

**ADHERENCE TO AND COMPLIANCE WITH
ARMS CONTROL, NONPROLIFERATION, AND DISARMAMENT
AGREEMENTS AND COMMITMENTS**



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ADHERENCE TO AND COMPLIANCE WITH ARMS CONTROL, NONPROLIFERATION, AND DISARMAMENT AGREEMENTS AND COMMITMENTS

INTRODUCTION

PURPOSE

This Report is transmitted pursuant to Section 403 of the Arms Control and Disarmament Act, as amended (22 U.S.C. 2593a), which requires a report by the President on *Adherence to and Compliance with Arms Control, Nonproliferation, and Disarmament Agreements and Commitments*.

SCOPE OF THE REPORT

This Report assesses U.S. compliance with and adherence to arms control, nonproliferation, and disarmament agreements and related commitments in 2018, including Confidence- and Security-Building Measures (CSBMs), as well as the compliance and adherence in 2018 of other nations to arms control, nonproliferation, and disarmament agreements and commitments, including CSBMs and the Missile Technology Control Regime, to which the United States is a participating State. The issues addressed in this Report primarily reflect activities from January 1, 2018, through December 31, 2018, unless otherwise noted.¹

The Compliance Report includes reporting and analysis at the levels of classification for which reliable supporting information is available. The longer unclassified version of this report, which will be submitted following full declassification review, recounts as much information as possible, but certain issues can be discussed only at higher levels of classification. Some compliance concerns are raised and some findings of violations are made, for instance, only in the TOP SECRET/SCI-level version of this Report.

ADHERENCE AND COMPLIANCE

Arms control, nonproliferation, and disarmament agreements and related commitments continue to be important tools that can protect and advance U.S. interests. Their provisions can limit or reduce threats to U.S. and allies' security, including by limiting participating States' access to or engagement in dangerous or destabilizing capabilities or activities, providing insight and transparency into the actions of participating States, and encouraging stabilizing patterns of

¹ In this Report, previous editions of the Report are cited by their year of release unless otherwise noted. In general, each edition of the Report focuses on activities that took place during the preceding calendar year. For example, the previous edition of the Report was released in 2018 and primarily reflected activities from January 1, 2017, through December 31, 2017. However, there have been some exceptions to that general practice. For example, the edition released in 2011 primarily reflected activities from January 1, 2009, through December 31, 2010, and the edition released in 2010 primarily reflected activities from January 2004 through December 2008.

behavior and interaction. In these ways, such agreements and commitments can contribute broadly to transparency and stability on a global and regional scale.

However, the utility of arms control, nonproliferation, and disarmament agreements and commitments as tools of statecraft and for the protection and advancement of security interests diminishes significantly if participating States do not fully implement the obligations and commitments they have undertaken. In fact, failure to comply can present serious national security challenges. A party that complies with a treaty only to have one or more of its counterparties violate the agreement, for instance, can find itself at a potentially grave and destabilizing disadvantage – a danger that would be all the more acute to the degree that such cheating is successfully concealed. Violations that are not appropriately and effectively addressed can perpetuate and compound these dangers. Therefore, within the framework of any given set of agreements and commitments, vigorous verification, scrupulous compliance analysis, and robust compliance enforcement are critical aspects of U.S. national security planning.

In evaluating any country's compliance with its arms control, disarmament, and nonproliferation obligations, the United States considers a variety of factors. These include the nature and precise language of the obligations undertaken in the context of international law, information regarding the country's activities – including that acquired by so-called National Technical Means of verification (*i.e.*, intelligence collection), cooperative verification measures, open source information, and diplomatic means – and any information provided by the country in question. A similar process is used to evaluate a country's adherence to politically binding commitments.

Many concerns relating to compliance involve matters of interpretation; many involve highly classified information derived from sensitive sources and methods. Furthermore, some states often attempt to conceal activity that is inconsistent with their obligations or commitments, and some are able to do so with a thoroughness and sophistication that can make it difficult to “pierce the veil” of denial and deception and establish the requisite factual basis for a compliance assessment. For these reasons, it may take significant time to assess whether the actions or activities that gave rise to concerns constitute violations or simply represent differences in implementation approaches or some other permissible activity.

In this Report, the term “violation” refers to any action or omission by a State Party to an international agreement that has been determined by the United States to be inconsistent with obligations owed by that State Party to the United States under the agreement in question and that may give rise to international legal remedies.

