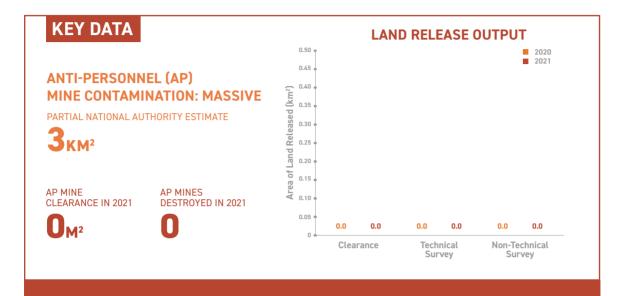
# ARMENIA

CLEARING THE MINES 2022



### **KEY DEVELOPMENTS**

The 2020 armed conflict between Armenia and Azerbaijan over Nagorno-Karabakh ended with Azerbaijan regaining most of its internationally recognised territory except for a part of Nagorno-Karabakh.<sup>1</sup> No new mined area was recorded in Armenia in 2021 and no mine clearance or other land release was planned or undertaken. Recorded contamination of area contaminated with anti-personnel mines-only a partial reporting-covers just over 3km<sup>2</sup>.<sup>2</sup>

Armenia's Center for Humanitarian Demining and Expertise (CHDE) focused on survey and clearance of cluster munition remnants (CMR) and explosive ordnance (EO) contamination in 2021.<sup>3</sup> In 2022, the CHDE initiated a baseline non-technical survey to determine more precisely the extent and type of contamination. Priorities for clearance will be defined when the survey is complete.<sup>4</sup>

## **RECOMMENDATIONS FOR ACTION**

- Armenia should commit to not use anti-personnel mines and should accede to the Anti-Personnel Mine Ban Convention (APMBC) as a matter of priority.
- Armenia should clear anti-personnel mines in areas under its jurisdiction or control as soon as possible, consonant with its obligations under international human rights law.
- Armenia should clarify the extent of remaining mine contamination, including in zones where access is restricted to the military.
- Armenia should mobilise the necessary resources to finish mine clearance and set a deadline for completion of operations.

<sup>1</sup> T. De Waal, "Unfinished Business in the Armenia-Azerbaijan Conflict", Carnegie Europe, 11 February 2021, at https://bit.ly/3PFvARz.

<sup>2</sup> Emails from Margaret Lazyan, Head of Mine Risk Education and Victim Assistance, Centre for Humanitarian Demining and Expertise (CHDE), 26 April 2021; and Karine Shamiryan, Head of International Affairs, CHDE, 27 May 2022.

<sup>3</sup> Email from Margaret Lazyan, CHDE, 26 April 2021.

<sup>4</sup> Emails from Vaghinak Sargsyan, CHDE Senior Non-Commissioned Officer (SNCO) Director, 13 June 2022; and Karine Shamiryan, CHDE, 27 May 2022.

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- Armenia should expedite the adoption of national mine action legislation and finalise a strategic mine action plan as soon as possible.
- Armenia should establish a platform for dialogue and cooperation with mine action operators and other stakeholders for information sharing and learning.

#### MANAGEMENT CAPACITY

Center for Humanitarian Demining and Expertise (CHDE)

#### NATIONAL OPERATORS

CHDE (in addition to serving as the NMAA, the CHDE conducted survey in 2021)

#### **INTERNATIONAL OPERATORS**

The HALO Trust

#### **OTHER ACTORS**

- United Nations Development Programme (UNDP)
- Geneva International Centre for Humanitarian Demining (GICHD)

### **UNDERSTANDING OF AP MINE CONTAMINATION**

There has been no release of mined areas in Armenia for two years and reported contamination in Armenia has remained constant since the end of 2019. At the end of 2021, Armenia had an estimated 9.52km<sup>2</sup> of mined area, with more than 5.69km<sup>2</sup> of confirmed hazardous area (CHA) and a further 3.83km<sup>2</sup> of suspected hazardous area (SHA)<sup>5</sup> (see Table 1). This is the same as reported in 2019 and 2020.<sup>6</sup> Mined area contaminated with anti-personnel mines was estimated at 3.01km<sup>2</sup> (2.90km<sup>2</sup> of CHA and 0.1km<sup>2</sup> of SHA).<sup>7</sup> A baseline non-technical survey began in 2022 to determine the extent of CMR and other explosive ordnance, including new contamination arising from the 2020 conflict.<sup>8</sup>

