

ARTICLE 4 DEADLINE: 1 NOVEMBER 2023
NOT ON TRACK TO MEET DEADLINE

KEY DATA

CLUSTER MUNITION CONTAMINATION: HEAVY

NATIONAL ESTIMATE, FOR FEDERAL IRAQ ONLY

178 KM²

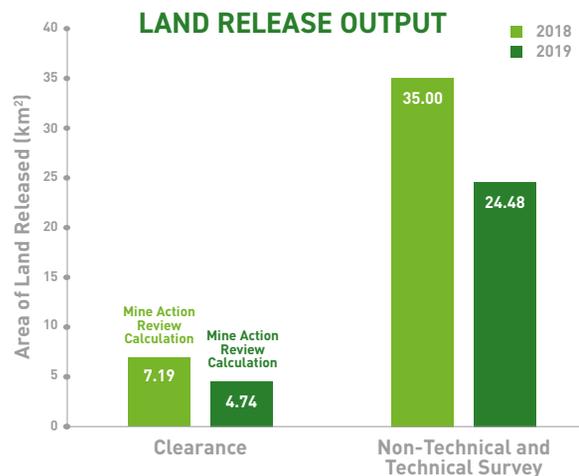
SUBMUNITION CLEARANCE IN 2019

4.74 KM²

(MINE ACTION REVIEW CALCULATION)

SUBMUNITIONS DESTROYED IN 2019

9,905



KEY DEVELOPMENTS

Land released through survey and clearance dropped in 2019 compared with the previous year. Operators also confirmed 21.6km² of contamination in two governorates.

RECOMMENDATIONS FOR ACTION

- Iraq should report comprehensively on cluster munition remnants (CMR) survey and clearance, providing data disaggregated by operator and region for Federal Iraq and the Kurdistan Region of Iraq (KRI).
- Iraq should provide an annual work plan setting out goals for survey and clearance.
- The Directorate of Mine Action (DMA) should develop a resource mobilisation strategy for tackling cluster munition contamination.

ASSESSMENT OF NATIONAL PROGRAMME PERFORMANCE

Criterion	Score (2019)	Score (2018)	Performance Commentary
UNDERSTANDING OF CMR CONTAMINATION (20% of overall score)	6	5	Iraq continues to find CMR contamination not previously recorded in the database underscoring the limitations of initial survey conducted after the 2003 war, but improved survey is generating more accurate data on CMR hazards.
NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT (10% of overall score)	6	6	The DMA is responsible for planning, tasking, and coordinating mine action but is overshadowed by powerful government ministries. CMR operations are concentrated in southern governorates overseen by the Regional Mine Action Centre-South (RMAC-S), which has engaged constructively with operators on land release methodologies and priorities.
GENDER AND DIVERSITY (10% of overall score)	5	5	The DMA has engaged with international organisations to strengthen gender diversity in mine action but progress remains slow. Demining operators employ women in administrative and support roles and community liaison, but opportunities for employing them in clearance operations depend on regional social norms that vary according to locality and are particularly limited in the main CMR-affected governorates in the south.
INFORMATION MANAGEMENT AND REPORTING (10% of overall score)	5	5	Iraq's mine action authorities operate Information Management System for Mine Action (IMSMA) data management systems but cumbersome procedures and reporting gaps can leave operators without access to timely or reliable data. CMR data, however, are concentrated in the RMAC-S database where operators have reported improving access and accuracy. Iraq submits regular Article 7 reports but KRI data is lacking.
PLANNING AND TASKING (10% of overall score)	6	5	Planning and tasking for survey and clearance of cluster munition affected areas has benefitted from good coordination between RMAC-S and operators.
LAND RELEASE SYSTEM (20% of overall score)	7	6	After testing and applying a new technical survey methodology in operations in 2018, based on the Cluster Munition Remnant Survey (CMRS) in south-east Asia, Federal Iraq adopted it as a national standard in 2019 citing the benefits for accurate mapping, planning, and clearance.
LAND RELEASE OUTPUTS AND ARTICLE 4 COMPLIANCE (20% of overall score)	5	5	Although output dipped in 2019, Federal Iraq has released significant amounts of CMR-affected areas through survey and clearance.
Average Score	5.8	5.3	Overall Programme Performance: AVERAGE

CLUSTER MUNITION SURVEY AND CLEARANCE CAPACITY

MANAGEMENT

- Higher Council of Mine Action
- Directorate of Mine Action (DMA)
- Iraq Kurdistan Mine Action Agency