As noted above, there can sometimes be legal or factual uncertainty as to whether a violation has occurred. Accordingly, this Report distinguishes between “violations” and instances in which the U.S. government is considering but has not yet determined whether a violation has occurred, for example because there are unresolved factual or legal questions about compliance. The Report refers to the latter category as “compliance concerns.”

In general, this Report uses the terms “violation” and “compliance” only in reference to legal obligations undertaken in international agreements. When discussing politically binding

commitments, the Report generally uses the term “adherence” instead of “compliance.” Thus, a State engaged in conduct that is determined to be inconsistent with a politically binding commitment is said to be “not adhering” to that commitment, rather than “violating” the commitment.

When concerns arise regarding the actions of treaty partners, the United States seeks, whenever possible, to address its concerns through diplomatic engagement. However, in the event that the United States determines violations to have occurred, we also have a range of options and means to try to convince violators it is in their interest to return to compliance and to prevent violators from benefitting from their violations.

This Report evaluates adherence to and compliance with arms control, nonproliferation, and disarmament agreements and commitments to which the United States is a participating State. The United States and the majority of the other participating States involved in these agreements and commitments are implementing these obligations and commitments and have indicated their intention to continue doing so. As the Report makes clear, however, compliance concerns – and in some instances treaty violations and actions determined to be inconsistent with political commitments – exist involving a relatively small number of States. Where possible, the United States continues to pursue resolution of those issues with the States in question, as well as to assess the implications of these States’ actions and how best the United States should respond to them.

U.S. Organizations and Programs to Evaluate and Ensure Treaty Compliance

Because of our deep-seated legal traditions, our commitment to the rule of law, and our belief in the importance of such agreements to enhance our security and that of our allies and friends, the United States complies with its obligations under all applicable arms control, nonproliferation, and disarmament agreements. It is longstanding U.S. policy to comply with international legal obligations. To the extent the United States has determined that compliance with an obligation is no longer in the U.S. national security interest, the United States has sought to negotiate modification of the agreement in question or withdraw from the agreement altogether – as indeed occurred with the Anti-Ballistic Missile (ABM) Treaty.

As a reflection of the seriousness with which the United States views these obligations, the United States has established legal and institutional procedures to ensure U.S. compliance. Individual departments and agencies within the executive branch have established policies and procedures to ensure that plans and programs under those departments and agencies’ purview remain consistent with U.S. international obligations. For example, U.S. Department of Defense (DOD) compliance review groups oversee and manage DOD compliance with arms control, nonproliferation, and disarmament agreements and related commitments, including CSBMs. Additionally, the U.S. Department of State, in its role as the lead U.S. agency on arms control matters, is responsible for providing policy advice and expertise related to compliance to individual departments and agencies and the interagency community. Further, an interagency review is conducted in appropriate cases, including when other treaty parties formally raise concerns regarding U.S. implementation of its obligations. Finally, Congress performs oversight functions through committee hearings and budget allocations.

OVERVIEW

This Report addresses U.S. compliance with arms control, nonproliferation, and disarmament agreements and commitments (Part I); other States' compliance with the Treaty on the Non-Proliferation of Nuclear Weapons (NPT) (Part II); other States' adherence to missile commitments and assurances (Part III); chemical weapons trends (Part IV); biological weapons trends (Part V); and conventional arms control (Part VI).

2019 Compliance Report

TRENDS

PART I: U.S. COMPLIANCE WITH ARMS CONTROL, NONPROLIFERATION, AND DISARMAMENT AGREEMENTS AND COMMITMENTS

U.S. Institutional and Procedural Organization for Ensuring Compliance

There are processes and controls within the U.S. executive branch, including at the Department of Defense (DOD), the Department of Energy (DOE), the Department of Homeland Security (DHS), the Department of Commerce, and the Nuclear Regulatory Commission (NRC), that operate to ensure that plans and programs under those departments' and agencies' purview remain consistent with U.S. international obligations and commitments in the areas of arms control, nonproliferation, and disarmament. Additionally, the Department of State, as the lead U.S. agency on arms control matters, has a role in providing policy advice and expertise related to compliance to individual departments and agencies and the interagency community. These processes and controls operate in parallel, and in addition to the Congressional oversight process.

