

KEY DATA

APMBC ARTICLE 5 DEADLINE: 1 DECEMBER 2023

Not on track to meet deadline and in serious violation of the Convention for acquisition and use of anti-personnel mines

AP MINE CONTAMINATION:

Massive but no reliable estimate

LAND RELEASE OUTPUTS

Release of AP mined area	Release in 2024 (km ²)	Release in 2023 (km ²)
Clearance (Clearance of areas suspected or confirmed to contain AP mines; official IMSMA data for humanitarian clearance operators, excluding clearance by State entities such as MoD and SESU)	2.07	0.33 (Official IMSMA data for 2023, provided in 2025. Previously reported as 0.52 based only on NGO clearance data)
Technical Survey (Reduction of areas suspected or confirmed to contain AP mines; official IMSMA data for humanitarian clearance operators, excluding technical survey by State entities such as MoD and SESU)	2.07	0.02 (Official IMSMA data for 2023, provided in 2025. Previously reported as 0.003 based only on NGO TS data)
Non-Technical Survey	0 (Official IMSMA data)	0 (NGO data)
Destruction of AP mines during clearance, survey, and spot tasks	2024	2023
AP Mines destroyed by all entities, including both humanitarian and military-related demining (National authority data). Includes 457 AP mines destroyed by humanitarian clearance operators according to official IMSMA data, of which 207 were destroyed in spot tasks by non-State operators	14,142	127 (NGO data)

MAIN AP MINE SURVEY AND CLEARANCE OPERATORS IN 2024:

Security and Defence Forces of Ukraine include:

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

National humanitarian operators include:

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

International NGOs:

- APOPO
- 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

On 29 June 2025, Ukraine's President, Volodymyr Zelenskyy, announced that he had signed a decree calling for support for a proposal from Ukraine's Ministry of Foreign Affairs (MFA) for Ukraine to withdraw from the Anti-Personnel Mine Ban Convention (APMBC). The following day, Ukraine's National Security and Defence Council (NSDC) shared a statement from the MFA on Ukraine's decision to withdraw from the Convention. If Ukraine formally submits a withdrawal to United Nations, Article 20 stipulates that it will not take effect until the end of any armed conflict in which the withdrawing State is engaged upon the expiry of the six-month period. Subsequently, on 21 July 2025, the Secretary-General of the United Nations, acting in his capacity as depositary, communicated the following: "In accordance with the provisions of the Vienna Convention on the Law of Treaties of 1969, Ukraine has decided, as of July 17, 2025, to suspend the operation of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction of September 18, 1997, signed on behalf of Ukraine on February 24, 1999 in New York." The communication states that: "The above action was effected on 18 July 2025".¹

This statement is without legal effect as it is not possible to suspend operation of the APMBC. The possibility of armed conflict involving a State Party in which it might use anti-personnel (AP) mines was specifically foreseen by the drafters of the APMBC and therefore it is not a fundamental change of circumstances that might allow suspension under the Vienna Convention on the Law of Treaties (VCLT). Ukraine should rescind its unlawful suspension of its implementation of the APMBC without delay.

Extensive use of AP mines by Russian forces continued in 2024. Ukraine has also made considerable use of AP mines, making it responsible for the most serious violation of the prohibition on use by a State Party to the APMBC in the treaty's history. The United States announced two transfers of self-destructing AP mines to Ukraine in November and December 2024. Ukraine's acquisition of these AP mines is another serious violation of the APMBC.

In February 2025, the Committee on Cooperative Compliance welcomed the cooperative dialogue sustained with Ukraine and the information provided by Ukraine on its efforts to carry out investigations² related to criminal offences between 24 February 2022 and 31 May 2024 concerning "the use of anti-personnel mines by unidentified military personnel of individual military formations in the territory of the city of Izyum, Kharkiv region, and surrounding areas." As at June 2025, the pre-trial investigation in these criminal proceedings was ongoing.³

Clearance and technical survey (TS) in 2024 increased significantly, due to expanded capacity. 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)".⁴ While disaggregated data are collected and submitted to the Information System for Mine Action (IMSMA) and were reported to Mine Action Review in 2025, when presenting information on contamination internationally, Ukraine generally states the extent of its explosive ordnance (EO) challenge without disaggregation by weapon type, as the majority of hazardous areas present a mixed EO 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 AP mines, 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, full compliance with the APMBC by every State Party is an international legal obligation.
- Ukraine should rescind its unlawful suspension of its implementation of the APMBC without delay.

1 UN, "Ukraine: Communication, Reference: C.N.385.2025.TREATIES-XXVI.5 (Depositary Notification)", 21 July 2025, available at: <https://bit.ly/4tBjLeb>.
2 APMBC Fifth Review Conference, Final Document, 5 February 2025, at: <https://bit.ly/4epFfIJ>, para. 21.
3 Statement of Ukraine on cooperative compliance, Intersessional Meetings, Geneva, 17–20 June 2025.
4 Email from Colonel Ruslan Berehulia, Head, National Mine Action Authority (NMAA) Secretariat, Ministry of Defence (MoD), 9 May 2025.

- Russia and Ukraine should immediately halt all use of AP mines.
- Ukraine should ensure its forces cease use of AP mines and prosecute past offenders in accordance with its domestic law.
- Ukraine should also refrain from further acquisition of any AP mines by any method or source. Importation or other means of acquisition is also a serious violation of the APMBC.
- 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 AP mines (or cluster munition remnants, 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.

ASSESSMENT OF NATIONAL PROGRAMME PERFORMANCE

Criterion	Score (2024)	Score (2023)	Performance Commentary
UNDERSTANDING OF AP MINE CONTAMINATION (20% of overall score)	5	5	Ukraine lacks complete information on AP mine contamination owing to the context of the ongoing armed conflict. When presenting information on contamination internationally, Ukraine largely continues to frame its EO challenge without disaggregation by munition type, as the majority of hazardous areas present a mixed threat. It intends to survey all accessible areas by the end of 2026.
NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT (10% of overall score)	6	6	Ukraine's National Mine Action Authority (NMAA) and National Mine Action Centre (MAC) have been fully operational since 2022, with the additional Centre for Humanitarian Demining (CHD) becoming fully operational in 2024. The national mine action programme continued to scale up significantly in 2024, with progress made on more unified procedures for certifying operators. Securing permission to use, transport, and store explosives as a prerequisite to accreditation for explosive ordnance disposal (EOD) remains a challenge. While 44 operators had already been accredited for this as at September 2024, several international operators were still going through the process.
GENDER AND DIVERSITY (10% of overall score)	5	3	Although no reference was made to gender or diversity in Ukraine's most recent Article 7 reports (covering 2023 and 2022), and only limited reference in additional information was provided in its 2023 Article 5 deadline extension request, Ukraine appears to be making progress in these areas. The national mine action strategy, published in 2024, incorporates nine measures intended to ensure equality and inclusion and specifies professional involvement in mine action of women, veterans, persons with disabilities, and victims of EO as a State priority. A national working group on gender in mine action is now up and running; and an assessment on gender and diversity in mine action was conducted in 2024.
ENVIRONMENTAL POLICIES AND ACTION (10% of overall score)	5	5	Ukrainian National Mine Action Standards (NMAS) include a chapter on "environmental regulations", and a section on environment, occupational health, and safety. Ukraine was intending to draft a NMAS on the environment by the end of 2025. The NMAA states that environmental assessments are conducted prior to clearance. International operators report various measures they are taking to protect the environment during demining.
INFORMATION MANAGEMENT AND REPORTING (10% of overall score)	6	5	Ukraine uses the latest version of the Information Management System for Mine Action – IMSMA Core. Ukraine's reporting to Mine Action Review on 2024 contamination and land release improved, compared to previous years, with data provided disaggregated by EO type and by technical survey and clearance. As at September 2025, Ukraine had not submitted an Article 7 report covering 2024. It previously submitted one on time, covering 2023.

Assessment of National Programme Performance Continued

Criterion	Score (2024)	Score (2023)	Performance Commentary
PLANNING AND TASKING (10% of overall score)	5	4	Ukraine has elaborated a national mine action strategy implementation plan for the period 2024–26. On 30 April 2024, Ukraine acted upon the decisions of the 21MSP and submitted a work plan for Article 5 implementation and provided an annual update in 2025. As at July 2025, a new methodology for prioritisation was being piloted. While operators reported some improvement in 2024, timely tasking and effective coordination of operators remains a challenge.
LAND RELEASE SYSTEM (10% of overall score)	5	5	NMAS were published in 2019 but were not fully applied in practice and were therefore updated in 2023. Several revised NMAS entered into force in 2024, including for information and quality management. New land release and mechanical land release standards entered into force in April 2025. International operators feel the existing NMAS need further work and that the instructions for cancellation, issued by the MAC, are overly restrictive.
LAND RELEASE OUTPUTS AND ARTICLE 5 COMPLIANCE (20% of overall score)	2	5	Ukraine's third request to extend its Article 5 deadline was granted at the 21MSP and a new deadline set for 1 December 2033. The Ukrainian authorities report significant increase in technical survey and clearance in 2024 thanks to massive use of demining machines and drones. The scale of contamination and extent of areas no longer under control of the Ukrainian government have increased significantly since February 2022. However, Ukraine's use of AP mines is a serious violation of the APMBC, adding to contamination and undermining its progress in Article 5 implementation, and explaining the significant drop in scoring.
Average Score	4.6	4.8	Overall Programme Performance: POOR

AP MINE SURVEY AND CLEARANCE CAPACITY

MANAGEMENT CAPACITY

- 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)

NATIONAL OPERATORS*

- Arkhipelag LLC
- BIG UA
- Demining Solutions
- EOD & RC
- 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)
- Global Clearance Solutions (GCS)
- The HALO Trust (HALO)
- Humanity & Inclusion (HI) – scheduled to begin NTS in September 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
- UN Environment Programme (UNEP)
- 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.⁵

**The team at Merefa 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 2025.⁶

UNDERSTANDING OF AP MINE CONTAMINATION

Taking into account the full-scale invasion of Ukraine by Russia and the fact that both primary non-technical survey (NTS) are ongoing, no reliable estimate exists for the extent of AP mined area in Ukraine. That said, the level of contamination is expected to be massive due to the very widespread use of AP mines by Russia in the course of its 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 AP mines, anti-vehicle (AV) mines, cluster munition remnants (CMR), and other EO as a result of the presence of troops/hostilities, totalled 105,877km² and were present in nine of Ukraine's twenty-four oblasts (administrative regions)⁷, as set out in Table 2. As at the end of 2024, areas within the control of Ukraine, which had undergone NTS and were suspected or confirmed to contain AP mines, totalled 76.72km² and were present in seven oblasts (see Table 1).⁸ Over half of this contamination (54%) is in Kharkiv; almost one quarter (24%) in Kherson; almost one fifth (18%) is in Mykolaiv; and the remaining 5% is spread between the oblasts of Donetsk, Kyiv, Sumy, and Chernihiv – all areas which have been temporarily occupied by the Russian Federation.⁹

It is believed that not all of the 105,877km² of EO-contaminated area 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 AP mines, despite widespread AP mine use in Ukrainian territory. A combined total of 70% of all potential hazardous areas contaminated with AP mines, AV mines, CMR, and other EO are in the Chernihiv, Kharkiv, Kherson, and Sumy oblasts (regions).¹⁰ 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, when presenting information on contamination internationally, Ukraine generally states the extent of its EO challenge without disaggregation by weapon type, with most hazardous areas having a mixed threat.¹¹

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

6 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 Advisor on Mine Action to the UN in Ukraine, UN Resident Coordinator's office (UNRCO), 16 June 2025.

7 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).

8 Email from Government of Ukraine, 6 September 2025.

9 Email from Government of Ukraine, 24 September 2025.

10 Email from Col. Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

11 Email from Government of Ukraine, 18 July 2025.

The updated estimate of AP mined area, specifically, in Table 1 compares to a very partial estimate of AP mined area of 35.22km² from April 2024 and reconfirmed to Mine Action Review in September 2025.¹² Ukraine duly cautioned in its Article 7 report, covering 2023, that this estimate of contamination was far from complete given the context of the ongoing war, stating that “the Ministry of Defence of Ukraine currently lacks complete information on the coordinates of all areas where anti-personnel mines might be installed”.¹³ At the time of writing, Ukraine had yet to submit its Article 7 report covering 2024. Ukraine estimated in April 2024 that 16% of hazardous areas on agricultural land contained AP mines.¹⁴

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. Second, 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.¹⁵ Norwegian People's Aid (NPA), for example, highlights that less than 5% of the areas it has surveyed are either suspected or confirmed to contain contamination,¹⁶ illustrating the critical importance of prioritising NTS efforts in Ukraine to determine the actual scope of contamination. For this reason, Ukraine recognises primary NTS and re-survey as effective use of resources, in line with its strategic goal to complete, by the end of 2026, primary NTS across all territory accessible for demining.¹⁷

Access by non-government 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.¹⁸ 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.¹⁹ Outside this zone, some 78.08km² of previously unrecorded AP mined area was discovered and added to IMSMA during humanitarian mine action operations in 2024, according to official IMSMA data (see Table 17 in the section below, “Land Release Outputs

in 2024”). The equivalent reported by humanitarian operators was nearly 54.2km² of previously unrecorded AP mined area in 2024, of which 7.3km² was SHA and 46.8km² CHA.²⁰ This is almost double the almost 27km² added to the national database by international operators in 2023.²¹ Even in areas that are accessible, however, barriers to accurate survey still exist. Operators caution that resurvey will be needed in many areas, either due to re-contamination or owing to the displacement of people, which has left few or no witnesses to new contamination. Thus, some polygons will require refinement once more data become available.²² Ukraine emphasises that NTS is a continuous process, which includes re-survey, and that, as the front line shifts, there will be a recurring need for primary NTS.²³

In its most recent Article 7 report (covering 2023), Ukraine stated that 156,000km² of land, including 14,000km² of water, where hostilities have taken place or are ongoing, remained “subject to preliminary survey” and that the Ministry of Defence (MoD) is checking contamination in the liberated territories.²⁴ As at September 2025, Ukraine stated on the Government's Demine Ukraine website that the area “affected by hostilities” and “at risk” stood at the lower total of 138,503km² and that 35,496km² could be considered “safe”.²⁵

Table 1: Identified mined areas by oblast (at end 2024) (official IMSMA data)²⁶

Oblast	Area (km ²)
Donetsk	2.36
Kyiv	1.28
Mykolaiv	14.13
Sumy	0.03
Kharkiv	40.55
Kherson	18.03
Chernihiv	0.34
Total	76.72

12 Email from Government of Ukraine, 6 September 2025.
13 Article 7 Report (covering 2023), Form D.
14 “Restoring Livelihoods and revitalising Rural Communities through Mine Action”, UN Food and Agriculture Organisation (FAO) and World Food Programme (WFP), Presentation at side event, UN National Directors Meeting (NDM), Geneva, 29 April 2024 (hereafter, FAO and WFP Presentation, NDM, 2024).
15 “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/3R6uvEI>
16 Email from Amela Balic, Programme Manager, NPA, 12 May 2025.
17 Email from Government of Ukraine, 24 September 2025.
18 “Ukraine Mine Action Today and Tomorrow”, Presentation from Roman Konovalov, Mine Action Department of the MoD, at the NDM, in Geneva, 9–11 April 2025.
19 “Mine Action in Ukraine: Interview with Paul Heslop”, OROLSI, DPO, and UNMAS, January 2025.
20 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; and Amela Balic, NPA, 12 May 2025.
21 Emails from Sophie Breinholdt Nielsen, DRC, 12 June 2024; Tony Connell, FSD, 14 June 2024; Michael Brown, HALO, 29 May 2024; and Vanja Sikirica, Country Director, NPA, 5 May 2024.
22 Emails from Michael Edwards, DCA, 3 May 2024; and Julie Bouvier, Armed Violence Reduction (AVR) Specialist, Humanity & Inclusion (HI), 16 May 2024.
23 Email from Government of Ukraine, 24 September 2025.
24 Article 7 Report (covering 2023), Form D.
25 Demine Ukraine, accessed 9 September 2025, at: <https://bit.ly/3VctUSK>.
26 Emails from Government of Ukraine, 6 and 22 September 2025.

