

### KEY DATA

#### NO CCM ARTICLE 4 DEADLINE:

State not party to the CCM

#### CMR CONTAMINATION:

Heavy, but no reliable estimate

#### LAND RELEASE OUTPUTS

Release of cluster munition-contaminated area	Release in 2024 (km <sup>2</sup> )	Release in 2023 (m <sup>2</sup> )
Clearance	11km <sup>2</sup> (clearance of areas suspected or confirmed to contain CMR; official IMSMA data)	9km <sup>2</sup> (official IMSMA data for 2023, provided in 2025. Previously reported as 87,066m <sup>2</sup> based only on NGO data)
Technical Survey	4.5km <sup>2</sup> (National authority data of all EO-contaminated area)	1,414m <sup>2</sup> (NGO data)
Non-Technical Survey	7.01km <sup>2</sup> (National authority data of all EO-contaminated area)	0m <sup>2</sup> (NGO data)
Destruction of submunitions during clearance, survey, and spot tasks	2024	2023
Submunitions destroyed	25,893 (National authority data)	Unknown

#### MAIN CMR SURVEY AND CLEARANCE OPERATORS IN 2024:

Security and Defence Forces of Ukraine include:

- State Emergency Services of Ukraine (SESU)
- The Armed Forces of Ukraine
- The National Police
- State Special Transport Service (SSTS)

National humanitarian operators include:

- Humanitarian Security LLC. (Mine Action Review requested data on CMR survey and clearance in 2024 from other national operators but only Humanitarian Security responded.)

International NGOs:

- DanChurchAid (DCA)
- Danish Refugee Council (DRC)
- Fondation suisse de déminage (FSD)
- The HALO Trust (HALO)
- Mines Advisory Group (MAG)
- Norwegian People's Aid (NPA)

Commercial operators:

- Multiple

# KEY DEVELOPMENTS

Extensive use of cluster munitions by Russian forces continued in 2024 and into 2025, along with continued use by Ukraine, with the United States (US) announcing a seventh transfer of cluster munitions to Ukraine in October 2024. Clearance and technical survey (TS) increased significantly, due to expanded capacity. Very limited cancellation through non-technical survey (NTS) by one international operator took place for the first time in six years. Several national operators also cancelled areas. Ukraine’s national authorities also reported significant increases in survey and clearance across all types of operators, national and international, made possible by “massive use of demining machines and surface scanning unmanned aerial vehicles (UAVs)”.<sup>1</sup> While disaggregated data are collected and submitted to the Information System for Mine Action (IMSMA), Ukraine generally states the extent of its explosive ordnance (EO) challenge without disaggregation by weapon type, with the majority of hazardous areas presenting a mixed threat. Ukraine has institutionalised in its National Implementation Plan for 2024–26, its intention to survey all accessible areas for all types of contamination, including cluster munition remnants (CMR), by the end of 2026.

## RECOMMENDATIONS FOR ACTION

- Mine Action Review recognises the extremely challenging circumstances Ukraine faces following the war of aggression launched by Russia in February 2022. Nevertheless, Mine Action Review supports universal adherence to and full compliance with the 2008 Convention on Cluster Munitions (CCM) and calls on both Russia and Ukraine to immediately halt all use of cluster munitions and accede to the CCM as a matter of priority.
- If it has not already done so by the time this report goes to print, Ukraine should expedite its processes for permission to operators to use explosives in clearance and destruction operations as well as subsequent accreditation to conduct explosive ordnance disposal (EOD).
- Ukraine should review its instructions to operators and processes for the issuance of cancellation certificates, which currently limit cancellation to battle area clearance (BAC) tasks with no history of evidence of CMR.
- Ukraine should formalise a gender and diversity policy in mine action and continue its work to develop an implementation plan for this through its Gender in Mine Action Initiative group.

# CLUSTER MUNITION SURVEY AND CLEARANCE CAPACITY

## MANAGEMENT

- Sectoral Working Group on Humanitarian Demining (SWG, under the Ministry of Economy)
- Centre of Humanitarian Demining (CHD, under the Economic and Financial Department of the Secretariat of the Cabinet of Ministers)
- National Mine Action Authority (NMAA), interministerial auxiliary collegial body, the secretariat of which sits under the Ministry of Defence (MoD)
- Mine Action Centre (MAC, under the SSTS and then the MoD, at Chernihiv)
- Kharkiv Mine Action Coordination Centre (under the Governor of Kharkiv oblast) (Established during 2024)
- Social-Humanitarian Response Centre (under the Ministry for Reintegration of the Temporarily Occupied Territories)
- State Special Transport Service (SSTS)
- Centre of Excellence for Humanitarian Demining (under the MoD) (Launched in 2024)

## CERTIFICATION AND QUALITY CONTROL CENTRES

In total, 13 institutions can train and issue certificates of deminers, including:

- Interregional Centre for Humanitarian Demining and Rapid Response of the State Emergency Service of Ukraine (SESU) (at Merefa\*\*)
- Demining Center of Military Unit A2641 (at Kaminiets Podilsky)
- Military Engineering School

## STATE SERVICES ENGAGED IN EMERGENCY RESPONSE

- State Emergency Services of Ukraine (SESU)
- Armed Forces of Ukraine
- National Police
- State Special Transport Service (SSTS)
- State Border Service
- National Guard

## STATE OPERATORS:

- State Emergency Services of Ukraine (SESU)
- State Special Transport Service (SSTS)

1 Email from Colonel Ruslan Berehulia, Head, National Mine Action Authority (NMAA) Secretariat, Ministry of Defence (MoD), 9 May 2025.

**NATIONAL OPERATORS\***

- Arkhipelag LLC
- BIG UA
- Demining Solutions
- EOD & RC
- Global Clearance Solutions (GCS)
- Humanitarian Security LLC
- International Demining Group (IDG)
- Mellom Pro LLC
- Nibulon
- Patron Demining
- Safe Ground Solutions LLC
- Safe Land
- Sheriff LLC
- Transimpex Demining
- Ukrainian Deminers Association (UDA)
- Ukrainian Demining Services (UDS)
- Ukroboronservice (UOS)

**INTERNATIONAL OPERATORS\***

- APOPO
- DanChurchAid (DCA)
- Danish Refugee Council (DRC)
- Fondation suisse de déminage (FSD)
- The HALO Trust (HALO)
- Humanity & Inclusion (HI) – scheduled to begin NTS in August 2025
- Mines Advisory Group (MAG)
- Norwegian People's Aid (NPA)
- SafeLane Global
- Safe Path Group

**OTHER ACTORS\***

- Geneva International Centre for Humanitarian Demining (GICHD)
- Lithuanian Demining Coalition
- Organization for Security and Co-operation in Europe (OSCE)
- Tetra Tech
- Tony Blair Institute for Global Change
- Mine Action Sub-cluster (MA AoR) chaired by the United Nations Development Programme (UNDP)
- UN Resident Co-ordinator Office in Ukraine (UNRCO)
- UN Office for Project Services (UNOPS)
- UN Food and Agriculture Organisation (FAO)
- UN World Food Programme (WFP)
- UNICEF
- UN Women
- The UN Office of the United Nations High Commissioner for Refugees (UNHCR)
- The UN Office for the Coordination of Humanitarian Affairs (OCHA)
- The UN Office of the High Commissioner for Human Rights (OHCHR)
- Chemonics
- East Europe Foundation
- Enhancing Human Security (ITF)
- NATO
- Ukrainian Red Cross Society
- MAT Kosovo

\* Information based on data available at July 2025. Due to the rapidly expanding mine action programme in Ukraine, there may be actors not included in this table.

An up-to-date list of certified mine action operators is available online on Ukraine's National Mine Action Platform, Demine Ukraine, which reports 108 certified mine action operators as at 17 July 2025, with more than 50 others undergoing accreditation.<sup>2</sup>

\*\* The team at Merefia relocated to Kyiv during 2024 due to the intensity of aerial attacks in the area, and remained in Kyiv at the time of writing in June 2025.<sup>3</sup>

## UNDERSTANDING OF CMR CONTAMINATION

Taking into account that both active conflict and primary NTS are ongoing, there is no reliable estimate for the extent of cluster munition-contaminated area in Ukraine, but the level of contamination is expected to be heavy due to the very widespread use of cluster munitions in the course of the Russian assault on Ukraine and subsequent use by the Ukrainian armed forces. As at the end of 2024, areas within the control of Ukraine and scheduled for NTS, which potentially contain CMR or anti-personnel (AP) mines, anti-vehicle (AV) mines, and other EO as a result of the presence of troops/hostilities, totalled 105,877km<sup>2</sup> and were present in nine of Ukraine's twenty-four oblasts (administrative regions)<sup>4</sup>, as set out in Table 1.

It is believed that not all of the 105,877km<sup>2</sup> has yet undergone survey to establish suspected hazardous areas (SHAs) or confirmed hazardous areas (CHAs) (or discredit the claimed presence of contamination). Therefore, not all of this area will contain EO, and less still will have CMR, despite widespread cluster munition use in Ukraine. A combined total of 70% of all potential hazardous areas are in the Chernihiv, Kharkiv, Kherson, and Sumy oblasts (regions).<sup>5</sup> It should also be noted that, where disaggregated data on hazardous areas have been collected, data are submitted to IMSMA with a list of the types of EO present and the area's designation as suspected or confirmed hazardous area. However, Ukraine generally states the extent of its EO challenge without disaggregation by weapon type, with most hazardous areas having a mixed threat.<sup>6</sup>

2 See "List of Operators", Demine Ukraine at: <https://bit.ly/45vLlVT>.

3 Email from Miljenko Vahtarić, Technical Adviser on Mine Action, Economic and Environmental, Organisation for Cooperation and Security in Europe (OSCE), 11 June 2025; and telephone interview with Paul Heslop, Senior Technical Adviser on Mine Action to the UN in Ukraine, UN Resident Coordinator's office (UNRCO), 16 June 2025.

4 Ukraine has twenty-four oblasts, plus the Autonomous Republic of Crimea, and two cities Special Status – Kyiv and Sevastopol. It is further divided into "hromadas" (municipalities).

5 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

6 Email from Government of Ukraine, 18 July 2025.

**Table 1: Area scheduled for primary NTS which may contain CMR, AP mines, or other contamination by oblast (at end 2024) (National authority estimate)<sup>7</sup>**

Oblast/District	Areas that may contain CMR and require NTS	Area (km <sup>2</sup> )
Dnipropetrovsk/Kryvorizhskyi	24	1,255
Dnipropetrovsk/Nikopolskyi	5	1,472
Donetsk/Kramatorskyi	83	4,464
Kyiv/Brovarskyi	52	2,767
Kyiv/Buchanskyi	82	2,554
Kyiv/Vyshhorodskyi	128	4,314
Kyiv/Fastivskyi	68	1,406
Zhytomyr/Korostenskyi	13	3,948
Mykolaiv/Bashtanskyi	347	4,466
Mykolayiv/Mykolayivskyi	335	5,493
Sumy/Konotopskyi	7	5,188
Sumy/Okhtyrskyi	8	3,195
Sumy/Romenskyi	1	2,395
Sumy/Sumskyi	19	5,961
Sumy/Shostkynskyi	50	2,694
Kharkiv/Bohodukhivskyi	3	2,128
Kharkiv/Iziumskyi	1,030	5,912
Kharkiv/Kupyanskyi	467	2,222
Kharkiv/Lozivskyi	3	2,805
Kharkiv/Kharkivskyi	131	1,606
Kharkiv/Chuhuyivskyi	118	4,015
Kherson/Beryslavskyi	400	4,750
Kherson/Khersonskyi	62	2,085
Chernihiv/Koryukivskyi	4	4,604
Chernihiv/Nizhynskyi	20	7,205
Chernihiv/Novhorod-Siverskyi	2	4,634
Chernihiv/Chernihivskyi	137	10,130
Chernihiv/Prylutskyi	3	2,209
<b>Totals</b>	<b>3,602</b>	<b>105,877</b>

The nature of EO contamination in Ukraine has been described as “unique” for three reasons. Firstly, there is a “scale, complexity and overlapping nature of different threats” not seen since the Second World War. Secondly, EO-contaminated areas are very heavily contaminated, unlike anything seen since the World Wars. Finally, many areas suspected to be contaminated—for example, because they were briefly occupied—have proven to contain little or no contamination.<sup>8</sup>

Access by non-governmental operators to perform survey or clearance within 20km of the front lines of conflict and State borders was prohibited in 2023 and remained so at the time of writing.<sup>9</sup> The front line is approximately 1,000km long and 5km deep. Inside this area is where the vast majority of EO contamination is believed to be situated.<sup>10</sup> Outside this buffer zone international operators recorded areas of CMR contamination in 2024.<sup>11</sup> Even in areas that are accessible, however, barriers to accurate survey still exist. Some operators caution that resurvey will be necessary in many areas, either due to recontamination or due to the displacement of people, which left few or no witnesses to new contamination. As such, some polygons will require further refinement once more data become available.<sup>12</sup>

According to the Monitor, “both parties to the conflict continued to use cluster munitions during 2023 and the first half of 2024, but it was not possible to systematically document and attribute the continued use of these weapons, given available evidence and lack of access to areas where there are active hostilities.”<sup>13</sup> The Monitor also states that, as of July 2024, “at least 13 types of cluster munitions and three types of individual submunitions had been used in Ukraine since February 2022. These types of cluster munitions are all launched from the ground in missiles, rockets, and mortar projectiles, except for the RBK-series cluster bomb, which is delivered by aircraft.”<sup>14</sup> Subsequently, in May 2025, the first use of the OAB-2.5RT submunition was reported in Ukraine, which was deployed by Russian forces. Several unexploded submunitions of this type were found in the Donetsk region, along with the tail fin of an RBK-500 dispenser bomb. The OAB-2.5RT is a spin-armed, aerially-delivered, high explosive fragmentation (HE-FRAG) anti-personnel submunition.<sup>15</sup>

From the outset of its attack against Ukraine that began in late February 2022, Russia’s armed forces have used cluster munitions extensively against Ukrainian military objectives, as well as, in violation of international law, against the civilian population and civilian objects. The exact number of cluster munition attacks is unknown, but as at May 2024, hundreds had been documented or reported<sup>16</sup> in at least

<sup>7</sup> Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

<sup>8</sup> “Mine Action in Ukraine: Interview with Paul Heslop”, The United Nations Office of Rule of Law and Security Institutions (OROLSI), Department of Peace Operations (DPO), and UNMAS, January 2025, at: <https://bit.ly/3R6uvEL>.

<sup>9</sup> “Ukraine Mine Action Today and Tomorrow”, Presentation from Roman Konovalov, Mine Action Department of the MoD, at the NDM, Geneva, 9–11 April 2025.

<sup>10</sup> “Mine Action in Ukraine: Interview with Paul Heslop”, OROSLI, DPO, and UNMAS, January 2025.

<sup>11</sup> Emails from Michael Edwards, Humanitarian Mine Action (HMA) Operations Manager, DanChurchAid (DCA), 8 April 2025; Roxana-Cristina Bobolicu, Head of Humanitarian Disarmament and Peacebuilding, Ukraine, Danish Refugee Council (DRC), 5 April 2025; Eleanor Porritt, Country Director, Fondation suisse de déminage (FSD) Ukraine, 17 March 2025; Steve Wallis OBE, Deputy Head of Operations (Support), The HALO Trust (HALO), 19 March 2025; Niamh McNamara, Programme Manager, Ukraine, Mines Advisory Group (MAG), 30 April 2025; and Amela Balic, Programme Manager, Norwegian People’s Aid (NPA), 12 May 2025.

<sup>12</sup> Emails from Michael Edwards, DCA, 3 May 2024; and Julie Bouvier, Armed Violence Reduction (AVR) Specialist, Humanity & Inclusion (HI), 16 May 2024.

<sup>13</sup> Cluster Munition Monitor, “Ukraine Cluster Munition Ban Policy”, accessed 28 January 2025, at: <https://bit.ly/40CrDnO>.

<sup>14</sup> Cluster Munition Monitor, “Ukraine Cluster Munition Ban Policy”, accessed 20 May 2025, at: <https://bit.ly/40CrDnO>. A table listing all types of cluster munitions used in Ukraine in 2022–24 is available there.

<sup>15</sup> “First use of OAB-2.5RT submunition in Ukraine”, Fenix Insight Bulletin, 27 May 2025.

<sup>16</sup> Human Rights Watch, “Ukraine: Civilian Deaths from Cluster Munitions”, 6 July 2023, at: <https://bit.ly/3V7hU6T>; and Landmine and Cluster Munition Monitor, “Ukraine 2023”, at: <https://bit.ly/3wwwJUF>.

ten oblasts, including: Chernihiv, Dnipropetrovsk, Donetsk, Kharkiv, Kherson, Luhansk, Mykolaiv, Odesa, Sumy, and Zaporizhzhia.<sup>17</sup> Further cluster munition attacks on civilian objects have been documented. On 7 March 2025, several munitions struck a residential area in Dobropillia, Donetsk region, including a multiple launch rocket system (MLRS), which evidence indicated likely dispersed cluster munitions.<sup>18</sup> On 4 April 2025, Russian forces struck a residential area in Kryvyi Rih in Dnipropetrovsk oblast, reportedly using an Iskander-M ballistic missile with a cluster warhead, which exploded mid-air over a "densely populated neighbourhood, directly hitting a children's playground", and killing twenty people, nine of whom were children. It was further reported that on 13 April, two ballistic missiles with cluster munitions were launched at central Sumy, killing 35 people and injuring a further 120. On 18 April, Russian forces reportedly launched three Iskander missiles, one of which had a cluster warhead that exploded near a residential building and struck a civilian company in Kharkiv, injuring almost 100 people.<sup>19</sup> It should be noted that, while these examples of cluster munition use by Russian Forces are provided based on available information, there may be other unrecorded cases that cannot be documented until NTS is undertaken.