In 1972, DOD established the first such department-level process. Under this compliance process, established at the conclusion of the Strategic Arms Limitation Talks (SALT) that led to arms control-related agreements on strategic offensive arms, key offices in DOD are responsible for overseeing DOD compliance with all U.S. arms control, nonproliferation, and disarmament agreements and commitments, including CSBMs. DOD components ensure that their implementing program offices adhere to DOD compliance directives and seek guidance from the offices charged with oversight responsibility. Similar processes have been established by other departments and agencies to ensure that their programs and activities comply with U.S. international obligations and commitments. For example, DHS similarly established a compliance review process to assess DHS-sponsored research for compliance with all relevant arms controls agreements. Interagency reviews also are conducted in appropriate cases, such as when other States formally raise concerns regarding the United States implementation of its arms control, nonproliferation, and disarmament obligations and commitments.

In addition, all Federal departments and agencies that fund, direct, or execute classified life sciences research are required to implement oversight measures to ensure all department or agency activities comply with applicable domestic and international legal obligations, and to report on classified life sciences research projects and on the functioning of their oversight processes.

U.S. Compliance

In 2018, the United States continued to be in compliance with all of its obligations under arms control, nonproliferation, and disarmament agreements and commitments. When other countries have formally raised a compliance concern regarding U.S. implementation activities, the United States has carefully reviewed the matter to confirm its actions were in compliance with its obligations.

PART II: NUCLEAR NON-PROLIFERATION TREATY (NPT)

This chapter of the Compliance Report covers developments relevant to other nations' compliance with the 1968 Treaty on the Non-Proliferation of Nuclear Weapons (NPT), including their compliance with their obligation under Article III of the NPT to conclude and implement a Comprehensive Safeguards Agreement (CSA) with the International Atomic Energy Agency (IAEA).

Key Agreement Provisions

Article II. Under Article II, each non-nuclear-weapon State (NNWS) Party undertakes four specific obligations: (1) not to receive a nuclear weapon or other nuclear explosive device; (2) not to exercise control over such weapons or explosive devices directly or indirectly; (3) not to manufacture or otherwise acquire nuclear weapons or other nuclear explosive devices; and (4) not to seek or receive any assistance in the manufacture of nuclear weapons or other nuclear explosive devices.

Article II assessments must weigh all available facts during the reporting period as well as relevant historical information in order to determine whether the Party is engaged in the manufacture or other acquisition of a nuclear weapon or other nuclear explosive device, or is seeking or receiving any assistance in such manufacture. The United States has made clear that, as explained in a prior edition of this Report, "the prohibition against the 'manufacture' of a nuclear weapon, as well as against seeking or receiving any assistance in this regard, reaches more than simply the final assembly of such a device." Even otherwise ostensibly innocuous activities could indicate a violation of Article II, since it has been the U.S. interpretation of Article II from the outset that "facts indicating that the purpose of a particular activity was the acquisition of a nuclear explosive device would tend to show noncompliance." Accordingly, "an important factor in Article II compliance analysis is the purpose of a particular activity," with the result that various "'warning signs' ... may indicate a prohibited nuclear weapons purpose, and thus suggest that a country's ostensibly 'peaceful' nuclear program might have violated Article II and should be closely scrutinized."

Article III. To prevent the diversion of nuclear technology from peaceful uses, Article III requires NNWS Parties "to accept safeguards, as set forth in an agreement to be negotiated and concluded with the International Atomic Energy Agency." In addition, under paragraph 2 of Article III, each State Party undertakes not to provide source or special fissionable material, or equipment or material especially designed or prepared for the processing, use, or production of special fissionable material, to any NNWS for peaceful purposes unless the source or special fissionable material in that NNWS is subject to safeguards.

IAEA Safeguards Compliance. There is a distinction between IAEA safeguards compliance findings and NPT compliance assessments. An IAEA finding of noncompliance with respect to a State Party's safeguards agreement does not necessarily constitute an NPT violation. The IAEA does not make determinations regarding compliance with the NPT. Such questions are for the States Party to the Treaty to decide.¹ Nevertheless, because Article III requires that safeguards be applied "on all source or special fissionable material in all peaceful nuclear activities within the territory of [a] State, under its jurisdiction, or carried out under its control anywhere," certain safeguards problems – *e.g.*, concealment from the IAEA of material that is required to be subject to safeguards – could amount to a violation of Article III of the NPT.

