

KEY DATA

NO APMBC ARTICLE 5 DEADLINE:

State not party to the APMBC

AP MINE CONTAMINATION: 2.8KM²

Medium
(Mine Action Review estimate)

LAND RELEASE OUTPUTS

Release of AP mined area	Release in 2024 (m ²)	Release in 2023 (m ²)
Clearance	0	0
Technical Survey	0	0
Non-Technical Survey	0	0
Destruction of AP mines during clearance, survey, and spot tasks	2024	2023
AP Mines destroyed	0	0

MAIN AP MINE SURVEY AND CLEARANCE OPERATORS IN 2024:

- None

KEY DEVELOPMENTS

Survey identified 31km² of previously unrecorded cluster munition-contaminated area in 2024, more than double the total area released through survey and clearance. Operator capacity dropped as a result of donor funding cuts that forced Danish Refugee Council (DRC), one of two international non-governmental organisations tackling cluster munition remnants (CMR), to halt operations at the end of July 2024 and close DRC's programme. The Directorate of Mine Action (DMA) acknowledged that Iraq will not meet its 2028 Article 4 clearance deadline and will need to seek another No survey or clearance of anti-personnel (AP) mines by national or international operators took place in Georgia during 2024, and the last reported release of any AP mined area was in 2022. No international operators are deployed in Georgia, either in Tbilisi Administered Territory (TAT) or in Abkhazia, an autonomous republic outside the effective control of the Georgian government, since The HALO Trust withdrew from the country in 2023. It is uncertain if and how international mine action may resume in Georgia, following the passing of a legislative package by Georgia's Parliament in April 2025, which restricts the activities of international donor-funded organisations.

RECOMMENDATIONS FOR ACTION

- Georgia should accede to the Anti-Personnel Mine Ban Convention (APMBC) as a matter of priority.
- Georgia should clear AP mines in areas under its jurisdiction or control as soon as possible, consonant with its obligations under international human rights law.
- Georgia should pursue bilateral political dialogue with Azerbaijan as well as multilateral dialogue with all stakeholders to enable clearance of the Red Bridge border minefield.
- Georgia should develop a resource mobilisation strategy and engage with donors to secure the resources needed to complete clearance.

AP MINE SURVEY AND CLEARANCE CAPACITY

MANAGEMENT

- State Military Scientific Technical Centre (DELTA)
- Humanitarian Demining Control Division (HDCD)

NATIONAL OPERATORS

- Engineering Battalion of the Ministry of Defence (MoD)
- Georgian State Security Service (SSS) EOD team

INTERNATIONAL OPERATORS

- None. The HALO Trust ceased operations in 2023.

OTHER ACTORS

- Geneva International Centre for Humanitarian Demining (GICHD)

UNDERSTANDING OF AP MINE CONTAMINATION

The full extent of mine contamination in Georgia is not known due to access restrictions and lack of survey. Georgia has at least 2.8km² of contamination across four regions and seven mined areas in the TAT (see Table 1).¹ This estimate dates back to 2022 and remained unchanged, according to Georgia's national authorities, as at the end of 2024.² In its most recent Convention on Certain Conventional Weapons (CCW) Protocol V Article 10 Report (covering 2024), Georgia

again confirmed that mined areas remained near the village Barisakho, close to the border with Dagestan in Russia; near the village of Kadoeti, which is close to South Ossetia and the administrative border line (ABL) of the Tskhinvali region; near the village of Khojali, close to the ABL with Abkhazia; and along Georgia's borders with Armenia and Azerbaijan.³ The size of these mined areas has not been made public.

Table 1: AP mined area in TAT (at end 2024)⁴

Region	District/ Municipality	Village	Type of mine contamination	Mined areas	Area (m ²)
Kvemo Kartli	Marneuli	Kirach-Muganlo	Mixed AP/AV	1	2,738,730
Mtskheta-Mtianeti	Dusheti	Kadoeti	Mixed AP/AV	1	*29,828
Mtskheta-Mtianeti	Dusheti	Barisakho	AP only	2	28,058
Shida Kartli	Khashuri	Osiauri	AP only	1	N/K
Samegrelo-Zemo Svaneti	Mestia	Khojali	AP only	2	**26,000
Totals				7	2,822,616

N/K = not known

*This comprises 16,825m² of confirmed hazardous area and 13,003m² of suspected hazardous area (SHA) identified by HALO during non-technical survey in 2022.