Ukraine's forces have also used cluster munitions in the current conflict, including in 2024. According to the Monitor, Ukraine used US-supplied M39A1 Army Tactical Missile System (ATACMS) ballistic missiles, equipped with a cluster munition warhead in an April 2024 attack on a military airfield at Dzhankoi, in occupied Crimea. The Monitor also refers to unconfirmed reports that Ukraine has used cluster munitions delivered by ATACMS to attack targets in Russia, but has not been able to verify these claims.<sup>20</sup> On 16 October 2024, the US Department of Defense announced a further US transfer of cluster munitions of unspecified type to Ukraine; the seventh transfer since the first one in July 2023.<sup>21</sup> Prior to July 2023, Ukrainian forces appear to have used cluster munitions at least three times in its fight against the Russian forces on Ukrainian territories.<sup>22</sup>

Further supply of cluster munitions to Ukraine from other States than the US was also reported in 2024, notably from Poland.<sup>23</sup> Media sources reported that Turkey began sending cluster munitions to Ukraine, notably DPICMs, in late 2022,<sup>24</sup> though Türkiye and Ukraine have denied the transfer.<sup>25</sup> However, photos circulated on social media in August 2023 purported to show Turkish-made 155mm M483A1 cluster munition projectiles being used in Ukraine by Ukrainian forces.<sup>26</sup> Several media outlets reported that Ukraine requested cluster munitions from Estonia and the US in 2022.<sup>27</sup> According to limited and unverified sources, Israeli-made (or copied) M971 120mm cluster munition mortar projectiles were photographed in the possession of the Ukrainian Armed Forces in December 2022. Each projectile delivers 24 M87 DPICM submunitions. It is not known how or from whom Ukraine may have acquired it.<sup>28</sup>

Use of a German-manufactured SMArt 155 artillery shell by Ukraine against two Russian tanks has also been documented, with these munitions reportedly first sent to Ukraine by Germany in March 2023. This weapon uses a pair of 'smart' anti-armour mines in a howitzer shell that flies submunitions to a target.<sup>29</sup> It is believed to fall within the limited exception for sensor-fuzed weapons excluded from the prohibitions in the Convention on Cluster Munitions (CCM) under its Article 2(2)(c).<sup>30</sup> A March 2023 Russian press article reported that the remains of a SMArt 155 (DM702 A1) submunition had been found at the position of a Russian battalion near the city of Kremennaya in Luhansk. The possibility was noted, however, that this submunition could have reached Ukraine via a State other than Germany.<sup>31</sup>

In July 2023, Human Rights Watch reported that Ukrainian cluster munition rocket attacks on Russian-controlled areas in and around the city of Izium in eastern Ukraine during 2022 had caused many casualties among Ukrainian civilians.<sup>32</sup> Ukraine is not a State Party to the CCM and is not therefore bound by its provisions, although use of cluster munitions are subject to the applicable rules of international humanitarian law. It has stated that it will record the location of any cluster

17 Human Rights Watch, "Growing Civilian Toll from Russian Cluster Munition Attacks", 25 August 2022, at: <https://bit.ly/3mEd07C>; and *Cluster Munition Monitor* 2022, p. 14.

18 "Report on the Human Rights Situation in Ukraine, 1 December 2024-31 May 2025", United Nations Office of the High Commissioner for Human Rights (OHCHR), p. 8.

19 "Cluster Iskander missiles rocking peaceful cities: Tactics and threat to civilians", *RBC Ukraine*, 18 April 2025, at: <https://bit.ly/43XWmN>. The 4 April and 13 April 2025 attacks (among other attacks by Russian forces on civilian areas, involving various weapons) are also documented by the OHCHR, though there is no specific mention of use of cluster munitions. See: "Sustained large-scale attacks by Russian armed forces kill and injure civilians across Ukraine in April", OHCHR, 24 April 2025, at: <https://bit.ly/4lb7yNe>. The following report notes that Kyiv said the attack "involved the usage of a cluster munition": "Zelenskyy Calls Out 'Weak' US Response To Russian Playground Strike That Killed 9 Children", *Radio Free Europe Radio Liberty*, 4 April 2025, at: <https://bit.ly/4kVrHaB>.

20 Cluster Munition Monitor, "Ukraine Cluster Munition Ban Policy", accessed 28 January 2025.

21 "Seventh U.S. Transfer of Banned Cluster Munitions Condemned", Cluster Munition Coalition, 17 October 2024, at: <https://bit.ly/3FhwFii>.

22 "To Push Back Russians, Ukrainians Hit a Village With Cluster Munitions", *The New York Times*, 18 April 2022, at: <https://bit.ly/41NMZgv>; Human Rights Watch, "End Cluster Munition Attacks in Ukraine", 11 May 2022, at: <https://bit.ly/3lx3cTX>; and OHCHR, "Situation of human rights in Ukraine in the context of the armed attack by the Russian Federation", Report, 29 June 2022, at: <https://bit.ly/3AkenqJ>, p. 12.

23 Cluster Munition Monitor, "Ukraine Cluster Munition Ban Policy", accessed 28 January 2025.

24 "Turkey Is Sending Cold War-Era Cluster Bombs to Ukraine", *Foreign Policy*, 10 January 2023, at: <http://bit.ly/3Kwekw6>.

25 Landmine and Cluster Munition Monitor, "Ukraine 2023".

26 Cluster Munition Monitor, "Ukraine Cluster Munition Ban Policy", accessed 28 January 2025.

27 "Ukraine seeks US cluster bombs to adapt for drone use – lawmakers", Reuters, 7 March 2023, at: <http://bit.ly/3GuBL8e>; "Estonia weighing giving Ukraine cluster munitions", *Estonian Public Broadcasting*, 26 January 2023, at: <http://bit.ly/3GrCpTW>; and "Exclusive: Biden administration weighs Ukrainian requests for access to US stockpile of controversial cluster munitions", CCN, 8 December 2022, at: <https://bit.ly/3Ghwiv2>.

28 Landmine and Cluster Munition Monitor, "Ukraine 2023".

29 "Cluster Munitions for Ukraine: Everything You Need to Know About Washington's Green Light Decision", *Kyiv Post*, 7 July 2023, at: <https://bit.ly/3www4VL>.

30 "A munition that, in order to avoid indiscriminate area effects and the risks posed by unexploded submunitions, has all of the following characteristics: (i) Each munition contains fewer than ten explosive submunitions; (ii) Each explosive submunition weighs more than four kilograms; (iii) Each explosive submunition is designed to detect and engage a single target object; (iv) Each explosive submunition is equipped with an electronic self-destruction mechanism; (v) Each explosive submunition is equipped with an electronic self-deactivating feature".

31 "The remains of a German guided anti-tank submunition from a SMArt 155 projectile were found near Kremennaya", *Top War*, 5 March 2023, at: <https://bit.ly/4bFWNyo>.

32 Human Rights Watch, "Ukraine: Civilian Deaths from Cluster Munitions", 6 July 2023.

munition use by its own forces, as well as adhering to certain other principles. Following the US announcement on 7 July 2023 that it would supply DPICMs to Ukraine, Ukraine's Minister of Defence Oleksii Reznikov presented five principles that he said the armed forces would respect upon receiving the cluster munitions:

- use them only in Ukraine;
- not use them in "urban areas (cities)" but only "in the fields where there is a concentration of Russian military";
- keep a strict record of where the munitions were used;
- conduct clearance activities after the de-occupation of the areas where the munitions were used; and
- report to partners on the use of the munitions and their efficiency.<sup>33</sup>

Wherever possible, State Emergency Services of Ukraine (SESU) personnel have cleared the contamination resulting from the use of EO, including CMR, immediately after use.<sup>34</sup> Ukraine asserts that it is continuing to clear CMR following de-occupation of areas<sup>35</sup> as well as undertaking rapid response to clear EO contamination in the buffer zone along the line of conflict.<sup>36</sup> Ukraine also has CMR contamination that predates the current conflict with Russia. Before 2022, Ukraine said that many unexploded submunitions

contaminated the Donetsk and Luhansk regions,<sup>37</sup> with the most intensive use of cluster munitions said to have occurred in and around the city of Debalcevo in Donetsk region.<sup>38</sup>

A total of 69.8km<sup>2</sup> of previously unrecorded CMR contamination, all of which has occurred since the beginning of Russia's full-scale invasion in 2022, was recorded by international operators in 2024, across 374 confirmed hazardous areas (CHAs) and 69 SHAs.<sup>39</sup> This is a more than ninefold increase on the 7.5km<sup>2</sup> of cluster munition-contaminated area recorded by international operators in 2023.<sup>40</sup> National operator Humanitarian Security also recorded 66.86km<sup>2</sup> of new contamination across 199 CHAs and five SHAs,<sup>41</sup> which, added to that recorded by international operators, brings the total to 136.7km<sup>2</sup> (see Table 16). Official IMSMA data provided to Mine Action Review in July 2025 recorded a lower figure of 125.06km<sup>2</sup> for previously unrecorded CMR contamination entered into the national database in 2024<sup>42</sup> (see Table 15).

Ukraine's national mine action strategy includes a target to complete "initial non-technical survey (NTS) in 100 per cent of the territories controlled by Ukraine, where it is possible to carry out humanitarian demining", including survey of CMR, by the end of 2026.<sup>43</sup> As at May 2025, however, it was not known whether Ukraine was on track to achieve this.

## OTHER EXPLOSIVE REMNANTS OF WAR AND LANDMINES

Ukraine is also contaminated by huge quantities of other ERW as well as by AP and anti-vehicle mines used during the different conflicts (see Mine Action Review's *Clearing the Mines* report on Ukraine for further information on the mine problem). It is also affected by unexploded ordnance (UXO) and abandoned explosive ordnance (AXO) remaining from the First and Second World Wars<sup>44</sup> and remnants of Soviet military training and abandoned stockpiles.

## NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

Humanitarian demining in Ukraine is coordinated by the First Deputy Prime Minister (DPM) of Ukraine, also the Minister of Economy as at July 2025.<sup>45</sup> The Ministry of Economy (MoE), ensures interaction of central executive bodies on humanitarian demining matters<sup>46</sup> and has

overall responsibility for strategic planning and system coordination.<sup>47</sup> Ukraine's National Mine Action Strategy, which covers the period 2024–33, was approved by the Cabinet of Ministers on 28 June 2024.<sup>48</sup>

33 Ibid.

34 "See how Kharkiv's bomb squad neutralizes cluster bombs in Ukraine", *National Public Radio (NPR)*, 24 April 2022, at: <https://n.pr/3NqnQ47>; and SESU Facebook page, 8 May 2022, at: <https://bit.ly/3G04DDJ>.

35 Human Rights Watch, "Ukraine: Civilian Deaths from Cluster Munitions", 6 July 2023.

36 Interview with Colonel Ruslan Berehulia, NMAA, MoD, in Geneva, 1 May 2024.

37 SESU, "Humanitarian demining in Ukraine: current issues and challenges", Anti-Personnel Mine Ban Convention (APMBC) Fourteenth Meeting of States Parties (14MSP), Side event, Geneva, 2 December 2015.

38 Interview with Lt.-Col. Yevhenii Zubarevskiy, Mine Action Department, MoD, in Geneva, 20 May 2016.

39 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

40 Emails from Vanja Sikirica, NPA, 21 April 2024; Sophie Breinholdt Nielsen, DRC, 10 May 2024; Michael Edwards, DCA, 3 May 2024; and Michael Brown, HALO, 29 May 2024.

41 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

42 Email from Government of Ukraine, 18 July 2025.

43 "Cabinet of Ministers of Ukraine order dated 28 June 2024, Order No. 616-p on approval of the National Mine Action Strategy for the period up to 2033 and approval of the operational action plan for its implementation in 2024–2026", section entitled "Strategic goals, objectives and expected results aimed at achieving the defined goals", at: <https://bit.ly/4cKpA5j>; and email from Government of Ukraine, 18 July 2025.

44 See, e.g., "During a Year in Kerch and Sevastopol neutralized 33,000 munitions", *Forum*, 4 December 2009.

45 Yulia Svyrydenko, at the time of writing, July 2025.

46 "Soul of Soil", UN Development Programme (UNDP), accessed 19 February 2024, at: <https://www.soulofsoil.com.ua/uk>.

47 Interview with Government of Ukraine, in Geneva, 11 April 2025.

48 "Government approves National Mine Action Strategy and Operational Plan for its implementation for the first 3 years", Government of Ukraine, 28 June 2024, at: <https://bit.ly/46i1Tcj>; and "Cabinet adopts changes to the Humanitarian Mine Action Architecture in Ukraine", Special issue of DRC Legal Alert, Issue 98, October 2023.



The National Mine Action Authority (NMAA) is the primary body responsible for developing and approving mid-term and long-term national plans for mine action, alongside operative plans.<sup>49</sup> It is an inter-ministerial body, with 17 Ministries represented as at April 2025.<sup>50</sup> The NMAA secretariat has responsibility for coordinating the work of the Mine Action Centre (MAC). The MAC and the Interregional Center For Humanitarian Demining and Rapid Response of the SESU share the remits of information management (IM), quality assurance (QA), monitoring, planning, and certification of the operators.<sup>51</sup> The NMAA also coordinates the ministries, central and local State bodies, local government, and other organisations (including mine action operators). While the MoE is the main policy-making body, the NMAA approves and ensures State mine action policy; monitors and reports on State progress in fulfilling its obligations in mine action under international treaties; and coordinates the development and execution of mine action strategy, the national mine action programme, and action plans.<sup>52</sup> While the NMAA sits at ministerial level, it is serviced by a secretariat with “some” managerial functions.<sup>53</sup>

The Sectoral Working Group (SWG), introduced in 2023, is an advisory body at the MoE, which “functions as a unified platform for coordinating and aligning cooperation efforts in the field of humanitarian demining between Ukrainian governmental authorities and development partners.” It is co-chaired by the DPM, the UN Resident Co-ordinator (UN RC), and the Ambassador of Japan. As at May 2025 the SWG had held three meetings since its establishment; two in 2023, and one in May 2024.<sup>54</sup> The Working Group includes representatives from several ministries and other key national entities.<sup>55</sup>

The Centre of Humanitarian Demining (CHD) was established in April 2023 as a State institution under the Economic and Financial Department of the Secretariat of the Cabinet of Ministers.<sup>56</sup> The CHD was established with the aim of improving coordination and mobilising resources. It is now the driving force behind Ukraine's State-funded land release compensation programme and is engaged in building up Ukraine's QA capacity, as well as working in many other areas of mine action.<sup>57</sup>

There are nominally four national supervisory and management bodies in Ukraine: the MAC, located in Chernihiv, which is under the SSTS and, in turn, under the MoD (for operational matters, including co-ordination and tasking); the Interregional Center For Humanitarian Demining and Rapid Response of the SESU, located in Merefa (hereafter, “the centre at Merefa”);<sup>58</sup> the inter-ministerial NMAA, serviced by a secretariat; and, at the top of the hierarchy, an inter-ministerial committee on humanitarian demining. A regional centre, the Kharkiv Mine Action Coordination Centre, was established in 2024 under the Governor of Kharkiv oblast.<sup>59</sup>

Three bodies are responsible for certification of operators and processes:<sup>60</sup> the centre at Merefa; the Demining Centre of Military Unit A2641, located in Kaminets Podilsky; and the MAC in Chernihiv. These three bodies are also responsible for quality management (QM) tasks. Ukraine's National Mine Action Strategy acknowledges that the ability of these institutions to carry out QM responsibilities “does not meet the needs of today” and that quality control (QC) and external monitoring require attention as part of systems improvement. It also cites the need for a “unified procedure” for certification of operators and processes.<sup>61</sup> Progress on both these matters is being made. As previously noted, the CHD is engaged in efforts to build QA capacity. In February 2024 Ukraine's Cabinet introduced a certification procedure for mine action operators, which unifies the separate lists of required documentation and separate lead times previously required by the three above-mentioned certification bodies.<sup>62</sup> In November 2024, the government adopted a further resolution that provided for the launch of a digital “Diia” accreditation portal, intended to further simplify and automate certification. The portal, which is being set up by the MoE and Ministry of Digital Transformation,<sup>63</sup> was due to go live by the end of 2025.<sup>64</sup> Details of the required process for certification as a mine action operator in Ukraine are publicly available on the Government's Demine Ukraine website.<sup>65</sup>

In March 2024, the Cabinet adopted Decree 284, approving the Procedure for Compensation of Costs for Humanitarian Demining of Agricultural Land, allowing land owners to reclaim from the Government 80% of the costs of demining

49 “Ukraine: Strengthening national mine action capabilities”, DRC, 9 February 2024, at: <https://bit.ly/3JY8fce>.

50 Interview with Government of Ukraine, in Geneva, 11 April 2025.

51 The Law of Ukraine on Mine Action, No. 2642-VIII, Chap. III, Art. 23; DRC-DDG Legal Alert Special, “Mine Action Law Amendment”, Issue 56, September 2020; interview with Miljenko Vahtarić, OSCE, 13 February 2020; and email from Government of Ukraine, 18 July 2025.

52 The Law of Ukraine on Mine Action, No. 2642-VIII, Chap. III, Art. 23; and DRC Special Legal Alert – “NMAA Framework 2022”, Issue 73, January 2022.

53 The Law of Ukraine on Mine Action, No. 2642-VIII, Chap. III, Art. 23; and email from the GICHD, 17 June 2022.

54 “The Sectoral Working Group”, Demining Ukraine, 2 July 2024, accessed 22 May 2025, at: <https://bit.ly/3zUWlhA>.

55 Email from the Geneva International Centre for Humanitarian Demining (GICHD), 23 July 2024.

56 “Center for Humanitarian Demining established in Ukraine”, *Interfax Ukraine*, 7 April 2023, at: <https://bit.ly/3LDzj1g>; and “Cabinet adopts changes to the Humanitarian Mine Action Architecture in Ukraine”, Special issue of DRC Legal Alert, Issue 98, October 2023.

57 Email from Government of Ukraine, 18 July 2025.

58 As previously noted, staff were relocated away from Merefa to Kyiv part way through 2024, due to the intensity of aerial attacks in the area. However, to avoid confusion, the term “the centre at Merefa” has been maintained throughout this report.

