Commentary on the EASO COI Query on Iraq:

What is the security context and treatment of Christians in Iraq? 22 October 2020

29th March 2021

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Introductory Remarks

This marks the first time that an ARC Foundation/Dutch Council for Refugees (DCR) Commentary focuses on an EASO COI Query Response.[1] We chose to review the October 2020 COI Query on *Iraq: What is the security context and treatment of Christians in Iraq* (hereafter the Iraq COI Query) given the high number of persons from Iraq who claim asylum in Europe and because a range of EASO COI products are in existence on Iraq.[2]

Overall we welcome the detailed overview provided, which includes a wide range of sources and address most relevant issues. Our comments are intended as constructive feedback, including comments on the Iraq COI Query's methodology, as well as on specific content issues considered relevant to the topic.

Recommendations

- EASO COI Queries should include a more detailed methodology which:

  o Details the specific time frame that research was conducted in, not just the date the COI Query was finalised;
  o Clarifies the distinction between *Sources Used* and *Sources Consulted*;
  o Clarifies when interlocutors have been consulted for a COI Query and provide greater transparency as to the questions posed to them and answers received;
  o Provides a list of sources consulted (distinct from a bibliography of sources cited);
  o Clarifies who drafts the COI Query's research headings;
  o Clarifies the peer-review process for a COI Query.

- The Iraq COI Query would have benefitted from

  o Clarity as to why certain topics haven't been addressed e.g. the situation of Christians in Baghdad, the ability of Christians to safely relocate, and the situation of Christian converts.

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[1] Information on the EASO Query System can be found here. See European Asylum Support Office (EASO), *EASO Query System*, undated [Last accessed: 10 March 2021]
2 See here: EASO, *COI Reports*, undated [Last accessed: 28 January 2021]

Comments on methodology

No methodology is provided as such for the Iraq COI Query. However, the following *Disclaimer* is included [emphasis added]:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> [...] Disclaimer
> This response to a COI query has been elaborated according to the EASO COI Report Methodology and EASO Writing and Referencing Guide.
> The information provided in this response has been researched, evaluated and processed with utmost care within a limited time frame. **All sources used are referenced. A quality review has been performed in line with the above mentioned methodology.** This document does not claim to be exhaustive neither conclusive as to the merit of any particular claim to international protection. If a certain event, person or organisation is not mentioned in the report, this does not mean that the event has not taken place or that the person or organisation does not exist. Terminology used should not be regarded as indicative of a particular legal position.
> The information in the response does not necessarily reflect the opinion of EASO and makes no political statement whatsoever.
> The target audience is caseworkers, COI researchers, policy makers, and decision making authorities.
> The answer **was finalised on 22 October 2020. Any event taking place after this date is not included in this answer**. [...]

Use of sources

The *Disclaimer* asserts that "All sources used are referenced". However, at the end of the document two lists of sources are in fact provided: *Sources Used* and *Sources Consulted.* This distinction between these two categories is not clear, especially as the *Disclaimer* sets out that if a source is "used" it would be referenced. One might expect *Sources Used* to indicate those cited in the Iraq COI Query whereas *Sources Consulted* would typically suggest the sources which were read in the preparation of the Iraq COI Query but not actually referenced in the document. However, the small number of *Sources Used* (five) is exceeded by the number of sources referenced, potentially indicating that the reverse was intended. Further confusing the distinction, of the five sources listed as *Sources Used*, all were also presented under *Sources Consulted.*

It is suggested that a full list of sources consulted be provided, even if those sources did not yield search results. This would aid users to conduct their own updates and would promote transparency by indicating the full range of sources consulted in the preparation of the Iraq COI Query, not just those cited.

The *Disclaimer* also makes no reference to the fact that any persons were interviewed for the purposes of the Iraq COI Query. Nor does the list of *Sources Consulted* make this clear. However, it appears that one interlocutor was contacted, listed in the *Sources Consulted* and cited in footnote 80 as follows:

❖ Puttick, M., email, 4 September 2020. Miriam Puttick is a specialist on human rights issues in Iraq and Head of Middle East and North Africa Programmes at the Ceasefire Centre for Civilian Rights.

It is not clear if they were contacted specifically for the purposes of this Iraq COI Query, nor what questions were posed to them.