**Identified as an SHA by HALO in 2022.

The only location of a mined area in Table 1 not mentioned in this most recent CCW Protocol V Article 10 report is one of an unknown size near the village of Osiauri, a military base in the interior of the country.⁵ Contamination in Georgia comprises AP mines only in five areas, with mixed AP and anti-vehicle (AV) mines in two areas.⁶ There may be other contamination. Since 2011, Georgia is believed to have been conducting a General Mine Action Assessment (GMAA) which may amend the baseline.⁷ In its latest Protocol V Article 10 report, however, Georgia again said that additional technical and financial support is needed to conduct the GMAA.⁸

In the mined areas at Barisakho and Osiauri, the extent of contamination is unknown. HALO was unable to secure the necessary permission and funding to be able to complete non-technical survey (NTS) at these areas. It says both technical survey (TS) and NTS are required to accurately determine their size.⁹ Having ceased operations in Georgia at the end of the first quarter of 2023 and leaving the country, HALO has no longer pursued efforts to secure access.¹⁰

1 Tbilisi Administered Territory does not include Abkhazia and South Ossetia, which are outside Georgia's effective control.

2 Email from Gocha Shavgulidze, HDCD, DELTA, 14 July 2025.

3 CCW Protocol V Article 10 Report (covering 2024), Form A.

4 Emails from Oleg Gochashvili, Head of Division, DELTA, 31 May 2022; Gocha Shavgulidze, HDCD, DELTA, 14 July 2025; Michael Montafi, Partnerships Manager, HALO, 26 July 2022; and Rachael Rosenberg, HALO, 12 April 2023. Data on mined areas at the villages of Kadoeti and Khojali were provided by HALO in April 2023. All other information in the Table was provided by Georgia's national authority in May 2022, and stated to be accurate as at the end of 2021. It was confirmed by Georgia's national authority in July 2025 to be unchanged as at the end of 2024.

5 Emails from Michael Montafi, HALO, 30 April 2021 and 17 May 2022.

6 Emails from Oleg Gochashvili, DELTA, 31 May 2022; Rachael Rosenberg, HALO, 12 April 2023; and Gocha Shavgulidze, HDCD, DELTA, 15 July 2025.

7 Email from Michael Montafi, HALO, 17 May 2022.

8 CCW Protocol V Article 10 Report (covering 2024), Form E.

9 Email from Michael Montafi, HALO, 17 May 2022.

10 Email from Tom Griffiths, Head of Region, HALO, 25 April 2024.

The Red Bridge minefield is an unfenced 7km-long minefield covering 2.2km² consisting of densely packed lines of AP and AV mines at the "Red Bridge" border crossings with Armenia and Azerbaijan. Laid in 1991 by Azerbaijan during the 1988 Nagorno-Karabakh war, it is the largest minefield in the Caucasus and the last major minefield not in the vicinity of a functioning military establishment. The Red Bridge minefield affects more than 4,000 people. As at May 2022, there had been 88 incidents: 22 involving people and the other 66 involving livestock.¹¹ It is not known if any incidents have occurred since then. In Barisakho, there are two mined areas close to a police station on the Russian border, which were laid to prevent entry from Ingushetia during the Second Chechen War. In Osiauri, at a military base in the interior of the country, next to the main east-west road through Georgia, mines were laid around the perimeter of an ammunition storage area to defend the position in an event of an invasion.¹²

HALO conducted NTS at Kadoeti and Khojali in 2022. Evidence of AV mines was found at Kadoeti, where 16,825m² of confirmed hazardous area (CHA) and 13,003m² of SHA was identified. At Khojali, two sections of SHA covering an area of 26,000m² were identified.¹³ There may also be mined areas in South Ossetia as a result of the 1990–92 Georgian-Ossetian war and the 2008 conflict between Georgia and Russia. HALO was not granted access for clearance in South Ossetia, which is under Russian control. HALO is not aware of any remaining areas of contamination in Abkhazia.¹⁴

HALO believes that, besides the areas already identified, any additional AP mine contamination in Georgia is so sparse and spread over such large areas that further survey of locations where access is permitted would not be productive.¹⁵

