

TO: The Judges of the International Court of Justice
The Peace Palace,
The Hague,
The Netherlands.

Amsterdam, 24 August 1993

YOUR EXCELLENCIES:

I hereby amend our Application of 20 March 1993 and our second Request for provisional measures of 27 July 1993 --and in particular Section C thereof-- by filing with the Court in support and substantiation thereof the attached article by Dr. Milan Vego, "Federal Army Deployments in Bosnia and Herzegovina," that was published in Jane's Intelligence Review (Europe) October 1992 at pages 445 - 448. This article in a well-respected, expert, and internationally recognized authoritative source provides conclusive evidence of the fact that the rump Yugoslavia (Serbia and Montenegro) actually exercises operational command-and-control over the J.N.A or Y.P.A. forces and units as well as the various Serb militia, and paramilitary units that have been and still are as of today operating illegally in the Republic of Bosnia and Herzegovina and in violation of the Genocide Convention as well as this Court's Order of 8 April 1993. We hereby submit this expert article in support of our second Request for provisional measures of 27 July 1993.

Please accept, Excellencies, the assurance of my highest consideration.

Francis A. Boyle

Professor Francis A. Boyle
General Agent for the Republic of
Bosnia and Herzegovina before the
International Court of Justice
VIA FAX

Federal Army Deployments in Bosnia and Herzegovina

Dr Milan Vego

War in Bosnia and Herzegovina was probably inevitable given the realities of the situation. However, the extent and intensity of destruction, especially of civilian targets and populations, was unexpected. The main but not sole culprit of the destruction and the atrocities has been the Army of the Federal Republic of Yugoslavia (FRY), formerly known as the Yugoslav People's Army (YPA).

The war in Bosnia and Herzegovina is not a 'civil war' or 'ethnic conflict' as many Western observers falsely assert. It was carefully planned by the top political and military leadership in Belgrade. The former federal army troops deployed in Bosnia and Herzegovina were reorganized and reinforced with other units withdrawn from Slovenia and Croatia. The reorganization of the YPA carried out in December 1991 led to the establishment of a new military district with its headquarters in Sarajevo. Additional federal troops were moved to Bosnia and Herzegovina from Serbia in the first few months of 1992. By then, the process of 'Serbianization' of the former federal army, which started in the aftermath of war in Slovenia, was almost complete. The main aim of the redeployments and reorganization of the federal troops in Bosnia and Herzegovina was to ensure military control of that republic. The former federal army was apparently determined not to be forced to leave the territory of yet another republic of the former Yugoslavia. The army, while professing to act to prevent inter-ethnic clashes in Bosnia and Herzegovina, was covertly providing large quantities of arms to the local Serbian para-military forces. Thus, the stage was set for the Serbian attempt to seize some 70 per cent of Bosnian territory, even though the local Serbs made up only about 31 per cent of the population. The illegally established 'Serbian Republic of Bosnia and Herzegovina' would never have been created without the whole-hearted support and participation of the former federal army.

Federal Army's Presence

Before the outbreak of hostilities in Slovenia in June 1991, the major part of the former YPA was deployed in the military districts encompassing the areas along Yugoslavia's borders. Defence of Bosnia and Herzegovina was the

responsibility of the 1st Military District (MD) in Belgrade. Besides Bosnia and Herzegovina, this military district encompassed a part of Serbia proper and the province of Vojvodina.

On the territory of Bosnia and Herzegovina were deployed forces of three army corps totalling some 45 000 men: 17th Corps with its headquarters in Tuzla, 5th Corps in Banja Luka, and 4th Corps in Sarajevo. The boundary between the Tuzla, Banja Luka and Sarajevo Corps was along the line Grmeč Mountain — Vlačić Mountain — Zvornik (see map). North of that line was the deployment area of the Tuzla and the Banja Luka Corps, while south of it was deployed the Sarajevo Corps. The troops of the Tuzla Corps were also deployed in the Croatian province of Slavonija. The units of the Banja Luka Corps were responsible for the defence of western Bosnia and part of Central Dalmatia. This boundary between the various corps deployed in Bosnia and Herzegovina was one more strand of evidence to point to the fact that the former federal army paid scant attention to the internal borders in the deployment of its units.