Should an interview have been conducted, whilst we appreciate that sensitive or personal security concerns may preclude EASO from publishing full transcripts (which would be preferable in order to promote transparency), in our view publishing the interview questions would promote transparency of the Iraq COI Query so that users are able to see the nuance of how questions are framed. Whilst we welcome the interlocutor's valuable contribution, we consider that it would have been helpful to have interviewed additional experts in order to gain a broader picture. Furthermore, it would have been helpful to consult experts on some additional issues, especially when public information seems to be scarce.

Time frame for research

The Iraq COI Query provides a completed date as to when the document was finalised. However, no details are provided as to any timeframe for the research. Having analysed the list of *Sources Consulted* it indicates that one source from 2015 was cited, no sources from 2016 and several sources from 2017 onwards. It is suggested that COI Queries clearly indicate the main reference period for research.

Moreover, whilst a completed date is provided and the clarification that "Any event taking place after this date is not included in this answer", it is not made fully clear as to whether this was the last date that a search of COI was undertaken, or the date that the Iraq COI Query was drafted, as a time lag between these two activities likely exists. The last date that COI sources were consulted would be useful for users to know, in order to be able to undertake their own updated research and thus to ensure that they are able to access the most up to date information.

The subheading *Targeting of Christians by armed actors* includes the following disclaimer with regards to the information found:

> EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020
> [...] 1.1. Post-ISIL security context of Christian community
> [...] Targeting of Christians by armed actors
> [...] Within the scope of the resources, limited sources and statistics were found covering the frequency of security-relevant incidents targeting Christians in Iraq, in the period from January 2019 to August 2020. [...]

This would imply that this section did have a particular timeframe. Whether this was the case across the whole report is however not clarified.

Subject Questions

The following main research question was detailed along with seven sub-issues:

> EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020
> [...] Main Subject Question(s)
> What is the security context and treatment of Christians in Iraq?
> Question(s) 1. Background
> 1.1. Post-ISIL security context of Christian community
> Targeted destruction of infrastructure and habitat
> Targeting of Christians by armed actors
> 1.2. Ninewa governorate and ability to secure law and order
> Governance, education and practice of Christianity in Iraq

1.3. Missing, IDPs and returnees [...]

However, it is not made clear who authored these *Main Subject Question(s)* and the resulting sub-issues*.* It is not clear whether the sub-questions were raised at the outset by the instructing Member State authority and put to the COI researcher(s) or whether these were issues that the COI researcher(s) themselves presented their research findings under. This is notable given that it is considered that there are some gaps in relevant issues addressed in this Iraq COI Query. For example, it is considered that it would have been relevant to have included information on the treatment of Christians in Baghdad, given that this is likely to be the proposed site of return to Iraq, as well as information on the safety of Christians to travel on to their home area from Baghdad and/or a proposed site of internal relocation.

It was also observed that limited information on the situation of female Christians was included, required for decision-makers to undertake a gendered assessment. It is considered that the relevant COI should have warranted a distinct heading to allow users to more readily engage with this information.

It is considered that it would have been also helpful to have clarified that this Iraq COI Query does not address the situation for Christians in the Kurdistan Region of Iraq, even though as section *1. Background* indicates, since the invasion of the Islamic State of Iraq and the Levant (ISIL) they were displaced to the region and have settled there.

The same applies to the situation of Christian converts. Even though on page 3 of the Iraq COI Query "new Christian groups" are mentioned in the context of the Kurdistan Region of Iraq, the situation of Christian converts is not covered [emphasis added]:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> [...] Reportedly, leaders of established apostolic churches in KRI and the Ninewa Plains have voiced concerns about KRG MERA flexible approach **enabling new Christian groups to become established in KRI**, and 'accused the new groups of damaging the churches' relationships with local Muslims by proselytizing'. [...]

It would have been useful to make this more explicit, as the result of not mentioning the treatment of Christian converts may lead to decision-makers overlooking this group in their risk assessments.

It is also considered that it would have been helpful to indicate which other EASO COI publications address the topic. For example, the following report contains a subsection on Christians:

❖ [EASO, Iraq: Targeting of Individuals, March 2019](#)

It would be useful to know if the intention of the Iraq COI Query response was only to include information which post-dated this publication.