OTHER EXPLOSIVE ORDNANCE CONTAMINATION

Georgia remains contaminated by other unexploded ordnance (UXO), likely in South Ossetia and also in former firing ranges across Georgia. The Georgian authorities also suggests that explosive remnants of war (ERW) contaminate the Shida Kartli region, bordering Russia, and "other populated places of Georgia, which were bombed".¹⁶

NATIONAL OWNERSHIP AND PROGRAMME MANAGEMENT

Georgia's national mine action authority is the Humanitarian Demining Control Division (HDCD), which sits under the State Military Scientific Technical Centre, known as DELTA, within the Ministry of Defence (MoD).¹⁷ As well as implementing and coordinating mine action, DELTA HDCD is responsible for munition demilitarisation and clearance of ERW remaining from the 2008 conflict with Russia. It conducts quality assurance (QA) and quality control (QC), and facilitates the development and implementation of Georgian National Mine Action Standards (NMAS), in accordance with the International Mine Action Standards (IMAS).¹⁸ The HDCD is also responsible for collecting and processing data for the Information Management System for Mine Action (IMSMA) database.¹⁹ It directly undertakes some NTS and TS.²⁰ The HDCD continues to participate in various courses organised by the Geneva International Centre for Humanitarian Demining (GICHD), including on mine action management and IMSMA in 2024. Nevertheless, the HDCD faces challenges in its work owing to a lack of equipment and says it still requires expert assistance in almost all areas of mine action.²¹

HALO reported that, during the time of its operations in Georgia, the authorities were enabling of mine action wherever access was granted. HALO had a memorandum of understanding with the HDCD, which allowed HALO to work in Georgia.²² It is, however, uncertain whether, and if so, how international mine action may resume in Georgia following the passing of a legislative package by Georgia's Parliament in April 2025, which restricts the activities of international donor organisations. Among other measures, the legislation bans foreign grants from being issued without prior approval from the Georgian government or an authorised representative. The bill was unanimously approved by lawmakers of the ruling Georgian Dream party, which is regarded as increasingly anti-Western,²³ though it is not yet known to what extent the government may restrict international mine action operators from re-entering Georgia if funding becomes available.

¹¹ Emails from Michael Montafi, HALO, 8 May 2020 and 17 May 2022.

¹² Emails from Michael Montafi, HALO, 30 April 2021 and 17 May 2022.

¹³ Email from Rachael Rosenberg, HALO, 12 April 2023.

¹⁴ Email from Fiona Kilpatrick, Head of Region, Europe (South Caucasus), HALO, 12 June 2023. Georgia notes that "no external QA/QC [quality assurance/quality control] was conducted by the DELTA" on areas released by HALO in Abkhazia, (because it is outside the effective control of Georgia). CCW Protocol V Article 10 Report (covering 2024), Form A.

¹⁵ Email from Rachael Rosenberg, HALO, 12 April 2023.

¹⁶ CCW Protocol V Article 10 Report (covering 2023), Form A.

¹⁷ Decree 897 issued by the Minister of Defence, 30 December 2010; and CCW Protocol V Article 10 Report (covering 2024), Form A.

¹⁸ CCW Protocol V Article 10 Report (covering 2024), Form A.

¹⁹ Emails from Oleg Gochashvili, DELTA, 6 July 2015; Michael Montafi, HALO, 17 May 2022; and Gocha Shavgulidze, HDCC, DELTA, 1 July 2024; and CCW Protocol V Article 10 Report (covering 2023), Form A.

²⁰ Email from Oleg Gochashvili, DELTA, 2 September 2022.

²¹ CCW Protocol V Article 10 Report (covering 2024), Form E.

²² Email from Rachael Rosenberg, HALO, 12 April 2023.

²³ "Georgia Passes Controversial Law Targeting Foreign-Funded NGOs, Drawing EU, US Condemnation", *Georgia Today*, 17 April 2025, at: <https://bit.ly/4elpMK3>; and "Georgia's parliament passes law restricting foreign grants to local groups", *Reuters*, 16 April 2025, at: <https://bit.ly/46dvD1N>.