59 Telephone interview with Paul Heslop, UNRCO, 16 June 2025.

60 “Cabinet of Ministers of Ukraine Order dated 28 June 2024, No. 616-”, section entitled “Analysis of the current state of affairs, trends and justifications for the need to solve the identified problems”, at: <https://bit.ly/4cKpA5j>.

61 Ibid. The document states that a fourth body is also responsible for QM, naming the Humanitarian Demining Centre. However, it is not known if this is intentional, as the centre at Merefa is also listed.

62 Decree №123 was adopted 2 February 2024. “DRC’s Legal Alert: Issue 102, 1 February–31 March 2024”, at: [legal-alert-issue-102.pdf](https://bit.ly/3FocPiC), pp. 2–3.

63 “The Ukrainian government has adopted a resolution that provides for the launch of the certification process for mine action operators on the Diia portal”, International Demining Group, 27 November 2024, at: <https://bit.ly/3FocPiC>.

64 Interview with Government of Ukraine, in Geneva, 11 April 2025.

65 “How to Become a Mine Action Operator”, Demine Ukraine, accessed 22 May 2025, at: <https://bit.ly/4jjZFNa>.

of each plot. In August 2024 this was amended to 100% of the cost of such services.<sup>66</sup> The objective of this programme is to restore economic activity in EO-affected areas. Farmers apply through the State Agrarian Register (SAR). As at June 2025, 482 applications had been received; 69 contracts had been signed; and the cycle of land release had been completed under 26 contracts, covering a total area of about 25km<sup>2</sup>.<sup>67</sup>

A national mine action law was adopted by Ukraine's parliament in 2018,<sup>68</sup> although the government did not proceed with its implementation on the grounds it was inconsistent with a number of other legal acts.<sup>69</sup> Amended legislation was passed in December 2020. The amended law created the two National Mine Action Centres (NMACs) at Cherniv and Meref. The MAC is said to play a pivotal role in planning and organisation of mine action, and, in the context of the current conflict, is the main coordination body for operations.<sup>71</sup> Reporting by mine action operators and their interaction with the NMAA is managed through the MAC and the NMAA Secretariat.<sup>72</sup>

The MoE continued to lead on coordination of the mine action sector more broadly in 2024. Operators report being consulted and involved in key decision making by the national authorities to a certain extent, for example, through these coordination meetings as well as national mine action standards (NMAS) drafting workshops. However, some operators also note that the complex nature of Ukraine's mine action oversight and regulation framework; the variety of institutions and government and military bodies involved; and their complex relations to one another, mean that key decision-making processes are not always completely transparent or inclusive. Operators also acknowledge that the ongoing war and state of martial law does preclude the national authorities from including operators fully in decision-making processes.<sup>73</sup>

In addition to the MoE, the UN Development Programme (UNDP) Mine Action Area of Responsibility (MA AoR) also remained a key coordination mechanism<sup>74</sup> and continued

meeting in 2024.<sup>75</sup> However, a formal transition is in progress from the Mine Action AoR to an MoE-led coordination structure. Presently, UNDP coordinates the MA AoR as part of the Protection Cluster, supporting the broader UN response and providing coordination in partnership with State institutions, national and international operators, other UN agencies, and the private sector. In line with Ukraine's National Mine Action Strategy (2024–33) and Operational Plan (2024–26), the Government of Ukraine, through the MoE, is leading efforts to enhance coordination and governance in the sector. UNDP will support the planned transition of the MA AoR from UNDP to full national ownership by 2030.<sup>76</sup> Additionally, the Senior Technical Advisor on Mine Action to the UN at the UN Resident Co-ordinator Office in Ukraine (UNRCO) convenes meetings approximately every other month of the key eight to twelve partners providing technical advice and support; there are two local Mine Action Support Group (MASG) meetings per year in advance of the global MASG meetings in Geneva and New York; and the UN Inter-Agency Coordination Group meets approximately five times per year.<sup>77</sup> A Mine Action Donor Coordination Workshop also took place in Kyiv in April 2024<sup>78</sup> and the Ukraine Mine Action Conference (UMAC) took place in Lausanne on October 2024,<sup>79</sup> with a further UMAC planned for autumn 2025, in Tokyo.<sup>80</sup> A multi-stakeholder coordination workshop took place in Geneva in April 2025 as well as a multi-stakeholder workshop in Kyiv in May 2025, to review the interim results of the national mine action strategy implementation.<sup>81</sup> Participants proposed multiple changes to the operational plan including expanding the programme of State compensation for demining to forests; adding new mechanisms to attract innovation; and improving the formats of mine action support for veterans, women, and victims of EO.<sup>82</sup>

Overall, operators have reported a positive environment for mine action and facilitation of the operators' work by the Ukrainian government. The HALO Trust (HALO), the largest international operator working in Ukraine, reports having a close working relationship with national and local

66 "DRC's Legal Alert: Issue 108, 1–30 September 2024", at: <https://bit.ly/3EeHn8l>, p. 8.

67 "Ukraine Mine Action Today and Tomorrow", Presentation from Roman Konokalov, Mine Action Department of the MoD, at the NDM, Geneva, 9–11 April 2025; and email from Government of Ukraine, 18 July 2025. Mine Action Review did not request information on how much of this area, if any, was contaminated with CMR as this would provide only partial understanding of the CMR problem.

68 OSCE, "Ukrainian parliament adopts legal framework for mine action, with OSCE advice provided", 10 December 2018, at: <http://bit.ly/2QdTaQo>; and interview with Miljenko Vahtarić, OSCE, 7 February 2019; and email, 13 June 2019.

69 DRC-DDG Legal Alert Special, "Mine Action Law Amendment", Issue 56, September 2020.

70 The Law of Ukraine on Mine Action, No. 2642-VIII, Chap. III, Art. 23; DRC-DDG Legal Alert Special, "Mine Action Law Amendment", Issue 56, September 2020; and interview with Miljenko Vahtarić, OSCE, 13 February 2020.

71 "Ukraine: Strengthening national mine action capabilities", DRC, 9 February 2024; and interview with Yevhenii Zubarevskiy, Administrator, Information Management System for Mine Action, Ministry of Defence, in Geneva, 1 May 2024.

72 The Work Plan for Humanitarian Demining of De-occupied Territories of Ukraine for 2024, submitted to the Chair of the Committee on Article 5 Implementation, 30 April 2024, Annex 1.

73 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

74 Email from Michael Edwards, DCA, 8 April 2025.

75 "Mine Action in Ukraine", presentation to the Mine Action Support Group (MASG) by Paul Heslop, Senior Mine Action Adviser to the UN Resident Coordinator Ukraine, New York, 24 October 2024, p. 6.

76 Emails from Government of Ukraine, 18 July and 1 August 2025.

77 Telephone interview with Paul Heslop, UNRCO, 16 June 2025.

78 "Ukraine Identifies Strategic Mine Action Goals to Strengthen National Recovery – Two-Day Donor Workshop Ends", Ministry of Economy of Ukraine, 19 April 2024, at: <https://bit.ly/43LfsGr>.

79 "GICHD Update", Presentation to the MASG, New York, 24 October 2024, p. 3.

80 "Japan ready to host Ukraine Mine Action Conference – Economy Ministry", *Ukrinform*, 19 June 2024, at: <http://bit.ly/4f2QOGi>.

81 Emails from Government of Ukraine, 18 July and 1 August 2025.

82 "Progress in the implementation of the National Mine Action Strategy: a two-day workshop was held in Kyiv", Demine Ukraine, 15 May 2025, at: <https://bit.ly/4l8LRwX>.



authorities, but also continues to advocate for greater involvement in strategic planning.<sup>83</sup> Ukrainian authorities are reportedly proactive when it comes to signing memoranda of understanding (MoUs) and facilitating cooperation with partners.<sup>84</sup> But importation legislation has proven restrictive, as many types of mine action equipment (e.g. machines, detectors) are considered “military”, which involves additional constraints. Further importation rules and documentation apply to international NGOs,<sup>85</sup> though FSD notes that being registered as a “charitable fund” has removed these challenges with importing equipment, allowing it to, in effect, be treated as a national NGO.<sup>86</sup> Operators also note that visa restrictions can sometimes make it difficult for international staff from some countries to enter Ukraine.<sup>87</sup>

Conscription of male staff was highlighted as major challenge for mine action operators in 2024. Operators held several meetings on this issue with the national mine action authorities and the MoE, during 2024, which were generally supportive. As at May 2025, a procedure was in place to allow international operators to obtain up to 100% exemption from conscription for their staff,<sup>88</sup> including half of field staff.<sup>89</sup> As would be expected, the security situation in 2024 limited humanitarian demining operations at times, for example, UAV flights were grounded during active air alerts or at the order of local military authorities on occasion, and temporary stop work orders were instituted for parts of Sumy and Kherson Oblasts at different points during the year, requiring HALO, for example, to redeploy teams to other areas. HALO were able to redeploy flexibly, resulting in no loss in overall productivity.<sup>90</sup> Due to the active conflict, not all hromadas<sup>91</sup> or all parts of hromadas assigned to operators are accessible.<sup>92</sup>

The requirements for explosive ordnance disposal (EOD) certification remained the same in 2024, with the main challenge still the approval process for transport and storage of explosives.<sup>93</sup> There are two separate processes involving different stakeholders. The process for acquiring permission to use, transport, and store explosives is

the same whether an organisation wishes to undertake demining or another relevant activity such as quarrying, and involves the Ministries of Labour and of the Economy. EOD accreditation, on the other hand, is implemented by the mine action centres. It is reportedly the permissions process for explosives that has caused difficulties rather than the EOD accreditation process. Ukraine requires that the destruction of any ordnance identified by international operators that do not have EOD certification is carried out by the Armed Forces of Ukraine, the State Special Transport Service (SSTS), or SESU.<sup>94</sup> In some cases, this can delay further work at a site until the hazard is cleared. Operators do report good cooperation with SESU and Ukrainian Armed Forces in the process of demolition of items found during clearance.<sup>95</sup>

HALO eventually gained EOD accreditation in December 2023, after a ten-month process, and FSD in August 2025, also after a 10-month process. However, as HALO and FSD highlight, even once certified challenges remain with the efficient management, storage, and transportation of explosives.<sup>96</sup> Additionally, the current permission and simplified accreditation are only valid under martial law. Once martial law is lifted, all EOD operators will be required to meet the full list of accreditation requirements, which HALO states previously made it almost impossible to conduct EOD.<sup>97</sup> As at April 2025, Danish Refugee Council (DRC) was working through the required steps to gain permission to use explosives.<sup>98</sup> As mentioned, FSD received certification to conduct demolitions in August 2025 and plans to use low-order techniques (for example, methods such as deflagration, used to neutralise UXO by burning the explosive material within the casing, rather than detonating it) as a way around the challenge of storage and transportation of explosives.<sup>99</sup> Humanitarian Security received EOD accreditation in April 2025.<sup>100</sup> Further information on the required process for obtaining permits for the acquisition, transportation, destruction, and storage of explosive materials by mine action operators can be accessed on the Government's Demine Ukraine website.<sup>101</sup>

83 Email from Michael Brown, HALO, 29 May 2024.

84 Email from Dino Šujak, ITF Enhancing Human Security (ITF) Ukraine, 16 May 2024.

85 Emails from Jon Cunliffe, Country Director, Ukraine, MAG, 26 April 2024; and Julie Bouvier, HI, 16 May 2024.

86 Email from Tony Connel, FSD, 25 June 2024.

87 Emails from Michael Edwards, DCA, 3 May 2024; Julie Bouvier, HI, 16 May 2024; and Tony Connel, FSD, 25 June 2024.

88 Email from Amela Balic, NPA, 12 May 2025.

89 Email from Eleanor Porritt, FSD, 28 July 2025.

90 Email from Steve Wallis OBE, HALO, 19 March 2025.

91 A hromada is the basic unit of administrative division in Ukraine, similar to a municipality.

92 Email from Niamh McNamara, MAG, 30 April 2025.

93 Email from Amela Balic, NPA, 12 May 2025.

94 The Work Plan for Humanitarian Demining of De-occupied Territories of Ukraine for 2024, 30 April 2024, Annex 1.

95 Email from Vanja Sikirica, NPA, 21 April 2024.

96 Emails from Michael Brown, HALO, 29 May 2024; and Eleanor Porritt, FSD Ukraine, 17 March and 28 July 2025.

97 Email from Michael Brown, HALO, 29 May 2024.

98 Email from Roxana-Cristina Bobolicu, DRC, 5 April 2025.

99 FSD highlights that low-order EOD techniques can significantly reduce noise, shockwaves, and physical damage, compared to traditional high-order detonation methods, and can be a more environmentally friendly and cost-effective option for UXO disposal. Emails from Eleanor Porritt, FSD Ukraine, 17 March and 5 June 2025.

100 Email from Maksym Slipchenko, Humanitarian Security, 1 June 2025.

101 “Permits for Activities with Explosives”, Demine Ukraine, 1 July 2024, accessed 22 May 2025, at: <https://bit.ly/4mo84cp>.

Ukraine continued to collaborate with implementing partners and operators on capacity building in its national programme during 2024. Geneva International Centre for Humanitarian Demining (GICHD) support focused on the development of Ukraine's first national mine action strategy and implementation plan; NMAS, including land release, mechanical operations and detection systems involving animals (ADS); and Ukraine's mine action information management system.<sup>102</sup> As at April 2025, GICHD was planning a programme of needs assessment and organisational development support for national mine action organisations, as well as preparing a report on gender and diversity in mine action in Ukraine.<sup>103</sup>

The Organization for Security and Co-operation in Europe (OSCE) continues to be engaged in mine action systems building, including on the environment and mine action<sup>104</sup> and the development of a unified EOD training curriculum, piloted in 2024 with participants from SSTS, SESU, and National Police EOD personnel.<sup>105</sup> UNDP's five-year mine action project in Ukraine continued to provide equipment and technical, expert, and strategic support. UNDP's project also involves innovative technologies for mine action such as satellite imagery, remote mine detection, artificial intelligence (AI), and machine learning.<sup>106</sup> The UN World Food Programme (WFP) continued to work with the Food and Agriculture Organisation (FAO), the Government of Ukraine, and FSD during 2024 to survey small-scale agricultural land for the presence of mines and other ERW; to clear land where necessary; and support safe release for food production. As at February 2025 the project was underway in Kharkiv.<sup>107</sup>

The national authorities and operators also continued to receive capacity development and training from international operators in 2024, including from HALO in the areas of NTS, manual demining, and gender mainstreaming.<sup>108</sup> HALO, Mines Advisory Group (MAG), and Norwegian People's Aid (NPA)

also supported with delivery of QM training for the NMAA, coordinated by the GICHD.<sup>109</sup> DRC delivered EOD training to NMAA, SESU, and MAC personnel.<sup>110</sup>

SESU also received training and capacity development support. NPA continued efforts to establish a sustainable mine detection dog (MDD) capability within SESU, training and providing six MDDs and providing staff training.<sup>111</sup> FSD provided technical expertise and capacity development to SESU in mechanical ground preparation.<sup>112</sup> Several international operators including DRC and HALO, donated equipment to the MAC and SESU, including vehicles; metal detectors; EOD kits, personal protective equipment (PPE); first aid kits; and office and IT equipment.<sup>113</sup>

It has been suggested that there is the need for a more joined-up approach to capacity development support to the national authorities in Ukraine, and that an independent training needs analysis could be useful. International organisations and private companies in Ukraine are reportedly overlapping or duplicating support in some cases, both in terms of equipment provision and training.<sup>114</sup> As at March 2025, Ukraine stated that international assistance remained "of crucial need" for equipping MoD Ukraine demining teams with demining machines, vehicles for EO transportation, and International Mine Action Standards (IMAS)-compliant EOD training of all levels abroad – "due to safety in Ukraine".<sup>115</sup>

To support innovation the MoE announced the launch of the Humanitarian Demining Innovation Platform in February 2025, intended as a coordination platform, which can test and improve new technologies; attract investment and resources from international partners and companies; and facilitate innovation scaling and establishing technology production in-country.<sup>116</sup>

## FUNDING FOR CMR SURVEY AND CLEARANCE

It is not possible to capture the full extent of all funding for survey and clearance of CMR (along with other EO) made available in Ukraine in 2024. A summary of information provided by international humanitarian operators on their funding for survey and clearance in 2024, and forecast for 2025, is provided in Table 2. Due to the extensive and mixed

nature of the EO threat, no distinct national resources are dedicated to survey and clearance of CMR, or any other particular type of EO, by the Government of Ukraine – all EO survey and clearance are funded as a whole.<sup>117</sup> The 2024 budget allocated by the government for all demining was UAH3 billion (approximately US\$76 million).<sup>118</sup>

102 "GICHD Update", presentation to the MASG, New York, 24 October 2024, p. 2.

103 Interview with the GICHD, Geneva, 10 April 2025.

104 "Support to Environmental Rehabilitation with Focus on Building National Humanitarian Mine Action Capacities of Ukraine", OSCE, accessed 15 April 2024, at: <https://bit.ly/4dHLoze>.

105 Interview with OSCE Ukraine, in Geneva, 11 April 2025.

106 "Mine Action Project in Ukraine", UNDP, accessed 19 February 2025, at: <https://bit.ly/43KwS5V>.

107 "Ukraine", World Food Programme, accessed 18 February 2025, at: <https://bit.ly/4mxy2u1>.

108 Email from Steve Wallis OBE, HALO, 19 March 2025.

109 Ibid.; and emails from Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

110 Email from Roxana-Cristina Bobolicu, DRC, 5 April 2025.

111 Email from Amela Balic, NPA, 12 May 2025.

112 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

113 Emails from Roxana-Cristina Bobolicu, DRC, 5 April 2025; and Niamh McNamara, MAG, 30 April 2025.

114 Email from Niamh McNamara, MAG, 30 April 2025.

115 CCW Amended Protocol II Article 13 Report (covering 2024), Form E.

116 "The Ministry of Economy launches a coordination platform for innovations in humanitarian demining", Ministry of Economy of Ukraine, 17 February 2025, at: <https://bit.ly/4mtijvT>.