It would have also been useful to direct users to the following EASO report which contained information on the security situation in Ninewa:

❖ [EASO, Iraq: Security Situation, October 2020](#)

As detailed further above, the *Disclaimer* notes that "A quality review has been performed in line with the above mentioned methodology". It is presumed that this is undertaken in-house by EASO. However, the following additional information is provided by EASO on Contributing EU+ COI units (if applicable) [emphasis added]:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> […] This query response was sent to the EASO COI Specialists Network on Iraq (i.e. Network composed of specialised COI researchers and analysts from EU+ countries) for contributions on the security context and treatment of Yazidis. No information was contributed by EU+ countries, but **feedback was received** from the Norwegian Country of Origin Information Centre (Landinfo). […]

The reference to the information being sought on the security context and treatment of Yazidis is presumed to be an error and that this relates to a different EASO COI Query. It is not clear if the "feedback" received from Landinfo was a detailed peer review or in relation to the presentation of information.

Section specific comments

1.1 Post-ISIL security context of Christian community

Whilst the heading of this section clearly indicates that the information is post-ISIL, it is considered that it would have been useful to have included an introductory sentence on the scale and severity of treatment of the Christian community under ISIL. This would have provided useful context for unfamiliar readers, given that as detailed by the Congressional Research Service in a report cited in the Iraq COI Query [emphasis added], "From 2014 through 2017, the Islamic State waged a particularly brutal campaign against Yezidis, Christians, and Shia Muslims in northern Iraq, which both the Obama and Trump Administrations have described as **constituting genocide**".[3] It would also have been relevant to note that a UN Investigative Team to Promote Accountability for Crimes Committed by Da'esh/Islamic State in Iraq and the Levant (UNITAD) was collecting evidence to ensure that "the experiences and voices of survivors, witnesses and communities" such as Christians "are placed at the centre of its work".[4]

It is considered that the following excerpt of the Iraq COI Query does not fully and accurately represent the original source cited [emphasis added]:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> […] 1.1. Post-ISIL security context of Christian community

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3 Congressional Research Service, *Iraq: Issues in the 116th Congress,* updated July 17, 2020, p.29. citing the following footnote:
> 104 Secretary of State John Kerry, "Remarks on Daesh and Genocide," March 17, 2016; and, Assistant Secretary of State for Near Eastern Affairs David Schenker, Special Briefing On the U.S.-Iraq Dialogue, June 11, 2020.

4 UN Security Council, *Investigative Team Making 'Significant Progress' Gathering Evidence to Prosecute ISIL/Da'esh for Atrocity Crimes in Iraq, Special Adviser Tells Security Council*, 15 July 2019

> [...] Long-running territorial disputes between the GoI and KRG in disputed areas result in Christians continually reporting scepticism [sic] in **GoI [Government of Iraq] capability to protect** them from sectarian factions within PMF, Shia and Sunni armed groups, and ISIL.[35] [...]
>
> 35 USCIRF, 2019 Annual Report, April 2019, url, p. 190 [...]

The original source stated [emphasis added]:

> ❖ USCIRF, 2019 Annual Report, April 2019
> [...] In addition, religious minorities, including the Yazidi and Christian communities, are skeptical [sic] of the **Iraqi government's willingness and capability** to protect them from both Shi'a and Sunni violent armed groups, including ISIS and sectarian elements of the PMF—the latter of which the Iraqi government remains unable or unwilling to place under the command structure of the ISF. [...]

That is, the Iraq COI Query neglects to mention that the U.S. Commission on International Religious Freedom report had also documented that Christian communities are sceptical of the Iraqi government's *willingness* to protect them, not just their capability. This is notable given that there are two generally accepted limbs of the assessment of effective or sufficient protection: an evaluation of the ability and willingness of the State to protect the claimant from the harm feared.[5]

The Iraq COI Query would have also benefitted from information on the current challenges Christians face in light of ISIL's departure. For example, a June 2020 report by the Aid to the Church in Need (ACN International), based on primary data collection and desk-based research, highlighted a number of challenges ranging from emigration, security and economic concerns, discrimination to reconstruction needs.[6]

Targeted destruction of infrastructure and habitat

It is considered that it would have been relevant to include information on the damage to churches as well as to properties in Christian areas in this section. This was addressed for example by the following sources:

> ❖ Kirkuk Now, Iraqi Christians: a fight for survival, 3 April 2020
> [...] According to the statistic of the administration of the churches in Kirkuk, there are 12 churches in the city, and at least seven car explosions have targeted them since 2003. Now, the church bell is rung only at one of the 12 churches.
> Either the churches and the ritual places of the Christians have been subjected to violence, or they have been closed. [...]
> In Nineveh ad Baghdad, majority of the churches stopped ringing the bell, as a result of years fo argmed [sic] groups' conflict and violence.
> 85 churches were significantly damaged in the Nineveh during the IS war, 43 of them are located in Nineveh plain, the ancient homeland of the Christians. Least churches have been reconstructed among the damaged ones, according to the statistics of the directorate of Chaldean churches in Nineveh and the directorate of Christian affairs of the Ministry of Endowment and Religious Affairs of the Kurdistan Regional Government (KRG). [...]
>
> ❖ Aid to the Church in Need (ACN International), Life after ISIS: New challenges to Christianity in Iraq, Results from ACN's survey of Christians in the liberated Nineveh Plains, June 2020
> [...] Current challenges: Reconstruction needs [...]

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5 See UNHCR, *Guidelines on 'Internal Flight or Relocation Alternative'*, 23 July 2003, para. 15
[6] See Aid to the Church in Need (ACN International), *Life after ISIS: New challenges to Christianity in Iraq, Results from ACN's survey of Christians in the liberated Nineveh Plains*, June 2020

While substantial progress has been made, most towns remain in a worse state than in 2014 […]
Key findings:
- One in five respondents said their house had not yet been fully restored, especially in Tesqopa and Baqopa
- 51% believe homes should be the number one priority for reconstruction
- After homes, gardens, cultural centers, and churches were considered most important […]
homes, in some towns, many homes still need to be fixed. ACN found that approximately 12% of Christians currently living in the Nineveh Plains had not yet returned to the location in which they were living in 2014, i.e., they remain internally displaced within the Nineveh Plains. Of these, 54% were still waiting for their home to be repaired, indicating that the task of repairing homes for all those who would like to return is not yet finished.

Many of the homes needing reconstruction are more heavily damaged; in another ACN survey, 22% of those without a restored home indicated it had been totally destroyed, vs. only 12% of those with a restored home.

Those without a home must find accommodation in other ways. For example, some rent a home elsewhere; for example, many families from Batnaya rent homes in Tesqopa. Others are living in homes that have been voluntarily given to them by Iraqi Christians who have emigrated and do not intend to return. In some cases, multiple families share the same home. [...]

Targeting of Christians by armed actors

It is considered that this section neglects to mention that the 50th PMF brigades have previously prevented the return and resettlement of Christians. The report states that [emphasis added]:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](url)
> [...] 1.1. Post-ISIL security context of Christian community
> [...] Targeting of Christians by armed actors
> Christians in Tal Kayf reported similar situation where PMF 50th Brigade continued to support the settlement of Sunnis and Shia Shabak, however it **did not block the return of Christians**.[57] [...]
>
> 57 USDoS, Iraq 2019 – International Religious Freedom Report, June 2020, url, p. 11 […]

In fact, the original source cited stated that it *no longer* blocked their return, thus implying that they did so formerly [emphasis added]:

> ❖ [USDoS, Iraq 2019 – International Religious Freedom Report, June 2020](url)
> [...] Christians in Tal Kayf said the nominally Christian but majority Shia Arab PMF 50th "Babylon" Brigade actively continued to facilitate the settlement of Sunni Arab and Shia Shabak populations in that town, but it **no longer** blocked Christians from returning to the area. [...]

Indeed, this is corroborated by other sources cited elsewhere in the Iraq COI Query, for example:

> ❖ [The Washington Institute, Normalizing Security in the Nineveh Plains, 9 July 2019](url)
> [...] Creating the widespread sense that an outsider non-Christian faction has hijacked local security forces, Kata'ib Babiliyun deters the return of many displaced persons to eastern Mosul and the northern Nineveh Plains. [...]

> ❖ [Assyrian Policy Institute (API), Contested control: the future of security in Iraq's Nineveh Plain, 1 June 2020](url)
> [...] Understanding the Rate of Return to Brigade 50-Controlled Areas
> The complete lack of return to areas controlled by Brigade 50 signify the threats posed to the local Christian Assyrian community. In the absence of Brigade 50, towns like Batnaya and Bashiqa are now

more recently, but still slowly, progressing; however, even in these areas the Iraqi Army has failed to match the rates of return produced by the NPU. [...]