Partial Withdrawal

In the months prior to the formal declaration of independence, the government in Sarajevo was involved in prolonged and ultimately fruitless talks with Belgrade about the status of the federal troops on the republic's territory. Finally, the republic's state presidency and government ordered, in separate statements on 27 April 1992, that *all* (emphasis added) federal army troops leave Bosnian territory. For its part, the federal presidency in Belgrade announced on 4 May the withdrawal of all military personnel and their dependants who were non-residents of Bosnia and Herzegovina. Their withdrawal was to be completed within 15 days. The rest of the federal troops were transferred to the illegally established 'Territorial Defence Forces of the Serbian Republic of Bosnia and Herzegovina'.

The government in Belgrade asserted that there was a total 60 000 federal troops in Bosnia and Herzegovina, of whom 80 per cent were residents of the republic. However, the federal army has deployed closer to 95 000 men on the territory of the republic. The latter figure also agrees with a report that 68 per cent

of the strength of the federal army (a total of about 140 000 men) was deployed in the republic on the eve of the current hostilities.

Belgrade's figure of the percentage of local Serbs serving in the federal army in the republic was immediately challenged by the government in Sarajevo which claimed that not more than 20 per cent of the federal army personnel were local residents. This means that out of 95 000 men, only 19 000 troops were local Serbs. The fact was that by then most non-Serbs had departed or deserted the former federal army. So by March 1992, about 97 per cent of personnel were Serbs and Montenegrins. Also, the percentage of the conscripts was much lower than at the beginning of the war in Croatia because a large number of Serbian and Montenegrin reservists were called to active service.

By 20 May about 14 000 military personnel were withdrawn from Bosnia and Herzegovina. Specifically, transport aircraft and helicopter units of the federal air force transported about 13 540 soldiers, 304 wounded, 43 600 civilians, and 2566 tons of cargo. Most of the personnel were apparently stationed in central Bosnia and eastern Herzegovina. Thus, a total of about 80 000 former federal troops were formally transferred to the 'Territorial Defence Forces of the Serbian Republic of Bosnia and Herzegovina'.

Command and Control

There is a great deal of genuine confusion in the West as to who actually controls the Serbian forces in Bosnia and Herzegovina. To make the situation even more complicated, the regime in Belgrade consistently tries to do its best to muddle the issue by denying its own responsibility for war in the neighbouring republic. For example, the President of the self-proclaimed FRY, Mr Dobrica Čosić (who is also Supreme Commander of the Federal Army) falsely asserted on 15 July that the army does not provide any weapons and military equipment to the former 'Territorial Defence Forces of the Serbian Republic of Bosnia and Herzegovina', except for 'some limited humanitarian aid'. Moreover, it does not command and control these forces. But the reality is quite different. The operational chain of command in the federal army runs from the Supreme

Defence Council (composed of the president of the FRY and presidents of the republics of Serbia and Montenegro) through the General Staff in Belgrade to the commanders of: 1st MD (Belgrade), 4th MD (Podgorica), the 'Army of the Serbian Republic of Bosnia and Herzegovina', Naval District (Kumbor, Bay of Cattaro), Air Force and Air Defence units.

The commander of the 'Army of the Serbian Republic of Bosnia and Herzegovina' is Lieutenant General Ratko Mladić, the former commander of the 9th Corps in Knin. General Mladić is professionally a mediocre officer, and extremely brutal in dealing with the Croatian and Moslem populations. In the war in Croatia he became notorious for his barbaric treatment of the Croatian civilians and his threats to destroy the Croatian coastal city of Sibenik. He has shown the same brutality by giving explicit orders to bombard and burn all

the non-Serbian civilian targets in the besieged Sarajevo. His headquarters was recently moved from Pale (near Sarajevo) to more secure Han Pijesak (some 55 km northeast of Sarajevo). This headquarters is located in an underground bunker providing multi-channel and secure communications to all subordinate corps commanders, the General Staff in Belgrade as well as the president of the FRY.