NATIONAL OPERATORS

- Ministry of Defence
- Ministry of Interior (Civil Defence)
- Al Khebra Company for Demining
- Al Waha Demining Company
- Baghdad Mine Action Organisation
- Ta'az Demining Company

INTERNATIONAL OPERATORS

- Danish Demining Group (DDG)
- Mines Advisory Group (MAG)
- Norwegian People's Aid (NPA)

OTHER ACTORS

- United Nations Mine Action Service (UNMAS)

UNDERSTANDING OF CMR CONTAMINATION

Federal Iraq reported CMR contamination of 178.64km² at the end of 2019 (see Table 1), around 7% less than at the end of 2018,¹ despite operators newly identifying hazardous areas in two governorates covering 21.6km².² The KRI also has CMR contamination but the extent is unknown. Iraq provided no data for the KRI but Mines Advisory Group (MAG) conducted CMR clearance in three Kurdish governorates in 2019³ and some areas close to the border with Turkey have yet to be surveyed.

Table 1: Cluster munition- contaminated area in Federal Iraq (at end 2018 and 2019)⁴

Province	Contamination at end 2018 (m ²)	Contamination at end 2019 (m ²)
Anbar	N/R	15,726
Babylon	N/R	290,701
Basrah	27,851,470	30,512,131
Diyala	20,076	20,076
Kerbala	2,107,444	2,107,444
Kirkuk	3,418,306	3,418,306
Missan	1,353,148	795,825
Muthanna	101,647,074	83,689,469
Najaf	5,321,629	5,010,038
Ninewa	N/R	4,157,090
Thi Qar	45,433,774	45,188,393
Qadissiya	3,966,337	3,137,824
Wassit	N/R	299,143
Totals	191,119,258	178,642,166

N/R = Not reported

Federal Iraq's contamination dates back to the Gulf War of 1991 and the United States (US)-led invasion of Iraq in 2003, following the path of allied forces advance from the south to Baghdad. Coalition aircraft also struck Iraqi army positions in the northern governorate of Kirkuk. The most heavily affected areas are the southern governorates of Basrah, Muthanna, and Thi Qar, which account for nearly 90% of Iraq's CMR contamination. The most commonly found items there are BLU-63 and BLU-97 submunitions. Other CMR found in the area include BLU-61 and M42 submunitions.⁵

OTHER EXPLOSIVE REMNANTS OF WAR AND LANDMINES

Cluster munitions, however, make up only a modest part of Iraq's overall landmine and explosive remnants of war (ERW) contamination. Four southern governorates alone have close to 1,000km² of minefield and substantial areas affected by ERW. Central and northern areas liberated from Islamic State have hundreds of square kilometres affected by mines of an improvised nature and the KRI reports more than 200km² of known mined area as well as ERW contamination in areas bordering Turkey that have yet to be surveyed because of insecurity.⁶ See Mine Action Review's *Clearing the Mines 2020* report on Iraq for further information on the mine problem.

NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

The mine action programme in Iraq is managed along regional lines. The DMA represents Iraq internationally and oversees mine action for humanitarian purposes in Federal Iraq, covering 15 of the country's 19 governorates.⁷ Mine action in the KRI's four governorates is overseen by the Iraqi Kurdistan Mine Action Agency (IKMAA), which reports to the Council of Ministers and is led by a director general who has ministerial rank.

FEDERAL IRAQ

The inter-ministerial Higher Council of Mine Action,⁸ which reports to the Prime Minister, oversees and approves mine action strategy, policies, and plans. The DMA "plans, coordinates, supervises, monitors and follows up all the activities of mine action." It draws up the national strategy and is responsible for setting national standards, accrediting, and approving the standing operating procedures (SOPs) of demining organisations and certifying completion of clearance tasks.⁹

The DMA said it asked the government for \$30.6 million a year for survey and clearance¹⁰ but has not reported how much it received or provided details of government expenditure on any aspect of mine action.

Coordinating the planning, tasking, and information management among all the actors has remained a significant challenge. As a department of the Ministry of Health and Environment, the DMA has less authority than the politically powerful Ministries of Defence and Interior, which manage significant explosive ordnance disposal (EOD) and mine clearance capacity, as well as the Ministry of Oil. Additionally, the DMA's status is not formally established by law.¹¹

Rapid turnover of directors has also hampered management and policy continuity. Essa al-Fayadh, who was at least the tenth director since 2003, was transferred to a different office in February 2019. Deputy Minister of Health and Environment, Kamran Ali, took over as acting director of the DMA until June 2019 when Khaled Rashad Jabar al-Khaqani, a former DMA director, was reappointed to the position. As of June 2020, his appointment had still not been confirmed. The DMA, meanwhile, appointed a new operations manager in the second half of 2019 and changes in Iraq's political leadership in 2020 raised the possibility of further management changes.