As an earlier version of the Compliance Report has explained, "[s]afeguards compliance judgments are necessarily somewhat contextual, and may be affected by a number of factors, which must be carefully considered in light of all the circumstances." Depending upon those circumstances, it could be that "even the non-declaration of a very small quantity of some materials in one single instance could constitute noncompliance if it occurred in connection with activities that were closely related to nuclear weapons development. Information suggesting deliberate concealment or other deceptive practices would be highly relevant to safeguards compliance assessment. Indeed, the presence of such practices could make the difference in distinguishing a mere technical error or mistake in one country from an instance of noncompliance in another – even where the activities in question were otherwise similar. A state's past record of safeguards compliance, moreover, would also be a relevant factor in how future problems are evaluated; countries that have a history of serious compliance problems should be scrutinized with particular care."

It should also be noted that a State Party that withdraws from the NPT after violating the Treaty's provisions is not absolved of those violations. In fact, the United States believes that such a state must still be held accountable for its violations and the threats they create, and that other NPT Parties should be committed to taking appropriate measures to address such violations.

Country Concerns

While overall compliance with the NPT remains strong, concerns remain with the activities of several countries.

Iran's retention of archives related to its past covert nuclear weapons program (the Amad Plan), as well as its efforts to keep many scientists and technicians from that former weapons program working together under the continued leadership of the former head of that program, raise serious questions regarding whether Iran intended to preserve the option to resume elements of a nuclear weapons program in the future in the event a decision were made to do so – an option that would be all the easier for Iran if it were permitted to take advantage of provisions in the Joint Comprehensive Plan of Action (JCPOA) allowing it to expand its fissile material production capability and stocks of enriched uranium once key restrictions in that deal begin to expire in 2025. New efforts by Iran to engage in elements of such a program would raise serious concerns regarding its compliance with Article II, and could potentially constitute a violation.

Additionally, were any nuclear material to exist in Iran that had not been declared to the IAEA as required by its CSA, and for which Iran is not able to provide a satisfactory explanation, this could constitute a violation of Article III.

Syria's Article III noncompliance started more than a decade ago when it undertook a covert project to construct a plutonium production reactor at Al Kibar. In addition, as an aggravating factor, it did so with the assistance of the DPRK. Since the IAEA Board of Governors adopted a resolution in 2011 finding Syria to be in noncompliance with its CSA, Syria has refused to cooperate with IAEA efforts to investigate evidence of undeclared nuclear materials and activities. Syria remains in violation of both its CSA obligations and Article III of the NPT.

Although the United States continues diplomatic efforts to achieve the final, fully verified denuclearization of the DPRK, the DPRK's violations of Articles II and III prior to its announced withdrawal from the NPT remain unresolved. North Korea's illicit nuclear and missile programs remain a threat to international peace and security.

PLUTONIUM MANAGEMENT AND DISPOSITION AGREEMENT (PMDA)

The PMDA was included in the previous two Compliance Reports, as made clear therein, not because of any Russian noncompliance but because Russia's 2016 purported suspension of the PMDA raises potential concerns with respect to Russia's intent to comply in the future. As this Compliance Report makes clear, whether or not that potential concern has a basis can better be determined if and when the two sides re-engage under the PMDA.

PART III: MISSILE COMMITMENTS AND ASSURANCES

During the last 15-20 years, foreign missile systems have continued to increase both in number and sophistication. These include multiple types of short-, medium-, intermediate-, and intercontinental-range ballistic missiles as well as cruise missiles of increasingly greater ranges. The proliferation of ballistic missiles constitutes a fundamental threat to international peace and security.

Ballistic missile proliferation adds volatility and escalatory pressures to existing regional problems, increasing the risk of conflict, and potentially encourages the development of weapons of mass destruction (WMD) payloads to amplify the strategic impact of such systems. The destabilizing effects of weapons proliferation are particularly evident in the Middle East, where we continue to witness the spread of more advanced missile and military capabilities, including to non-state actors.

Nowhere is the current challenge posed by missile proliferation and the expansion of missile capabilities more clear than in the case of Iran. Iran possesses the largest missile program in the

Middle East and continues to work to increase the size, sophistication, range, accuracy, and lethality of its missile arsenal. It is developing an array of solid and liquid propellant short-range and medium-range ballistic missile systems, and continues to push to expand its capabilities.

