



PALAU

ARTICLE 5 DEADLINE: 1 MAY 2018

(UNCLEAR WHETHER PALAU HAS AN OUTSTANDING ARTICLE 5 OBLIGATION)

RECOMMENDATIONS FOR ACTION

- Palau should ensure that all relevant information on contamination, survey, and clearance is acquired, including Cleared Ground Demining (CGD) data from Peleliu state, in order to complete population of the national Information Management System for Mine Action (IMSMA) database. This includes obtaining the necessary information regarding the mines reportedly found and cleared by CGD on Peleliu state in 2014–15, in the Umubrogol mountains (Bloody Nose Ridge).
- Palau should ensure that permission is granted for non-technical survey of Peleliu state so as to complete the National Safety Office’s nationwide non-technical survey.
- Palau should ensure that all relevant data is provided to the National Safety Office with regards to CGD’s survey and clearance activities undertaken in 2017–18, to validate whether or not any anti-personnel mines remain on Peleliu. If CGD has completed its investigation of this area and no anti-personnel mines have been discovered, Palau should determine whether this area can be declared as free from the suspicion of mine contamination.

CONTAMINATION

The extent to which Palau remains contaminated with anti-personnel mines is unclear. Palau is contaminated by explosive remnants of war (ERW), including unexploded ordnance (UXO) on many of its 200 islands, left over from World War II,¹ when it was the scene of a number of land and naval battles between Japanese and American forces. An estimated total of 2,800 tons (2.8 million kg) of ordnance was dropped or fired on Palau.² Much of this ordnance failed to detonate or was abandoned after the war, and as a result, an unknown amount of UXO remains on the land and in the sea, including in sunken ships.³ In February 2017, defensive maps detailing laid aircraft bombs, depth charges, and sea mines were provided to the Palau authorities by

the Japanese military, via a Japanese demining non-governmental organisation (NGO), the Japan Mine Action Service (JMAS).⁴

Clearance efforts to date have included “a combination of ‘spot tasks’ in response to reports of UXO, visual battle area clearance of general areas and sub-surface clearance of specified areas, like walking tracks and around the power station.” In Peleliu the work has reportedly “been ‘complicated’ by the presence of UXO in caves, and also the presence of human remains and war artefacts in the areas where UXO are found.”⁵

In 2011, Palau stated for the first time in its Anti-Personnel Mine Ban Convention (APMBC) Article 7 transparency report that it had mined areas on its territory. Contamination to date has included Japanese anti-vehicle and anti-personnel mines as well as sea mines, with anti-personnel mines reported in the Umubrogol mountains and Death Valley regions of Peleliu state.⁶ In its earlier Article 7 reports, Palau had declared no known or suspected mined areas.⁷

In its subsequent Article 7 report submitted the following year, Palau stated that clearance had been completed of all anti-personnel mines at the only two areas with confirmed contamination. It also reported that areas containing sea mines remained to be cleared. Palau further reported that areas containing abandoned anti-personnel mines remained in caves at Bloody Nose Ridge in the Umubrogol mountains in Peleliu state, recording that: "Landmines have been found stored in the complex cave and tunnel systems of the former battlefield. A total of 608 caves exist – operations have only taken place in 34 caves to date."⁸

At that time, CGD confirmed that anti-personnel mine contamination was only of abandoned stockpiled mines.⁹ In December 2011, in its statement to the APMBC Eleventh Meeting of States Parties, Palau claimed that it was not "obligated under the AP Convention to destroy emplaced antipersonnel mines because it never produced, stockpiled, used, nor transported them."¹⁰

In its Article 7 report for 2012, Palau reported that "AP Landmines have been found on Bloody Nose during the course of ERW clearance over the past three years. The AP landmines have been found emplaced and fused but unarmed in the ground as well as stored within defensive

cave and tunnel complexes", and that "ongoing clearance operations are removing these AP Landmines".¹¹ In addition, Palau also reported that sea mines had been found in two locations in Airai state, noting that the mines had been used in both anti-boat and anti-personnel roles.¹² Palau also reported that its contamination "was a result of a fiercest battle fought in the Pacific during WWII. With such circumstance, Palau is seeking assistance toward island wide survey to know its mine[d] areas and or suspected mine[d] areas."¹³