The DMA oversees three Regional Mine Action Centres (RMACs):

- North: covering the governorates of Anbar, Diyala, Kirkuk, Nineveh, and Salah ad-Din.
- Middle Euphrates (MEU): Babylon, Baghdad, Karbala, Najaf, Qadisiyah, and Wassit.
- South: Basrah, Missan, Muthanna, and Thi-Qar.

RMAC South, located in Basra City, maintains its own database and is responsible for tasking operators in its area of operations. RMAC North and MEU were located in Baghdad but RMAC North also opened a satellite office in Mosul in August 2019.¹²

Federal Iraq's spending on the DMA and mine action is unknown. The sector remains heavily dependent on international donor funding, most of it channelled through UNMAS and bilateral funding to clearance operators. In the past two years, the Iraqi government and donors have given priority to tackling massive contamination by mines of an improvised nature in areas liberated from Islamic State, leaving scant resources for tackling ERW contamination in others areas of Iraq, including the substantial CMR threat in the south.

KRI

IKMAA functions as a regulator and operator in the KRI. It reports directly to the Kurdish Regional Government's Council of Ministers and coordinates four directorates in Dohuk, Erbil, Garmian, and Sulimaniya (Sleman). Financial constraints halved salaries for all staff for the last three years and resulted in a number of posts being left vacant, but in 2019 payment of salaries resumed and IKMAA planned to fill vacant posts.¹³

IKMAA did not respond to requests for information about its capacity, priorities, and operating results.

GENDER AND DIVERSITY

The Iraq National Strategic Mine Action Plan specifically refers to gender equality and gender mainstreaming within mine action activities as objectives of an effective programmatic response.¹⁴ Most operators employ women in administrative office roles, many also have a significant representation of women in community liaison and risk education functions, and some also employ women in clearance teams, including as team leaders. The extent to which women participate varies significantly according to cultural sensitivities in different parts of the country.¹⁵

The DMA has had a Gender Unit since 2017. It was led in 2019 by the deputy head of the Planning Department¹⁶ and is said to encourage women to apply for employment in mine action.¹⁷ UNMAS developed terms of reference for the Gender Unit and designed and implemented a training plan. It also developed the Gender Unit's first Action Plan laying out activities designed to mainstream gender throughout the DMA. Additional support provided by UNMAS included

two training workshops for risk education, planning teams on developing gender-sensitive indicators and mainstreaming gender issues in their activities. IKMAA also reportedly established a Gender Committee in 2019 and UNMAS reported developing terms of reference setting out responsibilities and a reporting structure.¹⁸

UNMAS conducted a baseline assessment of the DMA's gender policy and practice in 2019, which concluded it had succeeded in raising awareness of gender both internally and in other government institutions engaged in explosive hazard management. Despite that progress, UNMAS observed challenges remained for recruitment, promotion and involving women in all levels of decision-making. UNMAS observed that "a highly patriarchal society, male dominated work force and general misunderstanding of what exactly 'gender in mine action' means in the day to day practical application of activities, continues to hinder widespread changes in mind sets and behaviours".¹⁹

INFORMATION MANAGEMENT AND REPORTING

The DMA and IKMAA maintain databases using Information Management System for Mine Action New Generation (IMSMA NG) with technical support from iMMAP, a commercial service provider based in Erbil and working under contract to the United States (US) Department of State's Office of Weapons Removal and Abatement (WRA).