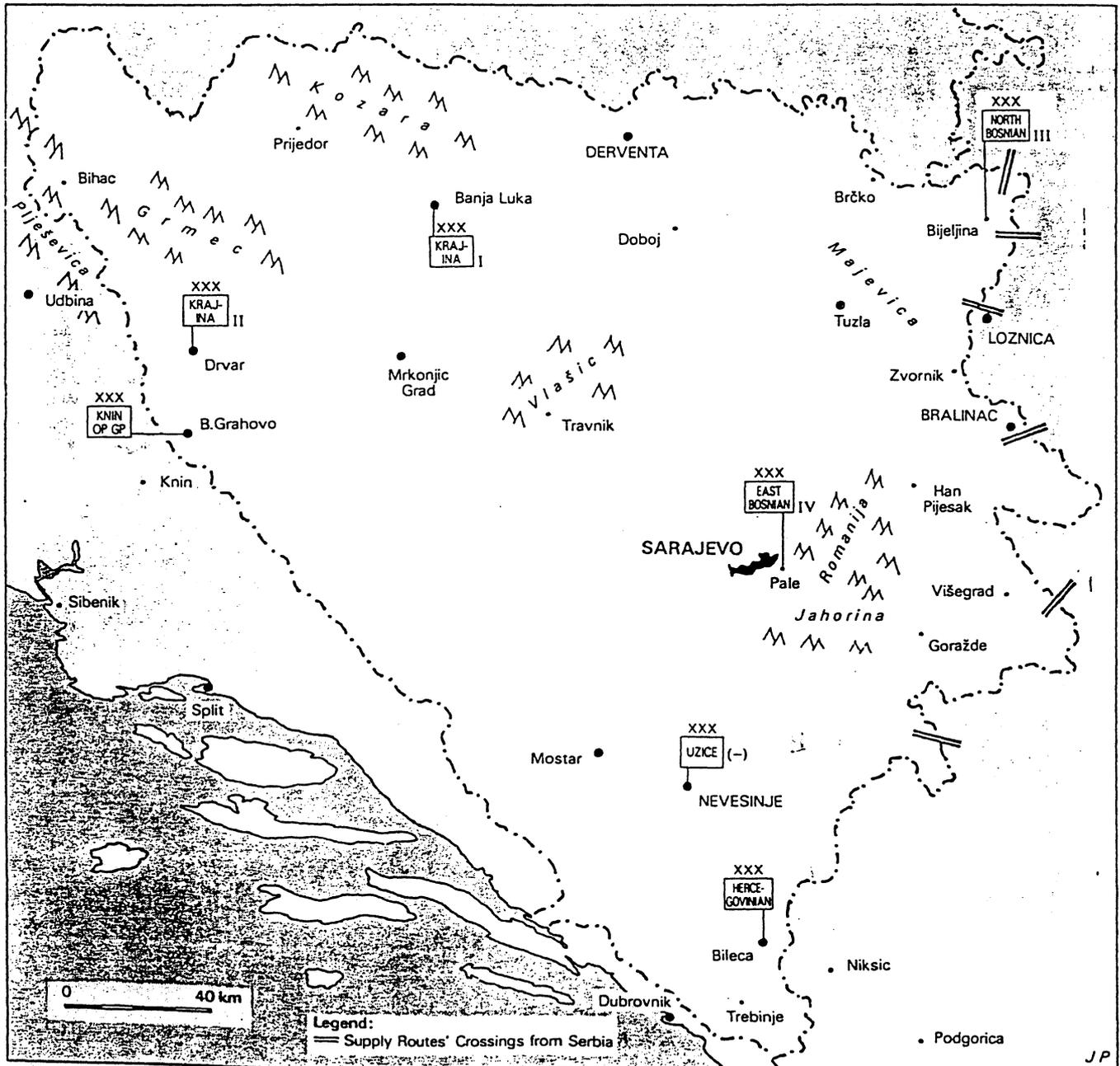
Formally subordinate to General Mladić are commanders of four army corps, one provisional 'operational group,' as well as air force and air defence units. General Mladić clearly does not control all and every action of his subordinate corps commanders in the field; apparently, they have considerable latitude in carrying out their assigned tasks. Co-operation between the federal army troops and local Serbian militia units is reportedly not very effective. Both the troops of the former federal army and the local militias