We also remain concerned about the continuing ties between Chinese suppliers and missile development efforts in places such as Iran – especially the activities of the infamous Chinese missile technology broker and fugitive from justice Li Fangwei (a.k.a. Karl Lee). A \$5 million reward for qualifying information on Li Fangwei is available from the U.S. Rewards for Justice program. Li continues to shelter in China while serving as the most important overseas supplier of items and materiel for Iran’s missile program. Li is a key broker for Iran’s ballistic missile program and provides significant assistance in supporting Iran’s ongoing efforts to develop more sophisticated missiles. The equipment and components that Li has provided to Iran have contributed to Iran’s continued development of more sophisticated missiles with improved accuracy, range, and lethality.

Despite a warrant out for his arrest, and more than a decade of imposing sanctions on Li under the Iran, Syria, and North Korea Nonproliferation Act (INKSNA), including most recently in April 2018, the Chinese government, to date, has not taken action to end his proliferation activity, nor been willing to work with the United States to bring him to justice in the United States.

In addition, North Korea continues to develop its ballistic missile programs. Because of North Korea’s proliferation, and as part of our efforts to take steps to impede its programs, we have continued to impose sanctions measures against entities and individuals involved in North Korea’s programs of concern. The United States imposed missile sanctions against two North Korean companies, Chilsong Trading Corporation and Korea Kuryonggang Trading Corporation, pursuant to the Arms Export Control Act in January 2018. In April 2018, the United States imposed sanctions against the Sakr Factory for Developmental Industries in Egypt under INKSNA for engaging in proliferation activity with North Korea.

PART IV: CHEMICAL WEAPONS

The United States remains concerned about the threat posed by chemical weapons use by state and non-state actors. Significant information on production and use of chemicals for their toxic purposes is available in open literature, and there is ready access to chemicals that pose a threat either because of their toxic properties, particularly toxic industrial chemicals, or to their potential use as chemical weapons precursors. Rapid advances in science and technology have expanded the ability of both state and non-state actors to synthesize, store, and disseminate chemical weapons. In addition, advances in the field of biotechnology can serve as enabling factors for those seeking to produce, isolate, and disperse toxins.²

² Toxins are more widely discussed in the Biological Weapons section.

This decade has seen a resurgence of chemical weapons use:

- Chemical weapons use in Syria attributed to the Assad regime has been widespread and frequent. The U.S. government attributes to the Assad regime at least 50 cases of chemical weapons use.³
- ISIS has also been identified as having used chemical weapons – both sulfur mustard and toxic chemicals – in Syria and Iraq.
- North Korea orchestrated the lethal VX attack in Malaysia on Kim Jong Nam in 2017.
- Russia used an unscheduled military-grade nerve agent in an assassination attempt in Salisbury, UK against former Russian intelligence officer Sergei Skripal and his daughter, Yulia, in 2018. The nerve agent used in the attack ultimately caused the death of British national Dawn Sturgess in an incident in Amesbury, UK.

These examples highlight the perceived utility of chemical weapons by state and non-state actors, and the threats against the international norm against chemical weapons use. For the Assad regime, chemical weapons have been seen as an integral tool in its quest to regain territory.⁴ North Korea and Russia have chosen to use chemical weapons for targeted assassinations on the territory of other nations, and the use by Russia of a new class of agent – Novichok – is particularly troubling.

Pharmaceutical-based agents, such as fentanyl, also pose a threat of use as chemical weapons. The United States is concerned that some states are deliberately developing pharmaceutical-based agents for warfare or for other harmful purposes under the guise of non-prohibited purposes such as law enforcement or pharmaceutical research. These activities have potentially serious implications regarding the elimination and non-proliferation of chemical weapons. The United States has already publicly noted its concerns that Russia and Iran are pursuing pharmaceutical-based agents for offensive purposes.

The CWC has achieved near universality with only four states yet to ratify or accede, yet significant risks remain from:

1. States Parties, such as Russia and Syria, that refuse to adhere to their obligations under the CWC, including the obligation to not possess or use chemical weapons;
2. States not party to the CWC, specifically North Korea; and
3. Non-state actors, such as ISIS in Syria and Iraq.

The United States continues to work diligently with partners and allies both inside and outside the context of the CWC to counter these trends and to impede proliferation to States and terrorists that would seek chemical weapons capabilities.

³ USUN, 13 April 2018, Speech by US Ambassador Nikki Haley to UN Security Council.