Palau did not submit Article 7 reports for 2013, 2014, or 2015, as it is obligated to do by the APMBC. In December 2015, however, CGD reported having cleared emplaced and armed anti-personnel and anti-vehicle mines in Palau between January 2014 and November 2015. The location of clearance was not specified, but was believed to be Bloody Nose Ridge, Peleliu state.¹⁴

In its UXO Action Plan 2017–19, Palau records that "A total of 43 anti-personnel landmines have been cleared", and that "it has 'cleared all known mined areas' in compliance with the APMBC."¹⁵

In October 2016, the Palau authorities confirmed they were in the process of applying Palau's UXO Policy and would collect relevant data from clearance operators to build Palau's understanding and awareness of contamination and for its submission of APMBC transparency reports.¹⁶ In 2017, Palau submitted its Article 7 report for 2016, in which it reported that there have "never been validated mined areas that contain or are suspected to contain anti-personnel mines under the jurisdiction or control of Palau".¹⁷ In 2018, Palau did not report any confirmed or suspected mined areas in its Article 7 report covering activities in 2017.¹⁸

PROGRAMME MANAGEMENT

Palau is in the process of establishing a mine action programme to address its ERW/mine contamination. Under the authority of Executive Order No. 335 of 14 May 2013, issued by the Office of the President, a UXO Advisory Committee was established.¹⁹ The Committee has reportedly met a number of times since it was established, and an informal working group established in 2010 had also met prior to the establishment of the Committee.²⁰

In June 2015, during meetings between Norwegian People's Aid (NPA) and government officials from the National UXO Advisory Committee, it was decided that a series of capacity-building workshops would be held with the government, with support from NPA and funding from the United States. The aim of the workshops was to support Palau's development of a national UXO policy, a national UXO action plan, and draft national UXO standards. A first workshop was held in July 2015, a second in August 2015, and the third and final workshop in January 2016.²¹

Palau's national mine action programme is now structured according to its UXO Policy, which was enacted by Presidential Executive Order 392 in March 2017, and which authorises the establishment of a national coordination system and a unified database mechanism.²²

Palau now has capacity to direct trained national personnel to clear priority areas of abandoned explosive ordnance (AXO) and UXO.²³ A new government demolition area became operational in early 2018, which is run by the National Safety Office, and is also used by JMAS.²⁴

Strategic Planning

The UXO Advisory Committee has overseen the development of the UXO Policy and UXO Action Plan 2017–19, which were enacted by Presidential Executive Order 392, signed on 1 March 2017.²⁵

The UXO policy outlines national coordination measures and assigns responsibilities to the relevant ministries. It also formally documents the role of the UXO Advisory Committee, which is composed of government ministries, states, agencies, and organisations. The Director of the Bureau of Domestic Affairs within the Ministry of State acts as the secretariat.²⁶

Furthermore, a UXO Technical Working Group, chaired by the National Safety Office and consisting of representatives at working level from each ministry,²⁷ Palau's states, and other concerned organisations, has been established by the Advisory Committee. The UXO Technical Working Group assists the Advisory Committee with its work, particularly on the technical aspects of UXO destruction.²⁸

Palau, in conjunction with international partners including NPA, CGD, and JMAS, is implementing a nationwide, non-technical survey, referred to in the UXO Action Plan 2017–19 as a “general UXO survey”, to confirm the UXO-affected areas of the country. NPA has conducted non-technical survey, which “will gather documentary information from a variety of sources, such as previous surveys, NGO progress reports, other ministries, states, police, construction agencies, dive operators and historical records. All data collected during the general survey is to be stored in IMSMA.”²⁹ In addition, all information from NPA is backed up and delivered to the Palau Automated Land and Resource Information System (PALRIS), in the Office of Planning and Statistics, which sits under the Ministry of Finance.³⁰

As at August 2018, non-technical survey had been completed of all states in Palau, with the exception of Peleliu, for which historical survey and clearance data had not yet been made available to the authorities by CGD.³¹ In order to better understand the level of remaining contamination and to manage clearance efforts, Palau strongly encourages its international partners, including CGD, in the spirit of cooperation, to share data to be incorporated in Palau's geographic information system (GIS) system for sustainable development.³²