are kept supplied by the Army of the FRY. Thus, there is little doubt that the regime in Belgrade pulls all the strings in the employment of the federal troops in the war in Bosnia and Herzegovina.

Ground Troops

Currently, out of total of some 80 000 former federal troops deployed in Bosnia and Herzegovina, only about 35 000 are considered an effective military force. The Serbian ground forces in western Bosnia are organized into two corps: I Krajina Corps in Banja Luka (formerly 5th Corps) and II Krajina Corps in Drvar (formerly Bihac Corps). In addition, the troops of the former 9th Corps, after their redeployment on the Bosnian side of the border with Croatia this Spring, were provisionally organized into the Knin Operational Group.

The Serbian forces deployed in eastern



Bosnia belong to the III North Bosnian Corps composed of the forces of the former Tuzla Operational Group and parts of the Sabac (Valjevo) Corps. The troops deployed in central and southeastern part of Bosnia are subordinate to IV East Bosnian Corps (also called Sarajevo-Romanija Corps). They are composed of units of the former 4th Corps (Sarajevo) and some units from Slovenia and Croatia which were previously deployed to the territory of the now apparently defunct 2nd MD.

On the territory of eastern Herzegovina were deployed forces of the former Užice Corps. After the Croatian and Moslem forces liberated Mostar, the headquarters of this corps was relocated to Nevesinje. In fact, there are some reports which indicate that major part of the Užice Corps has been withdrawn to its former deployment area in Serbia. The major part of the newly established Herzegovinian Corps (HQ at in Bileća) is composed of elements of the Podgorica Corps and the former 13th Corps. These units were previously part of II Operational Group for Herzegovina (also known as the Trebinje-Bileća Operational Group). The commander of the Herzegovinian Corps is a colonel, a sign perhaps that its strength does not exceed several thousand men.

The organization and equipment of the federal troops in Bosnia and Herzegovina varies greatly. There is also a lack of reliable open sources about the real strength of these forces. A Croatian source claimed that about 70 per cent of the weapons and equipment taken away with the federal troops deployed in Slovenia and Croatia was eventually assigned to the former 4th, 17th, and 37th Corps, while 30 per cent was assigned to the former 5th Corps and the Bihać Corps. The FRY President claimed

in mid-July 1992 that the Serbian forces had 300 tanks, 231 guns, 25 combat aircraft and trainers, 20 helicopters, and four surface-to-air missile (SAM) divisions (squadrons in the West). The acting Chief of the General Staff, General Zivota Panic, in a confidential speech defending the federal army against the charges of betraying the Bosnian Serbs said that the Serbian forces in the republic have acquired control of 900 tanks and armoured vehicles, 852 guns and multiple rocket launchers, one rocket brigade, and 48 aircraft (apparently not including helicopters).

The Croatian sources estimate that the Serbs possess about 350 tanks (T54/55, T84), more than 200 armoured personnel carriers, 1000 field guns (76, 100, 105, 122, 130, 152, and 155 mm), 800 recoilless guns (82 and 105 mm), and 1200 mortars (82 and 120 mm). Many of these tanks and armoured vehicles have been lost or heavily damaged in the fighting with the Croatian forces. Other tanks in the inventory might not be serviceable because of the lack of spare parts and maintenance personnel. The Serbian forces also use large number of the domestically produced 128 mm Plamen and Oganj multiple rocket launchers, and a small number of the jointly developed Iraqi-Yugoslav 262 mm Orkan multiple rocket launcher which can fire submunitions up to ranges of 50 km. The Serbian forces have huge quantities of small arms and ammunition. Reportedly, the federal army illegally seized about 450 000 small arms, of which 20 000 were in Sarajevo alone.