Mined areas contain anti-personnel mines or anti-vehicle mines, or a combination of both, as well as unexploded ordnance (UX0).<sup>9</sup> Of 94 CHAs, 55 contain anti-personnel mines, totalling just under 2.9km<sup>2</sup>. The remaining 39 CHAs totalling 2.8km<sup>2</sup> contain anti-vehicle mines only.<sup>10</sup> Three of the six SHAs, totalling just over 0.1km<sup>2</sup>, are thought to be contaminated by anti-personnel mines, with the remaining 3.7km<sup>2</sup> suspected to contain only anti-vehicle mines.<sup>11</sup>

#### Table 1: Mined area (at end 2021)<sup>12</sup>

Type of contamination	CHAs	Area (m²)	SHAs	Area (m²)
AP mines	41	2,176,085	3	105,500
AV mines	39	2,791,608	3	3,728,442
AP and AV mines	11	706,046	0	0
AP mines and UX0	2	12,769	0	0
AP and AV mines and UXO	1	4,842	0	0
Totals	94	5,691,350	6	3,833,942

AP = Anti-personnel AV = Anti-vehicle

Four of Armenia's eleven administrative areas (ten provinces plus Yerevan) contain mined areas. Three are contaminated with both anti-personnel and anti-vehicle mines while the fourth (Vayots Dzor) is contaminated solely with anti-vehicle mines, as set out in Table 2.<sup>13</sup>

11 Ibid.

<sup>5</sup> Email from Karine Shamiryan, CHDE, 27 May 2022.

<sup>6</sup> Emails from Margaret Lazyan, CHDE, 25 June 2020 and 26 April 2021.

<sup>7</sup> Email from Karine Shamiryan, CHDE, 27 May 2022.

<sup>8</sup> Emails from Vaghinak Sargsyan, CHDE, 11 May 2022; and Karine Shamiryan, CHDE, 27 May 2022.

<sup>9</sup> Email from Margaret Lazyan, CHDE, 26 April 2021.

<sup>10</sup> Email from Karine Shamiryan, CHDE, 27 May 2022.

<sup>12</sup> Ibid.

<sup>13</sup> Emails from Margaret Lazyan, CHDE, 26 April 2021; and Karine Shamiryan, CHDE, 27 May 2022.

Table 2: Mir	ned area by	province	(at end	<b>2021)</b> <sup>14</sup>
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Province	Type of contamination	CHAs	Area (m²)	SHAs	Area (m²)
Gegharkunik	AP mines	3	584,022	2	105,123
	AV mines	5	2,428,128	3	3,728,442
Syunik	AP mines	32	1,424,512	1	377
	AV mines	21	280,425	0	0
	AP and AV mines	8	676,617	0	0
	AP mines and UXO	2	12,769	0	0
	AP and AV mines and UX0	1	4,842	0	0
Tavush	AP mines	6	167,551	0	0
	AV mines	10	15,603	0	0
	AP and AV mines	3	29,429	0	0
Vayots Dzor	AV mines	3	67,452	0	0
Totals		94	5,691,350	6	3,833,942

A Landmine Impact Survey (LIS) was conducted in Armenia in 2005, followed by partial survey of 17 sites by The HALO Trust in 2012, and then again, in 2012–13, by the Swiss Foundation for Mine Action (FSD). FSD found 17 SHAs estimated to cover 26km<sup>2</sup> and 114 CHAs that covered 21km<sup>2</sup> in four districts bordering Azerbaijan. Thirteen of these areas, totalling 1.8km<sup>2</sup>, contained only UXO and not mines.<sup>15</sup> In 2019, the CHDE conducted non-technical survey in Syunik province but military-restricted zones continued to be off limit for survey and clearance.<sup>16</sup>

Mine and explosive remnants of war (ERW) contamination in Armenia is primarily the consequence of armed conflict with Azerbaijan in 1988–94, in which both sides used mines. The heaviest contamination exists in areas previously occupied by Armenia but regained by Azerbaijan during the 2020 conflict. The reclaimed territory contains heavily contaminated land, including around Nagorno-Karabakh, and a massive mined area along the 350km-long line of contact (LoC) that previously separated Armenian and Azerbaijani forces.<sup>17</sup> Armenia's border with Georgia has been cleared of mines whereas the border with Türkiye (formerly known as Turkey), also mined during the Soviet era, is still contaminated.<sup>18</sup> While non-technical survey in 2012–13 by FSD did not find evidence of mines outside the buffer zones in Ararat province, which borders Türkiye, certain areas on that border have not yet been surveyed because they are controlled by Russian border troops.<sup>19</sup> The LIS conducted under United Nations Development Programme (UNDP) auspices in 2005 had identified Ararat province as contaminated with anti-personnel mines, but this is not confirmed by the data provided from the CHDE.<sup>20</sup>

Armenia reported new CMR and other explosive ordnance contamination in Gegharkunik, Syunik, and Tavush provinces as a result of the conflict with Azerbaijan in 2020 (see Mine Action Review's *Clearing Cluster Munition Remnants* report on Armenia for further information).

### NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

The CHDE was established by the Armenian government in 2011 as a non-commercial State body responsible for conducting survey and clearance and identifying contaminated areas. In 2014, the CHDE was made Armenia's national mine action authority (NMAA).<sup>21</sup> An Advisory Board oversees the CHDE at the Deputy Ministerial level, with representation from the Ministry of Defence; Ministry of Emergency Situations; Ministry of Territorial Administration and Infrastructure; Ministry of Education, Science, Culture and Sports; the Ministry of Justice; and the Ministry of Foreign Affairs.<sup>22</sup>

- 14 Emails from Vaghinak Sargsyan, CHDE, 11 May 2022; and Margaret Lazyan, CHDE, 26 April 2021.
- 15 CHDE, "FSD non-technical mine action survey", Yerevan, 2013, p. 12.
- 16 Emails from Margaret Lazyan, CHDE, 19 April 2019 and 25 June 2020.
- 17 See Mine Action Review's *Clearing the Mines 2022* report on Azerbaijan for further information.
- 18 Emails from Ruben Arakelyan, CHDE, 19 March 2014 and 28 April 2017, and interview in Geneva, 1 April 2014.
- 19 CHDE, "FSD non-technical mine action survey", CHDE, Yerevan, 2013, p. 9; and emails from Varsine Miskaryan, CHDE, 8 August 2016; and Ruben Arakelyan, CHDE, 28 April 2017.
- 20 "Landmine Impact Survey", UNDP, 2005, at: http://bit.ly/3tfQtr0, p. 29.
- 21 Emails from Ruben Arakelyan, CHDE, 8 June 2015; and Margaret Lazyan, CHDE, 10 August 2020.
- 22 Emails from Geneva International Centre for Humanitarian Demining (GICHD), 13 July 2022; and Ani Zakaryan, Head of the Information Management, CHDE, 21 July 2022.

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In 2013, in conformity with a government decree, the CHDE began developing national mine action legislation. The CHDE began drafting the law in 2015<sup>23</sup> with the support of the Organization for Security and Co-operation in Europe (OSCE) office in Yerevan.<sup>24</sup> In 2019, the CHDE expected to submit the draft mine action law to the new Parliament of Armenia for discussion before the end of the year.<sup>25</sup> This did not occur. As at May 2022, the draft mine action law was reported to still be under development with the possibility that it would be finalised by the end of 2022.<sup>26</sup>

In 2021, the government allocated AMD317.6 million (approx. US\$695,000) to cover the costs of the CHDE and AMD6.3 million (approx. US\$14,000) for survey and clearance operations.<sup>27</sup> The national authorities do not provide direct funding to The HALO Trust, which undertook limited activities in Armenia in 2021.<sup>28</sup>

In 2021, the Grant Assistance for Grassroots Human Security Projects (GGP) programme, financed by Japan, initiated a project for Medical Support and First Aid Training. The project will provide training in the provision of explosive ordnance risk education (EORE) and first aid in mine-impacted communities in Armenia. The GGP included the supply of an ambulance to be used in support of clearance operations.<sup>29</sup>

UNDP provides capacity development to the CHDE within the framework of the "Strengthening the Capacities of National Mine Action Authorities in Armenia" project. Under the same project, the Geneva International Centre for Humanitarian Demining (GICHD) plans to support the CHDE in installing Information Management System for Mine Action (IMSMA) Core, conducting needs assessments, and training staff on the updated information management system. In June 2022, the CHDE reported that the process was underway.<sup>30</sup> UNDP and the GICHD will also support the CHDE in elaborating the National Mine Action Strategy and Law on Mine Action.<sup>31</sup>

#### ENVIRONMENTAL POLICIES AND ACTION

The CHDE deploys methods and tools to avoid damaging the environment where possible.<sup>32</sup> Armenia does not yet have a national mine action standard on environmental management but plans to develop one.<sup>33</sup>

