or efforts. Ukraine should provide a clear budget and resource mobilization strategy detailing the national contribution, the additional funds needed and the strategy to obtain those funds;
- It would be also useful to receive information about the amendment of the mine action legislation and the expected outcomes;
- Lastly, the request does not mention a Mine Action Strategy - Ukraine should provide clarifications whether it exists and whether the plan for the extension request has been developed with the input of all relevant institutions and operators.

We would also like to take this opportunity to call on States Parties and other partners to support Ukraine with its mine action efforts.

Thank you.