Federal Iraq's mine action database is located at the DMA's Baghdad headquarters. RMAC-S maintains a database in Basrah, receiving reports from demining organisations in its area of operations, which is synchronised with Baghdad's at intervals determined by the volume of data to be uploaded.²⁰

Operators are required to submit results to DMA in hard copy in Arabic delivered by hand every month. DMA then uploads results manually into the database. The procedure meets Iraqi legal requirements, which do not recognise electronic copies, but can cause delays of several months before results of survey and clearance are uploaded. As a result, operators say task orders issued by the DMA have often lacked the most up-to date information.²¹

In March 2019, RMAC-S started receiving data reports electronically as well as in hard copy. Improvements in cluster munitions survey are strengthening the quality of available data through RMAC-S database. In the mine action sector in general, operators report limited access to data and expressed concern about the limited quantity and quality of data available with task orders.²²

The DMA gave operators access to an online dashboard presenting mine action data and in 2019 introduced an Online Task Management System which it claimed as the first in the world and through which operators can request IMSMA data relating to specific tasks. Operators said the utility of these tools was limited by the slow entry of operating results into the database, the variable quality of data, depending on the source, and the patchy availability of information on land use and livelihoods, which is useful for planning and prioritisation but is not shared systematically.²³

There were big discrepancies between official data (reported by RMAC-S and in Iraq's Article 7 report covering 2019) and results reported by NPA, which appear to reflect delays by the national authorities in uploading data to the national database. Furthermore, Iraq's Article 7 report covering 2019 did not include clearance of CMR-contaminated area by MAG in the KRI.

PLANNING AND TASKING

Iraq does not have a strategic plan for clearance of CMR. Few resources have been available for survey and clearance as a result of the priority given to clearance of areas liberated from Islamic State occupation.²⁴ Against that background, RMAC-S said it gave priority to survey to better define contamination and clearance of areas that are close to communities, which have experienced recent casualties, or where contamination hinders development projects.²⁵

LAND RELEASE SYSTEM

STANDARDS AND LAND RELEASE EFFICIENCY

Iraq has national mine action standards for mine and battle area clearance (BAC), non-technical survey, and technical survey but they were written in 2004–05, exist in Arabic only and do not specifically address cluster munitions. However, the DMA has applied the Cluster Munition Remnant Survey (CMRS) methodology to CM operations since 2018, and in 2019 adopted CMRS as a national standard citing the benefits it has delivered for survey, planning and clearance.²⁶

OPERATORS AND OPERATIONAL TOOLS

Iraq provided no information on national organisations engaged in survey or clearance of CMR in 2019 but in Federal Iraq clearance is undertaken by the Army and the Ministry of Interior's Civil Defence and all demolitions are conducted by the Army.

In Federal Iraq, donors supported only two international organisations tackling CMR. Danish Demining Group (DDG), working in Basrah governorate operated with a total staff of 40, including two BAC teams with 24 deminers and two four-person survey and quality control teams,²⁷ operations were affected by the suspension of its registration by the NGO Directorate in May 2019, resulting in the stand down of operations teams for several months.²⁸

Norwegian People's Aid (NPA)'s Basrah-based operation employed a total of 96 staff, including 6 BAC teams with 57 personnel and two non-technical survey and one technical survey teams, working mainly in Basrah and Muthanna governorates.²⁹ In the KRI, only MAG reported working on CMR tasks.³⁰

LAND RELEASE OUTPUTS AND ARTICLE 4 COMPLIANCE

LAND RELEASE OUTPUTS IN 2019

Iraq reported release in Federal Iraq of 30.67km² of CMR-contaminated areas in 2019, including 24.48km² through survey and 6.2km² through clearance.³¹ The total was close to 30% less than the previous year, which Iraq attributed to funding and capacity constraints. In addition, and not included in Iraq's Article 7 report, almost 0.4km² was cleared by MAG in the KRI, albeit without finding any CMR.

On assessment of the data, Mine Action Review believes that in 2019 no more than an estimated 4.74km² of CMR-contaminated area was cleared by international and national operators (see Table 5).

SURVEY IN 2019

Iraq reported releasing 24,478,323m² through a combination of non-technical and technical survey in 2019. It said all the release occurred in the southern governorates managed by RMAC-South but gave no other details.³²

NPA confirmed 19.88km² as CMR-contaminated in 2019, a little over half of it in Muthanna governorate and the rest in Basrah³³ and DDG identified confirmed hazardous areas (CHAs) affecting 1.7km² in Basrah.³⁴ The two operators released a total of 15.2km² through non-technical and technical survey (see Table 2), with DDG cancelling 11.2km² through non-technical survey in Basrah and NPA reducing 4.1 km², most of it in Muthanna.³⁵

Table 2: CMR-contaminated area released through survey by international NGOs in 2019³⁶

Operator	Governorate	Area cancelled through NTS (m ²)	Area reduced through TS (m ²)
DDG	Basrah	11,227,925	0
NPA	Basrah	0	169,098
	Muthanna	0	3,468,431
	Missan	0	426,913
Totals		11,227,925	4,064,442

CLEARANCE IN 2019

Federal Iraq reported release of 6.2km² through clearance in 2019, 14% less than in 2018, a decline attributed to lack of capacity and meagre funding. A reported total of 9,905 CMR were destroyed during clearance in 2019. Big discrepancies between official data (see Table 3) and results reported by NPA (see Table 4) appear to reflect delays by the national authorities in uploading data to the national database. Mine Action Review believes that in 2019 no more than 4.74km² of CMR-contaminated area was cleared by international and national operators (see Table 5).

