



**Ministry of Interior
Joint Crisis Coordination Centre**

**Baghdad's Flight Embargo on
KRI's Airports has direly affected
Millions of People
Across Kurdistan Region and Iraq**

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1. Air Transportation in the Kurdistan Region

The Kurdistan Region has two international airports: Erbil International Airport (EIA) and Slemani International Airport (SIA). EIA was established following the collapse of the former Iraqi regime in 2003, when the KRG saw the opportunity of establishing international airports as a bridge between the Kurdistan Region of Iraq (KRI) and the world. The first aircraft landed at the EIA on December 15, 2003 and launched air traffic between the Kurdistan Region and the neighboring countries. In 2005, direct flights started between the Region and European Countries. The construction of Slemani International Airport began in December 2003 and the airport became operational in July 20, 2005. Iraqi Airways operated 56,903 flights in Iraq in 2016 of which 18,978 (or 33%) were from/to the Erbil and Slemani airports.

On September 29, 2017, the Federal Government of Iraq imposed a blockade on international flights to and from the Kurdistan Region. The aim of this blockade is to close international air traffic and isolate the Kurdistan Region in response to the September 25 Kurdish referendum vote for independence.

Airports are crucial enablers of economic activity in any region and therefore the closure of the air traffic to and from EIA and SIA has produced a detrimental direct and indirect impact. Government agencies, travelers, service providers and service clients are naturally particularly affected by this embargo particularly; not only in the Kurdistan Region but also across Iraq. Passengers, airlines, cargo companies, travel agencies and other providers and users of different services have been compelled to either cancel their businesses and plans or adopt far more expensive, inefficient and risky solutions. Moreover, closure of the airports have created an immediate and significant impact on the delivery of humanitarian assistance to thousands of internally displaced Iraqis and Syrian refugees who are continuously in need of urgent assistance in the Kurdistan Region and neighboring provinces. Humanitarian organizations and their personnel are today obliged to reroute transportation of humanitarian supplies through routes which are unsafe and that reduce both the volume and timeliness of humanitarian assistance due to prolonged distances.

2. Statistical Overview

The below table shows the number of weekly flights to/from Erbil International Airport before and after closure of international air traffic:

Airlines	# of flights before closure	# of flights after closure
Austrian	7	0
Lufthansa	2	0
Turkish Airline	18	0
Qatar Airways	10	0
Pegasus	9	0
Middle East	7	0
Germania	3	0
Fly Dubai	7	0
Royal Jordan	9	0
Egypt Air	4	0
Mahan Air	4	0
Al-Arabia	3	0
Air Arabia Jordanian	2	0
Zagros	14	0
Bora Jet	5	0
Al-Naser	3	0
Atlas Global	11	0
Fly Baghdad	14	20 (only domestic flights)
Iraqi Airways	31	22 (only domestic flights)
Total	136	42 (only domestic flights)

The below table presents the number of flights, cargo flights and international flights to/from Slemani International Airport (SIA) before and after the ban:

Number of flights per month	Number of cargo flights arriving to Slemani airport	Airlines	Status after September 29 th , 2017	
January	309	61	Iraqi Airways	Operational
February	282	55	Atlas Global Air	No flights
March	311	66	Fly Germany	No flights
April	301	73	Fly Baghdad	No flights
May	304	41	Fly Damas	No flights
June	319	38	Al Naser Company	No flights
July	349	52	Royal Jordanian	No flights
August	360	74	Turkish Airlines	No flights
September	330	70	Iranian airlines	No flights
October	141	0	Qatar Airlines	No flights
November	119	0	Pegasus Airlines	No flights

3. Economic and Commercial Impact

As of December 2017, no comprehensive assessment has been carried out to quantify and qualify the full economic impact of the international flight ban on the EIA and SIA. However, a statistical analysis gives a snapshot of the immediate and direct economic, commercial and humanitarian impact of the flight ban:

1. The Kurdistan Region has been facing an economic crisis since 2014 and the closure of international air traffic to and from the region has further deepened the crisis. To illustrate further, before the ban, EIA served between 50 and 60 flights (around 5,000 to 5,500 passengers) daily which largely contributed to the commercial and economic development of the region.
2. The flight ban has a direct effect on businesses and international investment in the Kurdistan Region. It has also influenced market-dynamics and prices and, as a result, individuals and households, the private and public sectors. Roads and transportation infrastructure in the region are damaged and insufficient to satisfy the region's trade and commercial activities. The cargo embargo has therefore far-reaching consequences on the economy of the region.
3. Cargo tonnage has all but disappeared during this period, a monthly averages of 2,500 tons from EIA plunging to less than 10 tons and Slemani from 550 tons to almost zero after the closure. Merchants cannot easily export and import goods because they must pay a lot more to receive their cargos through available alternative means. **The below figure further illustrates the monthly cargo import to Erbil International Airport before and after the ban.**

