

## **FAA Background Information Regarding U.S. Civil Aviation in the Baghdad Flight Information Region (FIR) (ORBB)**

Recent Shia militia attacks against U.S. interests in Iraq indicate an increased willingness on the part of these groups to attack such targets and highlight their continued capability to conduct attacks. This activity may exacerbate regional tensions and could result in coalition defensive or retaliatory action. Depending upon the circumstances, coalition defensive or retaliatory action could trigger use of anti-aircraft weapons by Shia militia groups, an Iraqi air defense response, or retaliatory attacks by Shia militia groups or Iran.

In this fluid and tense security environment, there is an unacceptable level of inadvertent risk to U.S. civil aviation operations in the Baghdad Flight Information Region (FIR) (ORBB) at all altitudes due to the potential for miscalculation or misidentification. As a result, on 12 March 2020, the FAA issued Notice to Airmen (NOTAM) KICZ A0036/20, which prohibits U.S. civil aviation operations in the Baghdad FIR (ORBB) at all altitudes. The flight prohibition for U.S. civil aviation contained in NOTAM KICZ A0036/20 is in addition to Special Federal Aviation Regulation (SFAR) No. 77, 14 C.F.R. § 91.1605, which remains in effect.

On 11 March 2020, likely Shia militia elements conducted a rocket attack on Taji Military Complex in Iraq, killing two U.S. soldiers and one British soldier. Iranian-supported Shia militias continue to call for the expulsion of U.S. armed forces from Iraq and are likely responsible for multiple indirect fire attacks targeting U.S. armed forces, as well as ongoing, intermittent rocket attacks targeting the U.S. Embassy in Baghdad and Baghdad International Airport (ICAO: ORBI). These attacks pose a risk to airports/airbases, aircraft on the ground, and aircraft operating at lower altitudes, including during the arrival and departure phases of flight. Anti-U.S. Shia militias armed with various anti-aircraft capabilities, including light anti-aircraft artillery and man-portable air defense systems (MANPADS), have publicly threatened to defend their locations, following a string of third party airstrikes in 2019. Iran has a history of proliferating advanced weapons capabilities to its proxy groups and could provide Shia militias in Iraq with additional and more advanced anti-aircraft capabilities, potentially increasing the risk to U.S. civil aviation operations throughout the Baghdad FIR. Additionally, Islamic State of Iraq and ash-Sham (ISIS) elements may have access to anti-aircraft weapons presenting a risk to U.S. civil aviation up to 25,000 feet.

After the issuance of NOTAM KICZ A0036/20, on 14 March 2020, another rocket attack occurred targeting the Taji Military Complex, resulting in at least five injured. Although the attackers remain unidentified, the attacks were likely committed by Iranian-backed Shia militia groups targeting U.S. interests in Iraq.

Continued Shia militia attacks could lead to further escalation of tensions in the region, especially if indirect fire attacks cause coalition casualties. Further escalation could precipitate air defense activity in the Baghdad FIR (ORBB). In this fluid and tense security environment, military, third party, and militia activities affecting U.S. civil aviation safety may occur with little or no warning, as highlighted by the 8 January 2020 Iranian retaliatory ballistic missile attacks targeting U.S. air bases in Iraq. In late May 2019, Iraq temporarily closed portions of its established air routes in response to potential military operations in northern Iraq; Iran and Turkey continue to conduct small-scale

attacks along and across Iraq's northern and eastern borders with little or no warning. In September 2018, Iran conducted a ballistic missile attack on Kurdish targets in northern Iraq and a no-notice ballistic missile attack against ISIS positions in Syria, in which the ballistic missiles transited over congested civil air routes in eastern Iraq. Furthermore, there is a potential inadvertent risk to U.S. civil aviation operations in the Baghdad FIR (ORBB) from fielded GPS jammers. This confluence of circumstances presents an unacceptable risk to U.S. civil aviation operations at all altitudes in the Baghdad FIR (ORBB).

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