Iraq's Article 7 transparency report for 2019 did not include KRI data. The clearance that MAG reported conducting in the KRI is believed to have raised the total area released by Iraq to around 6.6km² (see Table 3) but did not lead to destruction of any cluster munition remnants.³⁷

Table 3: CMR clearance in 2019 (as reported by the national authorities)

Region	Authority	Operator	Area cleared (m ²)	CMR cleared
Federal Iraq ³⁸	RMAC South	Al-Khebra	24,046	8,999
		Civil Defence	692,840	
		DDG	123,535	
		NPA	5,040,698	
		Taaz	2,654	
	RMAC MEU	Baghdad Mine Action	311,705	6
	Federal Iraq total		6,195,478	9,905
KRI ³⁹	MAG		385,005	0
Totals			6,580,483	9,905

Table 4: International NGO CMR clearance in 2019 (as reported by the operators)⁴⁰

Operator	Governorate	Area cleared (m ²)	Submunitions destroyed	AP mines destroyed	Other UXO destroyed
DDG	Basrah	116,005	25	0	0
NPA	Basrah, Missan, Muthanna	3,206,523	1,533	36	886
Sub-totals		3,322,528	1,558	36	886
MAG	Diyala, Dohuk, Sulaymaniyah (KRI)	385,005	0	0	385
Totals		3,707,533	1,558	36	1,271

International operators active in Federal Iraq recorded less clearance than the amount attributed to them by the DMA. This is especially the case with NPA (see Table 4). DDG reported clearance of 116,005m² with the location of 25 CMR in Basrah governorate in 2019, marginally less than the previous year.⁴¹ NPA's clearance also dipped to 3.2km² in 2019, down 15% from the previous year, but the density of contamination in the tasks it tackled, particularly in Muthanna, meant that it found more than double the number of CMR. The levels of contamination identified in Muthanna prompted the Army, which is responsible for all demolitions of explosive ordnance, to assign an EOD officer permanently to NPA's operations for that purpose.⁴²

Table 5: CMR clearance in Iraq in 2019 (Mine Action Review calculation)

Operator	Area cleared (m ²)
DDG	116,005
NPA	3,206,523
MAG	385,005
Al-Khebra	24,046
Civil Defence	692,840
Taaz	2,654
Baghdad Mine Action	311,705
Total	4,738,778

ARTICLE 4 DEADLINE AND COMPLIANCE



Under Article 4 of the CCM, Iraq is required to destroy all CMR in areas under its jurisdiction or control as soon as possible, but not later than 1 November 2023. The extent of Federal Iraq's CMR contamination alone ensures that it will not complete clearance by its Article 4 deadline in three years' time. How much longer it will need will depend on the levels of funding received from the government and international donors. Their priority in the last three years has been tackling dense mine contamination in areas liberated from Islamic State.

The rate of clearance continued to fluctuate in 2019, dropping 14% in Federal Iraq in 2019. But despite the limited capacity available for CMR operations, Iraq has released more than 90km² through survey and clearance in the last three years, underscoring the potential for accelerating progress towards fulfilling Iraq's treaty obligations if donor support enables more capacity to be deployed for cluster munitions survey and clearance. The United States and its NATO allies could provide useful support to the process of survey, planning and clearance by providing data on their cluster munitions strikes in the course of the Gulf Wars.⁴³

Table 6: Five-year summary of CMR clearance

Year	Federal Iraq (km ²)	KRI (km ²)	Totals (km ²)
2019	4.3	0.4	4.7*
2018	7.2	0 ⁴⁴	7.2
2017	4.4	0.3	4.7
2016	2.9	0.2	3.1
2015	8.2	0.6	8.8
Totals	27.0	1.5	28.5

