

GERMANY

MINE
ACTION
REVIEW

CLEARING CLUSTER
MUNITION REMNANTS
2019

CONVENTION ON CLUSTER MUNITIONS ARTICLE 4 DEADLINE: 1 AUGUST 2020
EXTENSION REQUESTED TO 1 AUGUST 2025

KEY DATA

CLUSTER MUNITION CONTAMINATION: MEDIUM

SUSPECTED
HAZARDOUS AREA

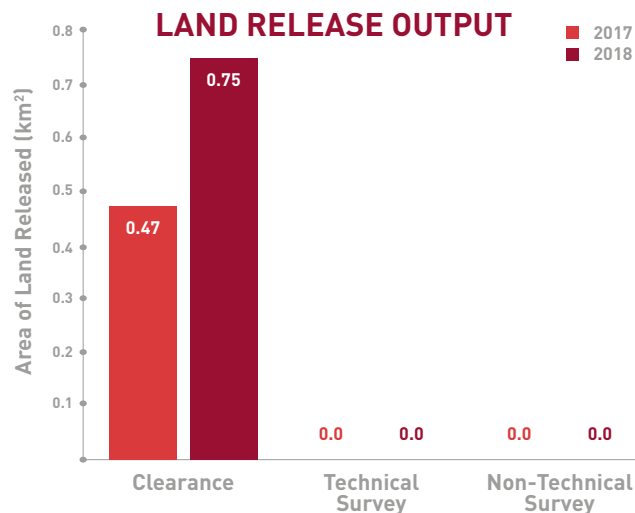
9.78 KM²

SUBMUNITION
CLEARANCE IN 2018

0.75 KM²

SUBMUNITIONS
DESTROYED IN 2018

1,542



KEY DEVELOPMENTS

In 2018, Germany continued to expand its clearance operations to clear and destroy cluster munition remnants (CMR) contamination at the former military testing facility at Wittstock, increasing clearance capacity from 40 in the summer of 2017 to 120 in 2018. However, Germany will not meet its 2020 Article 4 clearance deadline under the Convention on Cluster Munitions (CCM) and, at the end of 2018, submitted a request for a five-year extension to 1 August 2025. The request was due to be considered at the CCM Ninth Meeting of States Parties in September 2019.

RECOMMENDATIONS FOR ACTION

- Germany should assess ways in which it can speed up release of cluster munition-contaminated-area, to ensure that it fulfils its CCM Article 4 obligations before its requested new deadline of 1 August 2025. This could involve amending national legislation to allow international contractors to conduct clearance more quickly.
- Germany should ensure that its annual CCM Article 7 transparency report accurately reflects the amount of CMR contamination remaining at the end of the reporting period and should report annual clearance output for the reporting period, rather than clearance output to date.