117 Email from Government of Ukraine, 18 July 2025.

118 Presentation by Oleg Stoiev, Head, Mine Action Office, Ministry of Economy, "Ukraine: Meeting Food Security Needs Through Integrated Mine Action", Side event, NDM, Geneva, 1 May 2024.

As at January 2025, it was claimed that more than US\$1 billion had been pledged to mine action from international donors in the preceding two years. There is some concern that the future financial burden of mine action on Ukraine could be considerable if donor support decreases.<sup>119</sup>

Non-traditional or innovative funding is also being explored extensively for Ukraine's mine action sector, for example, through a UNDP study on potential innovative finance models in 2024,<sup>120</sup> and through a collaboration between the GICHD, the Mine Action Finance Initiative (MAFI), and Ukraine's MoE to develop and pilot innovative finance mechanisms for the Ukraine context, with the aim of scaling the mechanisms for the entire mine action sector.<sup>121</sup>

Various international operators in Ukraine were significantly impacted by the suspension of US funding in January 2025. FSD experienced a 25% reduction in survey and clearance capacity in Ukraine as the expected new contract for US funding was not signed.<sup>122</sup> HALO's funding in Ukraine from the US Office of Weapons Removal and Abatement (PM/WRA) was suspended. As at June 2025, HALO remained optimistic that PM/WRA funding would continue.<sup>123</sup> NPA received a stop-work order from PM/WRA on 24 January 2025, pending a project review. This was partially lifted in February before being fully lifted on 12 March 2025. The project is scheduled to end on 30 November 2025.<sup>124</sup>

**Table 2: Funding for survey and clearance by international operators in Ukraine (2024–25)**<sup>125</sup>

Donor	2024	2025
Canada (Peace and Stabilisation Operations Programme (PSOP))	HALO, MAG	HALO (as at March 2025), MAG
Czech Republic (Ministry of the Interior)	HALO	HALO (as at March 2025)
Denmark (Danish International Development Agency (Danida), Ministry of Foreign Affairs (MFA))	DCA, DRC	DCA (to end Q2 2025), DRC
EU European Civil Protection and Humanitarian Aid Operations (ECHO)	DCA, DRC	DCA, DRC
European Commission, Foreign Policy Instruments (EU-FPI)	HALO, MAG	HALO (as at March 2025), MAG
Festival Medical (UK charity)	MAG	MAG
France (Crisis & Support Centre (CDCS)) <sup>126</sup>	HALO	HALO (as at March 2025)
The Freeman Foundation	MAG	MAG
Germany (German Federal Foreign office (GFFO))	DCA, DRC, HALO, MAG, NPA	DCA, HALO (as at March 2025), MAG, NPA (until end June 2025)
Howard G. Buffett Foundation (HGBF)	DRC, FSD, HALO	DRC, FSD (to end October 2025), HALO (as at March 2025), MAG
The If! Foundation	MAG	MAG
Italy (Italian Agency for Development Cooperation (AICS)) <sup>127</sup>	MAG	MAG, DCA
Japan (Association for Aid and Relief)	HALO	HALO (as at March 2025)
KfW <sup>128</sup>	NPA (from Dec. 2024)	NPA
Latvia (MFA)	None	HALO
Luxembourg (MFA)	HALO	HALO (as at March 2025)

119 "Mine Action in Ukraine: Interview with Paul Heslop", OROLSI, DPO, and UNMAS, January 2025.

120 "Innovative Finance in Mine Action Progress to Date & New Initiatives. Progress since 4th Review Conference", Camille Wallen, Co-Founder & Director of Symbio Impact & MAFI, APBMC Fifth Review Conference, Siem Reap, 25–29 November 2024, pp. 11–12.

121 "MASG Intervention: Innovative Finance for Mine Action", GICHD, 29 April 2024, at: <https://bit.ly/4k7av1n>.

122 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

123 Emails from Steve Wallis OBE, HALO, 19 March and 19 June 2025.

124 Email from Vanja Sikirica, NPA Ukraine, 6 June 2025.

125 Emails from Michael Edwards, DCA, 8 April and 31 July 2025; Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025; Eleanor Porritt, FSD Ukraine, 17 March and 28 July 2025; Steve Wallis OBE, HALO, 19 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

126 The Crisis and Support Centre (Centre de Crise et de Soutien) is part of the French Ministry for Europe and Foreign Affairs. See "France Diplomacy", Ministry for Europe and Foreign Affairs, accessed 14 May 2025, at: <https://bit.ly/43f00A0>.

127 L'Agenzia Italiana per la Cooperazione allo Sviluppo (AICS) is the Italian Agency for Development Cooperation. See [www.aics.gov.it](http://www.aics.gov.it).

128 KfW is a German bank. In December 2024, NPA implemented a project with the Norwegian Refugee Council (NRC) under NRC's donor KfW. Email from Amela Balic, NPA, 12 May 2025.

Table 2 continued

Donor	2024	2025
Netherlands (MFA)	DRC, HALO, MAG	DRC, HALO (as at March 2025), MAG
The Netherlands Refugee Foundation (Stichting Vluchteling)	MAG	None
Norway (Norad <sup>129</sup> /MFA)	HALO, NPA	HALO (as at March 2025), NPA
Novo Nordisk Foundation <sup>130</sup>	DRC	DRC
The Sisley Foundation	MAG	MAG
Sweden (Swedish International Development Cooperation Agency (SIDA))	DRC	DRC
Swiss Solidarity	FSD	FSD
Switzerland (Swiss Agency for Development and Cooperation)	FSD, MAG	DRC, FSD, MAG
UNDP	HALO, <sup>131</sup> MAG, NPA	MAG, NPA
United Kingdom Foreign, Commonwealth and Development Office (FCDO)	HALO, MAG	HALO (as at March 2025), MAG
Ukraine Humanitarian Fund (UHF) <sup>132</sup>	DRC	None
US PM/WRA	DRC, FSD, HALO, MAG	DRC, FSD (to end January 2025 only), <sup>133</sup> MAG, NPA
Viterra <sup>134</sup>	HALO	HALO (as at March 2025)
WFP & FAO	FSD, NPA (in-kind support from WFP)	FSD, MAG (in-kind support from WFP), NPA in-kind support from WFP)
Other small donors (unspecified)	FSD, HALO	FSD, HALO (as at March 2025)

## GENDER AND DIVERSITY

Ukraine is taking steps to prioritise mainstreaming of gender and diversity concerns into all aspects of mine action. The National Mine Action Strategy incorporates nine measures intended to ensure equality and inclusion, including supporting veterans, mine-affected individuals, and persons with disabilities, as well as addressing gender inequality.<sup>135</sup> A national initiative group—the Gender Aspects in Mine Action Initiative—is up and running, and an assessment on gender and diversity in mine action was conducted in 2024. In February 2025, a multi-stakeholder workshop on gender

and inclusivity took place, organised by the MoE and the GICHD. Recommendations called for tools to strengthen the capacities of different social groups and initiatives to improve political and legal frameworks.<sup>136</sup> As at April 2025, the MoE was working on an implementation and monitoring and evaluation plan for tracking gender and diversity in the sector,<sup>137</sup> while the GICHD was updating a report on gender and diversity in the sector.<sup>138</sup> It has also been suggested that national-level reporting could improve gender-specific details.<sup>139</sup>

<sup>129</sup> Norad is the Norwegian Agency for Development Cooperation, under Norway's MFA. See [www.norad.no](http://www.norad.no).

<sup>130</sup> Novo Nordisk Foundation is an independent, Danish enterprise foundation. See [www.novonordiskfonden.dk](http://www.novonordiskfonden.dk).

<sup>131</sup> Although HALO's UNDP-funded land release project ended in 2024, HALO continues to cooperate with UNDP in other areas of mine action. Email from Steve Wallis OBE, HALO, 19 March 2025.

<sup>132</sup> The Ukraine Humanitarian Fund is a country-based pooled fund led by the UN Office for the Coordination of Humanitarian Affairs (OCHA). See "Ukraine Humanitarian Fund", OCHA, accessed 15 May 2025, at: <https://bit.ly/4j2JquT>.

<sup>133</sup> Ended as scheduled on 31 January 2025. As at 4 July 2025, the anticipated new contract was not signed due to freeze of US funding. Emails from Eleanor Porritt, FSD Ukraine, 17 March and 4 July 2025.

<sup>134</sup> Viterra is a Dutch agriculture company. See [www.viterra.com](http://www.viterra.com).

<sup>135</sup> "Social Inclusion and Gender Equality in Mine Action: Outcomes of the Two-Day Workshop", Demine Ukraine, 21 February 2025, at: <https://bit.ly/3YRHf6j>.

<sup>136</sup> Ibid.

<sup>137</sup> Interview with OSCE Ukraine, in Geneva, 11 April 2025; and email from Government of Ukraine, 18 July 2025.

<sup>138</sup> Interview with the GICHD, 10 April 2025.

<sup>139</sup> Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

One of the tasks identified in the National Mine Action Strategy implementation plan for 2024–2026 is to increase the percentage of marginalised groups who are “engaged in mine action”.<sup>140</sup> Operator policies related to gender are reportedly given consideration before operators are accredited. The same considerations and recommendations for equality of opportunity are applied by the national authorities to groups with disabilities, and steps are taken to promote equal access to employment in mine action for these groups.<sup>141</sup> All mine action operators, as with all businesses and organisations in Ukraine, are required to employ a certain percentage of persons with disabilities.<sup>142</sup>

With regard to increasing the numbers of female operational personnel, Ukraine has stated that, as it expands mine action operational capacity in the MoD up to an estimated 5,000

personnel, it expects female specialists to form up to 30% of the units, although no time frame for this has been given.<sup>143</sup> The NMAA states that, due to the ongoing Russian invasion against Ukraine, information regarding the composition of the Defence and Security Forces of Ukraine, which form all of Ukraine’s Government demining units, is considered to be sensitive data, which cannot be shared. Thus, Table 3 highlights the total numbers of staff (male and female) employed across government demining units and the centres involved in humanitarian demining operations (the MAC at Cherniv and the Centre at Merefa); and certified mine action operators. The numbers for women staff included in Table 3 cover only those employed by certified mine action operators.<sup>144</sup>

**Table 3: Gender composition of supervisory bodies and government demining units (at end 2024)**<sup>145</sup>

Total staff*	Total women staff (GUs excluded)	Total managerial or supervisory staff*	Total women managerial or supervisory staff (GUs excluded)	Total operational staff*	Total women operational staff (GUs excluded)
4,395	179	879	20	3,516	159

\* Includes the MAC at Chernihiv; the Centre at Merefa; the demining units of the armed forces, SESU, and SSTS; and national police EOD units.

Operators are required to provide gender and age-disaggregated beneficiary data.<sup>146</sup> All international survey and clearance operators implement their global gender, diversity, and inclusion policies at the country-level in Ukraine,<sup>147</sup> while HALO and MAG have developed country-specific gender and diversity strategies for their respective organisations in Ukraine.<sup>148</sup> According to some agencies, about 15% of those employed in mine action in Ukraine were women as at January 2025,<sup>149</sup> although Ukraine’s MoD says the proportion of women engaged in mine action “exceeds 35%”.<sup>150</sup>

A project underway with UN Women aims to bring 200 to 500 more women into the sector over the following 18 months, and ultimately increase the proportion to 40% to 50%, with women employed across all types of leadership, operational, and supporting positions.<sup>151</sup> DRC reports that the most commonly reported barriers to accessing the mine action sector identified by women, according to its 2023 perception survey, were: traditional gender stereotypes (26%); the

perceived need for necessary previous military training (22%); and the need to work in remote locations (20%).<sup>152</sup> DRC’s March 2024 report calls for recruitment processes to be strengthened so as to help overcome stereotypes about the mine action sector (particularly that military experience is required); reviewing working conditions, benefits, and pay packages; introducing shared parental/caretaker leave for both women and men; implementing capacity development plans to ensure career progression paths for women; and collecting and maintaining good, gender-disaggregated data for informed decision-making.<sup>153</sup> Further research on women’s perceptions of employment in mine action and key barriers, published by FSD and NGO Girls in the first quarter of 2025, made recommendations on: strengthening of information and awareness-raising activities to dispel fears and stereotypes; clearly communicating that newcomers to the sector receive proper training to help ensure their safety; clear emphasis of the principles of gender equality and openness to the employment of women; and transparent and decent working conditions and pay.<sup>154</sup>

140 “Cabinet of Ministers of Ukraine Order dated 28 June 2024 No. 616-p”, section entitled “Strategic goals, objectives and expected results aimed at achieving the defined goals”.

141 Interview with Yevhenii Zubarevskyi, MoD, in Geneva, 1 May 2024.

142 Email from Government of Ukraine, 18 July 2025. This is a legal requirement according to Law of Ukraine No. 2682-IX of 18 October 2022 “On Amendments to Certain Laws of Ukraine on the Protection of Social, Labor and Other Rights of Individuals, Including During Martial Law, and Simplifying the Registration of Jobs for Persons with Disabilities”.

143 Answers to additional questions of the APMBC Committee on Article 5 Implementation on Ukraine’s deadline extension request, 1 September 2023, p. 2.

144 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

145 Ibid.

146 Answers to additional questions of the APMBC Committee on Article 5 Implementation on Ukraine’s deadline extension request, 1 September 2023, p. 2.

147 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 1 April 2023; Almedina Musić, DRC, 7 February and 13 June 2022; Eleanor Porritt, FSD Ukraine, 17 March 2025; Denys Holovetskyi, HALO, 29 May 2023; Michael Brown, HALO, 29 May 2024; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

148 Emails from Steve Wallis OBE, HALO, 19 March 2025; and Niamh McNamara, MAG, 30 April 2025.

149 “Mine Action in Ukraine: Interview with Paul Heslop”, OROLSI, DPO, and UNMAS, January 2025.

150 “Over one-third of mine action personnel in Ukraine are women”, MoD of Ukraine, 21 February 2025, at: <https://bit.ly/4dzVcfcg>.

151 “Mine Action in Ukraine: Interview with Paul Heslop”, OROLSI, DPO, and UNMAS, January 2025.

152 “Ukraine: Gendered Perceptions and Participation in the Mine Action Sector”, DRC, March 2024, at: <https://bit.ly/3ST5w8p>, p. 15.

153 Ibid., pp. 21–22.

154 “Women’s Perceptions of Employment in Humanitarian Mine Action: Key Barriers” FSD and NGO Girls, February–March 2025, pp. 6–7, at: <https://bit.ly/45ayEPo>.

International operators are engaged in efforts to increase female employment in survey and clearance. Building on its gender perception survey findings of 2023, DRC launched a mass media campaign in June 2025.<sup>155</sup> DCA was, able, through a recruitment campaign featuring existing female staff as role models, to recruit, train, and deploy several

female staff in 2024, including some as team leaders.<sup>156</sup> NPA was able to increase the proportion of all staff who are women by 10% between 2023 and 2024.<sup>157</sup> National NGO operator, Humanitarian Security, had no female deminers at the time of writing but planned to train six by July 2025.<sup>158</sup> National operator UDA has 40% female staff.<sup>159</sup>

**Table 4: Gender composition of humanitarian mine action operators in 2024\***<sup>160</sup>

Operator	Total staff	Total women staff	Managerial or supervisory staff	Women managerial or supervisory staff	Operational staff	Women operational staff
DCA	170	60 (35%)	45	17 (38%)	86	19 (22%)
DRC	330	96 (29%)	21	5 (24%)	309	84 (27%)
FSD	622	157 (25%)	111	70 (63%)	511	87 (17%)
HALO	1,546	441 (29%)	360	97 (27%)	1,308	322 (25%)
Hum. Security	65	7 (11%)	6	2 (33%)	59	5 (8%)
MAG	303	131 (43%)	70	21 (30%)	246	97 (39%)
NPA	342	126 (37%)	103	27 (26%)	285	94 (33%)
<b>Totals</b>	<b>3,378</b>	<b>1,018 (30%)</b>	<b>716</b>	<b>239 (33%)</b>	<b>2,804</b>	<b>708 (25%)</b>

\* Includes data on all international survey and clearance operators and on national ones, where available. Mine Action Review was not able to source data on this matter from other national operators.

Initiatives to retain women, and parents, employed in survey and clearance in 2024 included the continuation of HALO's childcare stipend programme for mothers and single fathers, as well its parental leave programme. In 2024, HALO introduced additional support measures for working parents, including its "baby box" and "first grade kit" initiatives.<sup>161</sup> HALO, in partnership with Trimble, also launched the "Women in GIS for Demining" initiative, which trains and mentors female Geographic Information Systems (GIS) specialists from disadvantaged backgrounds. This project empowers women through technical skills development in geospatial technologies, allowing them to contribute to mine action and post-war recovery, while enhancing their long-term career prospects.<sup>162</sup> HALO also provides uniforms and PPE tailored for female employees.<sup>163</sup> In 2025, MAG planned to conduct an evaluation, exploring the impact of equitable employment practices, how these are mainstreamed throughout the programme, and if they are having an impact on retention of female staff.<sup>164</sup>

Efforts were also made to increase employment of war veterans in mine action. Various national and international operators, including Global Clearance Solutions (GCS), FSD, and HALO, worked alongside UNDP on a scheme, co-organised by the MoE and with the participation of other ministries, to enhance employment opportunities for military veterans.<sup>165</sup> In FSD, for example, the first cohort of 12 gained skills in operating drones, ground preparation machines, and detectors in 2024, and FSD planned to intensify its efforts in 2025.<sup>166</sup> HALO has mentorship programmes in place for war veterans.<sup>167</sup>

Measures were taken to increase recruitment of persons with disabilities and other under-represented groups into mine action. In 2024, MAG surpassed the minimum legal requirement that 4% of its workforce in Ukraine should comprise persons with disabilities, increasing from one staff member to 14 by the end of the year (more than 5% of its total workforce).<sup>168</sup> HALO conducts workplace accessibility assessments and took steps to enhance workplace

<sup>155</sup> Emails from Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025.