Table 2: Area scheduled for primary NTS which may contain explosive ordnance, including AP mines, by oblast (at end 2024) (National authority estimate)²⁷

Oblast/District	SHAs that may contain AP mines and require NTS	Area (km ²)
Dnipropetrovsk/Kryvorizhsky	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
Mykolaiv/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/Shostkinskyi	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
Totals	3,602	105,877

Extensive use of AP mines by Russian forces continues. In June 2024, Ukraine said it was encountering an "unprecedented density" of contamination with up to three landmines per square metre of land. Ukraine also claimed use of AP mines by Russian forces "launched by land and air combat systems to hit civilians, as well as objects used or inhabited by civilians".²⁸ Humanitarian organisations and media outlets stated that Russian forces had scattered mines in a haphazard and disorganised fashion across civilian areas.²⁹

Many AP mined areas in Ukraine can be directly associated with Russian defensive positions. The HALO Trust (HALO) found a significant number of tripwire AP mines in 2022 and 2023 in areas from which Russian forces had retreated.³⁰ No humanitarian operators reported finding improvised mines during 2024. Improvised AP mines are, however, included in data provided by the NMAA (see Table 2), and the NMAA states that the regions and districts affected by improvised AP mine bombardment were: Beryslavskyi, Kakhovskiy, and Khersonskiy in Kherson province; Sumskiy and Okhtyrskiy in Sumy; Kupyanskyi in Kharkiv; and Nikopolskyi in Dnipropetrovsk.³¹ Official IMSMA data also confirms that AP mines destroyed during TS and clearance in 2024 (excluding during rapid response by State operators) included two improvised AP mines.³² In June 2025, the APMBC Committee on Article 5 Implementation encouraged Ukraine to report, to the extent possible, on the disaggregation of AP mines of an improvised nature from other types of improvised explosive devices (IEDs).³³

In addition to contamination resulting from Russia's ongoing war of aggression, Ukraine is also contaminated by AP mines as a result of the earlier conflicts which began in 2014 with the Russian-backed, self-proclaimed Donetsk and Luhansk republics. Prior to these attacks, Ukraine was affected by residual contamination of mines and other ordnance, mostly as a result of heavy fighting between German and Soviet forces in the Second World War, but also from combat in the First World War. The MoD engineering units partially cleared affected areas in the mid-1970s, suggesting that a problem may remain, but the location and extent of the legacy mine threat is unknown. Before Russia's full-scale invasion in 2022, the heaviest mine and ERW contamination was believed to be inside the buffer zone, which then separated government-controlled areas from those controlled by Russian forces in the self-proclaimed Donetsk and Luhansk Republics.³⁴

²⁷ Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

²⁸ Statement of Ukraine, Intersessional Meetings, Geneva, 18–20 June 2024.

²⁹ "Land mines create a deadly legacy for Ukraine and possibly beyond", *The Washington Post*, 12 April 2022, at: <https://wapo.st/3e2X9WP>.

³⁰ In 2023, HALO identified four hand grenades attached to tripwire, which are considered AP mines under the APMBC. HALO had similarly seen grenades set to be detonated by tripwire in 2022. Emails from Michael Brown, HALO, 29 May 2024; and Denys Holovetskyi, Head of Operations, HALO, 29 May 2023.

³¹ Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.

³² Email from Government of Ukraine, 6 September 2025.

³³ Committee on Article 5 Implementation, "Preliminary Observations," Intersessional Meetings, 17–20 June 2025, p. 1.

³⁴ Email from Yuri Shahramanyan, Programme Manager, HALO Ukraine, 5 July 2018.

Ukraine's national mine action strategy includes a target to complete "initial non-technical survey in 100 percent of the territories controlled by Ukraine, where it is possible to carry out humanitarian demining", including survey of AP mined areas, by the end of 2026.³⁵ As at the time of writing in September 2025, however, it was not known whether Ukraine

was on track to achieve this. In June 2025, the Committee on Article 5 Implementation observed that Ukraine was still in the process of identifying the precise perimeter of mined areas and said it would welcome updated information from Ukraine on these efforts, including on the establishment of a baseline.³⁶

USE OF AP MINES BY RUSSIA

As at June 2023, Human Rights Watch had documented use of at least 13 types of AP mines since the 2022 assault on Ukraine.³⁷ The Landmine Monitor re-affirmed this number in November 2024 but noted that it was "not possible to systematically document, survey, and attribute the continuing use of antipersonnel mines in Ukraine given available evidence and lack of access to areas where there are active hostilities".³⁸ A range of delivery methods for landmines has been documented: in addition to those that are manually emplaced, mines have been mechanically laid; scattered by truck-mounted projectors; and remotely delivered by rocket.³⁹ Several new types of landmine have been used in hostilities by Russia for the first time in the ongoing armed conflict. These include the remotely delivered POM-3 AP mine, also known as the "medallion". The mine is typically aerially launched from a rocket, falling back to earth by parachute. It is equipped with a seismic proximity sensor that picks up approaching footsteps, and is said to be able to distinguish between humans and animals, making efforts to locate and destroy it far deadlier and more complicated. The POM-3 has self-destruct features that set the mine to explode after a certain period. Ukrainian deminers are using remote equipment to destroy these mines – an expensive undertaking.⁴⁰

HALO has described new explosive threats in Ukraine, including in Mykolaiv and Kharkiv regions for example, where more than 70% of the minefields or battle areas it assessed for clearance contained magnetic influence mines (which can be activated by the presence of metallic objects and a change in the magnetic field around the mine); or seismic mines (activated by vibrations in the earth). In this context, advanced survey techniques and the targeted deployment of mechanical clearance assets have been necessary.⁴¹

Russian employment of AP mines includes the use of drones to drop landmines on farms and residential areas.⁴² In June 2025, Human Rights Watch reported that Russian forces were modifying commercial quadcopter drones to scatter AP mines in and around the city of Kherson, killing dozens of civilians and injuring hundreds of others. Human Rights Watch also stated that Russian military-affiliated Telegram channels showed PFM-series AP mines, also known as "petal" or "butterfly" mines, being fitted onto the drones with a mechanism to allow them to be air-dropped. It reported having a "firm evidence base" for these attacks, having analysed more than 80 photos and videos that had been shared by witnesses and on social media.⁴³

Russian forces have also emplaced numerous victim-activated booby-traps as they retreated from positions they had taken, occupied, or fortified during the 2022 invasion. The booby-traps were constructed with various types of hand-grenades equipped with tripwires, including F-1, RGD-5, and RGN-type grenades.⁴⁴ According to Ukraine, Russian forces have laid booby-traps in residential areas, vehicles, critical infrastructures, and even food. Ukraine has found booby-traps in dead bodies, including those of children.⁴⁵ A considerable portion of these booby-traps are AP mines as defined in the APMBC.

The Organization for Security and Co-operation in Europe (OSCE)'s Special Monitoring Mission (SMM) in Ukraine has frequently reported on the use of both AP and AV mines prior to the full-scale Russian invasion.⁴⁶ In addition, a December 2017 report from the Office of the UN High Commissioner for Human Rights (OHCHR) stated that: "The parties to the conflict continued the practice of placement of [improvised explosive devices] IEDs and AP mines in populated areas and near objects of civilian infrastructure."⁴⁷ In 2018, OHCHR called on all parties involved in hostilities to "cease the use of victim-activated devices".⁴⁸

35 "Cabinet of Ministers of Ukraine order dated 28 June 2024 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>.

36 Committee on Article 5 Implementation, "Preliminary Observations", Intersessional Meetings, 17–20 June 2025, p. 2.

37 These are: MOB, MON-50, MON-90, MON-100, MON-200, OZM-72, PFM-1/PFM1-S, PMN-2, PMN-4, POM-2/POM-2R, and POM-3.

38 Landmine and Cluster Munition Monitor, "Ukraine", accessed 26 June 2025, at: <https://bit.ly/44l5dsr>. This page contains a list and specifications of 11 types of AP mines used in Ukraine by Russia since February 2022.

39 Human Rights Watch, "Landmine Use in Ukraine", Briefing Paper, 13 June 2023, pp. 2, 3, 8, and 10.

40 Human Rights Watch, "Landmine Use in Ukraine", Report, 15 June 2022, at: <https://bit.ly/3P03Yss>, pp. 4, 7, and 8; "New Russian Land Mine Poses Special Risk in Ukraine", *The New York Times*, 6 April 2022, at: <https://nyti.ms/3TgF9bL> and Presentation of Ukraine, Intersessional Meetings, Geneva, 19–21 June 2023.

41 HALO, "Ukraine", undated but accessed 28 January 2025, at: <https://bit.ly/3Cr0lBj>.

42 Landmine and Cluster Munition Monitor, "Ukraine", accessed 26 June 2025, at: <https://bit.ly/44l5dsr>.

43 Human Rights Watch, "Russia's Drone-Dropped Landmines Threaten Human Lives and Hard-Won Humanitarian Protections", 10 June 2025, at: <https://bit.ly/44l5dsr>.

44 Human Rights Watch, "Landmine Use in Ukraine", Briefing Paper, 13 June 2023, pp. 3 and 8.

45 Presentation of Ukraine, Intersessional Meetings, Geneva, 19–21 June 2023. See also, "Russians hid an anti-tank mine in a pedestrian figurine – this is a war crime" (Ukrainian), *Canal 24*, 7 August 2023, at: <https://bit.ly/45rALvB>.

46 See: "Daily and spot reports from the Special Monitoring Mission to Ukraine", at: <http://bit.ly/2K4lFms>.

47 OHCHR, "Report on the human rights situation in Ukraine 16 August to 15 September 2017", December 2017, p. 5.

48 OHCHR, "Report on the human rights situation in Ukraine 16 February to 15 May 2018", June 2018, p. 29.

USE OF AP MINES BY UKRAINIAN FORCES

Use of AP mines by Ukrainian forces during the current conflict, in violation of its international legal obligations, has also been reported. Any use of AP mines by a State Party is a serious violation of the APMB. Human Rights Watch documented repeated use of AP mines by Ukrainian forces during the summer months of 2022 when Russia controlled the city of Izium and its environs. In August 2023, an Independent International Commission Inquiry on Ukraine stated it had seen photos of weapons found in Izium city indicating that PFM AP mines had been delivered by a 220-mm Uragan rockets with a range of up to 35Km, and that both Ukrainian and Russian armed forces were stationed within striking distance of Izium, but concluded it was likely that the PMF AP mines were used by Ukrainian armed forces.⁴⁹ Ukrainian forces fired numerous 9M27K3 mine-laying rockets carrying PFM AP blast mines into at least nine different Russian-occupied areas or near Russian military facilities in and around Izium city. Researchers verified 11 civilian casualties from these mines. The Ukrainian Deputy Defence Minister, Oleksandr Polishchuk, responded to Human Rights Watch questions by saying that the Ukrainian authorities could not comment on the types of weapons used during the armed conflict “before the end of the war and the restoration of [Ukraine’s] sovereignty and territorial integrity”.⁵⁰

More recently, the Landmine Monitor has reported on examples posted on social media between April and September 2024, claiming that Ukrainian combatants have constructed drone-dropped AP mines for use against Russian forces, and that Ukraine has modified several types of AV mine for individual delivery by drone. However, the Landmine Monitor cautions that it has been unable to confirm these allegations, as they do not contain enough information to attribute to any given party.⁵¹

In February 2023, the President of the APMB Twentieth Meeting of States Parties issued a statement condemning the use of AP mines “anywhere, at any time, and by any actor”, and requested clarification of the allegations of AP mines use by the Ukrainian government.⁵² At the subsequent intersessional meetings, Ukraine said that “it did not have information which would corroborate the veracity of allegations made by some [organisation] concerning the use of anti-personnel mines by the Ukrainian Armed

forces” and that it stands ready to “conduct further inquiry into the manner and keep [the Convention] updated on the outcome”.⁵³ In June 2024, Ukraine informed the APMB intersessional meetings that it was conducting a pre-trial investigation for criminal offenses from 24 February 2022 to 31 May 2024 concerning “the use of anti-personnel mines by unidentified military personnel of individual military formations in the territory of the city of Izium, Kharkiv region, and surrounding areas.” As at June 2024, the pre-trial investigation in these criminal proceedings was ongoing⁵⁴ and remained so as at June 2025.⁵⁵ At the Fifth Review Conference in November 2024, Ukraine reiterated that alleged use of AP mines by Ukraine had been taken seriously and had been submitted to the General Prosecutor’s office, with the case initiated in February 2024 and, at that time, still ongoing. Ukraine also stated that it continued to comply with international humanitarian law; would convey concerns heard by Ukraine’s delegation to its government; and remained committed to the principles of the Convention.