ASSESSMENT OF NATIONAL PROGRAMME PERFORMANCE

Criterion	Score (2018)	Performance commentary
UNDERSTANDING OF CLUSTER MUNITION REMNANT (20% of overall score)	8	Germany has a good understanding of the extent of its sole CMR-contaminated area in a former Soviet military training area at Wittstock. Due to the lack of detailed data on the former testing of weapons at the site, and the significant amount of other unexploded ordnance (UXO), Germany has not been able to more accurately determine the extent and density of CMR at Wittstock.
NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT (10% of overall score)	8	There is now strong national ownership and commitment to release its sole CMR-contaminated area. Roles and responsibilities for clearance are clear, coherent, and entirely funded by the federal government, albeit at a relatively high cost. German law prevents the contracting of overseas commercial clearance operators or non-governmental organisations (NGOs) for CMR clearance.
GENDER (10% of overall score)	7	There is equal access to employment for qualified women and men for explosive ordnance disposal (EOD), including of CMR, in Germany, though women only make up a small proportion of the sector. At Wittstock, one woman holds an EOD licence, and five female UXO specialists are engaged operationally. The on-site project management and clearance supervision company employs two female full-time engineers and three male part-time employees.
INFORMATION MANAGEMENT AND REPORTING (10% of overall score)	6	Germany has reported on progress to survey and clear CMR contamination in both its CCM Article 7 transparency report and in its Article 4 deadline extension request. The Extension Request is of a high quality, with clear annual milestones for clearance, through to Article 4 completion. However, in its Article 7 reporting, Germany should reduce the annual contamination baseline of CMR contamination, which has remained at 11km ² for several years, to reflect land released by survey and clearance as work progresses. In addition, Germany should report annual clearance output in its Article 7 reporting, as the CCM requires, and not output to date.
PLANNING AND TASKING (10% of overall score)	8	Germany has a completion plan in place to address the remaining CMR contamination, with realistic annual clearance goals, based on forecast capacity and output.
LAND RELEASE SYSTEM (20% of overall score)	7	Germany is restricted from conducting technical survey or from using mechanical assets, due to the high level of explosive ordnance contamination at the site, which includes different types of UXO, with varying spatial distribution of contamination, resulting from overlapping contamination from multiple weapon types.
LAND RELEASE OUTPUTS AND ARTICLE 4 COMPLIANCE (20% of overall score)	5	Germany will not make its Article 4 clearance deadline of 1 August 2020 and has requested a five-year extension until 1 August 2025. It now plans to complete CMR clearance before the end of 2024, based on existing capacity and subject to available burnt area for clearance, favourable weather conditions, and the density of the contamination discovered.
Average score	6.9	Overall programme performance: AVERAGE

CLUSTER MUNITION SURVEY AND CLEARANCE CAPACITY

MANAGEMENT

- The Wittstock site is administrated and project managed by the Federal Forestry Agency as a subdivision of the Institute for Federal Real Estate (BImA), with support from the Central Office of the Federal Government for UXO Clearance and a consulting engineer

NATIONAL OPERATORS

- Commercial UXO clearance contractors: Röhl Munitionsbergung GmbH (Brandenburg (Havel)) and Schollenberger Kampfmittelbergung GmbH (Celle)

- On-site project management/clearance supervision company
- Destruction of CMR and other ordnance is the ultimate responsibility of the Brandenburg state explosive ordnance disposal (EOD) agency: KMBD

INTERNATIONAL OPERATORS

- None

OTHER ACTORS

- None

UNDERSTANDING OF CMR CONTAMINATION

As at December 2018, Germany reported that it had approximately 11km² of area suspected to contain CMR at a former Soviet military training area at Wittstock, Brandenburg, in former East Germany.¹ This is unchanged from the CMR contamination reported for 2017 and 2016, despite clearance of 470,000m² in 2017,² and 750,000m² in 2018.³ Taking into account the total clearance of 1.22km² in 2017–18, the remaining CMR contamination as at the end of 2018 was in fact an estimated 9.78km². A wide range of Soviet-era submunitions have been found at Wittstock: AO-1 SCh, AO-1 M, AO-2.5 RTM, AO-10 SCh, ShOAB-0.5, PTAB-1 M, PTAB-2.5 M, PTAB 2.5 TG, PTAB-10.5, ZAB 1-E, ZAB 2.5M, and ZAB 2.5.⁴

CMR were discovered “by chance” at Wittstock and declared in June 2011, first at the Anti-Personnel Mine Ban Convention (APMBC) intersessional meetings and then a week later at the CCM intersessional meetings.⁵ From 2011 to early 2014, suspected CMR contamination was reported to total 4km².⁶ In August 2014, however, Germany reported that the total suspected hazardous area (SHA) was actually 11km².⁷ The increased estimate was ascribed to discovery of submunitions during non-technical survey across a wider area than previously reported.⁸ According to Germany, the dense vegetation cover and the special hazards posed by CMR and other explosive ordnance did not allow for technical survey.⁹

The entire Wittstock site, which extends over 120km², is heavily contaminated with various kinds of unexploded ordnance (UXO), in varying special distribution and overlapping contamination, as a result of use of the site for military training purposes in 1945–93.¹⁰ The 11km² of CMR contamination is in the area of a mock airfield within the site, which was used by the air force for bombing practice, by the army for artillery firing exercises, as well as for general military exercises and training. Usage involved a wide range of munitions over a period of four decades. Only general information on historical use of cluster munitions at the site is available and the degree of contamination from submunitions and other UXO is not known for a large part of the hazardous area.¹¹

