Inter-American Convention against the OAS/Ser.L/XXII.2.20

Illicit Manufacturing and Trafficking CIFTA/CC-XX/doc.15/21

in Firearms, Ammunition, Explosives, 24 February 2021

and Other Related Materials (CIFTA) Original: Spanish

### Consultative Committee

Twentieth regular meeting

December 17, 2020.

Washington, D.C.

REPORT OF THE TWENTIETH REGULAR MEETING

OF THE CONSULTATIVE COMMITTEE OF THE CIFTA

(Presented by the Secretariat pro tempore)

1. **OPENING SESSION**

The Twentieth Regular Meeting of the Consultative Committee of the Inter-American Convention Against the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives and Other Related Materials (CIFTA) began with opening remarks from Ambassador Luz Elena Baños, Permanent Representative of Mexico to the Organization of American States (OAS), in her capacity as Secretary Pro Tempore of the Consultative Committee of the CIFTA.

Ambassador Baños expressed her appreciation to the delegations for their intense efforts and the flexibility they had shown in the preparations for the twentieth regular meeting, all in full compliance with the preventive measures in response to the COVID-19 pandemic. She also stressed the importance of continuing to work within CIFTA to strengthen coordination and synergies to counter that transnational challenge and benefit our societies, given the adaptability and persistent activity of criminal organizations.

Next, the Secretary for Multidimensional Security, Dr. Arthur Weintraub, thanked Mexico for its leadership on the issue of combating arms trafficking in the Americas, for its efforts during its tenure as Secretariat pro tempore of the CIFTA since 2017, and for its work to reactivate important forums for dialogue among the States Parties to the Convention.

Dr. Weintraub noted that, according to the Global Study on Firearms Trafficking 2020 of the United Nations Office on Drugs and Crime (UNODC), Central and South America, along with West Asia, accounted for 80 percent of arms trafficking destinations. He also recalled that in the Americas, almost 75 percent of homicides were committed with firearms. For that reason, he stressed the importance of specialized policy forums, such as the regular meetings of the CIFTA Consultative Committee, which served to design coordinated and comprehensive strategies to address the scourge.

Finally, he reiterated the firm commitment of the Secretariat for Multidimensional Security to continue providing support and technical assistance to countries to strengthen their capacity to meet their obligations under the CIFTA.

The full speech was distributed as document [CIFTA/CC-XX/INF.3/20.](http://scm.oas.org/doc_public/english/HIST_20/CIFTA00872e10.DOCX)

1. Consideration and adoption of the draft agenda and draft schedule

The States then adopted the agenda ([CIFTA/CC-XX/doc.2/20 rev. 2](http://scm.oas.org/doc_public/english/HIST_20/CIFTA00880E067.docx)) and schedule ([CIFTA/CC-XX/doc.3/20 rev. 2](http://scm.oas.org/doc_public/english/HIST_20/CIFTA00881e06.docx)).

1. Report of the Secretariat Pro Tempore of the Consultative Committee of the CIFTA on the Activities Carried out in the 2019–2020 term

Ambassador Baños, in her capacity as Secretary pro tempore, presented a summary of the report on the activities carried out in the 2019–2020 term, highlighting the Secretariat’s efforts to encourage the three signatory States that had not yet ratified the Convention to consider doing so as soon as possible. She also highlighted Mexico's efforts to promote and strengthen synergies between OAS member states and other international and regional agencies and mechanisms, such as by holding two successive meetings on "Strengthening regional cooperation in Latin America to prevent and combat the illicit trafficking of firearms and its related crimes," jointly organized with the UNODC Global Firearms Programme.

She also reported that, as chair of the Working Group on Firearms established pursuant to the Palermo Convention, on July 16 and 17, Mexico promoted the exchange of information and the importance of data collection to understand current trends in illicit firearms trafficking; it also encouraged multilateral cooperation for the fulfillment of target 16.4 of the Sustainable Development Goals, which called for the reduction of illicit financial and arms flows.

Ambassador Baños, in line with the mandate contained in operative paragraph 109 of resolution AG/RES. 2950 adopted in 2020, invited member states to collaborate with the hemispheric study on illicit trafficking of small arms and light weapons and ammunition in the Hemisphere. That effort was being promoted by Mexico in collaboration with the Departments of Transnational Organized Crime and Public Security.