Whilst this section documents the abduction of Christians, such information was brief and for example, the motivation for such abductions was not provided:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> [...] 1.1. Post-ISIL security context of Christian community
> [...] Targeting of Christians by armed actors
> In 2019, USDoS noted numerous reports of Iran-backed PMF 30th brigade (Liwa al-Shabak/Quwat Sahl Nineveh) and the PMF 50th brigade (Kata'ib Babiliyun) carrying out unlawful detention of Kurds, Turkmen, Christians, and other minorities in western Ninewa and the Ninewa Plains.[60]
> These brigades were involved in "extortion, illegal arrests, kidnappings, and detention of individuals without warrants".[61] [...]
>
> 60 USDoS, 2019 Iraq - Annual Report on Human Rights, March 2020, url, p. 14; The Washington Institute, Normalizing security in the Nineveh Plains, 5 July 2019, url
> 61 USDoS, 2019 Iraq - Annual Report on Human Rights, March 2020, url, p. 14; Kurdistan24, US sanctions Nineveh Plain's militia leaders for terrorizing population, blocking IDPs' return, and corruption, 19 July 2019, url [...]

Motivations for abductions is however detailed by the following source cited elsewhere in the Iraq COI Query [emphasis added]:

> ❖ [USDoS, Iraq 2019 – International Religious Freedom Report, June 2020](#)
> [...] Non- Muslim minorities reported continued abductions, threats, pressure, and harassment **to force them to observe Islamic customs**. [...]

It is also considered that one of the sources cited above in footnote 61 hasn't been fully and accurately represented. Kurdistan24 notes the following in respect to abuses perpetrated by the PMF 30th and 50th brigades [emphasis added]:

> ❖ [Kurdistan 24, US sanctions Nineveh Plain's militia leaders for terrorizing population, blocking IDPs' return, and corruption, 19 July 2019](#)
> [...] Nonetheless, Liwa al-Shabak engages in rampant criminal activity. "Members of the local population allege that the 30th Brigade has been responsible for egregious offenses, including physical intimidation**,** extortion, robbery, kidnapping, and **rape**," the Treasury Department stated. [...]

That the brigades' perpetrated rape is not included in the Iraq COI Query at all, although it does detail sexual harassment in a further excerpt:

> [EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
> [...] 1.1. Post-ISIL security context of Christian community
> [...] Targeting of Christians by armed actors
> PI also reported that the PMF 30th brigade had committed multiple accounts of "physical intimidation, sexual harassment, religious discrimination, robbery, and theft of land or property".[51] [...]
>
> 51 API, Contested control: the future of security in Iraq's Nineveh Plain, 1 June 2020, url, p. 37 [...]

It is considered that it would have been relevant to include information on the impunity enjoyed by the PMF in perpetrating abuses. For example:

- Knights, M. et al., Honored, not contained. The future of Iraq's Popular Mobilization Forces, March 2020

  [...] PART II SUMMARY: RIGHTS AND DUTIES OF HASHD MEMBERS

  [...] the Hashd does not meet many of the requirements for membership in the Iraqi security forces. Hashd forces have been excused since their establishment from most of the responsibilities, duties, or obligations of other soldiers, counterterrorism forces, and police officers. The Hashd has a different military culture from that of the Iraqi army, Counter Terrorism Service, or Federal Police. It looks and acts like a militia. Some elements of the Hashd have a history of blatantly violating the prohibition on political activities by members of the security forces. Most seriously, the Hashd has a poor record of military discipline and an already-long history of gross human rights violations against Iraqi civilians and of engaging in unauthorized foreign activities in Syria. [...]

- USCIRF, 2020 Annual Report, April 2020

  [...] The PMF continued to operate largely with impunity, despite nominal efforts to bring them under the oversight and accountability of the Iraqi armed forces. [...]