In early October 2011, ownership of Wittstock was transferred from the military to the federal government authority in charge of real estate, Institute for Federal Real Estate (BlmA). BlmA implemented a risk education programme that included marking the perimeter and preventing civilian access to the area, based on a “danger prevention plan”.¹² Once safely released, the site is due to remain part of a “nature protection area” in the Kyritz-Ruppiner-Heide, managed by BlmA as part of the Europa NATURA 2000 site, under the European Union (EU) Habitats Directive.¹³

Persistent delay in initiating clearance of CMR at Wittstock until March 2017¹⁴ was ascribed to extensive preliminary work needed to prepare the area for CMR clearance. Due to the dense vegetation in the contaminated area, Germany opted to burn the area in sections, to ensure an unobstructed view of the ground.¹⁵ Preparation for burning and clearance in turn necessitated a desk study and creation of an evacuation and access road network in 2013–15, to make the SHA accessible for clearance operators.¹⁶

This was followed in 2015–16 by the creation and maintenance of an internal site-wide system of firebreaks surrounding and subdividing the area suspected to be contaminated with CMR, to prevent uncontrolled forest fires during prescribed burning of the CMR contaminated area.¹⁷ Owing to contamination from large items of UXO, the fire-breaks were created using an unmanned, remote-controlled caterpillar by an explosive ordnance disposal (EOD) contractor in 2016.¹⁸ This was completed in 2016, with the exception of a small forested area on the eastern edge of the SHA.¹⁹ In total, 14 individual ShOAB-0.5 explosive submunitions were discovered during site preparation, which lasted to the end of 2016.²⁰

The prescribed burning of the first sections of the SHA started in 2017 and was ongoing as of writing. It requires special meteorological conditions to keep the fire under control, and, as such, prescribed burning can only take place on a few days each year. Germany plans to burn 200 to 300 hectares per annum, taking into account natural protection issues and planned clearance progress.²¹

NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

Germany has full national ownership of its land release efforts. The Wittstock site is administrated and project managed by the Federal Forestry Agency as a subdivision of the BlmA. The BlmA is an institution incorporated under public law and which is wholly owned by the federal government.²²

The Federal Forestry Agency’s responsibilities include project coordination and control, risk management, and budget planning. Support is provided by the Central Office of the Federal Government for UXO Clearance and a consulting engineer.²³

Commercial UXO clearance contractors are contracted and managed by the local branch of the Federal Forestry Agency, Bundesforstbetrieb Westbrandenburg.²⁴

The Regulatory Agency of the County of Ostprignitz-Ruppin is responsible for public security under the police law of the federal state of Brandenburg.²⁵

In Germany, the clearance and disposal of UXO is a security task that is under the control of the police and administrative legislation and is therefore the responsibility of the respective federal states. Almost all federal states have set up a corresponding state agency for EOD for these tasks. In Brandenburg, this is the so-called KMBD (in English: the Brandenburg state war material disposal service), which is part of the Brandenburg police. Under German legislation, the federal government is not allowed to maintain an agency for EOD.²⁶ Contracting foreign companies for CMR clearance in Wittstock is also not possible under

German law.²⁷ This limits Germany's ability to upscale demining capacity by preventing the contracting of NGOs or overseas commercial expertise.