She also referred to paragraph 18 of the Declaration on the Occasion of the Twentieth Anniversary of CIFTA, “Hemispheric Cooperation to Prevent, Combat, and Eradicate the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives, and Other Related Materials,” in order to respectfully urge states, international organizations, and other partners to make financial contributions to the trust fund established to enhance the operations and functions of the CIFTA.

The full report was distributed as document [CIFTA/CC-XX/doc.11/21](http://scm.oas.org/doc_public/english/HIST_21/CIFTA00885E03.docx).

1. Report of the Technical Secretariat of the Consultative Committee on:
	1. Status of signatures and ratifications of the CIFTA
	2. Directory of CIFTA Authorities
	3. Questionnaire on the implementation and effectiveness of the CIFTA

Mr. Michael Bejos presented the report of the Technical Secretariat, saying in reference to the status of signatures and ratifications of the CIFTA that there are 31 states parties and 3 signatory states to the Convention and that that there had been no new accessions to the Convention during the 2019–2020 term.

Regarding updates to the CIFTA Directory of Authorities, Mr. Bejos reported that the most current version of that document was circulated as CIFTA/CC-XX/doc.9/20 rev. 1,[[1]](#footnote-1)/ and he invited countries to notify any updates to their information. In reference to the Questionnaire on the Implementation and Effectiveness of the CIFTA, Mr. Bejos reported that, during the 2019–2020 term, the Technical Secretariat had received responses from five States Parties: Costa Rica, Ecuador, El Salvador, Mexico, and Peru.

The full report was distributed as document [CIFTA/CC-XX/doc.12/20](http://scm.oas.org/doc_public/english/HIST_21/CIFTA00886e09.docx).

1. Implementation of the 2018-2022 Course of Action for the Operation and Implementation of the CIFTA, and Synergies between the OAS, its entities, international and regional organizations, other relevant mechanisms and instruments, and civil society organizations in line with the objectives of the CIFTA: Review of activities implemented and measures to strengthen coordination and cooperation arrangements
	1. Actions undertaken by States Parties

The delegation of Mexico, headed Mr. Fabian Medina, Chief of the Office of the Minister of Foreign Affairs, reaffirmed his government's utmost commitment to the CIFTA and its effective implementation at the hemispheric level. He stressed that, as part of its foreign-policy priorities, Mexico, recognizing the seriousness of the threat posed by illicit trafficking in firearms and ammunition to peace and security, sought to strengthen regional efforts to address that threat. He invited the States that had not yet ratified CIFTA to do so and join the efforts in that regard.

Mr. Medina also cited figures to highlight the impact in terms of human lives that his country had suffered as a result of armed violence. Mexico called for deeper efforts at the national level to carry out the Course of Action for the Operation and Implementation of the CIFTA.

He also reported on Mexico's actions in this area, highlighting its role as chair of the seventh session of the Working Group on Firearms of the Conference of the Parties to the United Nations Convention against Transnational Organized Crime (UNTOC), its efforts to promote coordination and collaboration with various forums, including the Arms Trade Treaty (ATT), the Programme of Action to Prevent, Combat and Eradicate the Illicit Trade in Small Arms and Light Weapons in All Its Aspects (PoA), and the UNODC Global Firearms Programme.

In relation to the progress in the fulfillment of target 16.4 of the Sustainable Development Goals contained in the 2030 Agenda, Mr. Medina reported that his government had developed improved operational protocols on the link between illicit arms flows and other crimes, particularly illicit capital flows, two components that had increased the power of criminal organizations. He also highlighted the consolidation of the GC Armas Inter-Secretarial Working Group, which brought together all relevant national authorities under the technical secretariat of the Attorney General's Office, and added that Mexico was mainstreaming gender in its policies and activities, given the specific impact of armed violence on women.

Mr. Medina thanked the delegations for the support provided to his country during its period as chair of the Consultative Committee in the 2019-2020 term and asked the delegations to place their trust in him once more for a new term. In closing, he proposed, on behalf of his government, that the Fifth Conference of States Parties to CIFTA be held in April 2021.

