



Anti-Money Laundering and Counter-Terrorist Financing Measures

Cayman Islands

3rd Enhanced Follow-up Report &
Technical Compliance Re-Rating

October 2021





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CAYMAN ISLANDS: 3rd ENHANCED FOLLOW-UP REPORT

1. INTRODUCTION

1. The Fourth Round Mutual Evaluation Report (MER) of Cayman Islands was adopted on November 23rd, 2018, at the XLVIII Caribbean Financial Action Task Force (CFATF) Plenary held in Bridgetown, Barbados, and published on March 18, 2019. Since it met the thresholds of having eight (8) or more NC/PC ratings for technical compliance and a low or moderate level of effectiveness for seven (7) or more of the eleven (11) effectiveness outcomes, the Cayman Islands was placed under enhanced follow-up process¹.
2. In the 2nd Enhanced Follow Up Report (FUR) presented to the L Plenary held virtually in November 2020, Cayman Islands provided information on how it addressed the requirements of sixteen (16) Recommendations. In February 2021, the Plenary decided, by written procedure, to re-rate Rs. 2, 19, 21, 22, 23, 26, 28, 32, 34 and 35 as Compliant (C), maintain R.18 as Compliant (C), re-rate Rs. 1, 24, 25 and 29 as Largely Compliant (LC), and downgrade R.15 from LC to PC as the country did not meet the requirements of this Recommendation as revised in October 2019.
3. This report analyses the progress made by the Cayman Islands in addressing the outstanding requirements of R. 15.

2. FINDINGS OF THE MER & 2nd FUR

4. Based on the results of the MER and 2nd Enhanced Follow-Up Report, Cayman Islands' current ratings are as follows:

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
LC	C	C	LC	C	LC	LC	LC	C	LC
R 11	R 12	R 13	R 14	R 15	R 16	R 17	R 18	R 19	R 20
C	C	C	LC	PC	LC	LC	C	C	C
R 21	R 22	R 23	R 24	R 25	R 26	R 27	R 28	R 29	R 30
C	C	C	LC	LC	C	C	C	LC	LC
R 31	R 32	R 33	R 34	R 35	R 36	R 37	R 38	R 39	R 40
LC	C	C	C	C	LC	C	LC	C	LC

Note: There are four possible levels of technical compliance: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

Source: [Cayman Islands' MER, March 2019](#) and [Cayman Islands' 2nd Enhanced FUR, February 2021](#).

5. The assessment of Cayman Islands' request for technical compliance re-ratings and the preparation of this report was undertaken by Sherrece L. Saunders, Deputy Manager, Bank Supervision Department, Central Bank of The Bahamas with the support of the CFATF Secretariat.
6. Section 3 of this report summarises Cayman Islands' progress in improving technical compliance. Section 4 sets out the conclusion and a table showing the rating status of the Recommendations.

¹ Regular follow-up is the default monitoring mechanism for all countries. Enhanced follow-up is based on the CFATF's policy that deals with members with significant deficiencies (for technical compliance and/or effectiveness) in their AML/CFT systems and involves a more intensive process of follow-up.

3. OVERVIEW OF PROGRESS TO IMPROVE TECHNICAL COMPLIANCE

7. This section summarises Cayman Islands' progress to improve its technical compliance by implementing new requirements where the FATF Recommendations have changed since Cayman Islands' assessment; in this regard, the report focuses on the revised requirements of R.15.