All CMR clearance costs are, though, paid for by the federal BImA. National funding to complete CMR clearance has been fully secured and is said to cover unforeseen cost increases. Clearance costs were expected to increase from 2021, due to price inflations expected as part of the new tender planned for commercial UXO clearance.²⁸

In 2017, CMR clearance cost over €1.6 million while in 2018, the figure increased five-fold to more than €9.5 million,²⁹ presumably reflecting the upscaling of clearance operations. As at October 2018, total clearance costs to address CMR contamination at Wittstock were estimated to be more than €67 million, of which €60 million was budgeted for clearance by commercial contractors; €3 million for engineering costs; and €4.3 million for the disposal of ordnance.³⁰

GENDER

There is equal access to employment for qualified women and men for EOD clearance in Germany, however women only make up a small proportion of the sector. At Wittstock, one woman holds an EOD licence (required under the state law on explosives), and five

female UXO specialists are working operationally. The on-site project management and clearance supervision company employs two full-time engineers, both female, and three part-time employees, all male.³¹

INFORMATION MANAGEMENT AND REPORTING

Germany uses its own information management system to record the special distribution of CMR, including use of a geographical information system (GIS).³²

Germany provides regular updates on its progress in Article 4 implementation, both in its annual Article 7 transparency reporting, and in statements at the CCM Meeting of States Parties. However, in its Article 7 Transparency report for 2018,³³ Germany reported combined clearance output for 2017 and 2018, rather than the annual clearance output for 2018, as is required by the Convention.

Germany submitted a detailed, comprehensive, and timely Article 4 Extension Request, which was to be considered by states parties at the Ninth Meeting of States Parties in September 2019. In addition, Germany answered questions on its extension request from the CCM Coordination Committee Analysis Group.

Germany's Article 4 deadline extension request details progress in addressing its CMR contamination to date, the extent of contamination remaining, and includes a detailed and costed workplan covering the amount of time requested, with measurable benchmarks.

PLANNING AND TASKING

Germany has developed a national plan for the release of the CMR-contaminated area, as detailed in its extension request, with annual milestones for the release of areas confirmed or suspected to contain CMR. Based on current clearance projections of 1.5–2 km² per year, CMR clearance is currently expected to be completed by the end of 2024, with associated documentation to be finalised in 2025.³⁴

A project coordination committee meets on a weekly basis with its core members and monthly with an extended group, to assess the status of clearance progress as well as the quality of clearance, costs, and milestones compared to the project plans. Weekly reports are disseminated to document clearance and progress.³⁵

Nature conservation requirements limit the controlled burning to a maximum of 200–300 hectares (2km²–3km²) per year, which, for safety reasons, is limited to few days per year. In 2017, controlled burning was only possible on two separate days. Germany plans to burn approximately 250 hectares (2.5km²) per year, to build up a reserve of burnt areas for clearance.³⁶ In mid-March 2019, some 210 hectares (2.1km²) of heathland were burned, to guarantee sufficient area for CMR clearance operations in 2019 and 2020.³⁷

Detailed planning of the specific sections of the CMR-contaminated area to be cleared is not possible beyond annual planning, because it is determined by the location of areas that have been burnt, which in turn is contingent on weather conditions on the day of burning.³⁸

LAND RELEASE SYSTEM

STANDARDS AND LAND RELEASE EFFICIENCY

CMR clearance in Germany is conducted in accordance with German federal legislation and legislation of the state of Brandenburg, occupational safety standards of the German Statutory Accident Insurance Association (Deutsche Gesetzliche Unfallversicherung, DGUV), and the construction technical guidelines on UXO clearance of the federal government (Baufachlichen Richtlinien Kampfmittelräumung des Bundes). According to Germany, federal and state legislation is binding and takes precedent over the application of international health and safety or technical standards.³⁹

The “Guidelines for the Clearance of Unexploded Ordnance on Federal Properties” are the legal basis for the clearance of UXO on federal government properties and thus apply to action on the Wittstock site. In addition, site-specific work instructions, approved by the KMBD, include detection of UXO (instruments and their use); handling of submunitions and other UXO (on-site transport, storage, and disposal); and documentation.⁴⁰

The entire area suspected to be contaminated with CMR has been divided into 50 x 50 metre boxes, each of which is subject to prescribed burning, followed by sub-surface clearance.⁴¹ CMR clearance started in an area where the occurrence of CMR was known from earlier finds, and was conducted outwards in 50 x 50 metre boxes. According to Germany, to date, CMR have been found in almost every parcel cleared, and therefore technical survey has not been deemed useful thus far. Germany has declared that if, during future clearance, areas are often encountered which do not contain CMR, the method of land release will be changed to technical survey.⁴² The smallest target for detector sensitivity for clearance has been defined as a half sphere of the ShOAB-0.5 submunition.⁴³