As stated in the Final Document from the Fifth Review Conference, the Committee on Cooperative Compliance welcomed the cooperative dialogue sustained with Ukraine and the information provided by Ukraine on its efforts to carry out investigations.⁵⁶ On 18 February 2025, the Committee met with the Permanent Representative of Ukraine to the UN in Geneva and “appreciated Ukraine’s engagement with the Committee in a cooperative and transparent manner” as well as highlighting “the importance of receiving updated information from the Ukraine side on the alleged use of anti-personnel mines by the Ukrainian Armed Forces”. On 26 May 2025, the Permanent Representative of Ukraine to the UN in Geneva met with the Committee again to continue the cooperative dialogue. The Committee “encouraged Ukraine to provide an update to the States Parties on matters related to these allegations during the 2025 Intersessional Meetings”.⁵⁷

In both the 18 February and 26 May 2025 meetings between the Permanent Representative of Ukraine to the UN in Geneva and the Committee on Cooperative Compliance, the second critical matter discussed was the 20 November 2024 media reports which “surfaced with regard to the transfer of anti-personnel mines by the United States to Ukraine”.⁵⁸ The United States announced two transfers of AP mines to

49 Human Rights Council, Conference room paper on the Independent International Commission of Inquiry on Ukraine, UN doc. A/HRC/52/CRP.4, 29 August 2023, p. 49.

50 Human Rights Watch, “Landmine Use in Ukraine”, Briefing Paper, 13 June 2023, pp. 2 and 15.

51 Landmine and Cluster Munition Monitor, “Ukraine”, accessed 26 June 2025, at: <https://bit.ly/44l5dsr>.

52 APMB Implementation Support Unit (ISU), “Landmine treaty president to engage with Ukraine on allegations of use of prohibited weapon”, Press release, 3 February 2023.

53 Statement of Ukraine, Intersessional Meetings, Geneva, 19–21 June 2023.

54 Statement of Ukraine, Intersessional Meetings, Geneva, 18–20 June 2024.

55 Statement of Ukraine on Cooperative Compliance, Intersessional Meetings, Geneva, 19 June 2025.

56 Fifth Review Conference Final Document, 5 February 2025, p. 47, available at: <https://bit.ly/4nhRueL>.

57 Committee on Cooperative Compliance, “Preliminary Observations”, Intersessional Meetings, 17–20 June 2025, p. 5.

58 Ibid., p. 5.

Ukraine during 2024. In November, President Joe Biden—counter to the then US policy⁵⁹—authorised the supply of AP mines to Ukraine. US officials did not disclose what type of mines were being provided, but one official described them as “non-persistent,” meaning that the mines self-destruct or self-deactivate (i.e. lose battery charge to render them inactive) within days or weeks. The official reportedly said that Ukrainian policymakers had committed to not deploying the mines in densely populated areas. Use of the new mines, it was said, would be limited to Ukrainian territory, with an expected focus on eastern Ukraine. Prior to November 2024, the US had provided Ukraine with Claymores, a directional fragmentation munition that is set above ground and triggered by an operator, making them permissible under the APMBC if used in that manner.⁶⁰ In December 2024, a second transfer of AP mines from the US to Ukraine was announced. Prior to November 2024, the last time the United States transferred AP mines was in 1992.⁶¹

Following the allegations concerning the transfer of AP mines by the US to Ukraine, the President of the 21MSP and the Committee on Cooperative Compliance engaged in a cooperative dialogue with Ukraine to address and clarify the situation concerning potential transfer of AP mines. At the 18 February 2025 meeting, the Committee highlighted the importance of receiving an “explanation on potential transfer of anti-personnel mines by the United States”. At the 26 May 2025 meeting, the cooperative dialogue continued and the Committee “encouraged Ukraine to provide an update to the States Parties on matters related to these allegations during the 2025 Intersessional Meetings”.⁶² Ukraine did so, stating: “Regarding possible transfer of munitions to Ukraine, Ukraine has no information and cannot confirm any other information regarding the transfer to Ukraine of munitions that fall under the provisions of anti-personnel mines provided in paragraph 1, Article 2 of the Ottawa convention”.⁶³ As a matter of fact and law, the AP mines transferred by the US with self-destruction and self-deactivation features fall under Article 2(1) of APMBC and their importation by Ukraine is a serious violation of the Convention.

Unverified reports emerged in August 2024 of possible new use of landmines by Ukraine in the Kursk region of western Russia. Unverified video footage, made publicly available by an individual reporting to be a civilian filming in Kursk on 10 August 2024, appears to show several AV mines laid across a road.⁶⁴ On 2 September 2024, a Russian news agency reported, based on information from the Russian Ministry of Emergency Situations, that nine settlements in the Kursk region had been cleared of mines over the preceding week,

with 150 munitions rendered safe. Teams were continuing survey of populated areas and infrastructure.⁶⁵ It is not known if Ukraine emplaced AP mines as part of this offensive. In June 2025, a Bulgarian online news source reported that Russian forces, operating near Russia’s border with Ukraine, had encountered “3D-printed anti-personnel mines deployed by Ukrainian troops in Russia’s Kursk region”. However, the original source for this report was again the Russian State news agency, TASS, and the reliability of this report cannot be confirmed.⁶⁶

On 29 June 2025, Ukraine’s President, Volodymyr Zelenskyy, announced that he had signed a decree, calling for support for a proposal from the MFA for Ukraine to withdraw from the APMBC.⁶⁷ The following day, the NSDC shared a statement from the MFA on Ukraine’s decision to withdraw from the Convention. The statement highlights extensive use of AP mines by Russia in its armed aggression against Ukraine since 2014, and Russia’s “mass use” of AP mines since its full-scale invasion of Ukraine in 2022. The statement declares that: “As a result, Ukraine has found itself in an unequal and unjust situation that restricts its right to self-defence as enshrined in Article 51 of the United Nations Charter”. It goes on to say that: “Ukraine has made the difficult but necessary political decision to stop the implementation of irrelevant obligations under the Ottawa Convention. We are convinced that this step is both necessary and proportionate to the level of threats, as it concerns the survival and preservation of Ukraine as a sovereign, independent, and free state”.⁶⁸ It was further reported that the NSDC had instructed Ukraine’s Cabinet of Ministers to take urgent steps to ensure Ukraine’s withdrawal from the convention, and that the decree states that oversight for implementing the decision rests with the NSDC, which in turn gives instructions to the Cabinet. The Verkhovna Rada (Ukrainian parliament) is reportedly not mentioned in the decree.⁶⁹

It was not indicated when Ukraine planned to give notice of withdrawal to all other States Parties, to the Depositary and to the United Nations Security Council, as required under Article 20 of the Convention. As of early September 2025, it had not done so. In any event, Article 20 states that “such withdrawal shall only take effect six months after the receipt of the instrument of withdrawal by the Depositary. If, however, on the expiry of that six-month period, the withdrawing State Party is engaged in an armed conflict, the withdrawal shall not take effect before the end of the armed conflict”.⁷⁰ In a video address on 29 June 2025, President Zelenskyy acknowledged the “complexities” of the withdrawal procedure when conducted during war.⁷¹

59 US policy, as at December 2024, was that the US would “not export or transfer” AP mines and “not assist, encourage, or induce anyone, outside of the context of the Korean Peninsula, to engage in any activity that would be prohibited by the Ottawa Convention”. See International Campaign to Ban Landmines (ICBL), “ICBL Strongly Condemns Second US AP Mine Transfer to Ukraine”, Press release, 4 December 2024, at: <https://bit.ly/4e6h1S>.

60 “Biden approves antipersonnel mines for Ukraine, undoing his own policy”, *The Washington Post*, 19 November 2024, at: <https://bit.ly/3ZAlzuC>.

61 ICBL, “ICBL Strongly Condemns Second US AP Mine Transfer to Ukraine”, 4 December 2024.

62 Committee on Cooperative Compliance, “Preliminary Observations”, Intersessional Meetings, 17–20 June 2025, p. 5.

63 Statement of Ukraine on Cooperative Compliance, Intersessional Meetings, Geneva, 19 June 2025.

64 “Civilian gets shot after dodging landmines in Kursk 10.8.24”, *YouTube*, accessed 14 August 2024, at: <https://bit.ly/3M30Bg4>.

65 “Nine settlements in Kursk Region cleared of explosive objects in past week”, *TASS (Russian) News Agency*, 1 September 2024, at: <https://bit.ly/4gk1YH0>.

66 “Russia: Ukraine uses homemade 3D-printed anti-personnel mines”, *Bulgarian Military News*, 13 June 2025, at: <https://bit.ly/3T7JWNP>.

67 “Ukraine on track to withdraw from Ottawa anti-personnel mines treaty, Zelenskiy decree shows”, *Reuters*, 29 June 2025, at: <https://bit.ly/4eCPCcr>.

68 Statement of the MFA of Ukraine on the Decision to Withdraw from the Ottawa Convention, National Security and Defense Council of Ukraine, 30 June 2025, at: <https://bit.ly/3ZYztff>.

69 “Zelenskyy pulls Ukraine out of landmine treaty as war reshapes defense policy”, *RBC-Ukraine*, 29 June 2025, at: <https://bit.ly/44Hz6Ew>.

70 Art. 20, APMBC.

71 “Ukraine on track to withdraw from Ottawa anti-personnel mines treaty, Zelenskiy decree shows”, *Reuters*, 29 June 2025, at: <https://bit.ly/4eCPCcr>.

On 21 July 2025, the Secretary-General of the United Nations, acting in his capacity as depositary, communicated the following: "In accordance with the provisions of the Vienna Convention on the Law of Treaties of 1969, Ukraine has decided, as of July 17, 2025, to suspend the operation of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction of September 18, 1997, signed on behalf of Ukraine on February 24, 1999 in New York."

The communication states that: "The above action was effected on 18 July 2025".⁷² It is not possible for a State Party to suspend operation of the APMBC and so this statement is without legal effect. Ukraine therefore remains bound by the Convention and its continued use and stockpiling are serious violations of the Convention and of international law. Ukraine should rescind its unlawful suspension of its implementation of the APMBC without delay.

OTHER EXPLOSIVE ORDNANCE CONTAMINATION

Ukraine is also contaminated with CMR, the extent of which is not known but is thought to be heavy, as well as with huge quantities of other ERW (see Mine Action Review's *Clearing Cluster Munition Remnants* report on Ukraine for further information). Ukraine plans to complete NTS in all territories that can be accessed by the end of 2026.

NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

Humanitarian demining in Ukraine is coordinated by the First Deputy Prime Minister (DPM) of Ukraine, who was also the Minister of Economy as at July 2025. The Ministry of Economy (MoE), ensures interaction of central executive bodies on humanitarian demining matters⁷³ and has overall responsibility for strategic planning and system coordination.⁷⁴ Ukraine's National Mine Action Strategy, which covers the period 2024–33, was approved by the Cabinet of Ministers on 28 June 2024.⁷⁵

The National Mine Action Authority (NMAA) is the primary body responsible for approving mid-term and long-term national plans for mine action, alongside operative plans.⁷⁶ It is an inter-ministerial body, with 17 Ministries represented as at April 2025.⁷⁷ 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 State Emergency Services of Ukraine (SESU) share the remits of information management (IM), quality assurance (QA), monitoring, planning, and certification of the operators.⁷⁸ 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 and coordinates the development and execution of mine action strategy, 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

national mine action programme action plans.⁷⁹ While the NMAA sits at ministerial level, it is serviced by a secretariat with "some" managerial functions.⁸⁰

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 2024.⁸¹ The Working Group includes representatives from several ministries and other key national entities.⁸²

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.⁸³ 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.⁸⁴

There are nominally three national supervisory and management bodies in Ukraine: the MAC, located in Chernihiv, which is under the SSTS and, in turn,

72 Ukraine: Communication, Reference: C.N.385.2025.TREATIES-XXVI.5 (Depositary Notification), United Nations, 21 July 2025, available at: <https://bit.ly/4tBjLeb>.

73 "Soul of Soil", UN Development Programme (UNDP), accessed 19 February 2024, at: <http://bit.ly/4pf4aDU>.

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

75 "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/46iT1cj>; and "Cabinet adopts changes to the Humanitarian Mine Action Architecture in Ukraine", Special issue of DRC Legal Alert, Issue 98, October 2023.

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

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

78 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.

79 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; and email from Government of Ukraine, 22 September 2025.

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

81 "The Sectoral Working Group", Demining Ukraine, 2 July 2024, accessed 22 May 2025, at: <https://bit.ly/3zUWlHA>.

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

83 "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.

84 Email from Government of Ukraine, 18 July 2025.

under the MoD (for operational matters, including co-ordination and tasking); the inter-ministerial NMAA, serviced by a secretariat; and, at the top of the hierarchy, an inter-ministerial committee on humanitarian demining.⁸⁵ The Interregional Center For Humanitarian Demining and Rapid Response of the SESU, located in Merefa (hereafter, "the centre at Merefa")⁸⁶ is a QA and quality control (QC) centre, with authority to coordinate accredited SESU units.⁸⁷ A regional centre, the Kharkiv Mine Action Coordination Centre, was established in 2024 under the Governor of Kharkiv oblast.⁸⁸

The following bodies are responsible for certification of operators and processes:⁸⁹ the centre at Merefa; the Demining Centre of Military Unit A2641, located in Kaminiets Podilsky; and the MAC in Chernihiv; and the State Certification Centre of the SESU. These bodies are also responsible for quality management (QM) tasks.⁹⁰ 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.⁹¹

Progress on both these matters has been 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.⁹² 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, set up by the MoE and Ministry of Digital Transformation,⁹³ went live in September 2025.⁹⁴ Details of the required process for certification as a mine action operator in Ukraine are also publicly available on the Government's Demine Ukraine website.⁹⁵

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 of each plot. In August 2024 this was amended to 100% of the cost of such services.⁹⁶ 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 25km².⁹⁷ As at September 2025, approximately 34km² had been released through the programme.⁹⁸

A national mine action law was adopted by Ukraine's parliament in 2018,⁹⁹ although the government did not proceed with its implementation on the grounds it was inconsistent with a number of other legal acts.¹⁰⁰ Amended legislation was passed in December 2020. This created the national Mine Action Centre (the MAC, at Cherniv), as well as the legal basis for the creation of the CHD, established legally in 2023 and becoming operational in 2024. According to the current law, these two centres have almost identical authority. However, in practice their responsibilities are divided as follows: the MAC is responsible for IMSMA management, planning and coordination; and CHD is responsible for the demining market, State compensation programme, and new digital products for areas such as prioritisation, and information management.¹⁰¹ Reporting by mine action operators and their interaction with the NMAA is managed through the MAC and the NMAA Secretariat.¹⁰²

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;

85 Email from Government of Ukraine, 22 September 2025.

86 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.

87 Email from Government of Ukraine, 22 September 2025.

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

89 "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>.

90 Email from Government of Ukraine, 22 September 2025.

91 "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>.