The delegation of Brazil took the floor, recognizing Mexico's leadership on this important issue. He also acknowledged Secretary Weintraub for his most important work in the Technical Secretariat. He announced that his government supported and valued cooperation between countries under the terms of the CIFTA. He also highlighted the importance of weapons marking and tracing for his country and noted the progress made in the last two years by its Federal Police in formalizing its national weapons tracing center and the intensification of international cooperation in prevention and repression operations.

He underscored the valuable cooperation with countries and companies, particularly through INTERPOL, and made special mention of the successful cooperation with Paraguay and countries outside South America, such as the United States, in tracing thousands of weapons.

He concluded his remarks by drawing attention to the impact of illicit trafficking in firearms parts and components, which took advantage of less rigid controls and the ease with which they can be concealed. He requested that that issue be taken up by the States Parties to CIFTA, given the increase in the problem in recent years.

The delegation of the Dominican Republic laid out the policies adopted by its government to strengthen citizen security and prevent crime. In terms of his government's firearms and ammunition control policies, he highlighted several initiatives, including the establishment of a single government agency responsible for firearms registration and investigations; the creation of a specialized unit within the Police Department to conduct police firearms investigations; strengthening the capabilities of its Ballistics Unit; improving the handling of evidence and chain of custody related to firearms; increasing operations at ports and borders to seize firearms; and creating a gun court to handle firearms-related crimes.

He highlighted, among the measures already taken by his government, the National Firearms System (SISNA), which made it possible to register, catalog, and correlate the most relevant demographic, physical and biometric information on legal firearms and their owners, and to issue firearms carriers an identity document with high levels of security and the possibility of real-time authentication, supported by analysis by the Ballistic and Biometric Laboratory.

He concluded by noting that his president had appointed Mr. Roberto Santana as honorary advisor on security policies and prison systems.

The delegation of Argentina reiterated its government's commitment to CIFTA, stressed the importance of holding meetings to exchange experiences, and said that Argentina had chaired the Sixth Conference of States Parties to the Arms Trade Treaty. Argentina mentioned that, as Chair, it had placed special emphasis on the issue of diversion. It also highlighted that within the framework of the MERCOSUR Working Group on Firearms, a common MERCOSUR firearms nomenclator had been adopted to standardize firearms terms used in firearms information requests between countries in their common fight against illicit firearms trafficking.

It also highlighted its national programs, such as the updating of its laws in this area, the voluntary surrender of firearms, and the digitization of the management of access authorization processes for controlled material, among others.

The delegation of Colombia took the floor, highlighting the special relevance of the CIFTA and its Course of Action for the country, as they served as guiding and catalyzing instruments for the efforts of States to deal with the scourge of illicit firearms trafficking.

Regarding its country's progress in implementing the Course of Action, it noted that the State exercised monopoly and control over the manufacture, marketing, transport and destruction of weapons through Industria Militar de Colombia (INDUMIL), an enterprise attached to the Colombian army and the Ministry of Defense. It informed that INDUMIL had achieved high quality standards marking for arms and ammunition produced, as well as for their export and import.

It also highlighted the progress made by the Colombian National Police in terms of the degree of specialization in countering diversion and tracing, noting the creation of the weapons tracing group, which included the forensic ballistics laboratory, which was supported by INTERPOL's iARMS system, the U.S. eTrace system, and Europol's SIENA system. It said that the Colombian National Police had implemented a Single Ballistic Comparison System (SUCOBA), which allowed storage, comparison, and geo-referencing of ballistic information. It also informed that the Colombian National Police was open to sharing the experience gained from the creation and implementation of SUCOBA with other countries in the region.

It underscored the close links between arms trafficking and drug trafficking, given that they used the same transportation infrastructure and the same strategic corridors across land or maritime borders, which made border controls a key element in the fight against illicit arms trafficking. In that regard, it highlighted the efforts of the Colombian Customs to develop a set of controls and good operational practices to counter the introduction, diversion, and illicit trafficking of firearms, and that that entity recently published a memorandum entitled *“Fortalecimiento para Contrarrestar el Ingreso y Tráfico Ilícito de Armas de Fuego”* (Strengthening to Counteract the Entry and Illicit Trafficking of Firearms) as a technical and procedural reference tool for officials, police, and customs agents.

In conclusion, it reiterated its country's willingness and invited the CIFTA States Parties to strengthen international cooperation through the exchange of information and best practices in this area.