⁴ Global Public Policy Institute Report, February 2019, “Nowhere to Hide” Berlin Germany.

PART V: BIOLOGICAL WEAPONS

The United States remains concerned about the threat of biological weapons from state and non-state actors, as biological agents, materials, knowledge, and expertise are widely available. Rapid advances in science and technology have expanded the ability to manipulate biological organisms and materials leading to enhanced capabilities and lethality. In the current global economy, advances in biotechnology have led to diffusion of technology, ideas, and skills throughout the world. Certain advances, such as the creation of designer pathogens or the ability to evade countermeasures and attribution mechanisms, may expand how biology could be used for nefarious purposes, creating risks that could reach strategic proportions. Some examples below illustrate advances in biotechnology with potential risks:

- Rapid advances in genetic editing technologies, such as CRISPR/CAS;
- The confluence of Artificial Intelligence (machine learning), big data and biology; and
- Continued growth in popularity of biohacking (Do It Yourself [DIY] biotechnology).

Biotechnology and use of microorganisms for legitimate purposes has grown significantly, complicating efforts to ensure that biological warfare (BW) is never again used. In fact, many of the traditional “signatures” that characterized a BW program are no longer valid. Current BW programs are likely to be much smaller in scale compared to efforts that once involved large weapons programs, sizeable quantities of agent, and numerous facilities.⁵

Preventing and controlling BW threats is extremely challenging. It is important to ensure that rapid biotechnology advances unfold in a safe manner and are not misused. The United States welcomes discussions taking place at the annual Biological Weapons Convention (BWC) Meetings of Experts to assess the risks of emerging biotechnologies and develop ways to prevent misuse, while not hindering legitimate research and beneficial applications. The discussions began to take place at a greater level of sophistication at the meetings in August 2018, and the United States expects this trend to continue.

States Parties to the BWC are prohibited from developing, producing, stockpiling, or otherwise acquiring or retaining biological and toxin weapons and are obligated to destroy existing stockpiles. However, information about BW programs and the intent to use them has been difficult to assess. History shows that the Convention was flagrantly violated by the Soviet Union, and it managed to conceal a sophisticated offensive BW program, employing tens of thousands of personnel, after becoming party to the BWC. Consequently, the United States stresses its continued concerns that some States Party could misuse advances in the life sciences for prohibited activities.

Furthermore, non-state actors have repeatedly demonstrated the intent to acquire, develop, transfer, and use biological weapons. Their lack of success to date is no guarantee that they

⁵ U.S. BWC paper submitted at 2018 Meetings of Experts.

might not eventually succeed, and the United States continues to work with partners and allies to impede their efforts.

PART VI: CONVENTIONAL ARMS CONTROL

The United States remains concerned about Russia's aggressive actions in Europe and its disregard for basic international principles, which have strained all of the key pillars of European conventional arms control architecture, to include the Open Skies Treaty (OST), the Vienna Document 2011 (VD11) on Confidence and Security Building Measures (CSBMs), and the Conventional Armed Forces in Europe (CFE) Treaty. Russia's "suspension" since 2007 of its implementation of CFE – an action we do not view as legally available under CFE – continues to degrade confidence and transparency at a time when CSBMs are needed most and has resulted in increased uncertainty about the largest military force in Europe. Despite Russia's CFE "suspension" and the continued erosion of the conventional arms control regime resulting largely from Russian behavior, VD11 and OST continue to provide transparency on military forces and equipment in Europe, including Russian active forces in Russia and abroad

This Compliance Report covers adherence to VD11 requirements and compliance with OST obligations. The majority of participating States to the Organization for Security and Cooperation in Europe (OSCE), with the exception of Russia and increasingly some of our Central Asian partners, implement VD11 fully; however, there are gaps in its implementation which we will continue to attempt to address through a comprehensive substantive update of the Vienna Document. The vast majority of OST missions occur without incident, and several States Parties are investing in new aircraft and digital sensors. The United States will continue to pursue resolution of all violations and compliance concerns with all conventional arms control instruments and to modernize key provisions of the VD11.

For discussion of compliance with obligations under the Conventional Armed Forces in Europe (CFE) Treaty, see the 2019 Report on Compliance with the Treaty on Conventional Armed Forces in Europe, submitted pursuant to Condition 5(C) of the Senate Resolution of Advice and Consent to Ratification of the CFE Flank Document (also known as the "Condition 5(C) Report").

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