3.1. Progress to address technical compliance deficiencies identified in the MER.

3.1.1. Recommendation 15 (re-rated PC at 2nd FUR)

8. In the 2nd FUR, Cayman Islands was re-rated as PC with R.15 as the requirements reflected in criteria 15.3(a) and (b), 15.4, 15.5, 15.6(a) and (b), 15.7, 15.8(a) and (b), 15.9(b), and 15.10, as revised in October 2019, were still not addressed.
9. The *Virtual Asset (Service Providers) Act, 2020* (VASPs Act) and its amendments are now in full force and effect². The VASPs Act, together with the *Proliferation Financing (Prohibition) Act (2017 Revision)* (PFPA), the *Terrorism Act (2018 Revision)* (TA), the *Proceeds of Crime Act (2020 Revision)* (POCA), the *Anti-Money Laundering (Amendment) Regulations 2020* (AMLRs), the *Monetary Authority Act (2020 Revision)* (MAA), among other Acts, and various strategy and policy documents comprise the framework by which Cayman Islands addresses the majority of the outstanding requirements of R.15.
10. The definition of Virtual Asset Service Providers (VASPs) per the VASPs Act meets the FATF definition of VASPs as included in the General Glossary of Terms in the FATF Methodology. Specifically, Section 3(1) of the VASP Act defines a Virtual Asset Service Provider as a person who provides virtual asset service as a business or in the course of business, in or from within the jurisdiction. Section 2 of the VASP Act defines virtual asset service as the issuance of virtual assets or the business of providing one or more of the following services or operations for or on behalf of a natural or legal person or legal arrangement —
 - (a) the exchange between virtual assets and fiat currencies;
 - (b) the exchange between one or more other forms of convertible virtual assets;
 - (c) transfer of virtual assets;
 - (d) virtual asset custody service; or
 - (e) participation in, and provision of, financial services related to a virtual asset issuance or the sale of a virtual asset.
11. At the time of writing this report, the Cayman Islands Monetary Authority (CIMA) had collected information from twenty (20) VASPs that applied for registration³, which have an estimated USD 4.1 billion of assets under their control. By comparison, from the data gathered annually by CIMA, the banking sector holds USD 579 billion in assets; additionally, fund administrators reported total assets under administration of USD 2.157 trillion. Securities Investment Business Act (SIBA) Registered Persons and Licensees reported assets under the control of USD 1.283 trillion, principally relating to private funds and mutual funds. VASPs have therefore approximately the equivalent to 0.2% (USD 4.1

² The VASPs Act and its amendments are in force and effect as provided for the *Virtual Asset (Service Providers) Act, 2020 (Commencement) Order* and the *Virtual Asset (Service Providers) (Amendment) Act, 2020 (Commencement) Order, 2021*.

³ Since the VASP Sectoral Risk Assessment was completed in April 2021, there have been 10 further entities that applied to be registered with CIMA. This would increase the amount of assets under control by the VASP sector, but this figure would still be much smaller than those for the investment funds and banking sectors.

billion of USD 2,157 billion) of the assets under the control of Mutual Fund Administrators and SIBL Registered Persons and Licensees and are 0.7% the size of the banking sector assets. Based on the above, Cayman Island's VASP sector is not materially important to the jurisdiction.

12. The Cayman Islands has addressed sub-criterion 15.3(a). CIMA conducted a *VASP Sectoral Risk Assessment*, dated April 2021, which identifies and assesses the ML risks emerging from Virtual Asset (VAs) activities and the activities of VASPs. The information sources used to conduct the VASP Sectoral Risk Assessment included information received through the VASP application process for registration with CIMA; information held by the Authority about existing licensees and/or registrants linked to VAs and VASPs; information from the General Registry; information from the Special Economic Zone; open-source information about entities in the Cayman Islands linked to VAs and VASPs; the number and nature of Suspicious Activity Reports received by the Financial Reporting Authority (FRA) with links to VAs or VASPs; international guidance documents; reports by leading blockchain analytics providers; and discussions with industry representatives and consultants.
13. The VASP Sectoral Risk Assessment assessed the inherent ML/TF risks that VASPs face. The Assessment considered the mitigating factors as tied to the existing legal and regulatory framework, providing the resulting residual risk for each factor and an overall risk rating for the sector. Based on the analysis of the nature, size, and complexity of VASPs in the Cayman Islands, the types of customers they serve, their products, transactions and services, and their delivery channels/technology, the country concluded that the overall sectoral risk rating for VASPs is medium-high.
14. In addition, the TF risks related to VAs and VASPs were considered in Cayman Islands' *Terrorist Financing National Risk Assessment*, dated February 2020⁴. The assessment was conducted by the jurisdiction at the national level. Three internationally recognised methods of TF were reviewed, (namely collection, movement and use of funds for terrorist activities, or for use by a terrorist or a terrorist organisation for any purpose) and assigned a risk rating for each. The involvement of virtual currencies in such TF methods was analysed and consideration was given to the TF vulnerabilities of initial coin offerings.
15. Further, the *AML/CFT Strategy 2019 – 2022* and sections 53D and 53E(j) of the AMLRs provide for the updating of the assessment of the ML, TF, and PF risks assessments at the national and sectoral level, which is inclusive of the assessment of the ML/TF risks concerning VAs and VASP.
16. Sub-criterion 15.3(b) is addressed. According to section 24(1)(a) of the VASPs Act, CIMA must maintain a general review of the provision of VA services in the Islands; furthermore, CIMA's *RBA Methodology – AML/CFT 2020* and *AML/CFT Division Strategy and Transition Plan* allow for establishing the frequency and scope of the AML/CFT inspections based upon the risks identified in both national and sectoral risk assessments.
17. Criterion 15.4 is addressed. Section 4(1) of the VASPs Act requires that persons carrying or purporting to carry on VA services in or from within the Cayman Islands are licensed or registered. Section 4(2) sets out that a natural person shall not carry on, or purport to carry on, in or from within the Islands VA services as a business or in the course of business.