Legislation and Standards

In March 2017, Palau enacted Presidential Executive Order 392, which formally adopted the Palau UXO Policy and the Palau UXO Action Plan 2017–19.³³

The UXO Advisory Committee is also tasked to determine rules and regulations for the quality and standard of work performed by agencies such as the National Safety Office (in the Ministry of Infrastructure, Industries and Commerce), the police, international organisations, NGOs, and foreign militaries. These rules and regulations, known as ‘Palau UXO Standards’, are based on the International Mine Action Standards (IMAS) and have been drafted with the support of NPA.³⁴

In July 2017, the draft standards were streamlined to concentrate more on permissions and legalities for the removal of ERW rather than the technical aspects of clearance.³⁵ As at August 2018, the draft UXO standards had been accepted and disseminated, but had yet to be formally approved and adopted by the national authorities.³⁶

In its latest Article 7 report (for 2017), Palau reported that UXO Standard Operating Procedures (SOPs) had been drafted and were undergoing review prior to adoption.³⁷

Information Management

Previously, no centralised database contained historical information/data on, for example, the location and clearance of UXO, which could be retrieved for planning and prioritisation purposes.³⁸ However, with the support of NPA, the National Safety Office established a national UXO database in January 2017,³⁹ to help in the coordination of survey and clearance of explosive ordnance.

With the adoption of the UXO Policy and UXO Action Plan 2017–19, the Palau authorities now have a formal mandate to collect historical data from operators conducting UXO and landmine clearance in Palau, and verify and assess data for reporting to the Palau leadership, local communities, and the international community.⁴⁰ With the appropriate structure now in place, Palau will be better placed to report on ERW contamination, survey, and clearance to the Palau authorities, local communities, and the international community, including as part of its obligations under the APMB. ⁴¹

The National Safety Office now receives both historical and current data on contamination, survey, and clearance, to populate the IMSMA database.⁴² All items found to date have been reported by clearance operators, and entered into the UXO database, with the exception of historical data from CGD.⁴³ Although CGD is now submitting its 2017 clearance data,⁴⁴ as at August 2018, it had yet to submit its data from 2009 to 2016 to the Palau National Safety Office for entry into the national UXO database, and for qualification and validation.⁴⁵ In addition, as at August 2018, the US Corps of Engineers had yet to provide details of the location and type of explosive ordnance cleared during decades of clearance and construction work in Palau.⁴⁶

Operators

CGD has been conducting ERW clearance operations in Palau, both on land and in the sea, since 15 September 2009.⁴⁷ The clearance project is focused on Peleliu and Angaur – two southern islands of Palau – and aims to reduce the immediate risk from ERW to local people and tourists.⁴⁸

In 2012, JMAS, a Japanese demining NGO, began working in Palau, with a focus on underwater UXO clearance. JMAS's activities to date have included monitoring of the ‘Helmet Wreck’ off Malakal, Koror, and other wreck sites, and undertaking underwater surveys.⁴⁹ JMAC deployed seven personnel for UXO survey and clearance operations in Palau in 2017: four Japanese explosive ordnance disposal (EOD) specialists, a Japanese paramedic, and two Palauan EOD assistants.⁵⁰

In 2015, NPA received a grant to assist Palau to strengthen national capacity to manage and coordinate the UXO sector, and to help undertake surveys and UXO clearance; and subsequently initiated a programme of support. NPA reported that from April 2017 it had begun working under the National Safety Office, as the “ERW/UXO team”. NPA continued to build national capacity in the National Safety Office through 2017, and as at August

2018, the National Safety Office team had an operational capacity of 16 personnel, in addition to two safety officers (responsible for coordinating operations) and an international NPA advisor.⁵¹ National Safety Office ERW/UXO team personnel also provide EOD cover to Palau's water and sewer improvement projects,⁵² and will conduct risk assessments for all planned infrastructure work.⁵³

All three NGOs rely on direct funding from foreign donors, which Belgium, the Czech Republic, Japan, New Zealand, and the United States.⁵⁴