92 Decree No. 123 was adopted 2 February 2024. "DRC's Legal Alert: Issue 102, 1 February–31 March 2024", pp. 2–3.

93 "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>.

94 Interview with Government of Ukraine, in Geneva, 11 April 2025; and "Online certification of mine action operators has been launched on the Diia portal", Demine Ukraine, 24 September 2025, at: <https://bit.ly/4ntiurm>.

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

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

97 "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 AP mines as this would provide only partial understanding of the CMR problem.

98 Email from Government of Ukraine, 22 September 2025.

99 OSCE, "Ukrainian parliament adopts legal framework for mine action, with OSCE advice provided", 10 December 2018, at: <http://bit.ly/2QdTaQo>.

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

101 Email from Government of Ukraine, 22 September 2025.

102 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.

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.¹⁰³

In July 2025, the Tony Blair Institute for Global Change presented its "White Paper on Updating the Institutional Architecture of Mine Action in Ukraine", commissioned by the First Deputy Prime Minister. The authors of the study note that about 30 institutions work in the field of mine action, most of which are subordinate to three key ministries: the MoD, the Ministry of Internal Affairs, and the MoE. The study notes that this blurs responsibility and creates additional bureaucratic and administrative barriers, and that the lack of a single window of interaction with the government of Ukraine complicates decision-making; interferes with the development of joint programmes; and can make accountability difficult. The study proposes several options for updating the system, but suggests that, under an optimised architecture, the functions of the MAC and the CHD should be included in the structure of a future Agency, while ensuring the continuity of their work and preserving their expertise.¹⁰⁴

In addition to the MoE, the UN Development Programme (UNDP) Mine Action Area of Responsibility (MA AoR) also remained a key coordination mechanism¹⁰⁵ and continued meeting in 2024.¹⁰⁶ However, a formal transition is in progress from the Mine Action AoR to an MoE-led coordination structure. Presently, UNDP coordinates the MA AoR jointly with the MoE, 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 2030.¹⁰⁷ 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.¹⁰⁸

A Mine Action Donor Coordination Workshop also took place in Kyiv in April 2024¹⁰⁹ and the Ukraine Mine Action Conference (UMAC) took place in Lausanne on October 2024,¹¹⁰ with a further UMAC planned for autumn 2025, in Tokyo.¹¹¹ 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.¹¹² 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.¹¹³

Overall, operators have reported a positive environment for mine action and facilitation of the operators' work by the Ukrainian government. HALO, the largest international operator working in Ukraine, reports having a close working relationship with national and local authorities, but also continues to advocate for greater involvement in strategic planning.¹¹⁴ Ukrainian authorities are reportedly proactive when it comes to signing memoranda of understanding (MoUs) and facilitating cooperation with partners.¹¹⁵ Some operators suggest that 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,¹¹⁶ though Fondation suisse de déminage (FSD) notes that being registered as a "charitable fund" has removed these

103 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.

104 "New Mine Action System Architecture: Tony Blair Institute Launches White Paper", Demine Ukraine, 4 July 2025, at: <https://bit.ly/48Et61K>.

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

106 "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.

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

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

109 "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>.

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

111 "Japan ready to host Ukraine Mine Action Conference – Economy Ministry", *Ukrinform*, 19 June 2024, at: <http://bit.ly/4f2Q0Gi>.

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

113 "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>.

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

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

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

challenges with importing equipment, allowing it to, in effect, be treated as a national NGO.¹¹⁷ However, NPA states that it has imported more than ten demining machines and hundreds of detectors and items of personal protective equipment (PPE) without any of these items being considered of "military" or even "dual" purpose. Furthermore, NPA is registered in Ukraine as a branch (not as a charitable organisation) and has never encountered any delays or other challenges with the import of equipment.¹¹⁸ Some operators also note that visa restrictions can sometimes make it difficult for international staff from some countries to enter Ukraine.¹¹⁹

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,¹²⁰ including half of field staff.¹²¹ 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.¹²² Due to the active conflict, not all hromadas¹²³ or all parts of hromadas assigned to operators are accessible.¹²⁴

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.¹²⁵ 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.¹²⁶ 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.¹²⁷

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.¹²⁸ 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.¹²⁹ As at April 2025, Danish Refugee Council (DRC) was working through the required steps to gain permission to use explosives.¹³⁰ 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 unexploded ordnance (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.¹³¹ Humanitarian Security received EOD accreditation in April 2025.¹³² 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.¹³³

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.¹³⁴ 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.¹³⁵

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

118 Email from Vanja Sikirica, NPA, 21 August 2025.

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

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

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

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

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

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

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

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

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

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

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

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

131 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.

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

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

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

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

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 action¹³⁶ and the development of a unified EOD training curriculum, piloted in 2024 with participants from SSTs, SESU, and National Police EOD personnel.¹³⁷ 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.¹³⁸ 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.¹³⁹

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.¹⁴⁰ HALO, Mines Advisory Group (MAG), and NPA also supported with delivery of QM training for the NMAA, coordinated by the GICHD.¹⁴¹ DRC delivered EOD training to NMAA, SESU, and MAC personnel.¹⁴²

SESU also received other capacity development support. NPA continued efforts to establish a sustainable mine detection dog (MDD) capability within SESU, training and providing six MDDs and related staff training.¹⁴³ FSD provided technical expertise and capacity development to SESU in mechanical ground preparation.¹⁴⁴ APOPO and MAG jointly hosted

SESU and MAC delegates in Cambodia to introduce them to technical survey dogs (TSDs) ahead of APOPO's certification of TSDs in Ukraine.¹⁴⁵ Several international operators, including DRC and HALO, donated equipment to the MAC and SESU, including vehicles, mine detectors, EOD kits, PPE, first aid kits, and office and IT equipment.¹⁴⁶

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.¹⁴⁷ 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".¹⁴⁸ Ukraine also highlights that capacity development support for national operators is limited.¹⁴⁹

To support innovation the MoE announced the launch of the Humanitarian Demining Innovation Platform in February 2025, intended as a coordination platform for testing and improving technologies. This could also attract investment and resources from international partners and companies and facilitate innovation scaling and establishing technology production in-country.¹⁵⁰ Ukraine is taking other steps to lead humanitarian mine action innovation, for example, through its expanding use of AI in areas such as prioritisation, and satellite and thermal imagery.¹⁵¹

FUNDING FOR AP MINE SURVEY AND CLEARANCE

It is not possible to capture the full extent of funding for survey and clearance of AP mines (along with other EO) made available in Ukraine in 2024. A summary of information provided by international humanitarian operators for funding in 2024 and prospects for 2025 is provided in Table 3. Due to the extensive and mixed nature of the EO threat, no distinct national resources are dedicated to survey and clearance of AP mined area by the Government of Ukraine – all EO survey and clearance are funded as a whole.¹⁵² The 2024 budget allocated by the government for all demining was UAH3

billion (approximately US\$76 million).¹⁵³ In June 2025, the Committee on Article 5 Implementation noted that Ukraine had reported on its efforts to do their utmost to commit the resources needed to meet their Convention obligations as soon as possible and to explore all possible funding sources, including conventional and innovative sources and mechanisms of funding. The Committee said it would welcome updated information on Ukraine's efforts to develop resource mobilisation plans.¹⁵⁴

136 "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>.

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

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

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

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

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

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

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

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

145 Email from Nick Guest, APOPO, 3 March 2025.

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

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

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

149 Email from Government of Ukraine, 22 September 2025.

150 "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/4mtjivT>.

151 Email from Government of Ukraine, 22 September 2025.

152 Email from Government of Ukraine, 18 July 2025.

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

154 Committee on Article 5 Implementation, "Preliminary Observations", Intersessional Meetings, 17–20 June 2025, p. 5.

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.¹⁵⁵ Non-traditional or so-called 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 2024,¹⁵⁶ 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 Ukraine, with a view to scaling up funding mechanisms for the mine action sector.¹⁵⁷

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.¹⁵⁸ 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.¹⁵⁹ 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 2025.¹⁶⁰

Table 3: Funding for survey and clearance by international operators in Ukraine (2024–25)¹⁶¹

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 2026), 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)) ¹⁶²	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)) ¹⁶³	MAG	MAG, DCA
Japan (Association for Aid and Relief)	HALO	HALO (as at March 2025)
Norwegian Refugee Council (NRC) with KfW ¹⁶⁴	NPA (from Dec. 2024)	NPA
Latvia (MFA)	None	HALO
Luxembourg (MFA)	HALO	HALO (as at March 2025)
Netherlands (MFA)	DRC, HALO, MAG	DRC, HALO (as at March 2025), MAG

¹⁵⁵ "Mine Action in Ukraine: Interview with Paul Heslop", OROLSI, DPO, and UNMAS, January 2025.

¹⁵⁶ Camille Wallen, Co-Founder & Director of Symbio Impact & MAFI, "Innovative Finance in Mine Action Progress to Date & New Initiatives. Progress since 4th Review Conference", Fifth Review Conference, Siem Reap, 25–29 November 2024, pp. 11–12.

¹⁵⁷ "MASG Intervention: Innovative Finance for Mine Action", GICHD, 29 April 2024, at: <https://bit.ly/4k7av1n>.

¹⁵⁸ Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

¹⁵⁹ Emails from Steve Wallis OBE, HALO, 19 March and 19 June 2025.

¹⁶⁰ Email from Vanja Sikirica, NPA Ukraine, 6 June 2025.

¹⁶¹ Emails from Michael Edwards, DCA, 8 April, 31 July, and 1 September 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; Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 August 2025.

¹⁶² 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>.

¹⁶³ L'Agenzia Italiana per la Cooperazione allo Sviluppo (AICS) is the Italian Agency for Development Cooperation. See www.aics.gov.it.

¹⁶⁴ KfW is a German bank. In December 2024, NPA implemented a project with the Norwegian Refugee Council (NRC) under NRC's donor KfW. Emails from Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 August 2025.

Table 3 Continued

Donor	2024	2025
The Netherlands Refugee Foundation (Stichting Vluchteling)	MAG	None
Norway (Norad ¹⁶⁵ /MFA)	HALO, NPA	HALO (as at March 2025), NPA
Novo Nordisk Foundation ¹⁶⁶	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, ¹⁶⁷ MAG, NPA	MAG, NPA
United Kingdom Foreign, Commonwealth and Development Office (FCDO)	HALO, MAG	HALO (as at March 2025), MAG
Ukraine Humanitarian Fund (UHF) ¹⁶⁸	DRC	None
US PM/WRA	DRC, FSD, HALO, MAG, NPA	DRC, FSD (to end January 2025 only), ¹⁶⁹ MAG, NPA
Viterra ¹⁷⁰	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 and financial support for MDDs 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.¹⁷¹ 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.¹⁷² As at April 2025,

the MoE was working on an implementation and monitoring and evaluation plan for tracking gender and diversity in the sector,¹⁷³ while the GICHD was updating a report on gender and diversity in the sector.¹⁷⁴ *It has also been suggested that national-level reporting could improve gender-specific details.*¹⁷⁵

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”.¹⁷⁶ 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

¹⁶⁵ Norad is the Norwegian Agency for Development Cooperation, under Norway’s MFA. See www.norad.no.

¹⁶⁶ Novo Nordisk Foundation is an independent, Danish enterprise foundation. See www.novonordiskfonden.dk.

¹⁶⁷ 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.

¹⁶⁸ 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>.

¹⁶⁹ 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.

¹⁷⁰ Viterra is a Dutch agriculture company. See www.viterra.com.

¹⁷¹ “Social Inclusion and Gender Equality in Mine Action: Outcomes of the Two-Day Workshop”, Demine Ukraine, 21 February 2025, at: <https://bit.ly/3YRHf6j>.

¹⁷² Ibid.

¹⁷³ Interview with OSCE Ukraine, in Geneva, 11 April 2025; and email from Government of Ukraine, 18 July 2025.

¹⁷⁴ Interview with the GICHD, 10 April 2025.

¹⁷⁵ Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.

¹⁷⁶ “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”.

promote equal access to employment in mine action for these groups.¹⁷⁷ All mine action operators, as with all businesses and organisations in Ukraine, are required to employ a certain percentage of persons with disabilities.¹⁷⁸

In granting Ukraine's third extension request, the 21MSP noted that the detailed work plan to follow should contain information on how Ukraine ensures consideration for gender, age, and disability, and takes the diverse needs and experiences of people in affected communities in its implementation efforts.¹⁷⁹ But no such information was provided in the work plan received in May 2024, nor the annually updated work plan for 2025, made available by the APMBC in April 2025.¹⁸⁰

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.¹⁸¹ 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 4 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 4 cover only those employed by certified mine action operators.¹⁸²

Table 4: Gender composition of mine action supervisory bodies and government demining units (GUs) (at end 2024)¹⁸³

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 (4%)	879	20 (2%)	3,516	159 (5%)

* Includes the MAC at Cherniv; 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.¹⁸⁴ All international survey and clearance operators implement their global gender, diversity, and inclusion policies at the country-level in Ukraine,¹⁸⁵ while HALO and MAG have developed country-specific gender and diversity strategies for their respective organisations in Ukraine.¹⁸⁶ According to some agencies, about 15% of those employed in mine action in Ukraine were women as at January 2025,¹⁸⁷ although Ukraine's MoD says the proportion of women engaged in mine action "exceeds 35%".¹⁸⁸

A project underway with UN Women aims to bring more women into the sector in survey, clearance, and specialised positions over the following 18 months, and ultimately increase the number of women employed across all types of leadership, operational, and supporting positions in Ukrainian institutions and organisations.¹⁸⁹ 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%).¹⁹⁰ 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.¹⁹¹

177 Interview with Yevhenii Zubarevskiy, MoD, in Geneva, 1 May 2024.

178 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".

179 Decision of the 21MSP on Ukraine's Article 5 deadline extension request, p. 2.

180 "The Work Plan for Humanitarian Demining of De-occupied Territories of Ukraine for 2024 (hereinafter referred to as - the Work Plan) (With annual updates to the plan until 2032)", received 17 May 2024, available at: <https://bit.ly/3Jzxv10>; and "Annex 1, Workplan on humanitarian demining of newly liberated areas of Ukraine in 2025 (updated on annual basis until 2032)", undated but made available on the APMBC website on 30 April 2025, available at: <https://bit.ly/45lPCL5>.

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

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

183 Ibid.

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

185 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.

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

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

188 "Over one-third of mine action personnel in Ukraine are women", MoD of Ukraine, 21 February 2025, at: <https://bit.ly/4dzVcfc>.