Under state regulation on war material (“Kampfmittelverordnung”), the transport and disposal of explosive ordnance in Brandenburg state is the sole responsibility of the KMBD.⁴⁴

OPERATORS

In Germany, site clearance (search, discovery, identification, recovery, and preparation for handover to state agencies for demolition) is typically conducted by commercial contractors that meet the requirements of the law on explosives. There are reportedly only around 1,500 people working in commercial ordnance clearance in Germany; mostly small enterprises, which are active regionally.⁴⁵ Two commercial UXO clearance contractors won the public tender for CMR clearance at Wittstock: Röhl Munitionsbergung GmbH (Brandenburg [Havel]) and Schollenberger Kampfmittelbergung GmbH (Celle). On-site project management and supervision are provided by a separate company, which includes a consulting engineer.⁴⁶ As previously mentioned, disposal, whether through destruction or other means, is conducted by the KMBD.⁴⁷

CMR clearance commenced at Wittstock in March 2017, with nine personnel, which increased to forty in the summer of 2017, and to one hundred in April 2018. As of June 2018, capacity stood at 120 personnel, with an average daily clearance rate per person of between 50m² and 60m².⁴⁸ Since mid-March 2019, upscaling of demining capacity has been ongoing, and will result in the 140 or 150 personnel clearance capacity projected in Germany’s extension request.⁴⁹

There are staff shortages for deminers in Germany, in particular for the specially licenced team leaders required by German law.⁵⁰ The 150 demining personnel planned for deployment at Wittstock represents around 10% of the overall EOD personnel available in Germany.⁵¹ In its Article 4 deadline extension request, Germany is assuming an annual effective clearance capacity of 140 demining personnel, who will each work 225 days a year.⁵²

OPERATIONAL TOOLS

Subsurface CMR clearance at Wittstock is conducted only manually. According to federal guidelines, while mechanical clearance would be possible for clearance of CMR, it is not possible at Wittstock due to the presence of large quantities of air-dropped and shaped-charge munitions, which would pose a hazard to both the operators and the equipment.⁵³

LAND RELEASE OUTPUT AND ARTICLE 4 COMPLIANCE

LAND RELEASE OUTPUT IN 2018

A total of 750,000m² of CMR-contaminated area was cleared in 2018,⁵⁴ with the destruction of 1,542 submunitions, all in situ. No area was released by survey.⁵⁵

SURVEY IN 2018

No CMR-contaminated area was cancelled by non-technical survey or reduced by technical survey in 2018,⁵⁶ or in the previous year.

CLEARANCE IN 2018

Germany cleared 750,000m² of CMR-contaminated area in 2018 and destroyed 1,542 submunitions (2 AO-1 M; 23 AO-1 SCh; 1 AO-10 SCh; 2 AO-2.5 RTM; 1 PTAB-1 M; 101 PTAB-2.5 M; 4 PTAB-2.5 TG; 11 PTAB-10.5; 1,354 ShOAB-0.5; 1 ZAB 1-E; 1 ZAB 2.5; and 41 ZAB 2.5M).⁵⁷ Clearance output in 2018 was an increase on the previous year, when 470,000m² was cleared by the clearance that began in March 2017, with 508 submunitions destroyed.⁵⁸ Previously, in its Article 7 report for 2017, Germany had reported destruction of 513 submunitions in 2017, but this was subsequently reported as 508 submunitions in Germany's answers to the Article 4 analysis group.⁵⁹

Clearance was conducted by Röhll Munitionsbergung (Brandenburg (Havel)) and Schollenberger Kampfmittelbergung GmbH (Celle) in January–October 2018, with a long winter break due to frozen ground. For safety reasons, the contractors were assigned different geographical clearance areas.⁶⁰

CMR clearance is subject to internal quality control (QC) by the commercial contractors and to external quality control by an independent engineering company of between 10% and 20% of each 50 x 50 metre clearance box.⁶¹