In addition, mines were also believed to have been encountered during a "Last Human Remains Mission" undertaken in 2015 by Japan in a repatriation operation involving the Palau Historic Preservation Office (HPO), also known as the Bureau of Cultural and Historic Preservation, under the Ministry of Community and Cultural Affairs (MCCA).⁵⁵ The Government of Japan will reportedly clear caves on Peleliu as part of the programme to repatriate human remains from World War II.⁵⁶

LAND RELEASE

No operators in Palau reported finding any anti-personnel mines in 2017.⁵⁷

NPA started a nationwide non-technical survey on 18 September 2016 and, as at August 2018, NPA had completed non-technical survey of all states in Palau, except for Peleliu, where permission had not yet been granted for non-technical survey. Pre-2017 survey and clearance data had not yet been provided by CGD. NPA has found no evidence of anti-personnel mine contamination in its non-technical survey operations to date.⁵⁸

CGD did not encounter any emplaced anti-personnel mines during its clearance operations in Palau in 2016⁵⁹ or in 2017.⁶⁰ Previously, however, in December 2015, CGD reported having cleared five type 93 HE blast anti-personnel mines, which were laid and armed, in two separate caves, between January 2014 and November 2015.⁶¹ CGD also reported clearing during the same period: one yardstick anti-vehicle mine, found on a beach; three JB spherical anti-vehicle mines, found in three separate locations (underwater and in mangroves); 12 JE HE blast mines, found in nine different locations (in mangroves and residences); and one mine of an improvised nature (using modified aircraft bomb components), found on a beach.⁶² According to CGD, these mines can "be classed as anti-vehicle or anti-personnel (as both of those types deployed in World War II in Palau can be activated by people)".⁶³ These mines are covered by the APMBC. As at August 2018, CGD had provided data on ERW cleared in 2017, but had yet to provide the National Safety Office with the requested historical information on laid or armed landmines found in Peleliu state.⁶⁴ Until this information is provided by CGD, the Palau authorities are unable to validate and assess the information regarding the anti-personnel mines reported by CGD in 2015.⁶⁵

In 2017, CGD concentrated its activities in validating whether any anti-personnel mines remain on Peleliu state, in the vicinity of the caves in the Umubrogol Mountains. CGD's work, which included non-technical survey, technical survey, and clearance, was reportedly requested by the UXO Advisory Committee and Government of the state of Peleliu, and funded by a

consortium of donors including Palau itself, as well as Belgium, the Czech Republic, Ireland, and New Zealand. As part of this process, CGD stated that "methodologically wise any caves surrounding those caves where AP landmine stockpiles were previously found have also been checked thoroughly, and utilising sub-surface landmine detection drills and equipment to search for the presence of emplaced (buried) landmines at the cave entrances, CGD teams have been systematically working their way up and down the valleys and sub-ridges of the Umurbrogol Mountain range." In addition, CGD reported that "...cave search activities are taking place on the fringes of the Ridge, as well as a number of cave systems not actually on Bloody Nose Ridge, even including caves on neighbouring Ngedebus Island, have been searched for the presence of landmines during these last 2 quarters to confirm that no AP mines remain in Palau".⁶⁶

CGD reported undertaking door-to-door survey of every household in Peleliu, during which an example of a landmine found previously on Peleliu was shown. CGD's non-technical survey reportedly also included WWII research, including a 35-page US military report published in 1945, based on the cave system on Peleliu, which does not include any mention or warning of the likelihood of emplaced anti-personnel mines in cave entrances, but rather noted that the entrances were used, for example to roll out artillery or for mortar positions. CGD questions if Japanese military strategy would have emplaced mines in front of cave systems, given that troops frequently reoccupied caves lost to the US forces, and mainly at night under the cover of darkness. This viewpoint was backed by a leading Peleliu historian.⁶⁷ Finally, military maps made available by Japan did not indicate the use of anti-personnel mines.⁶⁸

As at August 2018, the National Safety Office was not aware of whether or not CGD had now completed survey of the area of Peleliu in which it had found a small number of anti-personnel mines in 2014/2015.⁶⁹ Completion of the CGD survey and provision of the CGD data to the National Safety Office should allow the Palau national authorities to determine whether this area can be declared free of mines.