⁴ The PF threats related to VAs and VASPs were assessed in the *Proliferation Financing Threat Assessment*, dated May 2020.

18. Criterion 15.5 is addressed. Section 24 of the VASPs Act requires CIMA to take reasonable measures⁵ to identify natural or legal persons that are carrying out VASPs activities without the required license⁶, registration, or waiver⁷. Furthermore, under section 35 of the VASPs Act, it is an offence to provide VA services if not registered, licensed, or in possession of a waiver. A fine of KYD25,000 (Sec. 35(1)) or KYD100,000 (Sec. 35(3)) and a term of imprisonment for one year is applied for persons committing the offence.
19. Sub-criterion 15.6(a) is addressed. In its capacity as Authority and based on sec. 24(1)(a) of the VASP Act, CIMA must maintain a general review of the provision of virtual asset services in the Islands. CIMA is empowered to regulate and supervise the sector pursuant to section 6(1)(b)(i) of the MAA and section 2 of the Monetary Authority (Amendment) (No.2) Act, 2020; furthermore, section 7 of the Proceeds of Crime (Amendment) Act, 2019, amends Schedule 6 of the POCA to categorise VASPs as “relevant financial businesses”, thereby subjecting VASPs to the AMLRs. Particularly, section 22(f) of the VASPs Act and Regulation 4 and Schedule 1, Part B.1(d), B.2 and B.3 of the Virtual Asset (Service Providers) Regulations, 2020, provides for licensing and registration requirements applicable to VASPs. On the other hand, Cayman Islands’ National AML/CFT Strategy 2019 – 2022 and the AML/CFT Division Strategy and Transition Plan establish the framework for the implementation of risk-based supervision.
20. Sub-criterion 15.6(b) is addressed. Section 24(1)(b) and (c) of the VASPs Act give CIMA the power to supervise, monitor and ensure compliance by VASPs with requirements to combat ML/TF. CIMA has the authority to receive regular returns, perform onsite inspections, and receive auditors’ reports; furthermore, sections 33(1) and 33(2) of the VASPs Act provide for the entry and search of any premises by a constable authorized by a warrant if there are reasonable grounds for suspecting that, in such premises, there is evidence of any contravention of the VASPs Act or the POCA. Finally, regulation 53A(1) of the AMLRs allows CIMA to require relevant financial businesses, including VASPs, to produce information as CIMA requires to carry out its functions. Where a person fails to comply with regulations 53A and 53B sanctions apply.
21. Regarding the requirement of imposing sanctions, VASPs are subject to disciplinary and financial sanctions, inclusive of licence revocation and registration cancellation under section 25(3) of the VASPs Act. The VASPs Act also allows for prosecutions where there is a contravention of the AMLRs according to section 25(3)(g) of the VASPs Act. Monetary penalties as detailed in sections 42A and 42B of the MAA and the Monetary Authority (Administrative Fines) Regulations (2019 Revision) can also be applied. Section 9(1) of the VASPs Act sets out that CIMA may, at the expense of the VASP, require the licensee or registered person to obtain an auditor’s report on the licensee’s AML systems and procedures for compliance with the AMLRs.

⁵ According to the authorities, such reasonable measures include, but are not limited to, the use of intelligence, assessment of publicly available information and information sharing amongst domestic agencies as well as foreign counterparts.