<sup>156</sup> Email from Michael Edwards, DCA, 8 April 2025.

<sup>157</sup> Emails from Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 April 2024

<sup>158</sup> Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

<sup>159</sup> "Birthday of the Ukrainian Deminers Association", 15 November 2024, at: <https://bit.ly/43gCpCb>.

<sup>160</sup> Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April and 11 June 2025; and Amela Balic, NPA, 12 May 2025.

<sup>161</sup> Email from Steve Wallis OBE, HALO, 19 March 2025.

<sup>162</sup> Ibid.; and "She maps. She protects. Women in GIS for Safer Lands", Presentation from Luan Jaupi, Head of Information Management & ICT, HALO, at the NDM, Geneva, 9–11 April 2025.

<sup>163</sup> Email from Steve Wallis OBE, HALO, 19 March 2025.

<sup>164</sup> Email from Niamh McNamara, MAG, 30 April 2025.

<sup>165</sup> Email from Government of Ukraine, 18 July 2025.

<sup>166</sup> "Training veterans in humanitarian demining", FSD, 24 December 2024, at: <https://bit.ly/40zT0hF>; and email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

<sup>167</sup> Email from Steve Wallis OBE, HALO, 19 March 2025.

<sup>168</sup> Email from Niamh McNamara, MAG, 30 April 2025.



accessibility in 2024. HALO also supported the MoE with a project to provide remote sensing imagery analysis training for a cohort of mine victims and employed many of the successful course participants. HALO is also collaborating with national NGOs and the State Employment Service of Ukraine to implement inclusive hiring practices, remove employment barriers, and provide tailored support to candidates from under-represented groups. Efforts include adjusting recruitment processes, improving workplace accessibility, and offering flexible work arrangements to accommodate employees with diverse needs.<sup>169</sup>

FSD, HALO, and MAG also highlight their efforts to employ community-facing personnel fluent in both Ukrainian and Russian.<sup>170</sup> MAG provides enhanced and country-specific conflict sensitivity training for staff.<sup>171</sup> FSD provides cultural sensitivity training to staff, particularly for engagement with displaced populations and vulnerable groups.<sup>172</sup> Key written communications, such as risk education materials and warning signs are commonly provided in both Ukrainian and Russian.<sup>173</sup>

## ENVIRONMENTAL POLICIES AND ACTION

It has been reported that there is good cooperation between the Ministries of the Economy, the Environment, and Defence, on mine action and the environment,<sup>174</sup> which extends to an environmental working group, with effective ministerial representation. The Department of Environment and Mine Action in the MoD coordinates all work on mine action and the environment, including research. The Conflict and Environment Observatory (CEOBS) highlights that Ukraine's environmental legislation and mine action legislation are not yet sufficiently aligned.<sup>175</sup>

Ukraine has a major strategic focus on demining agricultural land and, in turn, on soil specifically. In their January 2025 report on environmental degradation from explosive weapons in southern Ukraine, CEOBS and NPA recommend post-clearance soil sampling to help enhance understanding of the dispersal of metals and energetic materials from the use of explosive weapons.<sup>176</sup> The Ministry of Agriculture (MoA) has set up a working group to establish a protocol for soil sampling, with the FAO leading on this and related research. QA and QC teams of the MoD are implementing soil sampling on operational demining sites, and these personnel undertook environmental auditor qualifications in 2024 to prepare for this;<sup>177</sup> an initiative supported by OSCE.<sup>178</sup> Strategies suggested to mitigate the environmental impact of mine action on agricultural land in particular include: avoiding use of explosives where possible; restoring farmland for production of non-food crops; and using cleared agricultural land to generate other non-crop sources of

revenue, such as from solar panels and wind turbines.<sup>179</sup> It is understood that mechanical demining techniques widely applied to agricultural areas would not be suitable for clearance of EO-contaminated environmentally protected areas and forests.<sup>180</sup>

Ukraine's NMAS include a chapter (11.2.9) on "Environmental regulations", and a section (12.6) on "Environment, occupational health and safety".<sup>181</sup> Certain other standards further cover environmental aspects of demining, though not yet fully.<sup>182</sup> Operators report that Ukraine's NMAS on environmental management requires work to fully align it with the revised International Mine Action Standard (IMAS) 07.13 (Second Edition, 3 July 2024). Key gaps include climate change adaptation and mitigation; environmental risk assessments; environmental impact assessments; and compliance with international standards such as ISO 14001.<sup>183</sup> The updated IMAS 7.13 has been translated into Ukrainian<sup>184</sup> and the technical committee on standardisation plans to develop an updated NMAS, though a target date for this had not yet been determined at the time of writing.<sup>185</sup>

The NMAA states that environmental assessments are conducted to support the planning and delivery of survey and clearance of CMR and that environmentally friendly survey and clearance methods are applied where possible.<sup>186</sup> The OSCE is helping build the operational capacities of the national mine action centres to systematically conduct "environmentally safe" demining.<sup>187</sup>

169 Email from Steve Wallis OBE, HALO, 19 March 2025.

170 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; Michael Brown, HALO, 29 May 2024; and Niamh McNamara, MAG, 30 April 2025.

171 Email from Niamh McNamara, MAG, 30 April 2025.

172 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

173 Email from Government of Ukraine, 18 July 2025.

174 Interview with Miljenko Vahtarić and Iryna Maksymuk, OSCE, in Geneva, 11 April 2025.

175 Zoom interview with Anna McKean, Researcher, CEOBS, 28 April 2025; and email from Anna McKean, CEOBS, 15 June 2025.

176 "Assessing environmental degradation from explosive weapons in southern Ukraine", CEOBS and NPA, 16 January 2025, p. 12.

177 Zoom interview with Anna McKean, Researcher, CEOBS, 28 April 2025.

178 Interview with Miljenko Vahtarić and Iryna Maksymuk, OSCE, in Geneva, 11 April 2025.

179 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, p. 15.

180 Zoom interview with Anna McKean, CEOBS, 28 April 2025; and email from Anna McKean, CEOBS, 15 June 2025.

181 Emails from Almedina Musić, DRC, 7 February 2022; and Imogen Churchill, HALO, 23 March 2022.

182 These include Ukraine's NMAS: 8820-2023 ("Mine action. Management processes. Basic Provisions") and parts four and five of this which address, respectively, mechanised demining (8820-4) and land release (8820-5). Email from Government of Ukraine, 18 July 2025; and "National Mine Action Standards", Communication Platform for Technical Regulation in Ukraine, accessed 20 July 2025, at: <https://bit.ly/4m3vYzt>.

183 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; and Steve Wallis OBE, HALO, 19 March 2025.

184 Zoom interview with Anna McKean, CEOBS, 28 April 2025.

185 Email from Government of Ukraine, 18 July 2025.

186 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

187 "Support to Environmental Rehabilitation with Focus on Building National Humanitarian Mine Action Capacities of Ukraine", OSCE, accessed 14 May 2024, at: <https://bit.ly/4dHL0ze>.

The National Mine Action Strategy, approved in June 2024, does acknowledge the need for systemic consideration of the environment in mine action and outlines tasks related to the environment under each of the strategy's three strategic goals. These tasks include reducing pollution caused by EO; consideration of the environment during task prioritisation; and application of "environmentally friendly demining methods", especially in protected and conservation areas.<sup>188</sup>

International operators report varying approaches to the integration of environmental considerations into mine action in Ukraine. NPA applies its Green Office tool in Ukraine and, from May 2025, also began implementing the Green Field Tool. NPA Ukraine has conducted an environmental survey among staff and was developing an action plan based on findings at the time of writing.<sup>189</sup> DRC has an environmental management system in place<sup>190</sup> and all international operators have SOPs on environmental management.<sup>191</sup> MAG follows the direction of the NMAA with regards to environmental measures on task sites and includes environmental considerations in the planning and delivery of survey and clearance activities.<sup>192</sup> MAG also conducts post-clearance environmental assessments in line with its global standards.<sup>193</sup> FSD and DCA report to follow a

"do-no-harm" approach, for example, ensuring field activities cause minimal disruption to the environment.<sup>194</sup> FSD also emphasises responsible use of mechanical assets to limit soil disturbance and limits the detonation of explosive ordnance where possible.<sup>195</sup>

Some international operators are also engaged in efforts to reduce emissions. In 2024, HALO continued to develop and apply its framework to calculate and reduce greenhouse gases across its demining operations and administration, using the Humanitarian Carbon Calculator Plus (HCC+) online software.<sup>196</sup> HALO and FSD also highlight the importance of deploying teams as close as possible to work sites reduce vehicle emissions.<sup>197</sup> Humanitarian Security uses solar energy in field camps.<sup>198</sup>

HALO Ukraine has formed a partnership with World Wildlife Fund for Nature (WWF) Ukraine to restore the shelterbelts (vegetation barriers)<sup>199</sup> that HALO has demined in the Mykolaiv region. This project aims to have a positive impact on agriculture, help mitigate the impact of climate change, and contribute to the post-war recovery of affected communities.<sup>200</sup>

**Table 5: International operator environmental policies and action**<sup>201</sup>

Operator	Environmental policy in place	Environmental assessments conducted to support survey and clearance	Environmental focal point at country-programme level
DCA	Yes	Yes	No
DRC	Yes	No	No
FSD	Yes	Yes	No
HALO	Yes	In development (June 2025) <sup>202</sup>	Yes
NPA	Yes (country-specific)	Yes (from May 2025)	Yes
MAG	Yes	No	No

188 "Cabinet of Ministers of Ukraine Order dated 28 June 2024 No. 616-p", section entitled "Strategic goals, objectives and expected results aimed at achieving the defined goals".

189 Email from Amela Balic, NPA, 12 May 2025.

190 Email from Roxana-Cristina Bobolicu, DRC, 5 April 2025.

191 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Michael Brown, HALO, 29 May 2024; Nick Guest, MAG, 23 March 2023; and Amela Balic, NPA, 12 May 2025.

192 Email from Niamh McNamara, MAG, 30 April 2025.

193 Email from Nick Guest, MAG, 23 March 2023.

194 Emails from Michael Edwards, DCA, 8 April 2025; and Eleanor Porritt, FSD Ukraine, 17 March 2025.

195 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

196 Email from Steve Wallis OBE, HALO, 19 March 2025.

197 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; and Steve Wallis OBE, HALO, 19 March 2025.

198 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

199 A shelterbelt is a vegetation barrier, grown to protect crops and livestock from strong winds and to help prevent erosion, and topsoil depletion.

200 Email from Steve Wallis OBE, HALO, 19 March 2025.

201 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Amela Balic, NPA, 12 May 2025; and Niamh McNamara, MAG, 30 April and 11 June 2025.

202 As at June 2025, HALO was testing the NPA/CEOBS Green Field Tool, which was in the final stage of development. Emails from Steve Wallis OBE, HALO, 19 March and 19 June 2025.

## INFORMATION MANAGEMENT AND REPORTING

Ukraine is using IMSMA Core.<sup>203</sup> Operators report that the system functions effectively, and all operators have been trained in its use.<sup>204</sup> It is said to meet information requirements for the programme, and that it has been structured to support and adapt to the specific data needs of mine action operators. Furthermore, the established connection between operators and the national database enables its use for geographic information systems (GIS) purposes, allowing operators to leverage spatial data for mapping.<sup>205</sup> Operators also report that the national database is up to date in so far as is possible in the context of the ongoing conflict.<sup>206</sup>

Survey and clearance data entered into IMSMA are validated by the MAC.<sup>207</sup> All accredited operators are required to regularly submit reports, including on NTS, TS, and clearance.<sup>208</sup> Data collection forms are regularly discussed and agreed with operators.<sup>209</sup> The IMSMA database receives new information daily from operators that is shared across key partners.<sup>210</sup> Ukraine states that access to its IMSMA Core portal is open to all certified operators "within the defined

limits that do not contradict the privacy policy of sensitive data", as well as to government authorities involved in mine action, local authorities, international organisations, and the public at large.<sup>211</sup>

HALO developed an EOD reporting form in Survey123 in 2024, which is available for other operators to use once certified to conduct EOD operations. This has led to improved communication and co-ordination in this area between HALO and the MAC.<sup>212</sup> The MAC provides detailed, live information on a public website on progress in releasing EO-contaminated land, including the amount of land surveyed and cleared and the number of items destroyed (not disaggregated by weapon type), both by government units and humanitarian operators.<sup>213</sup>

Though large amounts of territory remain subject to primary NTS, so have not yet been excluded from being potentially contaminated, and not yet designated as SHAs or CHAs, Ukraine is collecting and recording disaggregated data in its IMSMA database in areas where it has access and where it has so far been able to conduct comprehensive NTS.<sup>214</sup>

## PLANNING AND TASKING

The National Mine Action Strategy for 2024–33 focuses on three strategic goals: "land release, protection of the people, and system improvement". Ukraine plans to update the implementation plan every three years.<sup>215</sup> An operational plan for 2024–26 is attached to the strategy. The strategy does not specifically address CMR, but rather refers throughout to "explosive ordnance".<sup>216</sup>

Ukraine prioritises clearance of critical infrastructure facilities and population centres.<sup>217</sup> The National Mine Action Strategy identifies the need for better planning and tasking as part of systems improvement, citing "the formation of a system of prioritisation of tasks for mine action and the centralised distribution of relevant tasks by the authorised body" as prerequisites to effective, centralised task

distribution in the country.<sup>218</sup> In October 2024, the Senior Technical Advisor on Mine Action to the UN in Ukraine advocated for "clear and appropriate task dossiers, linked to prioritisation & outcomes", rather than output-focused demining.<sup>219</sup> A pilot project to improve prioritisation, in partnership between digital technology company Palantir and the MoE, was underway in Kharkiv in April 2025.<sup>220</sup> In March 2025, the national authorities published the "Methodological Guidelines for Prioritizing Areas Contaminated by Explosive Ordnance for Humanitarian Demining".<sup>221</sup> As at July 2025, this new methodology for prioritisation was being piloted, with assessment at the hromada, oblast, and national levels.<sup>222</sup>

203 Email from the GICHD, 26 May 2023.

204 Email from Sophie Breinholdt Nielsen, DRC, 10 May 2024.

205 Email from Roxana-Cristina Bobolicu, DRC, 5 April 2025.

206 Emails from Jon Cunliffe, MAG, 26 April 2024; Vanja Sikirica, NPA, 21 April 2024; Sophie Breinholdt Nielsen, DRC, 10 May 2024; and Michael Brown, HALO, 29 May 2024.

207 Emails from the GICHD, 19 April 2023; and Michael Brown, HALO, 29 May 2024.

208 Emails from Michael Edwards, DCA, 3 May 2024; and Sophie Breinholdt Nielsen, DRC, 10 May 2024.

209 Email from Michael Brown, HALO, 29 May 2024.

210 GICHD, "Ukraine faces massive explosive contamination one year into conflict", 24 February 2023.

211 Answers to additional questions of the APMBC Committee on Article 5 Implementation on Ukraine's deadline extension request, 1 September 2023, p. 7.

212 Email from Steve Wallis OBE, HALO, 19 March 2025.

213 Ukraine National Mine Action Center, MoD and SSTS, accessed 22 May 2025, at: <https://ua-nmac.org/en/statistics/>.

214 Email from Government of Ukraine, 18 July 2025.

215 Presentation by Oleg Stoiev, Head of Mine Action Office, MoE, NDM, Geneva, 29 April 2024.

216 "Cabinet of Ministers of Ukraine Order dated 28 June 2024 No. 616-p".

217 2023 APMBC Article 5 deadline Extension Request, p. 3.

218 "Cabinet of Ministers of Ukraine Order dated 28 June 2024 No. 616-p", section entitled "Analysis of the current state of affairs, trends and justifications for the need to solve the identified problems".

219 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, p. 28.

220 Interview with the GICHD, 10 April 2025. See also "Palantir and Ministry of Economy of Ukraine Sign Demining Partnership", Palantir, 3 April 2024, at: <https://bit.ly/44LV5sq>.

221 "Mine Action in Focus, Issue 1", Demine Ukraine, MoE, June 2025, p. 9. At the time of writing, in July 2025, this document was available in Ukrainian, but it was not known if it was also available in English.