ARTICLE 5 COMPLIANCE

Under Article 5 of the APMBC, Palau was required to destroy all anti-personnel mines in mined areas under its jurisdiction or control as soon as possible, but not later than 1 May 2018.

Until recently, it was not believed that Palau had mined areas containing anti-personnel mines, other than a residual risk of contamination. Rather, it was thought the remaining mines were in abandoned stockpiles, which fall under Article 4 of the APMBC. However, in December 2015, CGD reported clearing a number of emplaced anti-personnel mines between January 2014 and November 2015.⁷⁰

As at August 2018, JMAS and NPA had not reported any emplaced, laid, or armed anti-personnel mines since 2012, but CGD had yet to submit its historical data to the National Safety Office for entry into the national UXO database, and for validation and qualification. Failure of CGD to submit its pre-2017 survey and clearance data, including regarding its clearance operations in Peleliu state, is preventing Palau from gaining a full understanding of the national status of explosive ordnance contamination.⁷¹

In 2017, when asked whether Palau intended to submit an Article 5 extension request, Palau responded that the National Safety Office would “submit its APMBC Article 7 reporting until such time the Palau National Safety Office have validated information about suspicious, laid or armed landmine in its jurisdiction”.⁷²

The Palau authorities also affirm that once CGD provides the National Safety Office with the requested CGD survey and clearance data, including information on any laid and armed anti-personnel mines discovered, they will then be in a position to validate and qualify this information, in order to determine whether or not any suspected mined area exists in Palau.⁷³