⁶ Cayman Islands has indicated that CIMA has identified 30 entities that may be conducting VASP activities but have not yet applied to be registered based on open source information as well as inter-agency information obtained from the Ministry of Financial Services (including from the Registrar of Companies).

⁷ Section 16(1) of the VASPs Act sets out that CIMA may waive the requirement for a licence or registration for an existing licensee where it determines that a VA service does not materially change the nature of the activity for which the existing licensee is licensed and the supervision and oversight carried out in relation to the business of the existing licensee is sufficient to include the VA service.

22. Criterion 15.7 is addressed. CIMA has the authority to issue guidance notes related to VASPs per section 29 of the VASPs Act. Section 34(1)(b) of the MAA sets out that CIMA may issue or amend statements of guidance concerning the requirements of the AMLRs or the provisions of the regulatory Acts. Pursuant to referred section 34, CIMA has issued the Guidance Notes (Amendment)(No.5), dated February 2020, which included guidance on ML/TF/PF risks, AML/CFT internal controls, CDD, ongoing monitoring, record keeping, implementation of targeted financial sanctions and reporting suspicious activities. The Guidance Notes provide some indicators of unusual or suspicious activities related to virtual assets. CIMA also issues Notices, Circulars, and Fact Sheets via its website, which is publicly accessible. In addition, on 21 February 2020, the FRA issued its guidance on preparing and submitting high-quality suspicious activity reports.
23. In terms of providing feedback, CIMA liaises with regulated entities directly via correspondence and meetings as well as industry association meetings and outreach sessions where regulatory expectations, concerns and best practices can be addressed. On 24 January 2020, the FRA also formally implemented issuing a feedback form to reporting entities on the quality and usefulness of reports of suspicious transactions.
24. Sub-criterion 15.8(a) is addressed. The following range of sanctions and penalties apply for VASPs that fail to comply with AML/CFT requirements:
- a. Regulation 56(1) of the AMLRs sets out that a person who contravenes the AMLRs commits an offence and is liable on summary conviction to a fine of KYD500,000 or on conviction on indictment to an unlimited fine and imprisonment for two years.
 - b. Section 25 of the VASPs Act details the enforcement powers of CIMA, including the power to direct and the power to impose a range of sanctions for non-compliance. The VASPs Act also allows for prosecutions where there is a contravention of the AMLRs (section 25(3)(g)).
 - c. Monetary penalties as detailed in section 42A of the MAA and the Monetary Authority (Administrative Fines) Regulations (2019 Revision) can also be applied, with a range of administrative penalties up to KYD100,000 for individuals and KYD1,000,000 for a body corporate.
 - d. Section 136 and 137 of the POCA provide for criminal penalties for failure to report suspicious activity. The related penalties are:
 - i. *Summary Conviction*: KYD5,000 fine or two years imprisonment or both
 - ii. *Conviction on Indictment*: Five (5) year imprisonment or fine or both. Section 142 provides that both the individual and body corporate may be prosecuted for the offences under the referenced sections of the POCA.
 - e. Under section 35 of the VASPs Act, it is an offence to provide VA services if not registered, licensed, or in possession of a waiver. A fine of KYD25,000 (Sec. 35(1)) or KYD100,000 (Sec. 35(3)) and a term of imprisonment for one year is applied for persons committing the offence.
25. The severity of the penalties referred to is considered dissuasive. Regarding proportionality, section 6.4 of CIMA's *Enforcement Manual*, dated February 2018, establishes several criteria to ensure the implementation of sanctions proportionate to the seriousness of breaches. In addition, section 6.14 of the Enforcement Manual (Procedure for Administering Administrative Fines), sets out that CIMA (via the Oversight Committee and Compliance Division making a recommendation to its Management Committee) addresses (a) whether there was sufficient evidence of a breach; (b) whether a fine or any other enforcement action would be appropriate; and (c), if relevant, the amount of the fine." CIMA may determine that multiple enforcement actions may be necessary, given the nature and severity of a contravention. This may also include a referral for a criminal sanction.
26. Sub-criterion 15.8(b) is addressed. Section 36(1) of the VASPs Act provides that where an offence is committed by a body corporate and it is proved to have been committed with the consent or connivance of or to be attributable to any neglect on the part of any senior officer of the body corporate, or any

person who was purporting to act in any such capacity, that person as well as the body corporate commits that offence and is liable to be proceeded against and punished accordingly.