The delegation of Argentina took the floor again, its previous intervention having been interrupted due to technical difficulties. The delegation reported on the country's National Agency for Controlled Access Materials, which managed the authorization and registration of firearms, ammunition, and explosive materials. It described efforts to enhance laws and mainstream a gender perspective. It also noted the great importance that the institution accorded to the traceability of weapons in order to deal with the problem of diversion, as well as the praiseworthy institutional efforts in destroying thousands of illicit firearms. It concluded by expressing the willingness of its National Agency to work with its counterparts in the region to enhance control of illicit arms flows.

The delegation of Paraguay reiterated its government's commitment to CIFTA and highlighted the important and successful collaboration program between Paraguay and Brazil for the control of illicit arms trafficking.

The delegation of Peru said that the application and implementation of CIFTA was a priority for Peru, indicating that illicit arms trafficking was of great concern due to its links to terrorism, drug trafficking, and organized crime, among other serious crimes that threaten national security and public safety.

It stated that Peru attached great importance to international, regional, and border cooperation and assistance, the exchange of information and experience, technical assistance and strengthening of national capabilities, as well as the coordinated work of the competent institutions with responsibilities in this area.

It reported on key government agencies, such as the National Commission against the Illicit Manufacturing and Trafficking of Firearms, Ammunition and Explosives, and other Related Materials; and the National Superintendency for the Control of Security Services, Arms, Ammunition and Explosives for Civilian Use (SUCAMEC).

It also reported on legislative efforts undertaken to increase the severity of penalties for crimes involving the use of firearms and illicit arms trafficking.

It mentioned that through SUCAMEC, Peru was participating in the Project “In support of Countering Illicit Proliferation and Trafficking of Small Arms, Light Weapons (SALW) and Ammunition and Their Impact in Latin America and the Caribbean” managed by the OAS Department of Public Security (DPS), under which Peru had destroyed 12,254 seized weapons and weapons for police use that had reached the end of their useful life. Training activities on the marking and destruction of weapons had also been carried out within the framework of this project. It also highlighted that within the framework of CIFTA, its government has signed a memorandum of understanding with the DPS to increase cooperation and technical assistance in the area of control of firearms, ammunition, and explosives.

It drew attention to the work being done to establish bilateral mechanisms, with an emphasis on border areas with Bolivia, Colombia, and Ecuador to prevent and combat illicit arms trafficking with the cooperation of UNLIREC and the European Union. It mentioned that Peru had strengthened the National Police by creating a specialized unit to combat illicit firearms trafficking, which had been working with its counterparts in other countries such as Chile, Ecuador, and Bolivia to carry out tactical operational activities.

* 1. Actions undertaken by States not party to the Convention

The United States delegation reported on its government's efforts to support other countries with the implementation of their arms control commitments. It highlighted the agreement between CARICOM countries – including the Dominican Republic – supported by the United States and other international partners, which contained 30 specific priority actions that the countries had committed to implement in order to effectively combat illicit firearms trafficking. It said that all the actions envisaged in that agreement were consistent with the CIFTA and that the aforementioned document had been approved by the CARICOM Conference of Heads of Government at its nineteenth special meeting in May 2019. The delegation requested that the document be distributed for the benefit of all States Parties.

It also reported on a Caribbean Firearms Roadmap that had been developed with the support of CARICOM IMPACS, UNLIREC, the United States, Canada, and Germany. That document set out timelines and indicators to support the effective implementation of agreed priority actions.

It also announced that its government, through the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) was initiating a Caribbean law enforcement working group with Caribbean countries to share experience, information, and best practices.

The delegation also reported on a government program to counter the proliferation of firearms and military equipment. The program, known as the "Conventional Weapons Destruction Foreign Assistance Program" was overseen by the Department of State and intended to support countries in improving management of State-owned stockpiles. The beneficiaries of this program include Ecuador, El Salvador, Guatemala, Honduras, Mexico, and Peru. In partnership with UNLIREC they were also developing a program for the Caribbean to support implementation of the Caribbean Firearms Roadmap. The delegation expressed its government's interest in expanding this program and receiving consultations from interested countries.