While permission to start clearance at two of the six minefields (at Khojali and Kadoeti) was granted to HALO in 2019, permissions for the other four were not granted and HALO did not expect permissions for clearance at Barisakho or Osiauri to be forthcoming due to the perceived tactical value of these minefields to the Georgian military.²⁴ Permission to access the Red Bridge area had also been denied since July 2015 when, a month after the granting of access to HALO and their initiation of NTS, the Azerbaijani

military demanded that TS be halted.²⁵ In 2019, Georgia reported further discussions with Azerbaijan regarding the clearance of Red Bridge minefield.²⁶ As at March 2023, however, as HALO was winding down operations in Georgia, it had still not been granted permission to restart clearance.²⁷ HALO closed its programme in Georgia that year.²⁸ While there has been no humanitarian demining in Georgia since HALO's departure, the HDCCD hopes this can resume at some point in the future.²⁹

FUNDING FOR AP MINE SURVEY AND CLEARANCE

The Georgian government funds the running costs of the HDCCD and the Engineering Battalion, which conducts some survey and battle area clearance (BAC).³⁰

GENDER AND DIVERSITY

Georgia is reported to have a gender and diversity policy in place for its mine action programme³¹ and to facilitate equal access to employment for qualified women and men in survey and clearance teams. Proportionately, however, the number of women in national mine action organisations has remained very low, with only one of the HDCCD's seven positions—the Geographic Information System (GIS)/IMSMA specialist—filled by a woman in 2022,³² and one in seven positions was filled by a woman in 2024.³³ DELTA reported that in 2021, only 1% of military personnel within the explosive ordnance disposal (EOD) Company of Combat Engineer Battalion were women.³⁴ No information has since been provided on the gender balance of within this Battalion. An update was requested in 2025, but DELTA stated it was beyond their scope of competency to provide it.³⁵

ENVIRONMENTAL POLICIES AND ACTION

In 2022, DELTA reported that Georgia's draft NMAS contained a standard on environmental management and policy.³⁶ DELTA has also stated that all national and international demining operators are expected to abide by State laws relating to environmental protection when planning and conducting demining operations.³⁷ Finally DELTA states that, to minimise environmental impact, explosive materials are processed only at designated waste sites.³⁸

INFORMATION MANAGEMENT AND REPORTING

The HDCCD uses the IMSMA database and confirms that data are disaggregated by type of contamination and method of land release.³⁹ According to HALO, when it was operational in Georgia, the data are accurate, with data archives going back to 2009 and regularly updated, based on HALO's reports and on work by the Engineering Battalion.⁴⁰ It is not known if data are disaggregated by type of contamination and method of land release.

²⁴ Email from Michael Montafi, HALO, 26 July 2022.

²⁵ Emails from Andrew Moore, HALO, 18 October 2016; Irakli Chitanava, HALO, 2 May 2017; and Oleg Gochashvili, DELTA, 3 April 2017.

²⁶ Email from Oleg Gochashvili, DELTA, 28 March 2019.

²⁷ Email from Rachael Rosenberg, HALO, 12 April 2023.

²⁸ Email from Tom Griffiths, HALO, 25 April 2024.

²⁹ Email from Gocha Shavgulidze, HDCCD, DELTA, 9 August 2024.

³⁰ Email from Gocha Shavgulidze, HDCCD, DELTA, 14 July 2025.

³¹ Email from Oleg Gochashvili, DELTA, 28 April 2021.

³² Emails from Oleg Gochashvili, DELTA, 28 April 2021 and 31 May 2022.

³³ Email from Gocha Shavgulidze, HDCCD, DELTA, 14 July 2025.

³⁴ Emails from Oleg Gochashvili, DELTA, 28 April 2021 and 31 May 2022.

³⁵ Email from Gocha Shavgulidze, HDCCD, DELTA, 15 July 2025.

³⁶ Email from Oleg Gochashvili, DELTA, 31 May 2022.

³⁷ Ibid.

³⁸ Email from Gocha Shavgulidze, HDCCD, DELTA, 14 July 2025.

³⁹ CCW Protocol V Article 10 Report (covering 2023), Form B; and email from Gocha Shavgulidze, HDCCD, DELTA, 14 July 2025.

⁴⁰ Emails from Michael Montafi, HALO, 8 May 2020 and 17 May 2022.