- Assyrian Policy Institute, Contested control: the future of security in Iraq's Nineveh Plain, 1 June 2020

  [...] Part IV: Security Forces in the Nineveh Plain

  [...] The Popular Mobilization Forces

  [...] In August 2018, former Iraqi Prime Minister Hader al-Abadi signed an executive order requiring that PMC-administered PMF forces to withdraw from Mosul city and the Nineveh Plain and transfer all soldiers in Ninewa Governorate to the operational and administrative control of the army-led Nineveh Operations Command. In July 2019, former Prime Minister Adel Abdul Mahdi reissued the order. At the time of writing, these forces have not complied with these orders, demonstrating that these forces are outside state control. [...]

- Aid to the Church in Need (ACN International), Life after ISIS: New challenges to Christianity in Iraq, Results from ACN's survey of Christians in the liberated Nineveh Plains, June 2020

  [...] Current challenges: Militia security concerns [...]

  The Shabak Militia and Babylon Brigade operate with impunity

  Some of the militias in the Nineveh Plains operate with effective impunity, limiting the ability of the Iraqi government to enforce criminal law. In particular, militias in the Nineveh Plains refused to comply with the Prime Minister's instructions in July 2019 to disband and integrate into the Iraqi Army. In part, this refusal to cooperate relates to entrenched economic and political interests. In part, it relates to a genuine fear of ISIS, and the feeling that such militias are needed to protect against the return of ISIS-like groups. The Shabak Militia is broadly supported by the Shabak population. 39% of those living under an Iran-backed militia claimed to have been negatively affected by a militia in the post-2017 period, vs. 18% of those surrounded by an Iran-backed militia, and only 14% of those adjacent to an Iran-backed militia. [...]

It was also observed that references 50, 53 and 54 of the Iraq COI Query are incorrect - they cite the 2019 U.S. Department of State Iraq - Annual Report on Human Rights whereas it should have been the Iraq 2019 – International Religious Freedom Report.

1.2 Ninewa governorate and ability to secure law and order

It is considered that it might have been helpful to include an introductory note as to why specifically the ability of the Ninewa government to secure law and order was addressed. Clearly, it is due to the fact that, as detailed in section *1. Background*, an estimated 200,000 of the remaining 250,000 Iraqi

Christian population reside in Ninewa and in the north part of the Kurdistan Region of Iraq, but for the unfamiliar reader, this context might have been missed.

It is also considered that some of the information contained within this section better belongs in the previous section on *1.2. Targeting of Christians by armed actors*. Several of the excerpts didn't relate to securing law and order or were not specific to the situation in Ninewa governorate. To take one example:

> EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020
> [...] 1.2 Ninewa governorate and ability to secure law and order
> In November 2019, the UN Committee on the Elimination of Discrimination against Women reported that Christian women are 'underrepresented in political and public life in the State party', and that they are among ethnic minorities in Iraq that are exposed to continued discriminatory stereotypes.[75] [...]
>
> 75 UN Committee on the Elimination of Discrimination against Women [CEDAW/C/IRQ/CO/7], Concluding observations on the seventh periodic report of Iraq*, 12 November 2019, url, p. 6. [...]

It is further observed that little information is included that is directly relevant to the Ninewa governorate's ability and willingness to protect Christians. For example, it would have been relevant to include:

❖ USDoS, Iraq 2019 – International Religious Freedom Report, June 2020
   [...] The Iraqi government continued to show a lack of willingness or ability to provide proper security for vulnerable religious and ethnic minorities. [...]

❖ Assyrian Policy Institute, Contested control: the future of security in Iraq's Nineveh Plain, 1 June 2020
   [...] Part IV: Security Forces in the Nineveh Plain
   Nineveh Plain Protection Units (NPU)
   [...] Yet the comparatively high rates of return do not mean that there are not concerns about the long-term viability of the undermanned and poorly-funded force. A January 2017 report published by Christian Science Monitor highlighted these concerns:
   > Most NPU members are from the Nineveh Plains and joined because they want Christian land to be protected by Christians, not the Iraqi Army or Kurdish Peshmerga. It's clear the force has inspired pride in its members. But its capabilities are still limited...The force has no heavy weapons and depends on help from the Iraqi Army and U.S. forces. While its soldiers engaged in several light skirmishes with IS fighters in the weeks after retaking the town, it would not have the repower necessary to withstand a large-scale attack.[119]
   [...] Opposition to the NPU
   For example, former Nineveh Governor Atheel al-Nujai (2009-2015) argues that the formation of minority-led security forces is problematic:
   > "I think it's very dangerous for these minority groups to have their own forces. [...] These minorities can be destroyed for that. If Chris- tians establish a Christian force to protect the Christian area, how much do you think they will be? A couple hundred. A couple hundred want to fight the majority..."[185]
   Indeed, Nujai echoes common concerns, namely that minority-led forces are small in number and thus ineffective in the face of a major security threat. He also suggests that such a force may be perceived as a threat by neighboring ethnic groups and consequently provoke attacks on these communities. This analysis fails to account for the fact that recruitment levels among Christian Assyrians is high in proportion to their numbers. Should minority-led forces, such as the NPU, receive proper funding and support as well as comprehensive training, they have the potential to meet long-term local security needs. [...]