189 Email from Cornelius Nolen, Women, Peace and Security programme, UN Women Ukraine, 14 October 2025.

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

191 Ibid., pp. 21–22.

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.¹⁹²

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 2025.¹⁹³ DanChurchAid

(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.¹⁹⁴ NPA was able to increase the proportion of all staff who are women by 10% between 2023 and 2024.¹⁹⁵ APOPO had no women in managerial or supervisory positions as of March 2025, but noted that two female dog handlers were undergoing Team Leader training from February.¹⁹⁶ National NGO operator, Humanitarian Security, had no female deminers at the time of writing but planned to train six by July 2025.¹⁹⁷ National operator, Ukrainian Deminers Association, (UDA) has 40% female staff.¹⁹⁸

Table 5: Gender composition of humanitarian mine action operators in 2024^{199*}

Operator	Total staff	Total women staff	Managerial or supervisory staff	Women managerial or supervisory staff	Operational staff	Women operational staff
APOPO	33	17 (52%)	3	0 (0%)	21	12 (57%)
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%)
Totals	3,411	1,035 (30%)	719	239 (33%)	2,825	720 (25%)

*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.²⁰⁰ 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.²⁰¹ HALO also provides uniforms and PPE tailored for female employees.²⁰² 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.²⁰³

192 "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>.

193 Emails from Roxana-Cristina Bobolicu, DRC, 5 April and 10 June 2025.

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

195 Emails from Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 April 2024.

196 Email from Nick Guest, APOPO, 3 March 2025.

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

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

199 Emails from Nick Guest, APOPO, 3 March 2025; 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.

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

201 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.

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

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

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.²⁰⁴ 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 2025.²⁰⁵ HALO has mentorship programmes in place for war veterans.²⁰⁶ NPA too encourages employment of war veterans, which comprised more than 4% of staff in 2024, rising to 5% as at July 2025.²⁰⁷

Measures were taken to increase recruitment of persons with disabilities and other underrepresented 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).²⁰⁸ On average, in 2024, persons with disabilities made 9% of NPA's workforce.²⁰⁹ HALO conducts workplace accessibility assessments and took steps to enhance

workplace 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 underrepresented groups. Efforts include adjusting recruitment processes, improving workplace accessibility, and offering flexible work arrangements to accommodate employees with diverse needs.²¹⁰

FSD, HALO, and MAG also highlight their efforts to employ community-facing personnel fluent in both Ukrainian and Russian.²¹¹ MAG provides enhanced and country-specific conflict sensitivity training for staff.²¹² APOPO is tasked through MAG and therefore MAG's community liaison and tasking policies apply to APOPO in Ukraine.²¹³ FSD provides cultural sensitivity training to staff, particularly for engagement with displaced populations and vulnerable groups.²¹⁴ Key written communications, such as risk education materials and warning signs are commonly provided in both Ukrainian and Russian.²¹⁵

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,²¹⁶ 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.²¹⁷

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.²¹⁸ 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;²¹⁹ an initiative supported by OSCE.²²⁰ Strategies suggested to mitigate the environmental impact of mine action on agricultural land in particular include: avoiding use of explosives where possible; restoring

204 Email from Government of Ukraine, 18 July 2025.

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

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

207 Email from Vanja Sikirica, NPA, 21 August 2025.

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

209 Email from Vanja Sikirica, NPA, 21 August 2025.

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

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

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

213 Email from Nick Guest, APOPO, 3 March 2025.

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

215 Email from Government of Ukraine, 18 July 2025.

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

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

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

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

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

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.²²¹ 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.²²²

The first draft of a dedicated NMAS on the environment was due to be finalised by the end of 2025. Under the coordination of the United Nations Environment Programme (UNEP) and the MoE, a working group has been formed to draft, pilot, and approve the future standard and identify best practices.²²³ The updated IMAS 7.13 (Second Edition, 3 July 2024) has been translated into Ukrainian.²²⁴ Ukraine's current NMAS include a chapter (11.2.9) on "Environmental regulations", and a section (12.6) on "Environment, occupational health and safety".²²⁵ Certain other standards further cover environmental aspects of demining, though not yet fully.²²⁶ Operators note that key gaps presently include climate change adaptation and mitigation; environmental risk assessments; environmental impact assessments; and compliance with international standards such as ISO 14001.²²⁷

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.²²⁸ The OSCE is helping build the operational capacities of the national mine action centres to systematically conduct "environmentally safe" demining.²²⁹

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.²³⁰ In June 2025, the Committee on Article 5 Implementation said it would welcome updated information from Ukraine

on its efforts to ensure that climate and environmental considerations inform all relevant areas of Convention implementation to appropriately address climate and environmental risks.²³¹

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.²³² DRC has an environmental management system in place²³³ and all international operators have SOPs on environmental management.²³⁴ 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.²³⁵ MAG also conducts post-clearance environmental assessments in line with its global standards.²³⁶ FSD and DCA report to follow a "do-no-harm" approach, for example, ensuring field activities cause minimal disruption to the environment.²³⁷ FSD also emphasises responsible use of mechanical assets to limit soil disturbance and limits the detonation of explosive ordnance where possible.²³⁸ APOPO has not yet implemented specific measures to protect the environment, apart from the management of waste products and animal waste, but planned to introduce further (unspecified) measures during 2025.²³⁹

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.²⁴⁰ HALO and FSD also highlight the importance of deploying teams as close as possible to work sites reduce vehicle emissions.²⁴¹ Humanitarian Security uses solar energy in field camps.²⁴²

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

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

223 Email from Government of Ukraine, 22 September 2025.

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

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

226 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>.

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

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

229 "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>.

230 "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".

231 Committee on Article 5 Implementation, "Preliminary Observations", Intersessional Meetings, 17–20 June 2025, p. 5.

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

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

234 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.

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

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

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

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

239 Email from Nick Guest, APOPO, 3 March 2025.

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

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

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

HALO Ukraine has formed a partnership with World Wildlife Fund for Nature (WWF) Ukraine to restore the shelterbelts (vegetation barriers)²⁴³ 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.²⁴⁴

Table 6: International operator environmental policies and action²⁴⁵

Operator	Environmental policy in place	Environmental assessments conducted to support survey and clearance	Environmental focal point at programme level
APOPO	Yes	No	Yes
DCA	Yes	Yes	No
DRC	Yes	No	No
FSD	Yes	Yes	No
HALO	Yes	In development (June 2025) ²⁴⁶	Yes
NPA	Yes (country-specific)	Yes (from May 2025)	Yes
MAG	Yes	No	No

INFORMATION MANAGEMENT AND REPORTING

Ukraine is using IMSMA Core.²⁴⁷ Operators report that the system functions effectively, and all operators have been trained in its use.²⁴⁸ 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 GIS purposes, allowing operators to leverage spatial data for mapping.²⁴⁹ Operators also report that the national database is up to date in so far as is possible in the context of the ongoing conflict.²⁵⁰

Survey and clearance data entered into IMSMA are validated by the MAC.²⁵¹ All accredited operators are required to regularly submit reports, including on NTS, TS, and clearance.²⁵² Data collection forms are regularly discussed and agreed with operators.²⁵³ The IMSMA database receives new information daily from operators that is shared across key partners.²⁵⁴ 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.²⁵⁵

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.²⁵⁶ 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.²⁵⁷

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.²⁵⁸

As at June 2025, the Committee on Cooperative Compliance noted that, "while Ukraine has not yet submitted an Article 7 report in 2025 [covering 2024], it submitted information on implementation of Article 5".²⁵⁹ As at early September 2025, the Article 7 report covering 2024 was still outstanding. Ukraine submitted an Article 7 Report covering 2023 on

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

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

245 Emails from Nick Guest, APOPO, 3 March 2025; 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; Vanja Sikirica, NPA, 6 June 2025; Amela Balic, NPA, 12 May 2025; and Niamh McNamara, MAG, 30 April and 11 June 2025.

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

247 Email from the GICHD, 26 May 2023.

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

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

250 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.

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

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

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

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

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

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

257 Ukraine National Mine Action Center, MoD and SSTS, accessed 22 May 2025, at: <http://bit.ly/487neOj>.

258 Email from Government of Ukraine, 18 July 2025.

259 Committee on Cooperative Compliance, "Preliminary Observations", Intersessional Meetings, 17-20 June 2025, Annex IV.

time and acted upon on the decisions of the 21MSP by submitting an updated work plan, both in 2024, and 2025.²⁶⁰ The Article 7 report covering 2023 was better than the one submitted a year earlier in that it included information on AP mined areas and land release.²⁶¹ The Committee encouraged Ukraine to report information on progress in accordance with land release methodology employed, in accordance with the IMAS and disaggregated by type of contamination, and to employ the Guide to Reporting in the drafting of its annual Article 7 report. It also called on Ukraine to update

information on its remaining challenge in a manner consistent with IMAS, disaggregated by SHAs, CHAs, their relative size, and type of contamination, and to continue disaggregating AP mines of an improvised nature from other IEDs.²⁶² Survey and clearance data provided by the government of Ukraine to Mine Action Review for the 2024 reporting period were better than previous years. Land release for 2024 was disaggregated by EO type as was land release methodology (area reduced through technical survey was disaggregated from area cleared).

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.²⁶³ An operational plan for 2024–26 is attached to the strategy. The strategy does not make separate provision for AP mines, but rather refers throughout to “explosive ordnance”.²⁶⁴

Ukraine submitted an annual work plan for 2024 to the other States Parties through the Implementation Support Unit in accordance with the decision of the 21MSP in response to its Article 5 deadline extension request, writing that it is “subject to annual updates until 2032”. The plan contains a table detailing all known AP mined areas by district with precise coordinates.²⁶⁵ Finally, annual land release targets for release of AP mined areas are given for the period 2024 to 2032, though these are provided only in Ukrainian and not in English.²⁶⁶

Ukraine submitted an updated annual work plan for 2025, in which it planned for 22 certified operators to undertake NTS and release through cancellation almost 205km² of AP mined area, across 1,212 hazardous areas (see Table 7). A detailed list is provided assigning each named operator with a certain number of areas and their size, as well as a detailed list of the “territorial communities” (TCs) that will be included

in the NTS, and the size of each TC. Ukraine also planned for 25 certified operators to undertake clearance of 2,711 hazardous areas “to get rid of mines and explosive remnants of war” in 104 TCs, measuring 506km², across eight oblasts (see Table 8). The number of hazardous areas to be cleared in each oblast is not stated. However, a detailed list is provided assigning named operators to a specific TC, with the size of each TC stated.²⁶⁷

Table 7: AP mined areas planned to be released through cancellation by Ukraine in 2025²⁶⁸

Oblast	No. of hazardous areas to be addressed	Area to be addressed (km ²)
Mykolayiv	476	97.3
Kharkiv	310	31.8
Kherson	207	47.4
Chernihiv	147	16.3
Dnipropetrovsk	29	2.1
Kyiv	26	9.4
Sumy	17	0.4
Totals	1,212	204.7

²⁶⁰ Ibid., pp. 3–4.

²⁶¹ Article 7 Reports (covering 2022 and 2023), Form D.

²⁶² Committee on Article 5 Implementation, “Preliminary Observations”, Intersessional Meetings, 17–20 June 2025, pp. 1–2.

²⁶³ Presentation by Oleg Stoiev, Head of Mine Action Office, MoE, NDM, in Geneva, 29 April 2024.

²⁶⁴ “Cabinet of Ministers of Ukraine order dated 28 June 2024 No. 616-p.

²⁶⁵ Work Plan for Humanitarian Demining of De-occupied Territories of Ukraine for 2024, 30 April 2024, Table 3.

²⁶⁶ Ibid., Table 4.

²⁶⁷ “Annex 1, Workplan on humanitarian demining of newly liberated areas of Ukraine in 2025 (updated on annual basis until 2032)”, pp. 7–9.

²⁶⁸ Ibid., p. 9.

Table 8: Areas planned to be cleared containing mines and ERW by Ukraine in 2025²⁶⁹

Oblast	Area to be addressed (km ²)
Mykolayiv	157.6
Kharkiv	193.4
Kherson	84.7
Chernihiv	21.13
Dnipropetrovsk	2.47
Kyiv	36.7
Sumy	1.68
Donetsk	8.7
Total	506.38

Ukraine prioritises clearance of critical infrastructure facilities and population centres.²⁷⁰ 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.²⁷¹ 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.²⁷² A pilot project to improve prioritisation, in partnership between digital technology company Palantir and the MoE, was underway in Kharkiv in April 2025.²⁷³ In March 2025, the national authorities published the "Methodological Guidelines for Prioritizing Areas Contaminated by Explosive Ordnance for Humanitarian Demining".²⁷⁴ As at July 2025, this new methodology for prioritisation was being piloted, with assessment at the hromada, oblast, and national levels²⁷⁵ and by September 2025 it was rolled out in five oblasts. Each year, Ukraine conducts a bottom-up exercise on tasking and prioritisation, gathering information from local authorities and operators, and approving the plan for the following year.²⁷⁶

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.²⁷⁷

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.²⁷⁸ 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.²⁷⁹

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.²⁸⁰

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.²⁸¹ APOPO reports that the issuance of task dossiers can take up to 10 working days, hampering continuity of operations and operational planning.²⁸² HALO, at times, has encountered delays in obtaining allocation of new areas for survey from

269 Ibid., p. 7.
270 2023 Article 5 deadline Extension Request, p. 3.
271 "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".
272 "Mine Action in Ukraine", presentation to the MASG by Paul Heslop, UNRCO, New York, 24 October 2024, p. 28.
273 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>.
274 "Mine Action in Focus, Issue 1", Demine Ukraine, MoE, June 2025, p. 9. At the time of writing (August 2025), this document was available in Ukrainian, but it was not known if it was also available in English.
275 Email from Government of Ukraine, 18 July 2025.
276 Email from Government of Ukraine, 22 September 2025.
277 Email from Amela Balic, NPA, 12 May 2025.
278 Email from Michael Edwards, DCA, 8 April 2025.
279 Email from Niamh McNamara, MAG, 30 April 2025.
280 Email from Eleanor Porritt, FSD Ukraine, 17 March 2025.
281 Ibid.
282 Email from Nick Guest, APOPO, 3 March 2025.

the MAC.²⁸³ 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 2025.²⁸⁴

LAND RELEASE SYSTEM

STANDARDS AND LAND RELEASE EFFICIENCY

NMAS were finalised by the MoD in 2018.²⁸⁵ 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 context²⁸⁶ and clarifying responsibilities for control and enforcement of marking systems.²⁸⁷ In April 2023, Ukraine issued "improved" national standards covering NTS, TS, manual demining, clearance, mechanical demining, EO destruction, and EORE.²⁸⁸ Certain revised NMAS were due to come into effect on 1 June 2024²⁸⁹ and IM standards and QM standards were approved in 2024.²⁹⁰ 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).²⁹¹ At the time of writing, MDD standards were expected to be released in 2026.²⁹² A new technical committee on the "Standardisation of Mine Action Processes" was established by the national authorities in March 2025.²⁹³ Under this Committee, as at September 2025, a primary review of the improved standards mentioned above has been conducted; a review of other standards is planned; the standard on EORE was pending approval; and work to develop the dedicated environmental standard had been launched.²⁹⁴

The changes to the NMAS in 2024 and early 2025 involved consultation with operators.²⁹⁵ Though generally well received, challenges remain over how they are understood and implemented.²⁹⁶ 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 mines or CMR, may be resurveyed and cancelled.²⁹⁷ Some operators suggest this is overly restrictive. HALO, for example, continues to advocate for revisions to 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.²⁹⁸ 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"²⁹⁹ and also suggests greater delegation of decision-making on cancellation, e.g. to the oblast level or further down.³⁰⁰ It has also been suggested that there should be greater clarity around the requirement to mark the entire perimeter of a given area during NTS, as doing so in inaccessible areas requires significant time, effort, and capacity.³⁰¹

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,³⁰² which require that at least one type of every asset is tested before approval

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

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

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

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

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

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

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

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

291 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.