In 2024, Georgia restated that various government agencies, in particular the Defence Forces and the EOD team of the Georgian State Security Service, report contamination discovered through their established networks and in response to information from local residents. DELTA compiles and regularly updates digital and printed maps of contaminated and cleared areas through the “national IMSMA database and GIS programme”. Exchange of data between relevant ministries, national agencies, and external organisations was reported to be ongoing in 2024.⁴¹ That said, Georgia has said that further support is needed to train staff in IMSMA.⁴²

PLANNING AND TASKING

In 2019, Georgia reported having a national mine action strategy in place whose goals and targets focused on clearing mined areas unless they are deemed to have military utility as well as areas with ERW.⁴³ Georgia last reported to Mine Action Review that it had a mine action plan in place for 2022.⁴⁴ Mine Action Review requested an update on the status of Georgia’s national mine action strategy in 2025, but DELTA HCD explained that this matter is beyond their scope of competency.⁴⁵ Georgia did not plan to undertake any clearance of mined areas in 2025.⁴⁶

Since 2009, Georgia has had no national level prioritisation system for clearance. In 2022, Georgia said that clearance is sometimes conducted at the request of ministries, organisations, or commercial companies to facilitate safe infrastructure development.⁴⁷

LAND RELEASE SYSTEM

STANDARDS AND LAND RELEASE EFFICIENCY

Georgia states that development of National Technical Standards and Guidelines (NTSGs) and NMAS continued in 2024, in line with IMAS.⁴⁸ In 2025, as in previous years, Georgia reported that a draft set of NMAS was still in need of final revision and expert and peer review.⁴⁹ In 2023, prior to its withdrawal, HALO stated that it had not been given access to the draft NMAS or asked to provide input.⁵⁰ The IMAS have been translated into Georgian.⁵¹

OPERATORS AND OPERATIONAL TOOLS

HALO, the only international operator present in Georgia in recent years, withdrew from Georgia in 2023.⁵² HALO also responded to call-outs in conflict-affected areas across Abkhazia until funding expired in 2023.⁵³ In 2024, the EOD company of the Eastern Command of the Defence Forces of Georgia was clearing UXO on the former military training ground of Gonio. Clearance has been ongoing since 2016. The EOD Company of the Engineering Battalion continued to dispose of ammunition in the Vaziani firing range area. No national capacity was deployed for survey or clearance of AP mines.⁵⁴

⁴¹ CCW Protocol V Article 10 Reports (covering 2024), Form B.

⁴² Ibid., Form E.

⁴³ Email from Oleg Gochashvili, DELTA, 28 March 2019.

⁴⁴ Email from Oleg Gochashvili, DELTA, 31 May 2022.

⁴⁵ Gocha Shavgulidze, HCD, DELTA, 15 July 2025.

⁴⁶ Email from Gocha Shavgulidze, HCD, DELTA, 14 July 2025.

⁴⁷ Emails from Oleg Gochashvili, DELTA, 31 May and 26 July 2022.

⁴⁸ CCW Protocol V Article 10 Report (covering 2024), Form A.

⁴⁹ Emails from Gocha Shavgulidze, HCD, DELTA, 1 and 10 July 2024 and 14 July 2025.

⁵⁰ Email from Rachael Rosenberg, HALO, 12 April 2023.

⁵¹ Email from Gocha Shavgulidze, HCD, DELTA, 14 July 2025.

⁵² Emails from Fiona Kilpatrick-Cooper, HALO, 12 April 2024.

⁵³ Email from Rachael Rosenberg, HALO, 12 April 2023.

⁵⁴ Email from Gocha Shavgulidze, HCD DELTA, 25 March 2025; and CCW Protocol V Article 10 Report (covering 2024), Form A.

LAND RELEASE OUTPUTS AND PROGRESS TOWARDS COMPLETION

LAND RELEASE OUTPUTS IN 2024

No area contaminated with AP mines was released through survey or clearance in Georgia in 2024. Georgia did not add any AP mined area to the national database during the year.⁵⁵

SURVEY IN 2024

No AP mined area was released through survey in Georgia in 2024.⁵⁶ The last time this occurred was in 2022, when 32,456m² was reported to have been reduced through TS by the HDCD at the Dedoplistsdkaro base in Kakheti region.⁵⁷

Georgia did not add any hazardous areas to the national database in 2024.⁵⁸ The last report of any new recording of AP mined area was during 2022, when HALO identified 26,000m² of SHA at Khojali as well as 13,003m² of SHA and 16,825m² of CHA at Kadoeti.⁵⁹ These areas were not added to the national database as HALO did not have access to the database in 2022.⁶⁰