The former federal troops in Bosnia and Herzegovina are with some exceptions very poorly trained and led. There is a great shortage of junior officers and NCOs. The morale and discipline of the troops is very low. This is

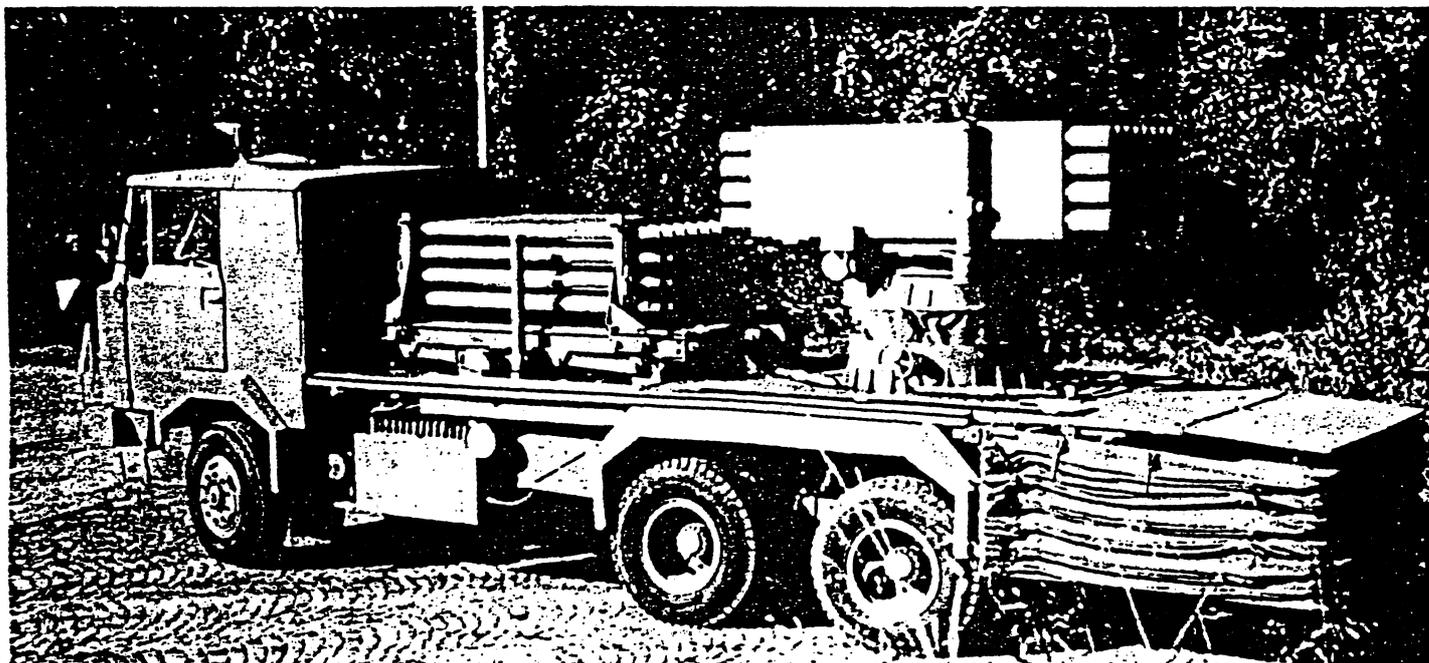
even true for the Serbian and Montenegrin reservists, despite the fact that they are well-paid; their salary is reportedly three times what an average worker earns. The units withdrawn from Slovenia and Croatia were poorly structured and largely unsuitable for combat employment in their new deployment areas. A similar situation prevails even in the units sent as reinforcements to the former 2nd MD from other parts of the country. The only troops in Bosnia and Herzegovina which have any combat effectiveness are heavy and rocket artillery, and the military police.