292 Email from Government of Ukraine, 22 September 2025.

293 "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.

294 Email from Government of Ukraine, 22 September 2025.

295 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.

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

297 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.

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

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

300 Ibid, p. 28.

301 Email from humanitarian operator, August 2025.

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

and deployment.³⁰³ The technical notes accompanying the NMAS on mechanical assets are also said to be not consistently understood or implemented across the sector.³⁰⁴

Operators also suggest the need for an amendment to the NMAS on clearance of confirmed surface-laid AP and AV mines, removing the requirement to clear to a sub-surface depth of 15cm. This requirement presents difficulties where deminers are forced to clear sub-surface metal contamination in areas where there is only surface presence of AP or AV mines.³⁰⁵ A suggested alternative is that the requirement to clear areas so that they are metal free should be risk- and threat-based and designated within the task dossier.³⁰⁶ Finally, it is suggested the NMAS criteria for reduction are, at times, restrictive and should be reviewed.³⁰⁷

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.³¹² The number of mine action operators in Ukraine has grown significantly since Russia's full-scale invasion in February 2022, increasing from 29 in 2023³¹³ to 45 by July 2024,³¹⁴ 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.³¹⁵

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 9).³¹⁶ This had increased to 278 by July 2025.³¹⁷ 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.³¹⁸ 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

The Government states that Ukraine's QM system is an area for further improvement, as capacity remains challenging.³⁰⁸ 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 MASG, with a recommendation for further investment in QA and QM.³⁰⁹ 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.³¹⁰ 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 2025.³¹¹

of 2,000 personnel in 2023³¹⁹ – nearly four times the capacity available in 2020.³²⁰ Ukraine expected a further increase in capacity during 2025³²¹ 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 9). It is not specified what level of this increased capacity will be available for the survey and clearance of AP mines. The plan for capacity growth refers throughout to "mines and explosive remnants of war".³²²

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.³²³ 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.³²⁴

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

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

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

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

307 Emails from Steve Wallis OBE, HALO, 19 March and 1 September 2025.

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

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

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

311 Interview with the GICHD, 10 April 2025.

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

313 "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".

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

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

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

317 Email from Government of Ukraine, 18 July 2025.

318 FAO and WFP Presentation, NDM, 2024.

319 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>.

320 APMBC Article 5 deadline Extension Request, 2020.

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

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

323 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 25 July 2025.

324 "Ukraine: Strengthening national mine action capabilities", DRC, 9 February 2024.

Table 9: Government unit capacities* deployed for survey, clearance, and EOD of AP mines in 2024³²⁵

Type of national government 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 to be sensitive, and hence it has not been provided to Mine Action Review. **Mechanical demining assets as of 2 May 2025.

Table 10: NGO operational NTS capacities deployed in 2024³²⁶

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

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

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 5,000.³²⁷

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 Coalition³²⁸ 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 EOD transportation, mine detectors, armoured vests and visors".³²⁹ Training of personnel in the Security and Defence Forces in 2024 covered NTS, TS, demining, mine and IED rapid clearance and spot tasks.³³⁰

Multiple international demining organisations operational in Ukraine include APOPO, DCA, DRC, FSD, HALO, MAG, and NPA (see Tables 10 and 11).³³¹ Humanity & Inclusion (HI), currently active in risk education, planned to begin NTS in September 2025.³³² Humanitarian Security is a national operator based in the Kharkiv region, where it planned to survey 90km² 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.³³³ 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.

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

326 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.

327 "Partnerships in Action: How Collaboration and Innovation Drive Impact", Presentation from Mikhalio Konopelniuk, Colonel, Demining, SSTS, at the NDM, Geneva, 9–11 April 2025.

328 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.

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

330 Ibid., Form A.

331 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>.

332 Emails from Fenella Henderson-Howat, Technical Head of Programme, HI, Ukraine, 4 April and 30 July 2025; and Muuaz Alfayad, Armed Violence Reduction (AVR) Specialist, HI, 29 August 2025.

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

Table 11: NGO operational TS and clearance capacities deployed in 2024^{*334}

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.
Totals	157	31	20	1,216	8	75

*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.

HALO and FSD both saw a significant increase in survey and clearance personnel deployed in 2024, compared to 2023.³³⁵ 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 2024.³³⁶ MAG was also able to increase community liaison and demining capacity due to more donor funding.³³⁷ 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.³³⁸ NPA had doubled the number of its manual teams³³⁹ 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

334 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.

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

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

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

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

339 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".

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, which were certified in April 2025, plus a further five MDD units in the spring of 2025 (handlers and MDDs), which were expected to be certified in September 2025.³⁴⁰

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.³⁴¹ 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.³⁴²

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 2025.³⁴³ HALO expected an increase in survey and clearance capacity during 2025, but not to the extent achieved in 2024.³⁴⁴ NPA expected to increase manual capacity in 2025.³⁴⁵ 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 2025.³⁴⁶ 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 2025.³⁴⁷

Some operators have enhanced or altered use of mechanical assets in Ukraine to adapt to the local context. FSD, for example, is using a mesh rather than a detector to screen soil in heavily metal-contaminated areas, prepared with the MV10 robotic demining system or the GCS200 unmanned EOD platform.³⁴⁸ FSD is also using locally-produced mine rollers, which it says are enhancing safety and efficiency,³⁴⁹ and HALO is working with a local manufacturer to refine a mini-flail ground preparation machine.³⁵⁰

MDD teams have been operational in Ukraine under NPA since the spring of 2024³⁵¹ and technical survey dogs (TSDs) were introduced into Ukraine in November 2024. APOPO, in partnership with MAG, deployed TSD teams working alongside MAG manual teams in Kharkiv and Mykolaiv oblasts, though adverse weather restricted operations. APOPO anticipated initial use of the dogs in suspected or confirmed hazardous agricultural areas, with remote-controlled vegetation-cutting machines considered for use in areas where there might be a tripwire threat. APOPO TSDs are trained to work in vegetation, removing the need for the ground-preparation that would be necessary when using more conventional MDDs. APOPO reports that this increases land release efficiency by allowing manual demining teams to focus their efforts on CHAs.³⁵² APOPO planned to add two further teams in 2025 and to survey at least 5km² using TSDs by the end of the year. However, it points out that this figure is based on minefield tasks with 50% survey coverage, whereas the MAC currently requires 100% survey coverage in BAC tasks.³⁵³ As most hazardous areas contain a mixed threat, full coverage will likely be required.

Further development of the use of UAVs (drones) and remote-sensing capabilities continued in 2024. HALO trained NTS and remote-sensing 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 the middle of 2024, high-resolution UAV survey was being used in planning every suitable clearance task. Automatically programmed flights over minefields are also used to rapidly collect high-resolution imagery, which is processed into a highly detailed minefield image map (orthomosaic).³⁵⁴ In early 2025, FSD undertook tests of UAVs equipped with ground-penetrating radar, though these did not provide useful findings due to issues with the GPS jamming during flight.³⁵⁵ NPA continued to use UAVs intensively for NTS and TS “and clearance”, as well as to generate orthomosaics, which can be later used by clearance teams as the basemap.³⁵⁶ NPA also introduced high-accuracy, global navigation satellite system (GNSS) devices to help field teams map mined areas and clearance polygons with centimetre accuracy.³⁵⁷

340 Emails from Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 August 2025.

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

342 Ibid.

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

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

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

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

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

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

349 “Our Mine action programme in Ukraine”, FSD, November 2024, at: <https://bit.ly/4hyEOMN>, p. 8.

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

351 Email from Government of Ukraine, 22 September 2025.

352 “APOPO in Ukraine”, APOPO, accessed 28 January 2025, at: <https://bit.ly/4aDj7ss>.

353 Email from Nick Guest, APOPO, 12 May 2025.

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

355 Emails from Eleanor Porritt, FSD Ukraine, 17 March and 29 August 2025.

356 A basemap is the background map layer in GIS or mapping applications that provides geographic context for data.

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

Operators also continued to explore the use of AI in 2024. NPA continued two AI projects with partners, which seek to generate an alternative tool for pinpointing landmine and EO evidence points, and assist traditional manual NTS. Importing this information directly into NPA's database is intended to eliminate the risk of manual entry errors.³⁵⁸ FSD is exploring using systems such as Safe Pro's *Spotlight AI* to help analyse NTS data and ensure clearance assets are

deployed efficiently.³⁵⁹ HALO has started to use AI analysis of satellite photos of war-affected areas to assess the potential mine threat.³⁶⁰

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".³⁶¹

LAND RELEASE OUTPUTS AND ARTICLE 5 COMPLIANCE

LAND RELEASE OUTPUTS IN 2024

Table 12: Land release outputs in 2024 (National authority data)³⁶²

Release of AP mined area	Release in 2024 (km²)	Comments
Clearance	2.07	Official IMSMA data provided on clearance of areas suspected or confirmed to contain AP mines by humanitarian operators, excluding clearance by State entities such as MoD and SESU. Not all these areas were ultimately found to contain AP mines.
Technical Survey	2.07	Official IMSMA data provided on reduction through TS of areas suspected or confirmed to contain AP by humanitarian operators, excluding State entities such as MoD and SESU.
Non-Technical Survey	0	Official IMSMA data.
Destruction of AP mines during clearance, survey, and spot tasks	2024	
AP mines destroyed	14,142 by all entities, including both humanitarian and military-related demining (National authority data). Includes 457 AP mines destroyed by humanitarian clearance operators according to official IMSMA data, of which 207 were destroyed in spot tasks by non-State operators)*	Total AP mines destroyed: NMAA data. EOD spot tasks: official IMSMA data.

*Data on the number of AP mines destroyed in spot tasks by government units were requested but not provided.

358 Ibid.

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

360 "Ukraine", HALO, accessed 28 January 2025, at: <https://bit.ly/3Cr0lbt>.

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

362 Emails from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025; and Government of Ukraine, 6 September 2025.

Official IMSMA data provided in September 2025 indicate that a total of almost 4.15km² of AP mined area was released in 2024 through humanitarian demining (i.e. excluding military demining), of which 2.07km² was reduced through TS (see Table 14) and 2.07km² was cleared (see Table 18). This is the mine clearance total Mine Action Review has used for 2024. While the 2.07km² was clearance of SHAs/CHAs suspected or confirmed to contain AP mines, not all these areas were ultimately found to contain AP mines during clearance.³⁶³ No mined area was cancelled through NTS in 2024. Official IMSMA data include humanitarian demining operations, but exclude the results of military-related demining activities. A total of 457 AP mines were destroyed during humanitarian operations in 2024. At the time of writing, Ukraine had yet to submit its APMBC Article 7 transparency report covering 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 AP and AV mines, CMR, and other items of UXO. According to the NMAA, a total of 11.51km² of all contamination types was released through survey in Ukraine in 2024, of which 7.01km² was cancelled through NTS and 4.5km² was reduced through technical survey.³⁶⁴ In addition, 17.1km² was cleared of all contamination types in Ukraine in 2024 (see Table 19).³⁶⁵ The NMAA reports that 14,142 AP mines were destroyed during TS, clearance, and EOD, together with 11,119 AV mines, 25,893 submunitions

and 164,248 other items of UXO.³⁶⁶ This includes both humanitarian and military demining operations. However, as noted above, the areas released, as reported by the NMAA, are of all EO contamination generally. Therefore, the size of the actual AP mined area addressed, is far smaller.

International operators reported that they released a total of 1.24km² of mined area in 2024, of which 724,171m² was cleared and 513,916m² reduced through TS (none was cancelled through NTS).³⁶⁷ In addition, national operator Humanitarian Security cleared 123,640m² of AP mined area and cancelled 2.39km² through NTS,³⁶⁸ although no AP mined area was recorded in IMSMA as having been cancelled by any operator in 2024. Mine Action Review requested information on survey and clearance from several other national operators in 2024 but was unable to source further data. A total of 512 AP mines were found by humanitarian operators during clearance, along with 937 AV mines and 230 items of UXO. According to humanitarian operators from whom Mine Action Review was able to obtain data, a further 19 AP mines and 4 AV mines were identified in spot tasks by humanitarian operators. All mines and UXO they found were transferred for destruction by authorised national operators, except in the cases of HALO and Humanitarian Security, both of which are accredited for EOD.³⁶⁹ The number of AP mines destroyed in EOD spot tasks by all operators in Ukraine in 2024, (excluding rapid response by State operators) was 207, according to official IMSMA data provided by the Government of Ukraine.³⁷⁰

SURVEY IN 2024

At the time of writing, Ukraine had yet to submit its Article 7 report covering 2024. However, according to official IMSMA data, 2.07km² of hazardous areas with suspected or confirmed AP mine contamination was reduced through technical survey in 2024 (see Table 14). No mined area was cancelled through NTS in 2024.³⁷¹ The amount of mined area reduced through TS in 2024 was a significant increase on 2023, when was 0.02km² was reduced by HALO, based on official IMSMA data provided to Mine Action Review in 2025. No mined area was cancelled in 2023.³⁷²

According to the NMAA, a total of 11.51km² across 379 hazardous areas contaminated with EO, including AP and AV mines, CMR, and other items of UXO, was released through survey by all operators in 2024. Of the total, 7.01km² across 300 SHAs was cancelled through NTS and 4.5km² across 79 areas was reduced through TS (see Tables 13 and 16).³⁷³

By comparison, in its Article 7 report covering 2023, Ukraine reported that 362km² of land was "inspected and demined", with NTS undertaken over 1,125km², of which 547km² was "subject to demining" and 70km² was actually demined, though it is not stated how much of this was suspected or confirmed to contain AP mines. Ukraine says that this work was conducted "in cooperation with regional military administrations" and by units of the Armed Forces of Ukraine, the SSTs, the National Guard of Ukraine, and the National Police of Ukraine.³⁷⁴ In its work Plan for 2024, Ukraine specifies that 4,275m² was reduced through TS in 2023.³⁷⁵

International operators reported release of 513,916m² through survey in 2024, all of which was reduction through TS, with 92,203m² reduced by HALO and 421,713m² reduced by NPA (see Table 15).³⁷⁶ The amount of land reduced by international operators in 2024 is a very large increase on the 3,135m² reduced in 2023, all by HALO.³⁷⁷

363 Email from Government of Ukraine, 6 September 2025.

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

365 Ibid.

366 Ibid. Disaggregated information regarding AP mines destroyed during TS and clearance, and those destroyed in EOD spot tasks, was requested but not provided.