Cargo Companies in Erbil Airport	Estimated Monthly Cargo in Tons (Before the ban)	Estimated Monthly Cargo in Tons (After the ban)
DHL	546	1
TNT	291	0
Zarawa Logistics	163	0
SKA Kurdistan	227	0
Star Light Airline	622	3
Mateen Express	431	6
FedEx	88	0
Direction Al-Iraq Cargo	132	0
Total	2500 Tons	10 ons

1. The number of tourists have decreased drastically following the ban. Passenger numbers fell by 72% from 159,237 in 2016 to 44,504 in October 2017. In November 2017, passenger numbers fell by 64%, from 129,793 in 2016 to 47,384 after the ban. Overall, the number of passengers dropped from an average of 1,500 to 350 per day.
2. The travel embargo has dramatically increased travel costs for both local and international travelers working in the region. People are compelled to spend more time and money to travel as they must travel through Baghdad and are therefore compelled to through Baghdad on their way to or from the Kurdistan Region; having need to buy one more two way tickets to fly Erbil/Baghdad and then to travel out/in to Iraq.
3. The economic loss has been particularly evident for airlines and travel companies. Approximately 4,000 travel and tourism companies have been directly affected and most of them being pressured to either close down or significantly reduce their operations in the region. **The table below illustrates further on the number of affected travel and tourism industry:**

Location	# Travel and Tourism Companies	Lost jobs
Erbil	2609	7,827 Individuals
Slemani	1391	4,173 Individuals
Total	4000	12000

4. Closure and reduction of company operations has deprived an estimated of 12,000 people of their jobs and sources of income. This has a dire impact on thousands of families whose bread winners have lost their jobs. This has increased unemployment rate in the Kurdistan region as well as in Iraq as a whole.

4. Impact on Health Care: Endangering Human Lives

The above mentioned economic crisis mentioned earlier has also reduced access to quality health care and medicine in particular in the Kurdistan Region. Following the flight embargo, local people, IDPs and refugees as well as soldiers with urgent and complicated medical conditions face difficulties in accessing

medical care abroad. For instance, to date, there are 3,600 thalassemia patients who are in dire need of medicine. Their situation is particularly alarming since Baghdad has refused to send KR-I's fair share of medicine. From the 3,600 thalassemia patients only 211 were able to travel abroad to access required treatment and 15 of those patients lost their lives due to lack of medicine and medical care.

The Peshmerga forces have been widely recognized as the first effective defense against ISIS, having been praised and recognized for their bravery and sacrifices for defending the free world on behalf of the international community. They provided security and protection to almost 10 Million people during the three-year war with ISIS. They have successfully protected KRI's territory and population and played a central role in liberating other Iraqi territories from ISIS as well. Moreover, Peshmerga forces have been protecting the displaced people and established secured routes to camps in the KRI and the rest of Iraq. In the fight against ISIS, *1,824 Peshmerga paid the ultimate sacrifice and lost their lives while 10,540 were severely injured and 62 are still missing.*

Now, the same heroes and defenders of human rights are banned from travelling to access life-saving medical care. It is devastating for them and their families when Peshmerga who were injured fighting ISIS are denied timely medical care overseas due to a flight ban. **The below table shows the number of injured Peshmerga who are directly affected and cannot travel to receive urgently needed medical care abroad:**

Total Number of Injured Peshmerga affected by the flight ban on KR-I		
Number of injured Peshmerga in need of medical treatment abroad with special conditions with injuries that do not allow them to fly abroad through Baghdad and border crossing for medical treatment.	120	
Number of Peshmerga treated abroad and in need of continued medical treatment, checks & monitoring but are unable to receive their required medical monitoring and check-ups abroad every two/three months.	1200	
Total	1320	

5. Humanitarian Impact: Aggravating the Hardship for Refugees and IDPs

The impact on the humanitarian operations is particularly illustrative of the Federal Government's disregard for the consequences of the flight ban on, not only the local population of the Kurdistan Region, but also the 1.5 million displaced Iraqis and Syrian refugees that are hosted in the Kurdistan Region and the thousands of households among them who are in need of humanitarian assistance on a daily basis. Additionally, thousands of them are unable to join their families abroad through family reunification programmes or visit their families here in the KRI. Some illustrative examples of the humanitarian impact include:

1. UN agencies and humanitarian organizations have expressed mounting concerns over the impact of the ban on movement of humanitarian staff and supplies. The flight ban imposes further difficulties on UN agencies and humanitarian organizations to meet urgent needs of a large number of IDPs and refugees in an already challenging environment. It has in fact cut off an important assistance lifeline to thousands of families not only in the Kurdistan Region but also in the neighboring provinces liberated from ISIS, including Mosul. It is a humanitarian imperative and obligation, under international law, for the Iraqi Government to exempt humanitarian operations from the flight ban. It should be noted that most of the humanitarian supplies are shipped to Kurdistan through cargo companies and following the ban most of the companies are not able to operate. Humanitarian organizations and UN agencies are not financially in a position to pay for private cargo flights.
2. Estimated figures of 20,000 foreign workers are affected. The majority of them are humanitarian personnel, who have been deployed by UN agencies and INGOs to manage the humanitarian operations and deliver assistance to displaced people in Kurdistan, returnees and vulnerable people in the liberated areas. The majority of the humanitarian personnel were forced to either leave before the ban or required to pay fines at Baghdad airport upon exit. Many have been unable to return due to lengthy delays in issuance of visas or intentional refusal by the Iraqi embassies abroad to issue visas.
3. Humanitarian funding to Iraq is limited and the travel ban has significantly increased the operational cost of humanitarian assistance, resulting in cost inefficiency and an even smaller portion of resources reaching the

individuals and families in need. The ban has therefore imposed a direct cost on foreign governments and their taxpayers and, more alarmingly, on vulnerable individuals and families that are in need of assistance to meet their daily basic needs.