27. Per section 25(2)(f) of the VASPs Act, CIMA may take enforcement action where senior officers, trustees or persons who have acquired ownership or control are found to be not fit and proper persons. Under section 25(3)(g), where CIMA reasonably believes there is a contravention they can report such to the Director of Public Prosecutions.
28. Regulation 56(1) of the AMLRs, provides that a person who contravenes the AMLRs commits an offence and is liable on summary conviction to a fine of KYD500,000 or on conviction on indictment to an unlimited fine and to imprisonment for two years. In addition, regulation 57 of the AMLRs provides that an offence against the regulations may be committed by a body corporate itself or by individuals within the body corporate such as director, manager, or secretary.
29. Sec. 136 and 137 of the POCA provide criminal penalties for failures to disclose suspicious activities. Sec. 142 provides that both the individual and the body corporate may be prosecuted for offences under those provisions of the POCA.
30. Sub-criterion 15.9(b)(i) is partly addressed. VASPs are included in the definition of a “relevant financial business” under section 2 of the POCA; therefore VASPs (and in this context, originating VASPs) are subject to the requirements of the AMLRs, in particular, to conduct CDD when establishing a business relationship or carrying out a one-off transaction as set out in Regulation 11(1)(a) and (b). In addition, regulation 31 requires that this information be kept. Regulation 31(2) of the AMLRs requires that upon request information is made available without delay to competent authorities. There is no reference to the required beneficiary information and submission of the information to the beneficiary VASP or the financial institution (if any) immediately and securely⁸. The same provisions apply to VASPs acting as beneficiary institutions, which do not oblige them to obtain and hold originator information; hence, sub-criterion 15.9(b)(ii) is also partly addressed.
31. Sub-criterion 15.9(b)(iii) is partly addressed. Regulation 40(1) of the AMLR addresses criterion 16.8; regulation 44 addresses criterion 16.11 and regulation 40(2) addresses criterion 16.13. In addition, VASPs are similarly subject to section 12(1) of Schedule 4A of the TA, concerning taking freezing action and prohibiting transactions with designated persons and entities. Sections 13 and 14 of Schedule 4A of the TA prohibit all transactions with designated persons by prohibiting the making of funds, financial services, or any other related services available to a designated person or for the benefit of a designated person and sections 20 – 23 of Schedule 4A of the TA address the relevant information requirements. However, the requirement for the monitoring of the availability of information is not addressed⁹. Furthermore, the deficiency found in sub-criteria 15.9(b)(i) and (ii) affects the implementation of targeted financial sanctions by limiting the relevant entities’ ability to conduct screenings to determine whether they are conducting business involving any sanctioned person or entity.
32. Sub-criterion 15.9(b)(iv) is addressed. Existing financial institutions carrying out VAs services are required to notify CIMA under section 15 of the VASPs Act and are subject to section 22 of the same Act on the decision of CIMA to license, register or approve their activities related to VAs. Section 35

⁸ Regulation 8 of the Anti-Money Laundering (Amendment) (No. 2) Regulations, 2020 provides for a new Part XA which seeks to address these requirements in regulations 49C and 49E. Regulation 8, however, has not yet come into effect.

⁹ These requirements are found in regulation 49H (2), but regulation 8 of the Anti-Money Laundering (Amendment) (No. 2) Regulations, 2020 is not yet in effect.

makes it an offence to carry on or purport to carry on VA services liable to a penalty of KYD25,000 and imprisonment for one year.