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

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

369 Emails from Roxana-Cristina Bobolicu, DRC, 5 April 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 and 11 June 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

370 Email from Government of Ukraine, 6 September 2025.

371 Email from Government of Ukraine, 6 September 2025.

372 Ibid.

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

374 Article 7 Report (covering 2023), "Implementation of demining measures in wartime", p. 26.

375 Work Plan for Humanitarian Demining of De-occupied Territories of Ukraine for 2024, 30 April 2024, Annex 1, Table 1. The total figure for all land released by technical survey given in the table is "44275", but this appears to be a typographical error.

376 Emails from Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, NPA, 12 May 2025.

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

As previously noted, cancellation by NGOs is possible, but only under specific instructions from the MAC. According to official IMSMA data no AP mined areas was cancelled by any operator in 2024.³⁷⁸ According to official IMSMA data for 2025, hazardous area suspected to contain AP mines had been reported by international and national NGOs to the national authorities for cancellation in 2025, but had yet to processed as cancelled in IMSMA as at time of writing; whereas a small amount of cancellation of mined area by national entities had been recorded as processed as cancelled.

No AP mined area was reported as cancelled by international operators through NTS in 2023, as no cancellation was accepted by the NMAA-MAC at that time, on the basis that the national standard for land release had not been approved.³⁷⁹

Table 13: Cancellation through NTS all EO-contaminated area in 2024 (National authority data)*³⁸⁰

Operators	SHAs cancelled	Area cancelled (km²)
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 by the NMAA. According to separate official IMSMA data provided, no hazardous areas suspected to contain AP mines were cancelled in 2024.³⁸¹

Table 14: Reduction of AP mined area through TS in 2024 (official IMSMA data)³⁸²

Oblast	Operator	Area reduced (m²)
Chernihiv	HALO	47,032
Sub-total		47,032
Kharkiv	HALO	16,844
Kharkiv	IDG	1,262,505
Kharkiv	UOS	24,233
Sub-total		1,303,582
Kherson	SSTS	42,024
Sub-total		42,024
Kyiv	HALO	181,907
Sub-total		181,907
Mykolaiv	HALO	3,976
Mykolaiv	NPA	109,285
Mykolaiv	UDS	384,207
Sub-total		497,468
Totals		2,072,013

Table 15: Reduction of AP mined area through TS in 2024 (operator data)*³⁸³

Operator	Oblast	District	Sub-district, locality	Areas reduced	Area reduced (m²)
NPA	Mykolaiv	Shevchenkivska	Novohryhorivka	1	98,113
NPA	Mykolaiv	Shevchenkivska	Liubomyrivka	1	323,600
Sub-total				2	421,713
HALO	Kharkiv	Chuhuivskyi	Chkalovska, Mykolaivska	1	101
HALO	Kharkiv	Chuhuivskyi	Chkalovska, Nova Hnylytsia	1	2,987

378 National operator, Humanitarian Security, reported that it cancelled 2.39km² of AP mined area through NTS in 2024, in the sub-district of Balakliya, in Izyum, Kharkiv. Email from Maksym Slipchenko, Humanitarian Security, 21 March 2025. However, this did not appear in IMSMA, calling into question whether this was in fact cancellation of hazardous areas suspected to be contain AP mines.

379 Email from Vanja Sikirica, NPA Ukraine, 5 May 2024.

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

381 Email from Government of Ukraine, 6 September 2025.

382 Ibid.

383 Emails from Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, NPA, 12 May 2025.

Table 15 Continued

Operator	Oblast	District	Sub-district, locality	Areas reduced	Area reduced (m ²)
HALO	Kyiv	Brovarskyi	Baryshivska, Peremoha	1	19
HALO	Kyiv	Brovarskyi	Velykodymerska, Zalissia	1	65,387
HALO	Kyiv	Buchanskyi	Makarivska, Lypivka	1	12,647
HALO	Kyiv	Vyshhorodskyi	Ivankivska, Orane	1	11,062
Sub-total				6	92,203
Totals				8	513,916

*Information based on data available at time of writing. Full information not available on survey outputs of all national humanitarian operators.

Table 16: Reduction of EO-contaminated area through TS in 2024 (National authority data)³⁸⁴

Operators	Areas reduced	Area reduced (m ²)
All government units, and national and international humanitarian mine action operators	79	4,499,971
Totals	79	4,499,971

According to official IMSMA data, some 78.08km² of previously unrecorded AP mined area was discovered and added to IMSMA during humanitarian mine action operations in 2024, of which 53% was in Kharkiv, 23% in Kherson, 19% in Mykolaiv, and the remainder in three other oblasts (see Table 17).

Equivalent data for previously unrecorded AP mined area in 2024, as reported by international operators and by national operator Humanitarian Security, totalled 54.1km².³⁸⁵ This is more than double the 26.97km² they added to the database in 2023. All areas newly recorded by humanitarian operators in 2024 were entered into the national database.³⁸⁶ Mine Action Review was not able to obtain comparative data on how much newly recorded AP mined area was identified by Ukraine's national operators in 2023.

Table 17: AP mine contamination newly recorded in 2024 (official IMSMA data)³⁸⁷

Oblast	Operator*	Area reduced (m ²)
Chernihiv	FSD	108,972
Chernihiv	HALO	226,686
Sub-total		335,658
Donetsk	DS	1,567
Donetsk	FSD	187,817
Donetsk	HALO	51,769
Donetsk	UDA	2,115,293
Sub-total		2,356,446
Kharkiv	DRC	864,911
Kharkiv	FSD	26,419,587
Kharkiv	HALO	6,794,190
Kharkiv	HS	185,882
Kharkiv	IDG	4,100,870
Kharkiv	PSM	1,109,540
Kharkiv	UOS	1,574,573
Sub-total		41,049,553
Kherson	DC-SSTS	6,072,969
Kherson	DRC	105,185
Kherson	DS	1,308,242
Kherson	HALO	2,818,579
Kherson	NPA	7,371,028
Kherson	UDA	455,602
Sub-total		18,131,605

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

385 According to information reported to Mine Action Review by clearance operators, DCA identified 8,467m² of newly record AP mine contamination in 2024; DRC identified 2,494,282m²; FSD identified 26,719,414m²; HALO identified 11,915,742m²; Humanitarian Security identified 43,876m²; and NPA identified 12,993,943m². This broadly matched the official IMSMA data provided by the government of Ukraine. Full information was not available for all national humanitarian operators on survey outputs. 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; and Amela Balic, NPA, 12 May 2025.

386 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; and Amela Balic, NPA, 12 May 2025.

387 Email from Government of Ukraine, 6 September 2025.

Table 17 Continued

Oblast	Operator*	Area reduced (m²)	Oblast	Operator*	Area reduced (m²)
Kyiv	DRC	72,598	Mykolaiv	NPA	5,876,198
Kyiv	HALO	513,773	Mykolaiv	T0950	36,158
Kyiv	UAD	285,702	Mykolaiv	UDA	137,119
Kyiv	UDS	460,462	Mykolaiv	UDS	3,211,897
Sub-total		1,332,535	Sub-total		14,842,303
Mykolaiv	DCA	8,444	Sumy	FSD	3,012
Mykolaiv	DRC	1,456,031	Sumy	HALO	27,320
Mykolaiv	DS	212,708	Sumy	NPA	3,788
Mykolaiv	HALO	1,364,715	Sub-total		34,120
Mykolaiv	HDR	2,539,033	Total		78,082,220

*Operator names are given as per information provided by Government of Ukraine from the IMSMA database, hence acronyms only are used in all cases.

CLEARANCE IN 2024

At the time of writing, Ukraine had yet to submit its APMBC Article 7 transparency report covering 2024. According to official IMSMA data provided by the government of Ukraine in September 2025, 2.07km² of hazardous areas suspected or confirmed to contain AP mines was cleared in 2024. Not all these areas were ultimately found to contain AP mines.³⁸⁸ Clearance output in 2024 was a significant increase on 2023 clearance, which was 0.33km² based on official IMSMA data provided to Mine Action Review in 2025.³⁸⁹

According to the NMAA, a total of 17.1km² of land contaminated with EO, including AP mines, CMR, and other items of UXO, was cleared by all operators in Ukraine in 2024.³⁹⁰ The NMAA also reports that 14,142 AP mines, along with 11,119 AV mines, 25,893 submunitions, and 164,248 other items of UXO were destroyed during TS, clearance, and spot tasks³⁹¹ (see Table 19). According to the Committee on Article 5 Implementation, Ukraine also reported that SESU pyrotechnic teams destroyed a total of 16,878 AP mines,³⁹² though it is unclear if this is additional to the 14,142 previously mentioned.

The NMAA explains that AP mine clearance was typically conducted in combination with clearance of other types of EO, including AP mines.³⁹³ 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".³⁹⁴ However, as noted above, the areas released, as reported by the NMAA are of all EO contamination. Therefore, the size of the actual AP mine contamination, is almost certainly far smaller.

In its Article 7 report covering 2023, Ukraine reported that 362km² of land was "inspected and demined" in 2023, neutralising in the process 153,000 items of EO.³⁹⁵ In its work plan for 2024, however, Ukraine stated that only 184,797m² of AP mined area was cleared with one AP mine and 201 items of UXO destroyed. No details on which operators conducted this clearance were provided.³⁹⁶

A total of 847,811m² across 22 AP mined areas was reported by humanitarian operators in Ukraine as having been cleared in 2024 (international operators DRC, FSD, HALO, MAG, and NPA, and national operator, Humanitarian Security). A total of 512 AP mines, 937 AV mines, and 230 items of UXO were found during TS and clearance (see Table 20).³⁹⁷ A further 31 AP mines and four AV mines were reported separately by NPA and Humanitarian Security as having been destroyed in spot tasks (see Table 22),³⁹⁸ bringing the total number of AP mines identified by humanitarian operators for destruction to 543. Apart from items found by HALO and Humanitarian Security, which are accredited for EOD, all EO, including

388 Email from Government of Ukraine, 6 September 2025.

389 Ibid.

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

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

392 Committee on Article 5 Implementation, "Preliminary Observations", Intersessional Meetings, 17–20 June 2025, p. 1.

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

394 Ibid.

395 Article 7 Report (covering 2023), "Implementation of demining measures in wartime", p. 26.

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

397 Emails from Roxana-Cristina Bobolicu, DRC, 5 April 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; Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 August 2025.

AP mines, identified by humanitarian operators during TS, clearance, and spot tasks were transferred to authorised government operators for destruction.³⁹⁹ The number of AP mines destroyed in EOD spot tasks by all operators in Ukraine in 2024, (excluding rapid response by State operators) was 207, according to official IMSMA data provided by the Government of Ukraine.⁴⁰⁰

The 847,811m² of AP mines areas cleared by humanitarian operators in 2024 is an increase on the 519,802m² cleared by in 2023, with more than four times as many AP mines identified for destruction in 2024 compared to the 109 in 2023.⁴⁰¹ FSD, HALO, and NPA all saw marked increases in clearance output due to increased capacity. NPA also introduced mechanical teams following certification in June 2024, and HALO increased its use of mechanical clearance methods in 2024, also contributing to higher clearance output.⁴⁰² DRC did not undertake any clearance of AP mined area in 2023 but did so in 2024. This was linked to a scale up of operations in Mykolaiv and Kharkiv, with hazardous areas more likely to contain mines following extended periods of occupation, than some other areas of operation.⁴⁰³ HALO cleared 37 hazardous areas with suspected or confirmed AP mine threats, covering 1.02km², which proved to contain no AP mines.⁴⁰⁴ NPA released one hazardous area of 12,623m², which proved to contain no AP mines, of which 1,332m² was fully cleared and the remainder was reduced (see Table 20).⁴⁰⁵

Table 18: Clearance of AP mined area in 2024 (official IMSMA data)⁴⁰⁶

Oblast	Operator**	Area cleared (m ²)*
Chernihiv	HALO	366,915
Sub-total		366,915
Kharkiv	HALO	112,330
Kharkiv	IDG	95,650
Kharkiv	UOS	53,657
Sub-total		261,637
Kherson	SSTS	14,000
Kherson	UAD	146,156
Sub-total		160,156
Kyiv	HALO	971,553
Sub-total		971,553
Mykolaiv	HALO	36,947
Mykolaiv	NPA	9,732
Mykolaiv	UDS	267,378
Sub-total		314,057
Total		2,074,318

*Release by TS and clearance of mined areas. Not all these areas were ultimately found to contain AP mines. **Operator names are given as per information provided by Government of Ukraine from the IMSMA database, hence acronyms only are used in all cases.

Table 19: Clearance of EO-contaminated area in 2024 (National authority data)⁴⁰⁷

Operators	AP mined areas cleared	Area cleared (m ²)	AP mines destroyed*	AV mines destroyed*	Other UXO destroyed
All government units, and national and international operators	302	17,095,009	14,142	11,119	190,141
Totals	302	17,095,009	14,142	11,119	190,141

*Includes mines destroyed during spot tasks. Data separating mines destroyed during TS and clearance from those destroyed in spot tasks were requested but not provided.

Table 20: Clearance of AP mined area in 2024 (operator data)⁴⁰⁸

Operator	Oblast	District/ Sub-District/Locality	Area cleared (m ²)	Areas cleared	AP mines destroyed***	AV mines destroyed***
DRC	Kharkiv	Not specified	1,108	**0	2	0
DRC	Kyiv	Not specified	3,546	**0	1	0
DRC	Mykolaiv	Not specified	1,475	**0	0	0
Sub-totals			6,129	**0	3	0

398 Emails from Maksym Slipchenko, Humanitarian Security, 21 March 2025; and Amela Balic, NPA, 12 May 2025.

399 Emails from Roxana-Cristina Bobolicu, DRC, 5 April 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 and 11 June 2025; Niamh McNamara, MAG, 30 April 2025; and Amela Balic, NPA, 12 May 2025.