Air Force

The 'Army of the Serbian Republic of Bosnia and Herzegovina' has recently created its own air force and air defence element. Officially, the Serbian forces have about 48 combat aircraft and some 20 helicopters. However, the number of serviceable fixed-wing aircraft is considerably lower than indicated. This is primarily due to lack of adequate maintenance and also because of relatively high losses inflicted by the Croatian air defences in western Herzegovina. The total number of helicopters might be, however, higher than indicated.

The principal aircraft used by the Serbian forces for ground support are domestically designed Orao-2 and Jastreb. A few MiG-21s are used mostly for reconnaissance. Despite Serbian denials, the federal air force jets are extensively used in support of the Serbian forces on the ground. These jets use the air bases at Batajnica (near Belgrade), Niš, Ponikve (near Užice), Priština, and Podgorica for combat

An Oganj 128 mm multiple rocket launcher of the Federal Army.



missions over Bosnia and Herzegovina. Reportedly, eight ex-Iraqi MiG-23 fighter bombers are used to bomb targets in Bosnia from their bases in Serbia. The most advanced aircraft in the inventory of the former federal air force, the MiG-29 'Fulcrum', does not fly very often and is kept in readiness for the defence of Belgrade.

Recent reports suggest that Serbs flew their transport aircraft from Batajnica to the Udbina airport northwest of Knin and then to Banja Luka to carry supplies for their troops. These flights were allowed by the UN under the Serbian pretext of the 'humanitarian aid' as such flights were initially used for the evacuation of federal troops and their dependants from western Bosnia. None of the flights was supervised by the UN, unlike flights to Sarajevo airport. However, a senior UN official in Zagreb has vehemently denied these reports.

The main base for the Serbian fixed-wing aircraft in Bosnia is at Mahovljani (near Banja Luka). This base is small and cannot accommodate large numbers of aircraft. Moreover, its fuel capacity is only 500 tons. So far, the Serbian forces have not succeeded in seizing a refinery at Bosanski Brod which would lessen their need to rely on fuel transported overland from Serbia. Because the repair facility 'Kozmos' at Banja Luka was evacuated to Serbia, servicing and maintenance of the remaining aircraft is exceedingly difficult. Most of the helicopters are based at Zalužani, also near Banja Luka. Another large base near Tuzla, used by the former federal air force, is surrounded by Moslem and Croatian forces. The Butmir airport near Sarajevo is currently controlled by the UN forces and is used exclusively for humanitarian aid to the besieged city. The air base at Mostar has been evacuated as it was a major part of the aircraft factory 'Soko'. A naval helicopter squadron (Mi-14 'Haze-A' and Ka-25 'Hormone-A') based there has been relocated to Tivat (Bay of Cattaro).

Air Defence

Air defence of the Serbian forces in Bosnia and Herzegovina is generally weak and is certainly no match for any US and allied forces. The only long-range air surveillance radars (probably Soviet P-35s) are located on the mountain tops of Jahorina (southeast of Sarajevo), Kozara (northeast of Banja Luka), Pljesevica (west of Bihać), and Majeвица (north of Tuzla). The air base near Banja Luka is defended by one division of the SA-2 (Volkhov) and a single battery of the SA-6 (KUB-M) missiles. In addition, one battery of the Swedish radar-controlled 40 mm L70 AA guns is deployed around the base. According to some unconfirmed reports the Serbs have also deployed two divisions of SA-3/6/9

missiles around the besieged city of Sarajevo. The Serbian troops in the field use large numbers of triple 20 mm Oerlikon and the Czech-designed twin 30 mm AA guns. However, none of these guns is radar-controlled. The troops in the field are equipped with relatively large numbers of the ex-Soviet SA-7 (Strela-1/2M) missiles.