The HALO Trust, in its limited operations in Armenia, seeks to minimise the environmental impact of its survey and clearance activities. It minimises fuel consumption by sharing vehicles; it does not burn vegetation during clearance or remove vegetation unnecessarily; it takes care not to contaminate water sources with fuels, lubricants, and paints; and it takes rubbish away when leaving a task. The HALO Trust also plans to conduct clearance around agricultural planting and harvesting cycles<sup>34</sup>

### **GENDER AND DIVERSITY**

The CHDE does not have a gender policy and associated implementation plan but has reported that gender has been mainstreamed in Armenia's draft national mine action strategy. During community liaison activities, all groups affected by mine contamination are consulted, including women and children. According to the CHDE, the needs of women and children in affected communities are taken into account in prioritisation, planning, and tasking of survey and clearance operations. However, the CHDE does not disaggregate mine action data by sex.<sup>35</sup>

The CHDE says it offers equal employment opportunities for both men and women. Only 17 of the 50 CHDE employees in 2021 were women (32%, down from 36% in 2020), while 6 of 16 managerial positions were held by women. Two of six staff in the Operations Department are women, as are two working in the training centre and five of six staff in the EORE Group. Survey teams do not include representatives from different ethnic or minority groups.<sup>36</sup>

33 Ibid.

<sup>23</sup> Email from Varsine Miskaryan, CHDE, 8 August 2016.

<sup>24</sup> Email from Ruben Arakelyan, CHDE, 28 April 2017.

<sup>25</sup> Email from Margaret Lazyan, CHDE, 19 April 2019.

<sup>26</sup> Email from Vaghinak Sargsyan, CHDE, 11 May 2022.

<sup>27</sup> Ibid.

<sup>28</sup> The HALO Trust report clearing an unfuzed landmine in 2021 which it registered as an unknown improvised landmine. Email from Fiona Kilpatrick-Cooper, Head of Region – Europe (South Caucasus), HALO Trust, 2 September 2022.

<sup>29</sup> Email from Margaret Lazyan, CHDE, 26 April 2021.

<sup>30</sup> Ibid.

<sup>31</sup> Email from Vaghinak Sargsyan, CHDE, 11 May 2022.

<sup>32</sup> Ibid.

<sup>34</sup> Email from Fiona Kilpatrick-Cooper, HALO Trust, 18 May 2022.

<sup>35</sup> Email from Vaghinak Sargsyan, CHDE, 11 May 2022.

<sup>36</sup> Email from Fiona Kilpatrick-Cooper, HALO Trust, 18 May 2022.

The HALO Trust disaggregates mine action data by age and sex. It is an equal opportunities employer, but due to the local cultural context and nature of the work, most HALO staff deployed in Armenia are men.<sup>37</sup> It has a team of four people based in Armenia: two are administrative staff (both women) and two are operational staff (both men). When HALO Trust deploys clearance and survey teams to Armenia, they are selected from its staff in Nagorno-Karabakh. In 2021, no women were engaged in HALO's operations in Armenia in 2021.<sup>38</sup>

### **INFORMATION MANAGEMENT AND REPORTING**

The CHDE manages the national IMSMA database.<sup>39</sup> The CHDE had been planning to install IMSMA Core in 2019 but this was delayed due to the outbreak of COVID-19 and was due to be installed in June 2022.<sup>40</sup> In June 2022, the GICHD and UNDP held a workshop with other partners in Armenia to help identify the needs of the CHDE and other mine action stakeholders. This will feed into the design of forms and procedures for the new IMSMA Core database in Armenia.<sup>41</sup> In 2020, the CHDE elaborated quality assurance (QA) and quality control (QC) forms using KoboCollect Software to improve data collection in the field.<sup>42</sup> IMSMA Core will allow the direct entry of data into the database using Survey 123.<sup>43</sup>

### **PLANNING AND TASKING**

The draft National Strategic Plan on Mine Action was presented for the approval to the Armenian Government in 2018. In early 2021, however, the plan was under reconsideration due to the emergence of new challenges (primarily CMR and other EO contamination resulting from the 2020 conflict)<sup>44</sup> and as at May 2022, it was still being developed.<sup>45</sup> The main objectives of the draft Plan were to address, as a priority, anti-personnel mines in CHAs that have a humanitarian impact, increasing community safety in support of the achievement of the 2030 Sustainable Development Goals.<sup>46</sup>