119 Kristen Chick, "Iraqi Christians: Will They Go Home?" Christian Science Monitor, January 14, 2017, www.csmonitor.com/World/Middle-East/2017/0114/ Iraqi-Christians-Will-they-go-home. [...]
185 Ahn, Campbell, and Knoetegen, The Politics of Security in Ninewa, 34-35. [...]

❖ [Aid to the Church in Need (ACN International), Life after ISIS: New challenges to Christianity in Iraq, Results from ACN's survey of Christians in the liberated Nineveh Plains, June 2020](#)
[…] Current challenges: Militia security concerns […]
These militias have the following functional roles:
• Manning checkpoints, including the major thoroughfare that runs through northern Iraq's two largest cities, Erbil and Mosul; they play a role in preventing the passage of militants
• Maintaining general security, i.e., neutralizing any threats posed by ISIS, other militants, or other militias
• Preventing the extension of the frontier with Kurdistan, who have expressed an interest in controlling a greater part of the Nineveh Plains
• Securing the functional political and economic interests of affiliated organizations (e.g., political parties)
In all locations, these militias share some responsibility with the Iraqi Army and police, as well as the intelligence service (Division 155), which guards several points of entry into Baghdad controlled Iraq. Although they purport to uphold security, they interfere with life in several ways:
• Political instability: The control of areas by militias discourages outsiders from visiting and makes both foreign and nationals reluctant to invest
• Limited freedom of movement: Constant checkpoints, at which there are often delays, limit free movement, which impacts both the economy and personal mobility
• Corruption and economic impacts: In some areas, militias have become involved in local businesses, engaging in mafia-life behavior to secure domination over certain sectors of the economy. For example, in Nineveh, some militias controlled the scrap metal business for a time.
• Human rights abuses: Some specific accusations of violence and intimidation have been made against these militias. In 2019, the leader of the Shabak Militia, Waad Qado, was formally sanctioned by the US government for extracting money from the local population through "extortion, illegal arrests, and kidnappings". The leader of the Babylon Brigade, Ryan Al-Kaldani, was also sanctioned.
• Cultural impacts: In some areas, militias have been accused of strategically positioning Shia Muslim shrines in prominent positions, sometimes in front of Christian monuments, as a form of intimidation. In ACN's survey, living under or close to an Iranbacked militia was directly correlated with feelings of insecurity. Christians feel most unsafe in Bartella, where 41% feel that their security is "absolutely not ensured." Bartella is the site of the Shabak Militia. […]

Governorate, education and practice of Christianity in Iraq

It is considered that the title of this section renders it unclear what is intended to be addressed, in particular in relation to 'governorate'. Furthermore, 'Practice of Christianity' is extremely broad, but this section is actually very succinct.

1.3 Missing, IDPs and returnees

It is considered that the following excerpt downplays the severity of challenges faced by Christian returnees, compared to the original source (emphasis added):

[EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020](#)
[...] 1.3 Missing, IDPs and returnees

[...] According to 2019 Annual Report of the United States Commission on International Religious Freedom (USCIRF), the majority of the Christian population remained displaced, and those that managed to return, estimated at 30-50 %, mostly coming from refuge in Erbil and areas in KRG, **continue to face challenges** due to harassment and threats from PMF factions.[89] [...]

89 USCIRF, 2020 Annual Report, April 2020, url, pp. 72-73 [...]

In comparison, the original report stated (emphasis added):

❖ USCIRF, 2020 Annual Report, April 2020
[...] The majority of Iraqi Christians remained displaced and **their challenges even after return have been significant,** while Yazidis—500,000 of whom fled ISIS atrocities in 2014—still faced serious distress in 2019. [...]

