

**Comments on Ukraine's Article 5 Extension Request, delivered by Mine Action Review**  
**Intersessional Meetings, 30 June – 2 July 2020**

Mine Action Review appreciates that Ukraine faces many challenges in fulfilment of its Article 5 implementation and that the actual extent of anti-personnel mine contamination cannot be reliably estimated until surveys have been completed. While survey is possible in some liberated areas, in many areas it is not possible as Ukraine does not have access to mined areas or else there is ongoing fighting.

Nonetheless, Mine Action Review believes that Ukraine's rough estimate of 7,000km<sup>2</sup> of area contaminated with mines and ERW to be a vast over-estimate of actual anti-personnel mine contamination. Ukraine's estimate includes both mine and ERW contamination. Ukraine should disaggregate contamination from anti-personnel mines (or mixed anti-personnel mine contamination), from contamination from other types of explosive ordnance, as the latter is not included under its Article 5 obligations.

We would welcome Ukraine providing a more accurate estimate of mined areas within the areas it has effective access to, based on the non-technical surveys that have been conducted.

Ukraine is requesting a two-year extension until 1 December 2023, although states that fulfilment of this deadline is dependent upon cessation of hostilities and it gaining the full control over the occupied territories. Even if Ukraine were to gain full control of all mined areas on its territory, it is highly improbable that it would be able to complete survey and clearance of all anti-personnel mined areas by December 2023. The extension request should therefore be viewed as an interim request.

We would welcome a detailed, costed, and multi-year workplan for the extension period, including projections of annual survey and clearance output, in accordance with the land release methodology employed (i.e. cancelled through non-technical survey, reduced through technical survey, or released through clearance), at a minimum for the areas to which it has effective access, appreciating that full planning is hindered by ongoing conflict and lack of access to many of the mined areas.

We would welcome clarification that Ukraine plans to undertake technical survey of mined areas, to confirm contamination, prior to commencing full clearance; as well as clarification on Ukraine's current survey and clearance capacity and the planned capacity for the period of the extension request.

We would also welcome information on what steps Ukraine plans to mainstream gender and diversity within its mine action programme, including on measures to ensure mixed-gender survey teams to help enable inclusive consultations with all groups in the local communities during survey and take the needs of women, children, boys, men, and ethnic and minority groups into account during prioritisation, planning, and tasking of survey and clearance activities.

Lastly, Ukraine should ensure that its information management database can allow for the nationwide recording and reporting of information, including on the remaining mined area, disaggregated by 'SHAs' and 'CHAs' and their relative size, as well as disaggregating anti-personnel mine contamination from other types of explosive ordnance contamination.

Thank you.