222 Email from Government of Ukraine, 18 July 2025.

Some changes to tasking procedures were made during 2024 and early 2025. A new procedure was introduced in 2024 requiring that humanitarian operators first request all tasks through the relevant oblast administration before an official task order is submitted to MAC. When the MAC and the oblast administration have differing priorities or inconsistent data availability, this has often led to significant delays. Improving coordination and data sharing between the MAC and the oblast administrations could help streamline this process.<sup>223</sup>

In early 2025, the MAC made changes to the task allocation process for hazardous areas requiring TS or clearance, such that operators now seek approval from the MAC, demonstrating they have capacity to begin work on a task within ten days of receiving approval. Unlike previously, requested tasks no longer need to be located in the hromadas originally designated to the operator for NTS or risk education. This allows greater flexibility for operators to apply for permission to conduct TS and clearance on high-priority hazardous areas.<sup>224</sup> The change could have been better communicated to all stakeholders, as initially there were delays in the issuing and renewal of task orders. By April 2025, however, the process was said to be working more effectively even though it has introduced an additional layer of bureaucracy.<sup>225</sup>

While there have been improvements, operators do highlight some continued challenges with tasking. For example, the annual assignment of areas for NTS can prove inefficient, as the NTS capacities of operators can change over the course of the year, leaving some operators constrained from conducting NTS where they have capacity and others unable to cover assigned areas adequately. Building more flexibility into the system of annual NTS area assignments would help ensure that operators with available resources are not constrained from conducting NTS in affected areas.<sup>226</sup>

Tasking for clearance sites can be lengthy and complicated, with approvals from several layers of administration required – and these bodies not always aligned on priorities.<sup>227</sup> HALO, at times, has encountered delays in obtaining allocation of new areas for survey from the MAC.<sup>228</sup> MAG also experienced challenges in tasking in early 2025, with other demining actors being issued task orders for clearance sites already issued to MAG. It seems that MAG was tasked for these sites within the IMSMA system, whereas others had been tasked by the MoE through the cadastral plot priority list, resulting in the overlap. The affected task sites were suspended while the issue of who has primacy to conduct clearance is resolved. This was ongoing as at April 2025.<sup>229</sup>

## LAND RELEASE SYSTEM

### STANDARDS AND LAND RELEASE EFFICIENCY

NMAS were finalised by the MoD in 2018.<sup>230</sup> At the time, the GICHD considered that these were in line with IMAS whereas other stakeholders felt they needed further refinement, for example, by tailoring the criteria for direct and indirect evidence to the new operational context<sup>231</sup> and clarifying responsibilities for control and enforcement of marking systems.<sup>232</sup> In April 2023, Ukraine issued “improved” national standards covering NTS, TS, manual demining, clearance, mechanical demining, EO destruction, and EORE.<sup>233</sup> Certain revised NMAS were due to come into effect on 1 June 2024<sup>234</sup> and IM standards and QM standards were approved in 2024.<sup>235</sup> New land release and mechanical land release standards entered into force on 1 April and 1 May 2025, respectively, with the former meaning that humanitarian operators are finally able to cancel land through NTS

(though only under certain criteria).<sup>236</sup> At the time of writing, MDD standards were expected to be released in 2025.<sup>237</sup> A new technical committee on the “Standardisation of Mine Action Processes” was established by the national authorities in March 2025.<sup>238</sup>

The changes to the NMAS in 2024 and early 2025 involved consultation with operators.<sup>239</sup> Though generally well received, challenges remain over how they are understood and implemented.<sup>240</sup> With regard to cancellation, according to the instructions issued by the MAC in August 2024, only areas with evidence of contamination from UXO, not areas with evidence of contamination from CMR or mines, may be resurveyed and cancelled.<sup>241</sup> Some operators suggest this is overly restrictive. HALO, for example, continues to advocate for revisions to

223 Email from Amela Balic, NPA, 12 May 2025.

224 Email from Michael Edwards, DCA, 8 April 2025.

225 Email from Niamh McNamara, MAG, 30 April 2025.

226 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

227 Ibid.

228 Email from Steve Wallis OBE, HALO, 19 March 2025.

229 Email from Niamh McNamara, MAG, 30 April 2025.

230 Emails from Gianluca Maspoli, GICHD, 25 September 2018; and Miljenko Vahtarić, OSCE, 25 September 2018; and interview, 7 February 2019.

231 Emails from the GICHD, 19 April 2023 and 19 June 2025.

232 Email from Michael Brown, HALO, 29 May 2024.

233 Answers to additional questions of the APMBC Committee on Article 5 Implementation on Ukraine's deadline extension request, 1 September 2023, p. 7.

234 Presentation by Col. Ruslan Berehulia, NMAA, MoD, at NDM, Geneva, 29 April 2024.

235 Email from Roxana-Cristina Bobolicu, DRC, 5 April 2025.

236 Emails from Michael Edwards, DCA, 8 April 2025; Amela Balic, NPA, 12 May 2025; and Roxana-Cristina Bobolicu, DRC, 5 April 2025; interview with the GICHD, Geneva, 10 April 2025; and “Mine Action in Focus, Issue 1”, Demine Ukraine, MoE, June 2025, p. 9.

237 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; and Amela Balic, NPA, 12 May 2025.

238 “Mine Action in Focus, Issue 1”, Demine Ukraine, MoE, June 2025, p. 9. This newsletter contains a link to a document in Ukrainian regarding this committee. At the time of writing (July 2025), it was not known if the document was also available in English.

239 Emails from Michael Edwards, DCA, 8 April 2025; and Roxana-Cristina Bobolicu, DRC, 5 April 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; and Amela Balic, NPA, 12 May 2025.

240 Email from Niamh McNamara, MAG, 30 April 2025.

241 This instruction was issued in the MAC's supplementary note No. 244, dated 21 August 2024. Email from the Government of Ukraine, 1 August 2025.

the instructions that enable operators to cancel areas that do not require further intervention, as very few tasks are eligible for cancellation under the current system.<sup>242</sup> This has been highlighted as particularly problematic, given that large areas of land are suspected of being contaminated by EO (primarily as a result of having been occupied by Russian forces), but without any evidence of contamination. The Senior Technical Advisor on Mine Action to the UN in Ukraine has advocated the adoption of a risk management approach "until land is confirmed as being contaminated or no evidence of mines is accepted"<sup>243</sup> and also suggests greater delegation of decision-making on cancellation, e.g. to the oblast level or further down.<sup>244</sup> These challenges and potential solutions apply equally to mine and CMR contamination. As already noted, under present instructions from the MAC, cancellation is not permitted in areas with a history of contamination of either weapon-type.

HALO points out that increased use of mechanical clearance techniques in Ukraine have the potential to dramatically increase the speed, efficiency, and safety of clearance, once context-specific methodologies have been refined and adapted to the terrain and threats in the country. HALO experienced some challenges with the process of accreditation of crewed mechanical assets during 2024, with delays to testing by the national authorities,<sup>245</sup> which require that at least one type of every asset is tested before approval and deployment.<sup>246</sup> The technical notes accompanying the NMAA on mechanical assets are also said to be not consistently understood or implemented across the sector.<sup>247</sup>

The Government states that Ukraine's QM system is an area for further improvement, as capacity remains challenging.<sup>248</sup> In October 2024 a "lack of scale of capacity to meet the needs of the sector, particularly for QM, QC and tasking" in Ukraine was highlighted to the Mine Action Support Group (MASG), with a recommendation for further investment in QA and QM.<sup>249</sup> HALO reports that limited external QC capacity among the national authorities caused delays during 2024, preventing HALO from handing over completed tasks to local communities in a timely manner.<sup>250</sup> The MoD and SESU both have QA teams. However, respective roles and responsibilities for QA reportedly require clarification, and the national authorities were looking into this as at April 2025.<sup>251</sup>

In 2024, DRC and DCA each cleared one area recorded as containing CMR but with no CMR found.<sup>252</sup> HALO cleared four hazardous areas covering a total of 261,039m<sup>2</sup> that were recorded as containing CMR, but which proved to contain none (see Table 6).<sup>253</sup> When reflecting on this data, it should be noted again that most contaminated areas in Ukraine contain a mixed explosive threat.

**Table 6: Areas cleared in 2024, which proved to contain no CMR (operator data)**<sup>254</sup>

Operator	Areas cleared	Area cleared (m <sup>2</sup> )
DCA	1	271,907
DRC	1	14,567
HALO	4	261,039
<b>Totals</b>	<b>6</b>	<b>547,513</b>

## OPERATORS AND OPERATIONAL TOOLS

As at July 2025, Ukraine had 108 certified mine action operators, including NGOs and government units, with more than 50 others undergoing accreditation.<sup>255</sup> The number of mine action operators in Ukraine has grown significantly since Russia's full-scale invasion in February 2022, increasing from 29 in 2023<sup>256</sup> to 45 by July 2024,<sup>257</sup> and then doubling to 90 by April 2025. As at June 2024, total demining capacity in Ukraine reportedly exceeded 3,000 but was changing regularly.<sup>258</sup>

The NMAA calculated the combined total of all government unit survey, clearance, and EOD personnel stood at 4,395 in 2024, along with 221 mechanical demining assets (see Table 7).<sup>259</sup> This had increased to 278 by July 2025.<sup>260</sup> For 2023, Ukraine reported that clearance of all types of EO by government units in Ukraine involved 384 teams comprising 1,503 personnel in total.<sup>261</sup> This was approximately in line with Ukraine's plan to expand from 200 demining teams of more than 1,000 personnel in December 2022, to 400 teams

242 Email from Steve Wallis OBE, HALO, 19 March 2025.

243 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, p. 7.

244 Ibid, p. 28.

245 Email from Steve Wallis OBE, HALO, 19 March 2025.

246 Interview with Government of Ukraine, 17 July 2025, online.

247 Email from Niamh McNamara, MAG, 30 April 2025.

248 Interview with Government of Ukraine, in Geneva, 11 April 2025.

249 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, pp. 25 and 28.

250 Email from Steve Wallis OBE, HALO, 19 March 2025.

251 Interview with the GICHD, 10 April 2025.

252 Emails from and Michael Edwards, DCA, 8 April 2025; and Roxana-Cristina Bobolicu, DRC, 5 April 2025.

253 Email from Michael Brown, HALO, 29 May 2024.

254 Emails from Michael Edwards, DCA, Roxana-Cristina Bobolicu, DRC, 5 April 2025; 8 April 2025; Steve Wallis OBE, HALO, 19 March 2025.

255 These numbers were correct as at 17 July 2025. See "List of Operators", Demine Ukraine at: <https://bit.ly/45vLIVT>.

256 "Cabinet of Ministers of Ukraine Order dated 28 June 2024 No. 616-p", section entitled "Analysis of the current state of affairs, trends and justifications for the need to solve the identified problems".

257 "List of Mine Certified Mine Action Operators", ArcGIS Web Application, accessed 23 July 2024, at: <https://bit.ly/3y9J58e>.

258 Email from Paul Heslop, (then) UNDP, 7 June 2024.

259 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

260 Email from Government of Ukraine, 18 July 2025.

261 FAO and WFP Presentation, NDM, 2024.

of 2,000 personnel in 2023<sup>262</sup> – nearly four times the capacity available in 2020.<sup>263</sup> Ukraine expected a further increase in capacity during 2025<sup>264</sup> and intends to set mine action operational capacity in the MoD at around 5,000 personnel. It was approaching this by the end of 2024 (see Table 7). It is not specified what level of this increased capacity will be available for the survey and clearance of CMR. However, Ukraine's plan for capacity growth refers throughout to "mines and explosive remnants of war".<sup>265</sup>

The MoD and several other ministries continue to deploy units that undertake rapid demining and EOD spot task destruction of mines and ERW. This includes the engineering units of the armed forces; SESU; national police EOD units; and the SSTS, which is responsible for demining national infrastructure.<sup>266</sup> The Armed Forces of Ukraine and police EOD teams are reportedly at the forefront of emergency response in disposing of ERW in newly accessible areas.<sup>267</sup>

Table 7: Government unit capacities deployed for CMR survey, clearance, and destruction in 2024<sup>268</sup>

Type of unit	NTS personnel	TS and clearance personnel	Emergency EOD personnel	Total personnel	Mechanical demining assets deployed*
All government demining & EOD units including in the armed forces; SESU; SSTS; and national police EOD units*	572	2,149	1,674	4,395	221**
Totals	572	2,149	1,674	4,395	221**

\* The NMAA states that, due to ongoing conflict, disaggregated information with regard to the composition of the separate demining entities within the Defence and Security Forces of Ukraine, is considered militarily sensitive and hence has not been provided to Mine Action Review.  
\*\* Mechanical demining assets as of 2 May 2025.

The SSTS reports to be the "largest formation in demining in Ukraine" and states that it conducted 54% of all demining in 2024, including 43% of all EOD and 65% of all survey, though it is not clear if this refers to demining in the area within 20km of the front lines of conflict, open only to government units, or to demining activity outside of this restricted area. As at April 2025, SSTS had four demining battalions and one underwater demining company, with 3,000 deminers trained and 250 more in training. For 2025–26, SSTS planned to establish a further underwater demining company and bring its total demining personnel to more than 5,000.<sup>269</sup>

Ukraine continued to build the capacity of its national demining units through international cooperation in 2024. Within the framework of NATO's international Demining Capability Coalition<sup>270</sup> over 1,000 humanitarian deminers of Ukraine's MoD received IMAS EOD1/EOD2 training. Humanitarian demining units of the MoD also received "demining machines, individual EOD kits, pick-up vehicles for EO transportation, mine detectors, armoured vests and

visors".<sup>271</sup> Training of personnel in the Security and Defence Forces in 2024 covered NTS, TS, demining, mine and improvised explosive device (IED) rapid clearance and spot tasks.<sup>272</sup>

Table 8: NGO operational NTS capacities deployed in 2024<sup>273</sup>

Operator	Teams	Total personnel
DCA	6	24
DRC	12	23
FSD	19	57
HALO	70	151
Humanitarian Security	1	3
MAG	12	24
NPA	17	34
Totals	137	316

262 US Department of State, "Demining Ukraine: A Pre-requisite for Recovery: Michael Tirre Remarks before the U.S. Helsinki Commission", 8 December 2022, at: <https://bit.ly/3KFdXZJ>.  
263 APMBC Article 5 deadline Extension Request, 2020.  
264 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.  
265 Answers to additional questions of the APMBC Committee on Article 5 Implementation on Ukraine's deadline extension request, 1 September 2023, p. 2.  
266 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 25 July 2025.  
267 "Ukraine: Strengthening national mine action capabilities", DRC, 9 February 2024.  
268 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.  
269 "Partnerships in Action: How Collaboration and Innovation Drive Impact", Presentation from Mikhailo Konopelniuk, Colonel, Demining, SSTS, at the NDM, Geneva, 9–11 April 2025.  
270 This coalition has 22 member States: Lithuania, Iceland, Belgium, Czech Republic, Croatia, Estonia, Denmark, Finland, France, Germany, Ireland, Greece, Hungary, Italy, Latvia, Poland, Slovak Republic, Spain, Sweden, Moldova, Japan, and Ukraine. The MoD of Ukraine, along with Ministry of National Defense of Lithuania, initiated the Demining Capability Coalition (DMC) in February 2024. CCW Amended Protocol II Article 13 Report (covering 2024), Form E.  
271 CCW Amended Protocol II Article 13 Report (covering 2024), Form E.  
272 Ibid., Form A.  
273 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Stipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.



Multiple international demining organisations operational in Ukraine include APOPO,<sup>274</sup> DCA, DRC, FSD, HALO, MAG, and NPA (see Tables 8 and 9).<sup>275</sup> Humanity & Inclusion (HI), currently active in risk education, planned to begin NTS in August 2025.<sup>276</sup> Humanitarian Security is a national operator based in the Kharkiv region, where it planned to survey 90km<sup>2</sup> of hazardous area by the end of 2025. Humanitarian Security highlights that several new operators, including Falcon Demine LLC, and the Charity Fund Relief Coordinating Centre, also began conducting significant NTS in Kharkiv and the wider Kharkiv region in 2025. It also cites Ukroboronservice (UOS) and International Demining

Group (IDG) as also actively conducting NTS and clearance in Ukraine. Humanitarian Security also highlights that, until early 2024, mainly international operators (along with government units) conducted survey, while the number of national humanitarian operators conducting survey was minimal.<sup>277</sup> While Mine Action Review made every effort to contact both international and national operators, due to the rapidly expanding nature of the mine action programme in 2024, it was not feasible to source and include information on all national operators who may have surveyed and cleared EO in 2024.

**Table 9: NGO operational TS and clearance capacities deployed in 2024\***<sup>278</sup>

Operator	Manual teams	Mechanical teams	MTTs	Total deminers**	Dogs and handlers	Machines***
DCA	5	0	0	45	0	Manual teams and total deminers includes 1 x TS team of 5 deminers.
DRC	0	0	20	180	0	0
FSD	23	6	0	260	0	MV10 x2 MV4 x1 GCS 200 x1 Robocut x4 Rollers x3 Bobcat x1
HALO	75	25	0	430 (380 manual, 50 mechanical)	0	Traxx x 3 T800 Robocut x 30 S300 Robocut x 13 Amtrac x 2 Hitachi 210-LC7 remotely operated excavators x 5
Humanitarian Security	10	N/K	0	40	0	3 x MR31 demining and QC
MAG	13	Mechanical team trained and certified but not operational in 2024.	0	94	0	0
NPA	31	15 mechanical demining personnel trained and certified in Q4 2024 but not operational.	0	167	8	7 ground preparation machines.
<b>Totals</b>	<b>157</b>	<b>31</b>	<b>20</b>	<b>1,216</b>	<b>8</b>	<b>75</b>

\* Information based on data available at time of writing. Full information not available on the capacity of national operators.

\*\* Excluding team leaders, medics, and drivers unless otherwise stated.

\*\*\* Excluding vegetation cutters and sifters.

274 APOPO did not undertake any survey or clearance operations in CMR-affected areas during 2024. Email from Nick Guest, Programme Manager, Ukraine, APOPO, 3 March 2025.

275 Emails from Vanja Sikirica, NPA, 21 April 2024; Michael Edwards, DCA, 3 May 2024; Dino Šujak, ITF Ukraine, 16 May 2024; Jon Cunliffe, MAG, 26 April 2024; Sophie Breinholdt Nielsen, DRC, 10 May 2024; and Michael Brown, HALO, 29 May 2024; and FSD, "Ukraine", accessed 10 April 2024, at: <https://bit.ly/4bIMYPH>.