33. Criterion 15.10 is addressed. VASPs are to implement monitoring obligations for Target Financial Sanctions (TFS) for terrorist and proliferation financing, according to regulation 5 of the AMLRs. In relation to criterion 6.5(d), CIMA has instituted an electronic email system to advise all regulated entities of TFS designations, which is a procedure that occurs without delay (please see the analysis of criteria 6.4 and 7.1 in Cayman Islands' 2019 MER) and cover VASPs. In addition, section 12 of Schedule 4A of the TA addresses prohibitions concerning designated persons and in particular freezing of funds and economic resources.
34. Cayman Islands complies with criteria 6.5(e) and 7.2(e) via section 20 of the TA which imposes reporting obligations related to TFS. Concerning PF, section 2B of the PFPFA requires persons to freeze funds of designated persons and section 2C requires reporting of "details of any frozen funds or economic resources or actions taken in compliance with prohibition requirements of the relevant Security Council measures, including attempted transactions." As a "relevant institution", VASPs are subject to these reporting obligations.
35. Per Section 4(ea) of the POCA, the FRA monitors compliance with TF/PF regulations. Pursuant to section 3 of the PFPFA, the FRA also has the responsibility for giving directions where actions are to be taken in respect of TFS relating to PF. In addition, under section 29 of the PFPFA, the FRA shall take appropriate measures to monitor persons operating in the financial sector to secure compliance with requirements of any directions given under the PFPFA. The FRA has issued a Policy regarding the receipt, processing, circulation, and publishing of Financial Sanctions Notices as well as issued a Financial Sanctions Guidance, and a compliance reporting form to be used by persons for reporting. Both the Policy and Guidance indicate that the FRA will send an automated email on TFS to all online subscribers, contacts for regulated entities that have been provided by their respective supervisor, designated contacts at local Act enforcement agencies, supervisory authorities to share with their supervised entities, self-regulated bodies, and to other government agencies. Sections 2D (1) and 2E(4) and (5) of the PFPFA make provisions for civil and criminal sanctions for failing to freeze and failing to report. As the Supervisory Authority, CIMA supervises VASPs' compliance with AMLRs and the requirements relative to the implementation of TFS. The above also addresses sub-criteria 6.6 (g), 7.2(d), 7.3, and 7.4(d).
36. The Cayman Islands has complied with implementing the requirements reflected in criteria 15.3, 15.4, 15.5, 15.6, 15.7, 15.8 and 15.10. A minor deficiency remains concerning sub-criterion 15.9(b)(iii) as the requirement for the monitoring of availability of VA transfers information is not in place; furthermore, the country still needs to address the requirements of sub-criteria 15.9(b)(i) and (ii) to require originating or beneficiary VASPs to obtain beneficiary information on VA transfers as Regulation 8 of the Anti-Money Laundering (Amendment) (No. 2) Regulations, 2020 that will cover such requirements has not yet come into effect. Given the low materiality of the VASP sector in comparison to the financial sector taken as a whole, the remaining deficiencies related to R.15 are considered minor. R.15 is re-rated as Largely Compliant.

3.2. Brief overview of progress on other Recommendations rated NC/PC

37. Cayman Islands has no other Recommendation rated as NC/PC.

4. CONCLUSION

38. Overall, Cayman Islands has addressed most of the requirements of the revised R.15 and, therefore, it is now rated as Largely Compliant with this Recommendation. In light of Cayman Islands' progress

since the adoption of its MER and 2nd Enhanced Follow-Up Report, its technical compliance with the FATF Recommendations has been re-rated as follows:

Table 2. Technical compliance with re-ratings, December 2021

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
LC	C	C	LC	C	LC	LC	LC	C	LC
R 11	R 12	R 13	R 14	R 15	R 16	R 17	R 18	R 19	R 20
C	C	C	LC	<i>LC</i>	LC	LC	C	C	C
R 21	R 22	R 23	R 24	R 25	R 26	R 27	R 28	R 29	R 30
C	C	C	LC	LC	C	C	C	LC	LC
R 31	R 32	R 33	R 34	R 35	R 36	R 37	R 38	R 39	R 40
LC	C	C	C	C	LC	C	LC	C	LC

39. Cayman Islands will remain in enhanced follow-up on the basis that it had a low or moderate level of effectiveness for 7 or more of the 11 effectiveness outcomes (CFATF Procedures, para. 83(a)). According to the enhanced follow-up process, Cayman Islands will continue to report back to the CFATF on progress to strengthen its implementation of AML/CFT measures.



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Anti-Money Laundering and Counter-Terrorist Financing Measures in Cayman Islands

3rd Enhanced Follow-up Report & Technical Compliance Re-Rating

This report analyses Cayman Islands' progress in addressing the technical compliance deficiencies identified in the CFATF assessment of their measures to combat money laundering and terrorist financing of March 2019.

The report also looks at whether Cayman Islands has implemented new measures to meet the requirements of FATF Recommendations that changed since 2019.

Follow-Up Report