It is also considered that this section could have benefited from additional information on the reasons underpinning the low return rate of Christians. For example, the May 2020 USAID / Middle East Research Institute report *Ninewa Plains and western Ninewa barriers to return and community resilience – A meta-analysis of existing studies and literature* is cited twice in the Iraq COI Query, but only in relation to the number of returnees:

EASO, COI Query, Iraq: What is the security context and treatment of Christians in Iraq? 22 October 2020
[...] 1.3 Missing, IDPs and returnees
[...] In May 2020 report produced by US AID and the Middle East Research Institute (MERI) it is mentioned that the most Christians from Telkaif district have emigrated to Europe, "with the exception of around 350 families who stayed behind and are currently living in IDP camps in the KRI or rest of Iraq (Local Authority KII:2019)".[96] Moreover, the MERI/US AID report provides that "although the IOM-DTM records a relatively high rate of return of 83% to Telkaif, Christian key informants expressed that only a handful of Christian families have returned since liberation (Christian KIIs:2019)".[97] [...]

96 USAID / Middle East Research Institute (MERI), Ninewa Plains and western Ninewa barriers to return and community resilience – A meta-analysis of existing studies and literature, May 2020, url, p. 34
97 USAID / Middle East Research Institute (MERI), Ninewa Plains and western Ninewa barriers to return and community resilience – A meta-analysis of existing studies and literature, May 2020, url, p. 35 [...]

This is despite that report including a 20 page section on *Barriers to Return & Stabilisation* which comprises a section on *District specific barriers to return*, including subsections on *Living Conditions and Barriers to Return* and *Current Concerns* as well as sections on *Sect- and Religion-Specific Barriers to Return*, including on *Christians* which details the results of a survey on Christian IDPs' barriers to return (the primary reason being "the lack of improvement of the security situation") and *Gender specific barriers to return.*

Other sources cited elsewhere in the Iraq COI Query also document the reasons for lack of motivation to return:

❖ USCIRF, 2019 Annual Report, April 2019
[...] A limited number of Assyrian and Chaldean Christians returned to their homes in the Nineveh Plains, such as in Qaraqosh where Assyrians celebrated Easter for the first time since 2014. Most did not yet return, however, as a lack of restored infrastructure, danger from ISIS booby traps and unexploded ordnance, and persistent fears of an ISIS resurgence prevented many Christian IDPs from returning to Mosul or villages in its social and economic orbit. [...]

❖ Assyrian Policy Institute, Contested control: the future of security in Iraq's Nineveh Plain, 1 June 2020

> [...] Part IV: Security Forces in the Nineveh Plain
>
> [...] Contested control and a legacy of mistrust towards the country's larger security forces means thousands of displaced persons and refugees, mostly minorities, refuse to return home. For those that have returned, many are wary of what the future holds.[104] Security fears remain high; the post-ISIS dynamic in the Nineveh Plain is not unlike the situation that enabled the Islamic State's invasion.
>
> [...] Part V: Assessing Returns
>
> [...] There are numerous factors that influence return decisions, such as level of devastation and lack of economic opportunities. However, for Christian Assyrians, security remains the most salient concern.[153]
>
> [...] The complete lack of return to areas controlled by Brigade 50 signify the threats posed to the local Christian Assyrian community.
>
> 104 [...] See Reine Hanna, Lives on Hold: Assyrian Refugees in Jordan (U.S.A.: Assyrian Policy Institute, 2019), www. assyrianpolicy.org/lives-on-hold.
>
> 153 API Fieldwork between 2018 and 2020 has consistently shown that security remains the main impediment preventing the return of local populations. See Hanna, Lives on Hold.

As mentioned further above, a June 2020 report by the Aid to the Church in Need (ACN International), based on primary data collection and desk-based research, highlighted a number of challenges ranging from emigration, security and economic concerns, discrimination to reconstruction needs amongst some of the reasons featuring in return considerations, which the Iraq COI Query could have addressed in more detail.[7]

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[7] See Aid to the Church in Need (ACN International), *Life after ISIS: New challenges to Christianity in Iraq, Results from ACN's survey of Christians in the liberated Nineveh Plains*, June 2020