276 Emails from Fenella Henderson-Howat, Technical Head of Programme, HI, Ukraine, 4 April and 30 July 2025.

277 Email from Maksym Slipchenko, Humanitarian Security, 11 June 2025.

278 Emails from Michael Edwards, DCA, 22 June 2025; Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

HALO and FSD both saw a significant increase in survey and clearance personnel deployed in 2024, compared to 2023.<sup>279</sup> HALO was able to double its number of NTS teams from 35 to 70, and began deploying its own dedicated EOD teams for the first time in 2024.<sup>280</sup> MAG was also able to increase community liaison and demining capacity due to more donor funding.<sup>281</sup> DCA reduced its NTS capacity from seven teams to six in 2024 but increased its TS and clearance capacity. It planned to continue this trend in 2025, while attempting to retain and retrain staff in line with its operational plan to increase focus on TS and clearance.<sup>282</sup> NPA had doubled the number of its manual teams<sup>283</sup> by the end of 2024, compared to the year before. NPA also obtained certification for mechanical assets in April 2024, with 13 deployed by the end of the year, and signed a partnership agreement with WFP. Under this agreement, WFP is providing mechanical assets and support with MDD capacity for demining on agricultural land during 2025. NPA reciprocates by sharing real-time data on cleared areas in Kherson and Mykolaiv regions, to enable targeted livelihood assistance. NPA also began training four additional MDDs in Q4 2024. It expected these to be certified and operational in March–April 2025.<sup>284</sup>

MAG imported two MineWolf 240 machines in April 2024, and gained mechanical certification in November 2024, following capability testing of the machines at the National Research Centre at the request of the national authorities, which caused some delay to certification. A mechanical team was trained and certified but not operational during the year.<sup>285</sup> MAG anticipates EOD accreditation to be completed towards the end of 2025. The process is ongoing but has been affected by the US review of foreign assistance.<sup>286</sup>

Following expansion in 2024, FSD saw a 25% reduction in survey and clearance capacity in early 2025, due to the unexpected cessation of US funding. FSD expected certification and deployment of dogs for TS in June 2025.<sup>287</sup> HALO expected an increase in survey and clearance capacity during 2025, but not to the extent achieved in 2024.<sup>288</sup> NPA expected to increase manual capacity in 2025.<sup>289</sup> MAG expected the number of teams to remain steady in 2025, though this depended on the outcome of the US decision following the stop work order and on other funding proposals in progress as at June 2025.<sup>290</sup> National operator Humanitarian Security planned to add one NTS team, two mechanical teams, and one manual team during 2025. It also planned to dedicate 12 personnel to EOD spot tasks only from April 2025 while increasing mechanical assets, with 11 Ukrainian-produced machines due for delivery in Q1–Q2 2025.<sup>291</sup>

In terms of use of new and developing technologies in 2024, HALO trained NTS and remote sensing (RS) personnel in UAV use and imagery analysis. It equipped teams with a mixture of small, medium, and large UAVs, including some with advanced sensors for use in different contexts. By June 2024, high-resolution UAV survey was being used in planning every suitable clearance task. HALO also introduced the Scorpion, a dual-sensor BAC detector consisting of an active metal detector and a magnetometer. It collects data referenced by differential global positioning system (DGPS) and HALO believes will prove valuable for subsurface clearance.<sup>292</sup>

With the continued flow of equipment donations into Ukraine's mine action programme, one of Ukraine's challenges has been highlighted as a lack of "logistics capacity to support equipment donations and keep them operational".<sup>293</sup>

## LAND RELEASE OUTPUTS AND PROGRESS TOWARDS COMPLETION

### LAND RELEASE OUTPUTS IN 2024

Land release data provided to Mine Action Review by Ukraine's NMAA pertain to release of land contaminated with various types of EO, including CMR, AP and AV mines, and other items of UXO. According to the NMAA, a total of 11.51km<sup>2</sup> of all contamination types was released through survey in Ukraine in 2024, of which 7.01km<sup>2</sup> was cancelled through NTS and 4.5km<sup>2</sup> was reduced through technical survey.<sup>294</sup> In addition, 17.1km<sup>2</sup> was cleared in Ukraine in 2024.<sup>295</sup> The NMAA

reports that 25,893 submunitions were destroyed during TS, clearance, and EOD, together with 14,142 AP mines, 11,119 AV mines, and 164,248 other items of UXO.<sup>296</sup> However, as noted above, the areas released, as reported by the NMAA are of all EO contamination. Therefore, the size of the actual cluster munition contamination (i.e. the contaminated area resulting from cluster munition strikes) addressed, is far smaller.

279 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; and Steve Wallis OBE, HALO, 19 March 2025.

280 Email from Steve Wallis OBE, HALO, 19 March 2025.

281 Email from Niamh McNamara, MAG, 30 April 2025.

282 Email from Michael Edwards, DCA, 8 April 2025.

283 NPA previously used the term "multi-task team" to refer to its teams capable of manual TS, clearance and BAC. However, from 2025, NPA is not using this term and refers instead to "manual teams".

284 Email from Amela Balic, NPA, 12 May 2025.

285 Email from Niamh McNamara, MAG, 30 April 2025.

286 Ibid.

287 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

288 Email from Steve Wallis OBE, HALO, 19 March 2025.

289 Email from Amela Balic, NPA, 12 May 2025.

290 Email from Niamh McNamara, MAG, 11 June 2025.

291 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

292 Email from Steve Wallis OBE, HALO, 19 March 2025.

293 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, p. 25.

294 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

295 Ibid.

296 Ibid. Disaggregated information regarding submunitions destroyed and TS and clearance, and those destroyed in EOD spot tasks, was requested but not provided.

Official IMSMA data provided in July 2025 states that 11km<sup>2</sup> of cluster munition-contaminated area was cleared in 2024,<sup>297</sup> which is the CMR clearance total Mine Action Review has used. While the 11km<sup>2</sup> was clearance of SHAs/CHAs suspected or confirmed to contain CMR, not all these areas were ultimately found to contain CMR during clearance.

Of 2,389 hazardous areas surveyed, 817 were found to contain CMR.<sup>298</sup> This represents 34% of all hazardous areas surveyed. Some 125.06km<sup>2</sup> of CMR-contaminated area was recorded across 817 hazardous areas: 29.31km<sup>2</sup> in 195 SHAs and 95.75km<sup>2</sup> in 622 CHAs<sup>299</sup> (see Table 16).

**Table 10: Land release outputs for all EO-contaminated areas in 2024 (National authority data)<sup>300</sup>**

Release of cluster munition-contaminated area	Release in 2024 (km <sup>2</sup> )	Comments
Clearance	11	Official IMSMA data provided on clearance of SHAs/CHAs suspected or confirmed to contain CMRs. Not all these areas were ultimately found to contain CMRs.
Technical Survey	4.5	Includes reduction of all EO-contaminated area.
Non-Technical Survey	7.01	Includes cancellation of all EO-contaminated area.
Destruction of submunitions during clearance, survey, and spot tasks	2024	
Submunitions destroyed	25,893 (Includes CMR destroyed during spot tasks)	Data provided by the NMAA combined the number of submunitions destroyed during clearance with those destroyed in spot tasks. Operators that provided data to Mine Action Review reported destroying 65 submunitions during spot tasks (DCA 6, NPA 48, and Humanitarian Security 11). <sup>301</sup>

International humanitarian operators released 267,257m<sup>2</sup> through survey, of which 121,143m<sup>2</sup> was cancelled by NPA and the remaining 146,014m<sup>2</sup> was reduced by DCA and HALO.<sup>302</sup> Several national operators also released areas through survey in 2024.<sup>303</sup> Mine Action Review made written inquiries to many national operators but was not able to source information from all of these.

International demining operators cleared 1.9km<sup>2</sup>, destroying 91 submunitions.<sup>304</sup> A further 54 submunitions were destroyed in EOD spot tasks by international operators.<sup>305</sup> Humanitarian Security reported clearing a further 2.56km<sup>2</sup>, destroying 175 submunitions. It destroyed a further 11 submunitions during EOD spot tasks in 2024.<sup>306</sup> These figures bring the total number of submunitions destroyed by humanitarian operators who reported data to Mine Action Review to 331 during TS, clearance, and spot tasks.

## SURVEY IN 2024

According to the NMAA, a total of 11.51km<sup>2</sup> across 379 hazardous areas contaminated with EO, including CMR, other items of UXO, and AP and AV mines was released through survey by all operators in 2024. Of the total, 7.01km<sup>2</sup> across 300 SHAs was cancelled through NTS and 4.5km<sup>2</sup> across 79 areas was reduced through TS (see Tables 11 and 13).<sup>307</sup>

International operators released 267,257m<sup>2</sup> across seven hazardous areas through survey in 2024 (see Tables 12 and 14).<sup>308</sup> As previously noted, cancellation by NGOs is possible, but only under specific instructions from the MAC. Several national operators cancelled areas in 2024,<sup>309</sup> although Mine Action Review was not able to source information from all of these.<sup>310</sup> NPA was the only international operator to report to

297 Email from Government of Ukraine, 18 July 2025.

298 Ibid.

299 Email from Government of Ukraine, 18 July 2025.

300 Emails from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025; and Government of Ukraine, 18 July 2025.

301 Emails from Michael Edwards, DCA, 8 April 2025; Amela Balic, NPA, 12 May 2025; and Maksym Slipchenko, Humanitarian Security, 21 March 2025.

302 Emails from Michael Edwards, DCA, 8 April and 22 June 2025; Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, NPA, 12 May 2025.

303 Email from Government of Ukraine, 18 July 2025.

304 Items found by DCA, DRC, FSD, MAG, and NPA were transferred to SESU for disposal. Emails from Michael Edwards, DCA, 22 June 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Niamh McNamara, MAG, 30 April 2025; and Vanja Sikirica, NPA, 6 June 2025.

305 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Zhanna Hulia, GIS Assistant, FSD Ukraine, 19 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

306 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

307 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

308 Emails from Michael Edwards, DCA, 8 April 2025; Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, Programme Manager, NPA, 12 May 2025.

309 Email from Government of Ukraine, 18 July 2025.

310 National operator, Humanitarian Security, reported cancelling 12.98km<sup>2</sup> across 24 hazardous areas. Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025. However, the Government of Ukraine reported to Mine Action Review that this operator had not cancelled any area according to the IMSMA database and explained that it is possible that the areas were not designated SHAs that were cancelled but areas that required survey to be freed from suspicion of possible contamination. Interview with Government of Ukraine, 17 July 2025; and email, 18 July 2025.

Mine Action Review that it released any area through NTS, cancelling one SHA with an area of 121,143m<sup>2</sup> (see Table 12). The remaining 146,014m<sup>2</sup> released by survey by international operators was reduced through TS: 117,835m<sup>2</sup> by DCA and 28,179m<sup>2</sup> by HALO (see Table 14).<sup>311</sup> National operator Humanitarian Security also reduced 173,845m<sup>2</sup> through TS in one hazardous area (see Table 14).<sup>312</sup> Mine Action Review was not able to source data from other national operators that reduced areas in 2024.

By comparison in 2023, just one international operator, HALO, reduced 1,414m<sup>2</sup> through TS,<sup>313</sup> the first time in five years where there had been reduction of CMR hazardous areas in Ukraine. HALO's reduction of cluster munition-contaminated area in 2024 was an almost twenty-fold increase on that achieved in 2023. This was due to increased capacity and more use of machines.<sup>314</sup> No international operators released any cluster munition-contaminated area through NTS in 2023, then the fifth year in a row without cancellation.<sup>315</sup> No information was available on release of cluster munition-contaminated area by Ukrainian national bodies through survey in 2023. Ukraine reported only on survey of contamination broadly since the beginning of Russia's full-scale invasion in February 2022, with data not disaggregated by weapon type or by type of hazardous area (i.e. SHA or CHA), and not provided for survey undertaken in 2023 specifically.<sup>316</sup>

According to official IMSMA data, during 2024, of 2,389 hazardous areas surveyed, 817 were found to present a CMR hazard.<sup>317</sup> This represents 34% of hazardous areas

surveyed. Some 125.06km<sup>2</sup> of CMR-contaminated area was recorded across 817 hazardous areas: 29.31km<sup>2</sup> in 195 SHAs and 95.75km<sup>2</sup> in 622 CHAs<sup>318</sup> (see Table 16). International humanitarian operators recorded 69.8km<sup>2</sup> of previously unrecorded CMR contamination in 2024, with 10.6km<sup>2</sup> in 69 SHAs and 59.16km<sup>2</sup> in 374 CHAs.<sup>319</sup> In addition, national operator Humanitarian Security identified almost as much again; 66.86km<sup>2</sup> (see Table 17).<sup>320</sup> It explains that, in the Balakliya-Barvinkove area of Kharkiv where its 2024 survey operations were focused, the front line had remained motionless for almost six months in 2022, with both sides to the conflict using mainly multiple launch rocket systems (MLRS) against each other. This resulted in the primary contamination in the area being from unexploded submunitions, hence the operator recorded significant new areas of contamination from CMR in the national database<sup>321</sup> (see Table 16). These figures bring the total of previously unrecorded CMR contamination identified by humanitarian operators (national and international) to 136.67km<sup>2</sup> according to data supplied to Mine Action Review by operators, who state that all these areas were entered into the national database.<sup>322</sup> NPA highlights that in 48 of the 102 CHAs newly recorded by NPA (see Table 16), the primary contamination was from mines, though the areas also contained CMR. The remaining 54 CHAs are battle areas containing direct or indirect evidence of CMR contamination.<sup>323</sup> The 69.8km<sup>2</sup> of new contamination added by international operators is an increase on the 51.2km<sup>2</sup> added to the national database by international operators in 2023.<sup>324</sup>

Table 11: Cancellation through NTS of all EO-contaminated area in 2024 (National authority data)\*<sup>325</sup>

Operators	SHAs cancelled	Area cancelled (km <sup>2</sup> )
All government units, and national and international demining operators.	300	7.01
Totals	300	7.01

\* Information on cancellation through NTS, disaggregated by weapon type, was requested but not provided.

311 Emails from Michael Edwards, DCA, 8 April and 22 June 2025; and Steve Wallis OBE, HALO, 19 March 2025.

312 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

313 Email from Michael Brown, HALO, 29 May 2024.

314 Email from Steve Wallis OBE, HALO, 19 March 2025.

315 Emails from Roxana-Cristina Bobolicu, DRC, 1 April 2023; Nick Guest, MAG, 23 March 2023; Alberto Rinaldo Serra, NPA, 15 March 2023; Tony Connell, FSD, 24 March 2023 and 24 March 2021; Almedina Musić, DRC, 7 February 2022 and 20 April 2021; Imogen Churchill, HALO, 23 March 2022; Ronan Shenhav, HALO, 20 April 2021; Michael Edwards, DCA, 3 May 2024; Sophie Breinholdt Nielsen, DRC, 10 May 2024; Vanja Sikirica, NPA, 21 April 2024; Jon Cunliffe, MAG, 26 April 2024; and Michael Brown, HALO, 29 May 2024.

316 CCW Amended Protocol II Article 13 Report (covering 2023), Forms B and E. Form B stated that 331,638 hectares had been surveyed "since the beginning of the large-scale military invasion of the Russian federation on the territory of Ukraine". Form E stated that, since 24 February 2022: "non-governmental organizations have conducted non-technical survey of 2,250 areas with a total area of 29,674 hectares and technical survey of 182 areas with a total area of 2555 hectares, cleared 234 hectares of territories, identified 7,103 items of unexploded ordnance, during NTS of 18,000km<sup>2</sup> indicated as out of suspicion.

317 Email from Government of Ukraine, 18 July 2025.

318 Ibid.

319 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

320 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

321 Emails from Maksym Slipchenko, Humanitarian Security LLC, 21 March and 11 June 2025.

322 Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

323 Email from Amela Balic, NPA, 12 May 2025.

324 Emails from Vanja Sikirica, NPA, 21 April 2024 and Amela Balic NPA, 5 June 2024; Sophie Breinholdt Nielsen, DRC, 10 and 29 May 2024; Michael Edwards, DCA, 3 May and 10 June 2024; Michael Brown, HALO, 29 May and 6 June 2024; and Tony Connell, FSD, 25 June 2024.

325 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

Table 12: Cancellation of battle areas, including with CMR in 2024 (international operator data)<sup>326</sup>

Operator	Oblast	District	Sub-district	Cancellation of areas suspected to contain CMR	Area cancelled through NTS (m²)
NPA	Mykolaiv	Shevchenkivska	Liubomyrivka	1*	121,243*
<b>Totals</b>				<b>1*</b>	<b>121,243*</b>

\* The MAC accepted cancellation as the farmer had ploughed the area and the initial evidence of CMR was indirect.

Table 13: Release of EO-contaminated area through TS in 2024 (National authority data)<sup>327</sup>

Operators	Areas reduced	Area reduced (m²)
All government units, and national and international humanitarian operators.	79	4,499,971
<b>Totals</b>	<b>79</b>	<b>4,499,971</b>

\* Information on reduction through TS, disaggregated by weapon type, was requested but not provided.

Table 14: Reduction of cluster munition-contaminated area through TS in 2024 (operator data)<sup>328</sup>

Operator	Oblast	District, sub-district, locality	Areas reduced	Area reduced (m²)
DCA	Mykolaiv	Mishkovo-Pohorilivska Mishkovo-Pohorilove	1	117,835
<b>Sub-totals</b>			<b>1</b>	<b>117,835</b>
HALO	Chernihiv	Chernihivskiy, Ivanivska, Budy	1	14,230
HALO	Kyiv	Brovarskiy, Kalytianska, Kalyta	2	12,009
HALO	Kharkiv	Chuhuivskiy, Novopokrovska, Svitanok	1	1,139
HALO	Chernihiv	Chernihivskiy, Kulykivska, Hrabivka	1	801
<b>Sub-totals</b>			<b>5</b>	<b>28,179</b>
Humanitarian Security	Kharkiv	Izyum, Balakliya	1	173,845
<b>Sub-totals</b>			<b>1</b>	<b>173,845</b>
<b>Totals</b>			<b>7</b>	<b>319,859</b>

Table 15: Areas contaminated with CMR, newly recorded in 2024 (official IMSMA data)<sup>329</sup>

Oblast	Hazardous areas (CHAs and SHAs)	Size of hazardous areas (km²)	SHAs	Size of SHAs (km²)	CHAs	Size of CHAs (km²)
Dnipropetrovsk	0	0	0	0	0	0
Donetsk	45	4.78	0	0	45	4.78
Kyiv	44	10.33	15	2.65	29	7.68
Zhytomyr	0	0	0	0	0	0
Mykolayiv	221	31.94	44	5.03	177	26.91
Sumy	8	0.36	1	0*	7	0.36
Kharkiv	369	62.84	114	19.52	255	43.32

326 Emails from Vanja Sikirica, NPA, 6 June 2025; and Amela Balic, NPA, 12 May and 29 July 2025. Data from IMSMA provided to Mine Action Review by the Government of Ukraine on 18 July states that, in 2024, NPA cancelled 2,568,391m² and HALO cancelled 40,233m² (whereas HALO informed Mine Action Review that it did not release any land by cancellation). As at the time of writing Mine Action Review had not yet been able to resolve this data discrepancy regarding any cancellation by HALO. However, NPA clarified that the size of areas reported to Mine Action Review by the Government as cancelled by NPA, refers to the total of all areas cancelled (i.e. including areas with other types of contamination), whereas the area cancelled by NPA with previous evidence of CMR contamination was 121,243m², as per Table 12. On the matter of ploughed land, CEOBS reports that SESU has a standard stipulating that land may be considered safe from explosive hazards if it has been tilled at least three times. "Assessing environmental degradation from explosive weapons in southern Ukraine", CEOBS and NPA, 16 January 2025, p. 18.