ARTICLE 4 DEADLINE AND COMPLIANCE

CCM ENTRY INTO FORCE FOR GERMANY: 1 AUGUST 2010

CCM ARTICLE 4 DEADLINE: 1 AUGUST 2020

ON TRACK TO MEET ARTICLE 4 DEADLINE: NO

FIVE-YEAR EXTENSION REQUESTED TO 1 AUGUST 2025

Under Article 4 of the CCM, Germany is required to destroy all CMR in areas under its jurisdiction or control as soon as possible, but not later than 1 August 2020. Germany will not meet this deadline and has requested a five-year extension (the maximum length permitted under the Convention) to 1 August 2025.

After extensive and lengthy preliminary work for preparation of the site for clearance, including survey and a creation of a fire protection system, Germany finally began CMR clearance in March 2017. A total of 1.22km² of CMR contamination has been cleared in the last two years (see Table 1).

Table 1: Five-year summary of CMR clearance (2014–18)

Year	Area cleared (m ²)
2018	750,000
2017	470,000
2016	0
2015	0
2014	0
Total	1,220,000

Germany predicts it will take between five years (meaning completion of clearance in 2023) and six years (completion of clearance in 2024), based on the estimated 980 hectares (9.8km²) of remaining CMR contamination as at the end of 2018, and an estimated annual clearance capacity of 140 personnel, working 225 days per annum, at a clearance rate of 50–60m² per person per day. This corresponds to clearance of 1.5–2km² per annum. Reporting and documentation relating to clearance efforts are predicted to be finalised in 2025.⁶²

Potential obstacles that could impact Germany's ability to meet its requested new deadline of August 2025 include the very high levels of CMR and UXO contamination, including different spatial distributions and potentially higher levels of contamination than expected and addressed to date.⁶³ Germany's clearance plan also assumes that a sufficient amount of controlled burning is able to take place to meet the planned clearance output, which has so far been the case. There is also the potential for the planned clearance schedule to be negatively impacted due to metrological conditions, in particular, extended periods of frost, resulting in frozen ground that cannot be cleared.⁶⁴

Finally, as previously mentioned, there are also challenges posed in acquiring suitably qualified personnel for clearance, which could potentially lead to staffing shortfalls. EU procurement requirements will likely require new tendering of the clearance at Wittstock in 2020, which could further impact the number of personnel available.⁶⁵