The Jamaican delegation stated that it was important for its country to support the CIFTA, given the challenges it faces with respect to illicit trafficking in firearms and ammunition, as manifested in the high levels of violent crime. It said that in recent years, an average of eight in every ten homicides committed in his country involved the use of a firearm. Therefore, the delegation expressed its full support for international efforts to control and eradicate illicit flows of conventional arms, as well as its commitment to different international agreements on the subject, including CIFTA, the UN Arms Protocol, and the Arms Trade Treaty.

It reported that in recent years, its government had taken several steps to ensure that they were in a position to ratify the CIFTA. They included a review of its domestic laws on the subject, strengthening border controls, enhancing stockpile management systems, destruction of surplus stockpiles, marking, and implementation of public policies to reduce diversion of weapons into civilian hands. In addition, Jamaica had taken steps to strengthen police capabilities to investigate and prosecute cases of illicit firearms trafficking.

It expressed its government's interest in continuing to collaborate with international partners such as the OAS in this area, including firearms marking and tracing activities. It also called on firearms-producing countries to ensure that each firearm was properly marked and that robust controls were in place to regulate their movement.

* 1. Actions undertaken by the Technical Secretariat

The presentation was given by Mr. Guillermo Moncayo, Acting Director of the Department of Public Security, who highlighted the activities carried out in 2020 in relation to the current Course of Action for the operation and implementation of the CIFTA.

He said that in order to continue supporting the States Parties in strengthening their capacities to carry out the Course of Action and the obligations of the CIFTA, the Technical Secretariat had designed and implemented strategies to: (i) enhance the operational capacities of the States Parties in the areas of marking, tracing, destruction, and storage of small arms and light weapons, ammunition, and related materials; (ii) assist countries in the legislative review of their regulatory framework governing frameworks, bearing in mind CIFTA obligations and standards; and (iii) increase the capacities of the countries to investigate crimes related to illicit trafficking and proliferation of firearms.

He also reported that due to the COVID-19 pandemic and the prevention measures adopted by the countries of the region, the Technical Secretariat had had to adopt creative strategies that enabled valuable forward strides in its projects and activities, such as the project “In support of Countering Illicit Proliferation and Trafficking of Small Arms, Light Weapons (SALW) and Ammunition and Their Impact in Latin America and the Caribbean”; the Homicide Plan; the Hemispheric Study on Illicit Trafficking of Small Arms and Light Weapons and Ammunition; as well as cooperation and synergies with other organizations.

The full report was distributed as document [CIFTA/CC-XX/doc.13/20](http://scm.oas.org/doc_public/english/HIST_21/CIFTA00887e03.docx).

* 1. Remarks by other agencies

On behalf of the UNODC Global Firearms Programme, the Head of that Programme, Dr. Simonetta Grassi, presented the work they were doing in that field. Dr. Grassi highlighted several findings from the UNODC Global Study on Firearms Trafficking 2020, including major transnational flows of illicit firearms trafficking and figures on illicit arms seizures.

She also reported on the structure of the Global Firearms Programme and the work carried out in the region within its framework, highlighting the support offered to strengthen policies and legislative frameworks; control and security measures; capacity building in criminal justice; measures and techniques to strengthen international cooperation and information exchange; and support provided in terms of monitoring, collection, and analysis of data on illicit firearms trafficking.

The complete presentation was distributed as document [CIFTA/CC-XX/INF.8/20](http://scm.oas.org/doc_public/SPANISH/HIST_21/CIFTA00888T03.docx)

* 1. Dialogue between States Parties and non-party States

No remarks were offered in this regard.

1. Discussion on marking and tracing

On this point, the delegation of the United States took the floor to underscore the importance of marking and cooperation in tracing weapons as effective tools against illicit arms trafficking. Marking allows weapons to be effectively traced, thus facilitating the identification of illicit trafficking routes, as well as enabling prosecution of traffickers. It expressed its interest that at the next meeting of the States Parties countries reaffirm the importance of such tools. It requested the Technical Secretariat to support countries' efforts to obtain marking and training machines by compiling these requests and sharing them with donor countries and international partners.

The delegation of Mexico agreed with the comments of the delegation of the United States regarding the importance of marking and tracing as a key element in implementing the CIFTA. It also underscored the relevance of this topic for future work within the framework of the CIFTA, such as the generation of synergies between the forums and mechanisms engaged in this topic; exchanges of good practices, especially in the marking of ammunition and parts; and the usefulness a deeper understanding between the parties to the Convention and international organizations on the use of new technologies for marking and tracing.