Tasking for clearance is based on CHDE criteria. Priority is given first to contaminated areas that are up to 1km away from a population centre, then to those near agricultural land, and finally to contaminated areas that negatively affect the environment. These are mostly located in the mountains. To optimise efficient deployment of resources, clearance plans are typically drawn up on a community-by-community basis.<sup>47</sup> Reflecting the immediate focus on CMR and EO contamination as a result of the 2020 conflict, Armenia's annual work plan of 2021 envisaged battle area clearance (BAC) of 45,000m<sup>2</sup> of CMR and other UXO in the Kornidzor area (Syunik province); technical survey and clearance of 15,000m<sup>2</sup> of contaminated land in Davit Bek (also Syunik province); and non-technical survey in Gegharkunik, Syunik, and Tavush provinces to identify new contamination from the 2020 conflict.<sup>48</sup>

In 2022, the CHDE started the baseline non-technical survey to determine the extent of new EO contamination arising from the 2020 conflict, and planned to clear 50,000m<sup>2</sup> of EO-contaminated area and to reduce a further 60,000m<sup>2</sup>.<sup>49</sup> By mid-2022, the baseline non-technical survey had already been completed in Syunik province.<sup>50</sup> Priorities for clearance will be defined once the non-technical survey results have been collated and analysed.<sup>51</sup>

37 Ibid.

- 38 Ibid.
- 39 Email from Ruben Arakelyan, CHDE, 19 March 2014.
- 40 Email from Vaghinak Sargsyan, CHDE, 11 May 2022.
- 41 Email from GICHD, 13 July 2022.
- 42 Emails from Margaret Lazyan, CHDE, 25 June 2020 and 26 April 2021.
- 43 Email from GICHD, 13 July 2022.
- 44 Emails from Margaret Lazyan, CHDE, 10 August 2020 and 26 April 2021.
- 45 Email from Vaghinak Sargsyan, CHDE, 11 May 2022.
- 46 Email from Margaret Lazyan, CHDE, 19 April 2019.
- 47 Email from Ruben Arakelyan, CHDE, 28 April 2017.
- 48 Email from Margaret Lazyan, CHDE, 26 April 2021.
- 49 Emails from Vaghinak Sargsyan, CHDE, 11 May 2022; and Ani Zakaryan, CHDE, 21 July 2022.
- 50 Email from Vaghinak Sargsyan, CHDE, 13 June 2022.
- 51 Ibid.

## LAND RELEASE SYSTEM

### STANDARDS AND LAND RELEASE EFFICIENCY

The Armenian National Mine Action Standards (NMAS) were approved by the government in April 2014.<sup>52</sup> In 2018, amendments were made to the NMAS on mine risk education, accreditation of demining organisations, and use of mine detection dogs (MDDs). No amendments were made to the NMAS in 2021.<sup>53</sup> According to the CHDE, reviews of the NMAS follow changes to the International Mine Action Standards (IMAS) and international best practice.<sup>54</sup>

The CHDE has been developing standard operating procedures (SOPs) for several years.<sup>55</sup> SOPs on manual mine clearance, BAC, marking of hazardous areas, and medical support were elaborated by 2018.<sup>56</sup> In 2020, the

CHDE elaborated SOPs on Information Management (IM), non-technical survey, technical survey, explosive ordnance disposal (EOD) and quality management (QM).<sup>57</sup> The CHDE has no strategy to address residual contamination. The only national capacity to address contaminated areas discovered following completion of clearance is within the CHDE.<sup>58</sup>

As previously mentioned, Armenia does not yet have a national mine action standard on environmental management, but reportedly plans to develop one.<sup>59</sup> The HALO Trust, when conducting occasional deployments in Armenia, operates under SOPs that were updated in line with those in Nagorno-Karabakh, which are accredited by the CHDE.<sup>60</sup>

### **OPERATORS AND OPERATIONAL TOOLS**

In 2021, with the focus on BAC, the CHDE deployed three non-technical survey teams, each comprising a team leader and three surveyors, compared with one non-technical survey team in 2020. Two technical survey teams were deployed by the CHDE in 2021.<sup>61</sup> The CHDE had planned to add one new non-technical survey team and one or two demining teams in 2021; in fact, two non-technical survey and two technical survey teams were added. The CHDE is still planning to deploy two more clearance teams.<sup>62</sup> The CHDE's plans to acquire mechanical clearance equipment did not materialise in 2020 or in 2021 due to changes in domestic law, which impeded procurement.<sup>63</sup>