- 1 Statement of Palau, Anti-Personnel Mine Ban Convention (APMBC) Sixth Meeting of States Parties, Zagreb, 29 November 2005.
- 2 US military statistics included in the document provided to Landmine Monitor by email from Cassandra McKeown, Finance Director, CGD, 19 May 2010.
- 3 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 6; and "UXO Policy", 1 March 2017.
- 4 Emails from Luke Atkinson, Programme Manager, Norwegian People's Aid (NPA), 11 and 12 July 2017.
- 5 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 12.
- 6 Article 7 Report (for 2010), Form C.
- 7 Article 7 Report, Form C, for the periods 1 May to 14 September 2008 and 16 September 2008 to 16 September 2009.
- 8 Article 7 Report, Form C (for 2011).
- 9 Email from Cassandra McKeown, CGD, 18 July 2011.
- 10 Statement of Palau, 11th Meeting of States Parties, Phnom Penh, 1 December 2011.
- 11 Article 7 Report (for 2012), Form C.
- 12 Ibid.
- 13 Ibid.
- 14 Email from Steve Ballinger, Operations Director, CGD, to the Palau Authorities, 1 December 2015.
- 15 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 7.
- 16 Email from Eunice Akiwo, Director, Bureau of Domestic Affairs, Ministry of State, 20 October 2016.
- 17 Article 7 Report (for 2016), Form C.
- 18 Article 7 Report (for 2017), Form C.
- 19 Article 7 Report (for 2016).
- 20 Government of Palau, "UXO Policy", 1 March 2017.
- 21 NPA, "Humanitarian Disarmament in Palau", accessed 16 October 2015, at: <https://www.npaaid.org/Our-Work/Humanitarian-Disarmament/Where-we-work/Humanitarian-Disarmament-in-Palau>; email from Balkuu Kumangai, National Safety Officer, National Safety Office, Bureau of Public Works, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017; and Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 3.
- 22 Emails from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017; and Luke Atkinson, NPA, 21 March 2017; Article 7 Report (for 2016), Form J.
- 23 Interview with Luke Atkinson, NPA, 31 August 2018.
- 24 Ibid.
- 25 Article 7 Report (for 2016), Form A.
- 26 Email from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017.
- 27 Government of Palau, "UXO Policy", 1 March 2017; and email from Eunice Akiwo, Ministry of State, 21 April 2017.
- 28 Government of Palau, "UXO Policy", 1 March 2017.
- 29 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017.
- 30 Email from Luke Atkinson, NPA, 30 August 2017.
- 31 Interview with Luke Atkinson, NPA, 31 August 2018.
- 32 Email from Eunice Akiwo, Ministry of State, 29 September 2017.
- 33 Article 7 Report (for 2017), Form A.
- 34 Government of Palau, "UXO Policy" and "UXO Action Plan 2017–19", 1 March 2017; and Article 7 Report (for 2016).
- 35 Email from Luke Atkinson, NPA, 30 August 2017.
- 36 Interview with Luke Atkinson, NPA, 31 August 2018.
- 37 Article 7 Report (for 2017), Form A.
- 38 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017.
- 39 Email from Eunice Akiwo, Ministry of State, 21 April 2017.
- 40 Article 7 Report (for 2016 and 2017), Form A.
- 41 Email from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017.
- 42 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017; and email from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017.
- 43 Interview with Luke Atkinson, NPA, 31 August 2018.
- 44 Email from Luke Atkinson, NPA, 11 July 2017.
- 45 Emails from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017; and Eunice Akiwo, Ministry of State, 29 September 2017; and interview with Luke Atkinson, NPA, 31 August 2018.
- 46 Interview with Luke Atkinson, NPA, 31 August 2018.
- 47 CGD, "Republic of Palau Project", accessed 12 October 2016, at: http://www.clearedground.org/projects_palau.aspx; and M. L. Poso, "Team removes WWII ordnance in Palau", *Palau Horizon*, 3 May 2010, at: www.eastwestcenter.org/pacific-islands-development-program/about-pidph/; and B. H. Carreon, "Clearance of landmines, UXO starts in Peleliu", *Palau Horizon*, 7 October 2009, at: www.mvariety.com.
- 48 CGD, "Republic of Palau Project".
- 49 Pacific Islands Report, "Team From Japan Removes Depth Charges From Palau Wreck", 22 December 2015, at: <http://www.pireport.org/articles/2015/12/22/team-japan-removes-depth-charges-palau-wreck/>; Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 6; and email from Yasuo Terada, Programme, JMAS, 17 March 2017.
- 50 Email from Antonina Antonio, JMAS, 18 April 2018.
- 51 Interview with Luke Atkinson, NPA, 31 August 2018.
- 52 Email from Luke Atkinson, NPA, 30 August 2017, and interview, 31 August 2018.
- 53 Email from Luke Atkinson, NPA, 21 March 2017.
- 54 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 6; interview with Luke Atkinson, NPA, 31 August 2018; and CGD, "2nd and 3rd Quarter Report of GICHD (1st April to 31st October 2017)", 9 November 2017, p. 2.
- 55 Email from Steve Ballinger, CGD, to the Palau Authorities, 1 December 2015.
- 56 Government of Palau, "UXO Action Plan 2017–19", 1 March 2017, p. 13.
- 57 Article 7 Report (for 2017), Form C; email from Antonina Antonio, JMAS, 18 April 2018; and interview with Luke Atkinson, NPA, 31 August 2018.
- 58 Interview with Luke Atkinson, NPA, 31 August 2018.
- 59 Interview with Steve Ballinger and Cassandra McKeown, CGD, Geneva, 9 February 2017.
- 60 Article 7 Report (for 2017), Form C.
- 61 Email from Steve Ballinger, CGD, to the Palau Authorities, 1 December 2015.
- 62 Ibid.
- 63 Ibid.
- 64 Interview with Luke Atkinson, NPA, 31 August 2018.
- 65 Interview with Eunice Akiwo, Ministry of State, in Geneva, 8 February 2017.
- 66 CGD, "2nd and 3rd Quarter Report of GICHD (1st April to 31st October 2017)", 9 November 2017, p. 2 and annex.
- 67 Ibid., p. 3.
- 68 Emails from Luke Atkinson, NPA, 11 and 12 July 2017.
- 69 Interview with Luke Atkinson, NPA, 31 August 2018.
- 70 Email from Steve Ballinger, CGD, to the Palau Authorities, 1 December 2015.
- 71 Interview with Eunice Akiwo, Ministry of State, in Geneva, 8 February 2017; and email from Luke Atkinson, NPA, 21 March 2017.
- 72 Email from Balkuu Kumangai, Ministry of Public Infrastructure, Industries and Commerce, 3 April 2017.
- 73 Interview with Eunice Akiwo, Ministry of State, in Geneva, 8 February 2017.