- 1 CCM Article 7 Report (for 2017 and 2018), Form F; email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 7 May 2018; and CCM Article 4 deadline Extension Request, 2019, (hereafter, CCM Extension Request 2019), p. 11.
- 2 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 7 May 2018.
- 3 CCM Extension Request 2019, p. 29.
- 4 Article 7 Report (for 2018), Form F.
- 5 Statement of Germany, APMBC intersessional meetings (Standing Committee on Mine Action), Geneva, 21 June 2011; and Statement of Germany, CCM intersessional meetings (Clearance and Risk Reduction Session), Geneva, 28 June 2011.
- 6 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 7 May 2018; and Statement of Germany, CCM Third Meeting of States Parties, Oslo, 13 September 2012; Article 7 Reports (for 2012 and 2013), Form F.
- 7 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 4 August 2014.
- 8 Statement of Germany, First CCM Review Conference, Dubrovnik, 7 September 2015.
- 9 CCM Extension Request 2019, p. 9.
- 10 Emails from official on the Desk for Conventional Arms Control, Federal Foreign Office, 7 May and 12 July 2018; CCM Extension Request 2019, pp. 1 and 5; Statements of Germany, First CCM Review Conference, Dubrovnik, 7 September 2015 and CCM Eighth Meeting of States Parties, Geneva, 3-5 September 2018.
- 11 CCM Extension Request 2019, p. 9.
- 12 Statement of Germany, APMBC intersessional meetings, Geneva, 23 May 2012; and CCM Article 7 Report (for 2011), Form G.
- 13 APMBC Article 5 deadline Extension Request, 15 April 2013, p. 7; and CCM Article 7 Report (for 2015), Form F.
- 14 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 5, at: <http://bit.ly/2DnYvGw>.
- 15 Article 7 Report (for 2015 and 2018), Form F.
- 16 CCM Extension Request 2019, pp. 16 and 36–37.
- 17 *Ibid.*, pp. 14, 16–17, and 36–37.
- 18 *Ibid.*, p. 19; email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 19 April 2017; and Article 7 Report (for 2016), Form F.
- 19 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 19 April 2017; and Article 7 Report (for 2016), Form F.
- 20 CCM Extension Request 2019, p. 4.
- 21 *Ibid.*, p. 22.
- 22 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 5.
- 23 *Ibid.*
- 24 *Ibid.*
- 25 *Ibid.*, p. 6.
- 26 CCM Extension Request 2019, p. 12.
- 27 *Ibid.*, p. 34.
- 28 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 4.
- 29 Article 7 Report (for 2018), Form I.
- 30 CCM Extension Request 2019, pp. 3 and 39.
- 31 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 16 April 2019.
- 32 *Ibid.*
- 33 CCM Article 7 Report (for 2018), Form F.
- 34 CCM Extension Request 2019, p. 3.
- 35 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 3.
- 36 CCM Extension Request 2019, p. 35.
- 37 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 16 April 2019.
- 38 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 3.
- 39 *Ibid.*, p. 2.
- 40 CCM Extension Request 2019, p. 12.
- 41 *Ibid.*, p. 25.
- 42 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 2.
- 43 *Ibid.*
- 44 2019 CCM Extension Request, p. 12.
- 45 *Ibid.*
- 46 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 5.
- 47 CCM Extension Request 2019, p. 12.
- 48 *Ibid.*, pp. 3 and 30.
- 49 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 16 April 2019.
- 50 Email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 12 July 2018.
- 51 CCM Extension Request 2019, pp. 33 and 34; and Statement of Germany, CCM Eighth Meeting of States Parties, Geneva, 3 September 2018.
- 52 CCM Extension Request 2019, p. 33.
- 53 *Ibid.*, p. 15.
- 54 Article 7 Report (for 2018), Form F; and Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 4.
- 55 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 4.
- 56 CCM Article 7 Report (for 2017 and 2018), Form F.
- 57 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 4.
- 58 *Ibid.* In its Article 7 report for 2018, Germany reported clearing a total of 1,234,000m² of CMR-contaminated area, during which 2,050 submunitions were destroyed (56 AO-1 Sch, 2 AO-1 M, 2 AO-2.5 RTM, 2 AO-10 Sch, 1,678 ShOAB-0.5, 1 PTAB-1 M, 188 PTAB-2.5 M, 4 PTAB 2.5 TG, 13 PTAB-10.5, 1 ZAB 1-E, 102 ZAB 2.5M, and 1 ZAB 2.5). There is therefore a small difference between the combined 1,220,000m² reported for 2017 and 2018 in Germany's Extension Request, and the combined 1,234,000m² total reported in its Article 7 report for 2018. Presumably this is because the Extension Request only included clearance data up to the end of October 2018 and not to the end of the year. In addition, previously Germany had reported that 513 submunitions were destroyed in 2017 (CCM Article 7 Report (for 2017), Form F; and email from official on the Desk for Conventional Arms Control, Federal Foreign Office, 7 May 2018).
- 59 CCM Article 7 Report (for 2017), Form F; and Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 4.
- 60 Germany, Extension Request Report – Answers to the Analysis Group, 8 February 2019, p. 6; and CCM Extension Request 2019, p. 12.
- 61 CCM Extension Request 2019, p. 28.
- 62 CCM Extension Request 2019, pp. 33 and 37.
- 63 Email from official from the Desk for Conventional Arms Control, Federal Foreign Office, 7 May 2018; and CCM Extension Request 2019, pp. 35 and 36.
- 64 CCM Extension Request 2019, pp. 3, 34, and 36.
- 65 *Ibid.*, pp. 33 and 34; and Statement of Germany, CCM Eighth Meeting of States Parties, Geneva, 3 September 2018.