Logistical Support

The Serbian forces have more than sufficient supplies of weapons and ammunition to continue fighting at the current level of intensity for more than two years according to some reports. The Serbian forces have control of almost two-thirds of the 250,000 tons of ammunition in the possession of the former federal army. Yet, these forces are highly dependent on other supplies, especially fuel for aircraft, tanks and armoured vehicles, and special equipment which can only come from Serbia and Montenegro. Thus, the Serbian forces are supplied both by the air and overland. Despite the UN sanctions, there are reports that literally hundreds of Serbian tractor-trailers, including oil tankers move daily over the roads from northwestern part of Serbia across the Drina River to Bijeljina and then to Banja Luka and other cities in western Bosnia. Other road communications to the Serbian forces also run across the Drina River at Loznica, Bralinac, and Višegrad. Another overland supply used to supply the Serbian forces runs from Sćepan Polje (Montenegro) to Sarajevo.

Conclusions

The former federal troops deployed in Bosnia and Herzegovina although relatively large and powerfully armed are poorly organized, trained and led. Their successes have been almost entirely due to their overwhelming superiority in firepower over the Moslem and Croatian forces. However, whenever they have met a well-armed and motivated opponent they have suffered defeat or severe setback.

Perhaps, one of the most misleading views among some Western politicians and media is that the Serbian forces in Bosnia and Herzegovina are somehow beyond anyone's control. This is just what the Belgrade regime wants the outside world to believe. But this is totally false. The recent resubordination of the former federal army units in Bosnia and Herzegovina was designed to fulfil the demands of the CSCE and EC and thereby avoid sanctions, while denying any responsibility and culpability of the federal army and the Serbian leadership for the aggression against the internationally recognized state of Bosnia

and Herzegovina.

The operational chain of command in the former federal army has not been radically changed since the summer of 1991. However, the Serbian president, Slobodan Milošević, exercises far more control over the former federal army than he did only a few months ago. After the purge of more than 40 generals and admirals in April 1992, there are no 'Titoist' generals in office, regardless of whether they were Serbs or non-Serbs. Currently, the General Staff in Belgrade is obedient to President Milošević. The Belgrade regime not only plans the actions of the Serbian forces in Bosnia and Herzegovina but also keeps these forces supplied with weapons, equipment, and ammunition. The commanders of the Serbian forces in that republic are assigned, promoted or dismissed from their posts by the General Staff in Belgrade, which in turn gets its orders from President Milošević.

Dr Milan Vego was born in the former Yugoslavia but now works in the USA where he teaches East European history and politics as well as naval operational art. A full list of references used in this article can be obtained from the Editor.

Notes on deployments (opposite)

1. Composed of the former Tuzla Operational Group (remnants of the 17th Corps) and the newly established Sabac (Valjevo) Corps.
2. The Serbian term for the guerrilla-type formation modelled after similar elements in the Tito-led forces of the Second World War.
3. Formerly 5th Corps.
4. Probably only one battery is operable.
5. Formerly Bihać Corps.
6. Formerly 9th Corps. After the arrival of the UNPROFOR forces to 'Sector South' (northern Dalmatia), the major part of this corps was redeployed to the Bosnian side of the border with Croatia.
7. Formerly 4th Corps. Also called the Sarajevo-Romanija Corps.
8. The Corps HQ was moved from Mostar to Nevesinje probably in June 1992. Reportedly, most if not all units of the Užice Corps have been withdrawn to their previous deployment area around Užice.
9. From the former 5th Corps.
10. From the former 4th Corps.
11. From the former 4th Corps.
12. Composed of parts of the Podgorica Corps and the Rijeka Corps. The current strength of the corps is probably much lower than that shown with some units being redeployed to Montenegrin territory.
13. Previously part of the II Operational Group for Herzegovina (also called the Bičević-Trebinje Operational Group).
14. Perhaps as many as 20 of these aircraft have been lost in combat so far.
15. Northwest of Knin in the Serbian controlled part of Croatia.