400 Email from Government of Ukraine, 6 September 2025.

401 Emails from Tony Connell, FSD, 14 June 2024; Michael Brown, HALO, 29 May 2024; and Vanja Sikirica, NPA, 5 May 2024.

402 Emails from Eleanor Porritt, FSD Ukraine, 17 March 2025; Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, NPA, 12 May 2025.

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

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

405 Emails from Amela Balic, NPA, 12 May 2025; and Vanja Sikirica, NPA, 21 August 2025.

406 Email from Government of Ukraine, 6 September 2025.

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

408 Emails from Roxana-Cristina Bobolicu, DRC, 5 April 2025; Eleanor Porritt, FSD, 17 March 2025; Zhanna Hulia, GIS Assistant, FSD, 19 March 2025; Steve Wallis OBE, HALO, 19 March 2025; Maksym Slipchenko, Humanitarian Security, 21 March 2025; and Amela Balic, NPA, 12 May 2025.

Table 20: Continued

Operator	Oblast	District/ Sub-District/ Locality	Area cleared (m²)	Areas cleared	AP mines destroyed***	AV mines destroyed***
FSD	Kharkiv	Iziumskyi/Donetska/ Pryshyb	3,746	1	1	0
FSD	Kharkiv	Iziumskyi/Iziumska/ Kamianka	13,027	2	0	0
FSD	Kharkiv	Iziumskyi/Oskilska/ Topolske	3,588	3	123	0
FSD	Kharkiv	Iziumskyi/Oskilska/ Dovhenke	2,115	2	0	0
FSD	Chernihiv	Chernihivsky/ Ivanivska/Yahidne	11,103	2	3	0
Sub-totals			33,579	10	127	0
HALO	Kharkiv	Chuhuivskyi/ Chkalovska/ Mykolaivska	16,067	2	6	0
HALO	Kharkiv	Chuhuivskyi/ Chkalovska/Nova Hnylytsia	2,398	1	2	0
HALO	Kyiv	Brovarskyi/ Baryshivska/ Peremoha	1,668	1	1	0
HALO	Kyiv	Brovarskyi/ Velykodymerska/ Zalissia	119,411	1	3	0
HALO	Kyiv	Buchanskyi/ Dmytrivska/Myla	251,510	1	5	0
HALO	Kyiv	Buchanskyi/ Makarivska/Lypivka	202,800	1	1	2
HALO	Kyiv	Vyshhorodskyi/ Ivankivska/Orane	9,428	1	1	0
Sub-totals			603,282	8	19	2
Hum. Security	Kharkiv	Izyumskyi	123,640	2	347	267
Sub-totals			123,640	2	347	267
MAG	Mykolaiv	Mykolaivska, Halytsynivska, Stepova Dolyna	723	*0	0	0
Sub-totals			723	0	0	0
NPA	Mykolaiv	Shevchenkivs, Novohryhorivk	8,400	1	3	0
NPA	Mykolaiv	Shevchenkivs, Liubomyrivka	43,106	1	11	406
NPA	Mykolaiv	Pervomaiska/ Maksymivka	10,246	0 (7 partial)	1	119
NPA	Mykolaiv	Shevchenkivska/ Vavyllove	12,623	0 (3 partial)	0	141
NPA	Kherson	Vysokopilska/ Arkhanhelske	6,083	0 (3 partial)	1	2
Sub-totals			80,458	2	16	668
Totals			847,811	22	512	937

*Information based on data available at time of writing. Full information not available on the clearance outputs of all national humanitarian operators. **Tasks not yet complete as at the end of 2024. ***With the exception of items found by HALO, all items of EO, including AP mines, were transferred to authorised government operators for destruction.

Table 21: Area cleared by international operators in 2024 in which no AP mines were found⁴⁰⁹

Operator	Area cleared (m ²)	Comments
HALO	1,021,045	Cleared across 37 AP mined areas
NPA	1,332	One hazardous area of 12,623m ² released (1,332m ² cleared and remainder reduced)
Total	1,022,377	

Table 22: Mines identified by humanitarian operators during spot tasks in 2024⁴¹⁰

Operator	Oblast	AP mines identified	AV mines identified
Humanitarian Security	Kharkiv	12	0
NPA	Mykolaiv	16	3
NPA	Kherson	3	1
Totals		31	4

*Information based on data available at time of writing. Full information not available on destruction of AP mines during EOD spot tasks by all national humanitarian operators.

ARTICLE 5 DEADLINE AND COMPLIANCE



Under Article 5 of the APMBC (and in accordance with its latest extension), Ukraine is required to destroy all AP mines in mined areas under its jurisdiction or control as soon as possible, but not later than 1 December 2033. Despite Ukraine's plan to complete clearance where possible by 2033, the ongoing war of aggression by Russia and the extent of AP mined area mean it will not fulfil its Article 5 obligations by this deadline.

At the time of the announcement on 29 June 2025 by President Zelenskyy of Ukraine's intention to withdraw from the APMBC, it was not indicated when Ukraine planned to give formal notice of withdrawal to the other States Parties, to the Depositary and to the United Nations Security Council, as required under Article 20 of the Convention. Article 20 states that "such withdrawal shall only take effect six months after the receipt of the instrument of withdrawal by the Depositary. If, however, on the expiry of that six-month period, the withdrawing State Party is engaged in an armed conflict, the withdrawal shall not take effect before the end of the armed conflict".⁴¹¹ As at the time of writing (September

2025), no such notice of withdrawal had been given by Ukraine.

On 21 July 2025, however, the UN Secretary-General, in his capacity as depositary, communicated the following: "In accordance with the provisions of the Vienna Convention on the Law of Treaties of 1969, Ukraine has decided, as of July 17, 2025, to suspend the operation of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction of September 18, 1997, signed on behalf of Ukraine on February 24, 1999 in New York." The communication states that: "The above action was effected on 18 July 2025".⁴¹² As noted above, this claimed suspension is invalid under the terms of the Convention and general international law. The possibility of armed conflict involving a State Party in which it might use AP mines was specifically foreseen by the drafters of the APMBC and therefore it is not a fundamental change of circumstances that might allow suspension under the law of treaties.⁴¹³ On 15 July 2025, prior to Ukraine communicating its "suspension" of the APMBC to the UNSG, the Ukraine

409 Emails from Steve Wallis OBE, HALO, 19 March 2025; and Amela Balic, NPA, 12 May 2025.

410 Emails from Maksym Slipchenko, Humanitarian Security, 21 March 2025; and Amela Balic, NPA, 12 May 2025. NPA reports spot tasks to SESU which then conducts demolition.

411 Art. 20, APMBC.

412 Ukraine: Communication, Reference: C.N.385.2025.TREATIES-XXVI.5 (Depositary Notification), United Nations, 21 July 2025, available at: <https://bit.ly/4tBjLeb>.

413 See Art. 62, 1969 Vienna Convention on the Law of Treaties: "fundamental change of circumstances which has occurred with regard to those existing at the time of the conclusion of a treaty, **and which was not foreseen by the parties**" [added emphasis].

Parliament had passed a Bill⁴¹⁴ which the President had signed the same day and which entered into force on July 17.⁴¹⁵ An explanatory note to the Bill, available in Ukrainian only, and referenced in an online article written by representatives from the Legal Department of the Ukrainian MoD,⁴¹⁶ sought to justify Ukraine's decision to "suspend", rather than withdraw from the APMBBC claiming "...the suspension of the 1997 Convention would enable unlimited use of necessary types of weapons until the moment of removal of the threat of attack or danger for the state independence of Ukraine." The explanatory note sought to further justify other changes of circumstances, including the failed Budapest Memorandum on security assurances. Nothing contained in the explanatory note changes the fact that Ukraine's attempted suspension of the APMBBC is unlawful and without valid effect in international law. As at the time of writing (the end of October 2025), at least four States Parties to the APMBBC—Austria,⁴¹⁷ Belgium,⁴¹⁸ Switzerland,⁴¹⁹ and Norway⁴²⁰—had submitted objections to Ukraine's attempted suspension to the UN Secretary-General. In addition, France⁴²¹ submitted a declaration on the topic. However, neither the objections, nor France's declaration, had yet been published on the UN Treaty Collection webpage.⁴²²

Ukraine could not meet its earlier December 2023 deadline, and in April 2023 it submitted a request for a 10-year deadline extension for consideration by 21MSP. Ukraine had been encouraged to submit a five-year extension, instead of the full ten-year extension, to take into account recommendations by States Parties.⁴²³ Following feedback from the Committee on Article 5 Implementation, Ukraine said it did not object to reducing the requested extension to five years, which would have been through to 1 December 2028.⁴²⁴ On 1 September 2023, however, Ukraine submitted additional information to the Convention maintaining its request for a 10-year extension period. It justified the requested period by the continued Russian aggression, the use of remote mining of its border territories, and the lack of knowledge as to how long hostilities would continue.⁴²⁵

At 21MSP, Ukraine's 10-year extension request was granted and a new deadline set for 1 December 2033. In the 21MSP decision on the request, the Meeting noted "the commitment

of Ukraine to present to the Twenty-Fifth Meeting of the States Parties in 2028 a detailed overview of the national situation including a) the progress made since the granting of its request for extension; b) the remaining challenge, and; c) the plan to address this challenge by the 1 December 2033 deadline."⁴²⁶

In 2020, Ukraine had stated that fulfilment of its first extended deadline of June 2021 was dependent upon "completion of hostilities, restoration of the constitutional order and gaining the full control over the occupied territories, including over the State border between Ukraine and the Russian Federation".⁴²⁷ The 2022 full-scale invasion by Russia has resulted in huge new contamination as well as significant barriers to safe access for survey. The time needed to clear AP mines in Ukraine can only be estimated once hostilities have ended and a national contamination survey has been completed. This said, in June 2023, Ukraine's MoE stated an intention to bring 80% of all land potentially contaminated with EO back into productive use within ten years.⁴²⁸

The reported increase in clearance compared to previous years, reflects the rapid upscaling of capacity needed to address the massive contamination in Ukraine resulting from the war with Russia (see Table 23). Land release efforts have of course been hugely impeded by the Russian aggression.

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. That said, large-scale cancellation of AP mine-affected areas will not be possible while the currently restrictive instructions for cancellation remains in place.

Prior to the full clearance data provided by Ukraine's national authorities covering 2024 and 2023, which encompasses both national and international operators, annual clearance data have only been available from international operators (see

414 "Draft Law on the Suspension for Ukraine of the Operation of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction", 15 July 2025, available at: <http://bit.ly/4nhi9ah>.

415 "Law of Ukraine On the Suspension for Ukraine of the Operation of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction", available at: <http://bit.ly/3WeTEj2>.

416 I. Zavorotko and O. Plotnikov, "Tentative remarks on Ukraine's suspension of the Ottawa Convention", *Articles of War*, 8 October 2025, available at: <http://bit.ly/4neZ0dU>.

417 Note Verbale (reference 2025-0.845.883), Permanent Mission of Austria to the United Nations in New York, 17 October 2025.

418 Communication reference: NYKUNO/MUL.03/MVD/NV/2025/614, Permanent Mission of the Kingdom of Belgium to the United Nations in New York, 17 October 2025.

419 "Switzerland submits objection to Ukraine's suspension of the Ottawa Convention", Bern, 17 October 2025, at: <http://bit.ly/4qM711x>; and Communication reference: 205-2025, Permanent Mission of Switzerland to the United Nations in New York, 17 October 2025.

420 Document No. 118/2025, Permanent Mission of Norway to the United Nations in New York, 20 October 2025.

421 Declaration reference SF/SECPOL 2025-0418923, Permanent Mission of France to the United Nations in New York, 20 October 2025.

422 United Nations Treaty Collection webpage (see treaty reference XXVI-5).

423 "Reflections on the Article 5 Extensions Process", APMBBC doc. APLC/MSP.12/2012/4, submitted by the President of the 11th Meeting of the States Parties on behalf of the States Parties mandated to analyse requests submitted under Article 5 of the Convention, 2012.

424 2023 Article 5 deadline Extension Request, Additional Information, 1 September 2023, p. 1.

425 Ibid.

426 "Decision on the request submitted by Ukraine for an extension of the deadline for completing the destruction of anti-personnel mines in accordance with Article 5 of the Convention", November 2023, available at: <https://bit.ly/4dsKgOH>, para. 3.

427 2020 Article 5 deadline Extension Request, p. 5.

428 Ministry of Economy, "Our goal is to bring 80% of potentially contaminated land back into use in ten years: Yuliia Svyrydenko at the London conference", 22 June 2023, at: <https://bit.ly/4dMpGu3>.

Table 23). This makes it difficult to conclude how effectively AP mine clearance is proceeding. That said, the NMAA believes that Ukraine saw a twelve-fold increase in clearance of EO in 2024 compared to 2023, thanks to hugely increased capacity and use of demining machines and UAVs.⁴²⁹

Clearance data are not available from areas of Ukraine that were already outside of government control prior to Russia's invasion in February 2022. While Russia is not a State Party or signatory to the APMBC, it also has obligations under international human rights law to clear AP mines as soon as possible in any areas of Ukraine over which it exercises effective control, by virtue of its duty to protect the right to life of every person under its jurisdiction.

Table 23: Five-year summary of AP mine clearance

Year	Area cleared (km²)
2024	2.07 (official IMSMA data)
2023	*0.33 (official IMSMA data provided in 2025)
2022	0.17 (NGO data)
2021	1.26 (NGO data)
2020	0.83 (NGO data)
Total	4.66

*Official IMSMA data for 2023, provided in 2025. Previously reported as 0.35km² in last year's Clearing the Mines report on Ukraine, based on operator data only.

PLANNING FOR MANAGEMENT OF RESIDUAL CONTAMINATION

Ukraine is making provision for a sustainable national capacity to address previously unknown mined areas including regional military administrations, units of the Armed Forces of Ukraine, the SSTS, the National Guard, and the National Police.⁴³⁰ The need for detailed planning for such residual risk is years if not decades away.

429 Email from Colonel Ruslan Berehulia, NMAA Secretariat, 9 May 2025.
430 Committee on Article 5 Implementation, "Preliminary Observations", Intersessional Meetings, Geneva, 18–20 June 2024, p. 3.