The delegation of Peru stated that the issue of explosives was a high priority for Peru. It emphasized that CIFTA was the only international instrument that dealt with explosives and it requested the cooperation of the Technical Secretariat in arranging exchanges of information, good practices, and experience in explosives marking and tracing.

1. Election of the Secretariat pro tempore, pursuant to Article XXI of the Convention

Proceeding to the next item on the agenda, "Election of the Secretariat pro tempore for the 2020-2021 term,” the Secretary pro tempore informed the delegations of the nomination of the Government of Mexico, which had been distributed to the delegations as document
CIFTA/CC-XX/INF.1/20. He also informed that the Technical Secretariat had not received any additional notifications in this regard; however, he offered the floor to delegations wishing to propose a candidate at that time.

The delegation of Mexico took the floor to reiterate its country's commitment to continue assuming this responsibility and to request the support of the States Parties in that regard.

In the absence of any other nomination, the delegation of Argentina took the floor to second the nomination of Mexico and request that the election be done by acclamation. There being no objections, the delegation of Mexico was reelected as Secretariat pro tempore of the CIFTA for the 2020-2021 term, in accordance with Article XXI of the Convention.

1. Establishment of the date of the twenty-first regular meeting of the Consultative Committee, pursuant to Article 7 of its Rules of Procedure

On this item, the Secretariat pro tempore proposed that the twenty-first regular meeting of the Consultative Committee, with a duration of one day, be held during the first half of 2021, at a venue and with a format to be determined. The proposal was agreed to without objection.

1. Communication on the Fifth Conference of States Parties to the CIFTA

Having been addressed by the delegation of Mexico in previous remarks, there were no further comments on this point.

1. Discussion on possible sources of funding for the operation of the Convention

The delegation of Argentina requested that a balance should be found regarding the periodicity of the meetings, so that they might be scheduled with sufficient notice to ensure substantive discussions and without overloading the schedule of international meetings in this area.

The delegation of Mexico referred to the commitment made at the last Conference of States Parties to create a specific fund for the implementation of the CIFTA, and announced that, as a sign of its commitment and the priority it represented, its government would make a contribution of US$10,000 to the fund.

The Secretariat pro tempore thanked the delegation of Mexico for its contribution and cordially invited other States Parties to join in this necessary practice to fund the important work of CIFTA.

1. Other business

On this item, Mr. Guillermo Moncayo, Acting Director of the Department of Public security (DPS), took the floor to thank the Mexican delegation for the contribution to the CIFTA specific fund. He also thanked his DPS colleagues and acknowledged their hard work and sacrifice in ensuring the implementation of its project in what had been a very difficult year due to the COVID-19 pandemic.

The delegation of Paraguay expressed its appreciation for the cooperation received from UNODC and the European Union to combat illicit firearms trafficking.

The delegation of Ecuador congratulated Mexico on its reelection and commended the Technical Secretariat and the Department of Public Security for their sterling efforts under difficult circumstances.

Mr. Michael Bejos, on behalf of the Department against Transnational Organized Crime, took the floor to thank the Government of Mexico for the contribution to the CIFTA specific fund and for the support it had always given to the Department.

1. Closing remarks

Before bringing the meeting to a close, Ambassador Baños, on behalf of her country, expressed her deep appreciation to the States Parties for honoring her with their confidence by continuing to entrust her with the Secretariat pro tempore of the CIFTA.

She said that the Secretariat pro tempore and the Technical Secretariat would continue working to advance exchanges of experience, best practices, and strategies that contributed to regional efforts to combat the scourge of illicit firearms trafficking, and to make the region an example for the international community to follow.

She closed the meeting with remarks thanking the Technical Secretariat team, the Department of Conferences and Meetings Management, and the interpreters. She extended her special appreciation to her colleagues Oscar Holguin and Isaac Morales, and to the team at the Ministry of Foreign Affairs of Mexico. She also thanked all the delegations present for their participation.

CIFTA00892E05

1. . Link to Directory updated on January 26, 2021: [CIFTA/CC-XX/doc.9/21 rev. 2](http://scm.oas.org/doc_public/SPANISH/HIST_21/CIFTA00891T03.docx) [↑](#footnote-ref-1)