QM is conducted in accordance with IMAS and the NMAS. QA is conducted by dedicated officers who make regular field visits to inspect cleared land.<sup>64</sup> QC is conducted once clearance of the land has been completed, but prior to handover.<sup>65</sup>

COVID-19 had no impact on landmine survey operations in Armenia in 2021.66

### LAND RELEASE OUTPUTS AND PROGRESS TOWARDS COMPLETION

#### LAND RELEASE IN 2021

In 2021, for the second consecutive year, no anti-personnel mined area was surveyed or cleared.<sup>47</sup> In 2019, the last year when mine clearance was undertaken in Armenia, 16,180m<sup>2</sup> of anti-personnel mined area was cleared and two anti-personnel mines found and destroyed.

- 52 Email from Margaret Lazyan, CHDE, 19 April 2019.
- 53 Email from Vaghinak Sargsyan, CHDE, 11 May 2022.
- 54 Emails from Margaret Lazyan, CHDE, 19 April 2019 and 26 April 2021.
- 55 Email from Varsine Miskaryan, CHDE, 8 August 2016.
- 56 Email from Margaret Lazyan, CHDE, 8 August 2018.
- 57 Email from Margaret Lazyan, CHDE, 26 April 2021.
- 58 Email from Vaghinak Sargsyan, CHDE, 11 May 2022.
- 59 Ibid.
- 60 Email from Fiona Kilpatrick-Cooper, HALO Trust, 18 May 2022.
- 61 Email from Margaret Lazyan, CHDE, 26 April 2021.
- 62 Email from Vaghinak Sargsyan, CHDE, 11 May 2022.
- 63 Emails from Margaret Lazyan, CHDE, 26 April 2021; and Karine Shamiryan, CHDE, 27 May 2022.
- 64 Email from Ruben Arakelyan, CHDE, 8 June 2015.
- 65 Email from Margaret Lazyan, CHDE, 8 August 2018.
- 66 Emails from Vaghinak Sargsyan, CHDE, 11 May 2022; and Fiona Kilpatrick-Cooper, HALO Trust, 18 May 2022.
- 67 Emails from Vaghinak Sargsyan, CHDE, 11 May 2022; and Ani Zakaryan, CHDE, 21 July 2022.

### PROGRESS TOWARDS COMPLETION

No goal is set for clearance of all anti-personnel mined area in Armenia. No target date has been set for the completion of even partial mine clearance in Armenia, due to the uncertainty over future capacity and funding.<sup>68</sup> Moreover, due to the new UXO contamination resulting from the 2020 conflict with Azerbaijan, in 2021 the CHDE prioritised BAC and technical survey in part of Syunik, and non-technical survey in the newly contaminated provinces of Gegharkunik, Syunik, and Tavush.<sup>69</sup>

Over the past five years, demining in Armenia has been slow and productivity rates low, as Table 3 illustrates, and very little demining has taken place. Armenia claims that challenges in its mine and ERW clearance include the low level of contamination and the random distribution of mines, which creates obstacles for the effective and efficient implementation of technical survey and clearance activities, and the absence of donor funding.<sup>70</sup> The CHDE launched a baseline non-technical survey in 2022 and planned to clear mined and battle areas of 50,000m<sup>2</sup> in 2022, with priorities to be determined following the completion of the non-technical survey.<sup>71</sup>

#### Table 3: Five-year summary of anti-personnel mine clearance

Year	Area cleared (km <sup>2</sup> )
2021	0
2020	0
2019	*0.02
2018	*0.01
2017	0
Total	0.03

\* Areas rounded up

### PLANNING FOR MANAGEMENT OF RESIDUAL CONTAMINATION

According to the CHDE, Armenia has included provisions for addressing previously unknown mined areas following completion in national strategies. Currently the only national survey and clearance capacity in place to address previously unknown mined areas discovered following completion is the team at the CHDE.<sup>72</sup>

<sup>68</sup> Emails from Margaret Lazyan, CHDE, 19 April 2019 and 26 April 2021.

<sup>69</sup> Email from Vaghinak Sargsyan, CHDE, 11 May 2022.

<sup>70</sup> Emails from Margaret Lazyan, CHDE, 10 August 2020; and Ruben Arakelyan, CHDE, 28 April 2017.

<sup>71</sup> Email from Vaghinak Sargsyan, CHDE, 11 May 2022.

<sup>72</sup> Ibid.