4. Yet another humanitarian consequence is that displaced Iraqis and Syrian refugees with difficult or urgent health conditions are unable to access medical care and needed medicine neither in the KRI nor abroad. Supply of medicine into the KRI has been dramatically reduced and travel outside the region made more difficult and costly and thus practically impossible for many people.

The below table demonstrates the reduction in volume of humanitarian assistance arriving to KR-I airports before and after the ban:

Date	Volume in Tons	Type of Humanitarian Aid
January	820	Health & Non-Food Items
February	954	Health & Non-Food Items
March	721	Health & Non-Food Items
April	158	Health, Dry Food and Non-Food Aid
May	113	Health & Non-Food Items
June	161	Health & Non-Food Items
July	97	Health, Dry Food and Non-Food Aid
August	52	Health & Non-Food Assistance
September	219	Health & Non-Food Items
October	2	Health & Non-Food Items
November	0	None
December	0	None

6. Impact on International Travelers

The airports in the Kurdistan Region offered a valuable sense of security and freedom for national and international travelers. They transformed the Kurdistan Region into a safe gateway into and out of Iraq for private and business travelers as well as government employees and officials particularly when ISIS took control of large territory in the three major governorates of Ninewa, Anbar and Salahaddin. Just as an illustrative example, estimated 2000 students who are completing their graduate studies abroad are directly affected as the flight ban has increased the cost and time of travelling. Many students have been forced to change their study plans faced with the impossible challenge of travelling in and out of the country.

The level of peace and security maintained within the region has allowed for international travelers to enter and exit Iraq through the airports in Erbil and Slemani. The flight ban and limitation down to only domestic flights has deprived international travelers of the needed sense of security and trust. Moreover, reports are emerging of personal violation-cases against passengers travelling through Baghdad airport. This has made the situation more difficult for passengers for increasing numbers of passengers, who are obliged to choose to travel by land-road into Turkey and from there to access international flights.

As of the end of December 2017, more than 1,500 flights have been cancelled. The number of international air travelers through EIA alone has reduced by approximately **5,000** per day. Alarmingly, many Kurds cannot travel through Baghdad as some are banned from doing so and others fear for their safety and dignity. Many ordinary citizens cannot travel overseas for medical treatments and international humanitarian workers are leaving, further compromising humanitarian assistance to refugees and IDPs. There is a legitimate concern and fear that international passengers leaving via Baghdad with a KRG residency will not be granted visas to return. Foreign travelers with a KR-I residency card or visa are fined a \$450 when they travel out of Iraq through Baghdad airport and there are indications that the amount will be increased in 2018.

7. Conclusion:

Constitutional experts have stressed that the flight ban is a grave violation of the Iraqi Constitution by the Federal Government. According to article 110 of the Constitution, management, administration and operation of the airports is not an exclusive authority of the Federal Government. Moreover, article 115 states that *"All powers not stipulated in the exclusive powers of the federal government belong to the authorities of the regions and governorates"*. Moreover, immigration and passport control, the customs department, and the air traffic controller departments of the Kurdistan Region are all employees of the federal government and operate according to the rules and regulations of, and directly under the Federal Government's authorities. Therefore, the flight ban has no constitutional legitimacy but is, on the contrary, an evident violation of the Constitution.

Additionally, the flight ban is a violation of the article (9) of the Chicago International convention on Civil Aviation of 1944.

This indicates that the evident aim of the flight embargo imposed by the Federal Government on the Kurdistan Region is a political rather than constitutional. The move is to collapse the stability and to harm the economy of the region by isolating it from the rest of the world. Paralyzing its economy, minimizing international diplomatic and humanitarian presence, pushing out international businesses, freezing foreign investment and other such measures are undertaken with no consideration for the consequences suffered by the entire population in Kurdistan inclusive IDPs, refugees and foreigners residing in the KRI. The flight ban is solely a collective punishment by the Federal Government against the people of the Kurdistan Region for having exercised their democratic right to express their voices and opinion. The ban has directly affected the citizens, but not the leadership as repeatedly claimed by the imposing authorities. It should be underlined that Iraqi Airways continues to operate domestic flights from the two KRI airports to Baghdad and Basra. This is a confirmation that the airports are safe, secure, and fully functional and operational.

Finally the operations of Erbil and Slemani airports have been fully subsidized by the KRG; both airports are run and operated with the KRG covering wide-ranging security and most operational expenses in which the operational costs exceed revenues in both airports.