* Based on Mine Action Review calculation

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- 1 Article 7 Report (covering 2019), Form F.
- 2 Emails from Marie-Josée Hamel, Regional Programme Advisor – Middle East, Danish Demining Group (DDG), 31 May 2020; Gus Guthrie, Country Director, Norwegian People's Aid (NPA), 11 May 2020.
- 3 Email from Portia Stratton, Country Director, MAG, 20 June 2020.
- 4 Article 7 Report (covering 2019), Form F.
- 5 Interview with Nibras Fakhir Matrood, Director, DMA RMAC-S, and Haitham Fattah Lafta, Operations Manager, RMAC-S, Basrah, 29 April 2019; and with Mats Hektor, Project Manager, NPA South Iraq, Basrah, 28 April 2019.
- 6 Interviews with Nibras Fakhir Matrood and Haitham Fattah Lafta, RMAC-S, Basrah, 29 April 2019; and Siraj Barzani, Director General, IKMAA, in Erbil, 9 May 2019.
- 7 DMA presentation to 2015 Mine Action Country Planning Workshop for Iraq, Istanbul, 13 May 2015; Geneva International Centre for Humanitarian Demining (GICHD), "Capacity Development Support to National Mine Action Authorities in Iraq, Phase 1: Initial Assessment Mission", February 2012.
- 8 The council is led by the Prime Minister and includes representatives of the ministries of defence, interior, oil, and environment, as well as the National Security Adviser and the head of IKMAA.
- 9 "Document of roles and responsibilities", undated but 2019, received by email from the DMA, 13 May 2019.
- 10 Anti-Personnel Mine Ban Convention (APMBC) Article 7 Report (covering 2019), p. 71.
- 11 Interviews with the DMA, Baghdad, 3 and 5 May 2019.
- 12 Interview with Gus Guthrie, NPA, in Geneva, 12 February 2020.
- 13 Interview with Siraj Barzani, IKMAA, Erbil, 9 May 2019.
- 14 National Strategic Mine Action Plan, pp. 12, 18, 20, and 30.
- 15 Interviews with mine action stakeholders in Iraq, 28 April–6 May 2019.
- 16 Email from Shinobu Mashima, Programme Officer, UNMAS, 6 April 2020.
- 17 Email from Peter Smethers, Programme Manager/Country Director, FSD, 20 April 2020.
- 18 Email from Shinobu Mashima, UNMAS, 6 April 2020.
- 19 Ibid.
- 20 Interview with Nibras Fakhir Matrood, DMA RMAC South, Basrah, 29 April 2019.
- 21 Interviews with operators in Iraq, 28 April–6 May 2019.
- 22 Ibid.
- 23 Emails from international operators, April–June 2020.
- 24 Statement of Iraq to the Ninth Meeting of States Parties to the CCM, Geneva, 2 September 2019.
- 25 Interview with Nibras Fakhir Matrood and Haitham Fattah Lafta, RMAC-S, Basrah, 29 April 2019.
- 26 Email from Haitham Fattah Lafta, RMAC-S, 12 August 2020.
- 27 Email from Mohammed Qasim, Programme Manager, DDG Basrah, 29 April 2019.
- 28 Email from Marie-Josée Hamel, DDG, 31 May 2020.
- 29 Emails from Gus Guthrie, NPA, and Chris Ramsden, Project Manager NPA South, 11 August 2020.
- 30 Email from Portia Stratton, MAG, 28 June 2020.
- 31 Article 7 Report (covering 2019), Form F.
- 32 Ibid.
- 33 Email from Gus Guthrie, NPA, 11 May 2020.
- 34 Email from Marie-Josée Hamel, Regional Programme Advisor – Middle East, DDG, 31 May 2020.
- 35 Emails from Gus Guthrie, NPA, 11 May 2020, and Marie-Josée Hamel, DDG, 31 May 2020.
- 36 Ibid.
- 37 Article 7 Report (covering 2019), Form F; email from Portia Stratton, MAG, 28 June 2020.
- 38 Email from Haitham Fattah Lafta, RMAC-S, 11 August 2020; Article 7 Report (covering 2019), Form F.
- 39 Email from Portia Stratton, MAG, 28 June 2020.
- 40 Emails from Marie-Josée Hamel, DDG, 31 May 2020; Gus Guthrie, NPA, 11 May 2020; and Portia Stratton, MAG, 28 June 2020.
- 41 Email from Marie-Josée Hamel, DDG, 31 May 2020.
- 42 Email from Gus Guthrie, NPA, 11 May 2020.
- 43 Article 7 Report (covering 2019), Form J.
- 44 MAG reported 27,663m² of clearance for 2018.