CLEARANCE IN 2024

No AP mined area was released through clearance in Georgia in 2024.⁶¹ As a result of "demining operations" at the Gonia former military base, however, 17,400m² were cleared with one anti-vehicle mine, a TM-62 blast mine, was found, among other items of UXO.⁶² The last reported clearance of AP mined area in Georgia took place during 2022, when a total of 0.28km² of clearance was conducted.⁶³ Almost all (0.24km²) took place at Primorsky, the site of an explosion at an ammunition storage area in 2017. As such, the mines had not been emplaced but rather scattered around the area by the explosion.⁶⁴

PROGRESS TOWARDS COMPLETION

No target date has been set for completion of AP mine clearance in Georgia. DELTA reiterated in 2021 that, "given all the impediments, it is difficult to name specific timelines".⁶⁵ Again, in July 2025, DELTA stated that Georgia is "striving to have its territories free of mines" but without a set deadline.⁶⁶ The Red Bridge minefield is Georgia's largest mined area, clearance of which has previously been identified as one of its key strategic mine action priorities.⁶⁷ Georgia previously reported plans to start clearing the Red Bridge minefield in 2015, but after discussions between Georgian and Azerbaijani representatives only survey was permitted.⁶⁸ In 2022, HALO reported that, while there had been indications from the Georgian Ministry of Foreign Affairs (MFA) that progress

had been made on general demarcation disputes between Georgia and Azerbaijan, there was still no clear evidence of progress towards Red Bridge clearance.

In September 2024, it was reported that a spokesperson for the Azerbaijani MFA had stated that two thirds of the border with Georgia had been agreed upon,⁶⁹ though there was no mention of the Red Bridge area. The Landmine Free South Caucasus Campaign, which had provided a forum for regional discussion of border minefield clearance, was paused indefinitely in March 2024. As at May 2025, it was consulting with local and international partners about a possible relaunch.⁷⁰

PLANNING FOR MANAGEMENT OF RESIDUAL CONTAMINATION

DELTA states that Georgia's national strategy provides for action to address previously unknown mined areas that are found after completion.⁷¹ The MoD Engineering Battalion has been trained to carry out EOD, demining, and BAC by the North Atlantic Treaty Organization (NATO) Partnership for Peace programme.⁷² Georgia has expressed concern—echoed by HALO—that this capacity to tackle residual contamination is limited.⁷³

55 Email from Gocha Shavgulidze, HDCD, DELTA, 14 July 2025.

56 Ibid.

57 Emails from Jemal Kopaleishvili, DELTA, 18 May and 16 June 2023.

58 Email from Gocha Shavgulidze, HDCD, DELTA, 14 July 2025.

59 Emails from Jemal Kopaleishvili, DELTA, 18 May 2023; and Rachael Rosenberg, HALO, 12 April 2023.

60 Emails from Rachael Rosenberg, HALO, 12 and 19 April 2023.

61 Email from Gocha Shavgulidze, HDCD, DELTA, 14 July 2025.

62 CCW Amended Protocol II Report (covering 2024), Form B.

63 Emails from Rachael Rosenberg, HALO, 12 April 2023; and Jemal Kopaleishvili, DELTA, 18 May and 16 June 2023.

64 Email from Rachael Rosenberg, HALO, 12 April 2023.

65 Email from Oleg Gochashvili, DELTA, 31 May 2022.

66 Email from Gocha Shavgulidze, HDCD, DELTA, 14 July 2025.

67 Email from Oleg Gochashvili, DELTA, 3 April 2017.

68 Interview with George Dolidze, Ministry of Foreign Affairs, in Geneva, 28 May 2009; and email from Oleg Gochashvili, DELTA, 3 June 2015.

69 The article also states that since 1996 "a relevant commission between the two countries has been working on delimitation". "MFA: Azerbaijan, Georgia agreed 2/3 of state border", *Report News Agency*, 17 September 2024, at: <https://bit.ly/3ZXseJU>.

70 "Opinion: Landmine free South Caucasus – the job is far from finished", *commonspace.eu*, 9 May 2025, at: <http://bit.ly/44tjbbd>.

71 Email from Oleg Gochashvili, DELTA, 31 May 2022.

72 Emails from Oleg Gochashvili, DELTA, 28 April 2021; and Michael Montafi, HALO, 30 April 2021.

73 Email from Oleg Gochashvili, DELTA, 31 May 2022.