327 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

328 Emails from Michael Edwards, DCA, 8 April and 22 June 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025.

329 Email from Government of Ukraine, 18 July 2025.

Table 15 continued

Oblast	Hazardous areas (CHAs and SHAs)	Size of hazardous areas (km <sup>2</sup> )	SHAs	Size of SHAs (km <sup>2</sup> )	CHAs	Size of CHAs (km <sup>2</sup> )
Kherson	119	14.47	20	2.10	99	12.37
Chernihiv	11	0.34	1	0.01	10	0.33
<b>Totals:</b>	<b>817</b>	<b>125.06</b>	<b>195</b>	<b>29.31</b>	<b>622</b>	<b>95.75</b>

\* This is data as provided. Size of this SHA likely rounded to zero due to small size.

Table 16: Cluster munition-contaminated area newly recorded in 2024 (operator data)<sup>330</sup>

Operator	Oblast	District/ Sub-district/locality	SHAs	Area (m <sup>2</sup> )	CHAs	Area (m <sup>2</sup> )
DCA	Mykolaiv	Mishkovo-Pohorilivska	0	0	3	34,351
DCA	Mykolaiv	Mykolaivska	2	31,301	10	502,701
DCA	Mykolaiv	Tiahynska	0	0	1	5,929
DCA	Mykolaiv	Voskresenska	1	381,065	2	260,651
<b>Sub-totals</b>			<b>3</b>	<b>412,366</b>	<b>16</b>	<b>803,632</b>
DRC	Mykolaiv	Bashtanskyi	1	193,582	6	1,221,498
DRC	Kharkiv	Kharkivskyi	1	201,032	21	1,575,337
DRC	Kherson	Khersonskyi	0	0	3	109,892
DRC	Mykolaiv	Mykolaivskyi	2	162,531	6	891,624
DRC	Kyiv	Vyshhorodsky	0	0	1	6,315
<b>Sub-totals</b>			<b>4</b>	<b>557,145</b>	<b>37</b>	<b>3,804,666</b>
FSD	Chernihiv		1	12,423	8	302,988
FSD	Donetsk		0	0	22	2,094,698
FSD	Sumy		1	3,012	0	0
FSD	Kharkiv		52	8,845,998	171	32,926,860
<b>Sub-totals</b>			<b>54</b>	<b>8,861,433</b>	<b>201</b>	<b>35,324,546</b>
HALO	Chernihiv	Chernihivskyi, Tupyhivska, Burivka	0	0	1	18,600
HALO	Donetsk	Kramatorskyi, Novodonetska, Spasko-Mykhailivka	0	0	4	217,115
HALO	Donetsk	Kramatorskyi, Oleksandrivska, Oleksandrivka	0	0	1	10,775
HALO	Kharkiv	Iziumskyi, Balakliiska, Bairak	0	0	1	36,887
HALO	Kherson	Beryslavskyi, Velykooleksandrivska, Davydiv Brid	0	0	1	39,626
HALO	Kherson	Beryslavskyi, Velykooleksandrivska, Ishchenka	0	0	1	53,107
HALO	Kherson	Beryslavskyi, Velykooleksandrivska, Karierne	0	0	2	187,728
HALO	Mykolaiv	Bashtanskyi, Bashtanska, Chervonyi Stav	0	0	1	10,703
HALO	Mykolaiv	Bashtanskyi, Bashtanska, Yavkyne	0	0	1	11,099
HALO	Mykolaiv	Bashtanskyi, Snihurivska, Snihurivka	0	0	1	16,690
HALO	Mykolaiv	Bashtanskyi, Snihurivska, Vasylyky	0	0	2	72,968

<sup>330</sup> Emails from Michael Edwards, DCA, 8 April 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.



Table 16 continued

Operator	Oblast	District/ Sub-district/locality	SHAs	Area (m <sup>2</sup> )	CHAs	Area (m <sup>2</sup> )
HALO	Mykolaiv	Bashtanskyi, Snihurivska, Yasna Poliana	0	0	1	9,344
Sub-totals			0	0	17	684,642
Humanitarian Security	Kharkiv	Izyum, Balakliya	1	800	72	22,976,567
Humanitarian Security	Kharkiv	Izyum, Barvinkove	0	0	127	43,843,808
Humanitarian Security	Kharkiv	Izyum, Savynska	3	26,983	0	0
Humanitarian Security	Kharkiv	Izyum, Donetske	1	15,615	0	0
Sub-totals			5	43,398	199	66,820,375
MAG	Kherson	Chornobaivska, Posad-Pokrovske	0	0	1	3,451
Sub-totals			0	0	1	3,451
NPA	Kherson	Beryslavskyi, Bopozenska, Borozenske	0	0	1	89,925
NPA	Kherson	Beryslavskyi, Bopozenska, Charivne	2	20,379	3	251,213
NPA	Kherson	Beryslavskyi, Bopozenska, Piatykhvatky	2	610,582	9	1,318,785
NPA	Kherson	Beryslavskyi, Vysokopilska, Arkhanhelske	1	21,762	7	1,002,720
NPA	Kherson	Beryslavskyi, Vysokopilska, Blakytne	0	0	1	209,141
NPA	Kherson	Beryslavskyi, Vysokopilska, Kostyrka	1	106,892	0	0
NPA	Kherson	Beryslavskyi, Vysokopilska, Novopetrivka	0	0	4	1,285,782
NPA	Kherson	Beryslavskyi, Vysokopilska, Novovoznesenske	0	0	3	772,654
NPA	Kherson	Beryslavskyi, Vysokopilska, Veremiivka	2	59,429	3	898,516
NPA	Mykolaiv	Mykolaivskyi, Halytsynivska, Prybuzke,	0	0	1	149,889
NPA	Mykolaiv	Mykolaivskyi Halytsynivska, Stepova Dolyna	0	0	3	390,942
NPA	Mykolaiv	Mykolaivskyi Pervomaiska, Blahodatne	0	0	6	1,460,096
NPA	Mykolaiv	Mykolaivskyi Pervomaiska, Kyselivka	0	0	3	236,220
NPA	Mykolaiv	Mykolaivskyi Pervomaiska, Maksymivka	0	0	9	1,715,423
NPA	Mykolaiv	Mykolaivskyi Pervomaiska, Partyzanske	0	0	6	2,130,700
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Bohorodytske	0	0	2	50,534
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Liubomyrivka	0	0	3	854,536
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Myrne	0	0	13	2,843,469
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Novohryhorivka	0	0	13	1,738,048
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Ternovi Pody	0	0	11	700,025
NPA	Mykolaiv	Mykolaivskyi Shevchenkivska, Vavylove	0	0	1	439,749
Sub-totals			8	819,044	102	18,538,367
Totals			74	10,693,386	573	125,979,679

CLEARANCE IN 2024

According to the NMAA, a total of 17.1km<sup>2</sup> of land contaminated with EO, including CMR, other items of UXO, and AP mines was cleared by all operators in Ukraine in 2024.<sup>331</sup> The NMAA also reports that 25,893 submunitions were destroyed during TS, clearance, and spot tasks,<sup>332</sup> along with 14,142 AP mines, 11,119 AV mines, and 164,248 other items of UXO (see Table 17). The NMAA explains that CMR clearance was typically conducted in combination with clearance of other types of EO, including AP mines.<sup>333</sup> Ukraine saw a twelve-fold increase in clearance of EO in 2024 compared to 2023, which was made possible thanks to an unprecedented increase in the number of demining teams and certified mine action operators, as well as “massive use of demining machines and surface scanning UAVs”.<sup>334</sup> However, as noted above, the areas released, as reported by the NMAA are of all EO contamination. Therefore, the size of the actual cluster munition contamination (i.e. the contaminated area resulting from cluster munition strikes) addressed, is almost certainly far smaller. According to official IMSMA data, 11km<sup>2</sup> of CMR-contaminated area was cleared in 2024,<sup>335</sup> which is the total Mine Action Review has used for annual reporting. While the 11km<sup>2</sup> was clearance of SHAs/CHAs suspected or confirmed to contain CMR, not all these areas were ultimately found to contain CMR during clearance.

International operators cleared 1.9km<sup>2</sup>, destroying 91 submunitions,<sup>336</sup> 127 AP mines, and 38 other items of UXO (see Table 18). A further 54 submunitions were destroyed in EOD spot tasks by international humanitarian operators (see Table 19).<sup>337</sup> Humanitarian Security reported to have cleared a further 2.56km<sup>2</sup>, destroying 175 submunitions, along with 17 AP mines and 418 other items of UXO (see Table 18). Humanitarian Security also destroyed 11 submunitions during spot tasks in 2024 (see Table 19).<sup>338</sup> These figures bring the total number of submunitions destroyed by humanitarian operators during TS, clearance, and EOD spot tasks to 331.

By comparison, HALO was the only international operator to release any cluster munition-contaminated area through clearance in 2023, releasing one area measuring 87,066m<sup>2</sup>. Two submunitions were identified and marked by HALO for disposal by the national authorities, as HALO did not have EOD teams at that time.<sup>339</sup> HALO saw almost a six-fold increase in clearance of CMR in 2024 compared to 2023, due to increased capacity and greater use of mechanical methods.<sup>340</sup>

Table 17: Clearance of EO-contaminated area in 2024 (National authority data)<sup>341</sup>

Operators	CMR areas cleared	Area cleared (m <sup>2</sup> )	Submunitions destroyed	Other UXO destroyed	AP mines destroyed	AV mines destroyed
All government units, and national and international operators	302	17,095,009	25,893	164,248	14,142	11,119
Totals	302	17,095,009	25,893	164,248	14,142	11,119

Table 18: CMR clearance in 2024 (operator data)<sup>342</sup>

International operator	Oblast	District, sub-district, locality	Areas cleared	Area cleared (m <sup>2</sup> )	Submunitions destroyed	Other UXO destroyed	AP mines destroyed
DCA	Mykolaiv	Mishkovo-Pohorilivska	2	297,487	21*	2*	0
Sub-totals			2	297,487	21*	2*	0
DRC	Mykolaiv	Not stated	1	40,634	23*	0	0
DRC	Kharkiv	Not stated	1	14,794	0	1*	0
DRC	Mykolaiv	Not stated	0	101,082	1*	2*	0
DRC	Kharkiv	Not stated	0	14,232	0	0	0
Sub-totals			2	170,742	24*	3*	0

331 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

332 Disaggregated information regarding submunitions destroyed in TS and clearance and those destroyed in EOD spot tasks were requested but not provided.

333 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

334 Ibid.

335 Email from Government of Ukraine, 18 July 2025.

336 Items found by DCA, DRC, FSD, MAG, and NPA were transferred to SESU for disposal. Emails from Michael Edwards, DCA, 22 June 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025; Niamh McNamara, MAG, 30 April 2025; and Vanja Sikirica, NPA, 6 June 2025.

337 Emails from Michael Edwards, DCA, 8 April and 22 June 2025; Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025, Zhanna Hulia, Geographic Information Systems (GIS) Assistant, FSD, 19 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

338 Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025.

339 Emails from Michael Brown, HALO, 29 May and 6 June 2024.

340 Email from Steve Wallis OBE, HALO, 19 March 2025.

341 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

342 Emails from Michael Edwards, DCA, 8 April and 22 June 2025; Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025; Eleanor Porritt, FSD Ukraine, 17 March 2025, Zhanna Hulia, FSD, 19 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; Niamh McNamara, MAG, 30 April 2025; Vanja Sikirica, NPA, 6 June 2025; and Amela Balic, NPA, 12 May 2025.

Table 18 continued

International operator	Oblast	District, sub-district, locality	Areas cleared	Area cleared (m <sup>2</sup> )	Submunitions destroyed	Other UXO destroyed	AP mines destroyed
FSD	Kharkiv	Iziumskyi, Donetsk, Pryshyb	1	10,081	0***	0	1*
FSD	Kharkiv	Iziumskyi, Iziumska, Fedorivka	2	181,815	0***	0	0
FSD	Kharkiv	Iziumskyi, Iziumska, Kamianka	2	13,027	0***	0	0
FSD	Kharkiv	Iziumskyi, Barvinkivska, Ridne	2	93,415	11*	0	0
FSD	Chernihiv	Chernihivskyi, Ivanivska, Lukashivka	1	30,690	3*	0	0
FSD	Chernihiv	Chernihivskyi, Ivanivska/Yahidne	4	221,841	0***	0	3*
FSD	Donetsk	Kramatorskyi, Lymanska, Lozove	1	77,403	0***	0	0
FSD	Donetsk	Kramatorskyi, Lymanska, Oleksandrivka	1	11,316	0***	0	0
FSD	Kharkiv	Iziumskyi, Oskilska, Yaremivka, Dovhenke	2	2,729	20*	0	0
FSD	Kharkiv	Iziumskyi, Oskilska, Topolske	3	3,588	0***	0	123*
Sub-totals			19	645,905	34*	0	127*
HALO	Chernihiv	Chernihivskyi, Ivanivska, Budy	1	121,034	1	10	
HALO	Chernihiv	Chernihivskyi, Kulykivska, Hrabivka	1	2,355	1	0	0
HALO	Kharkiv	Chuhuivskyi, Novopokrovska, Svitanok	1	92,097	1	0	0
HALO	Kyiv	Brovarskyi, Kalytianska, Kalyta	2	86,462	4	0	0
HALO	Mykolaiv	Bashtanskyi, Snihurivska, Snihurivka	1	202,420	1	14	0
Sub-totals			6	504,368	8	24	0
Humanitarian Security	Kharkiv	Izyum, Barvinkove	8	1,711,610	157	345	12
Humanitarian Security	Kharkiv	Izyum, Balakliya	2	851,363	18	73	5
Sub-totals			10	2,562,973	175	418	17
MAG	Mykolaiv	Mykolaivski, Halytsynivska, Halytsynove	0	46,170	2*	4*	0
MAG	Mykolaiv	Mykolaivski, Halytsynivska, Halytsynove	0	121,679	1*	5*	0
Sub-totals			0	167,849	3*	9*	0
NPA	Mykolaiv	Mykolaivskyi, Shevchenkivska, Novohryhorivka	1**	106,513**	1*	0	0
Sub-totals			1**	106,513**	1*	0	0
Totals			40	4,455,837	266	456	144

\* Items found by operator but transferred to authorised government operators for disposal.

\*\* Mine clearance of 106,513m<sup>2</sup> during which one submunition was found and destroyed.

\*\*\* Tasks not completed as at end of 2024.

**Table 19: Submunitions destroyed in EOD spot tasks in 2024 (operator data)**<sup>343</sup>

International operator	Oblast	District, sub-district, locality	Submunitions destroyed
DCA	Mykolaiv	Mishkovo-Pohorilivska	1
DCA	Mykolaiv	Voskresenska	1
DCA	Mykolaiv	Mykolaivska	2
DCA	Mykolaiv	Radsadivska	2
Sub-total			6
Humanitarian Security	Kharkiv	Kharkivska, Izyum, Barvinkove	7
Humanitarian Security	Kharkiv	Kharkivska, Izyum, Balakliya	4
Sub-total			11
NPA	Mykolaiv	Not specified	41
NPA	Kherson	Not specified	7
Sub-total			48
Total			65

**PROGRESS TOWARDS COMPLETION**

No target date has been set for completion of CMR clearance in Ukraine, nor is it realistic to expect one for the foreseeable future given the ongoing hostilities. The present phase of conflict, ongoing since February 2022, has certainly resulted in heavy new contamination, with both sides using cluster munitions. Any estimate of a date of completion remains speculation until Ukraine is in a position to conduct a national survey to assess the scale and nature of its contamination.

Both Ukraine and Russia have obligations under international human rights law to clear CMR as soon as possible, in particular by virtue of their duties to protect the right to life of every person under their jurisdiction or effective control. The reported increase in clearance and TS of CMR-affected areas in 2024 and 2023, compared to previous years, reflects the rapid upscaling of capacity needed to address the heavy extent of contamination in Ukraine resulting from the war with Russia (see Table 20). Land release efforts have of course been hugely impeded by the Russian aggression. In addressing the significant contamination that it now faces, Ukraine will need to ensure that all operators are applying evidence based survey and efficient land release methodologies to identify and release contaminated land. It is therefore a welcome development that cluster munition-contaminated area was released through NTS and TS in 2024, with no release having taken place through survey in earlier years. That said, large-scale cancellation of CMR-affected areas will not be possible while the currently restrictive instructions relating to cancellation remain in place.

Against the incredibly challenging circumstances of war, Ukraine has been able to continue to scale up operational capacity and technological innovation considerably and further improve national ownership and programme management. Key steps taken in 2024, including the launch of the National Mine Action Strategy and implementation plan and the adoption of several critical NMAS, including standards for land release, will help ensure Ukraine can make progress towards completion when circumstances allow.

**Table 20: Five-year summary of CMR clearance**

Year	Area released (km <sup>2</sup> )
2024	11.00 (official IMSMA data)
2023	*9.00 (official IMSMA data provided in 2025)
2022	**0.02 (official IMSMA data provided in 2025)
2021	0.57 (NGO data)
2020	0.02 (NGO data)
Total	20.61

\* Official IMSMA data for 2023, provided in 2025. Previously reported as 0.09km<sup>2</sup> in last year's *Clearing Cluster Munition Remnants* report on Ukraine, based on operator data only. \*\* Official IMSMA data for 2022, provided in 2025. Previously reported as 0.33km<sup>2</sup> in last year's *Clearing Cluster Munition Remnants* report on Ukraine, based on operator data only.

343 Emails from Michael Edwards, DCA, 8 April 2025; Amela Balic, NPA, 12 May 2025; and Maksym Slipchenko, Humanitarian Security, 21 March 2025.