

Anti-money laundering and Counterterrorist financing measures

Madagascar

12th Enhanced Follow Up Report and 5th Technical Compliance Re-Rating April 2025





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MADAGASCAR: 12th ENHANCED FOLLOW-UP REPORT & 5th REQUEST FOR TC RE-RATING

I. INTRODUCTION

- 1. The World Bank evaluated the Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing (AML/CFT/CPF) regime of the Republic of Madagascar under its Second Round of Mutual Evaluations in 2017, using the FATF 2013 evaluation methodology. The ESAAMLG Council of Ministers adopted the Mutual Evaluation Report (MER) in September 2018. According to the MER, the Republic of Madagascar was rated Compliant (C) on 4 Recommendations, Largely Compliant (LC) on 9 Recommendations, Partially Compliant (PC) on 15 Recommendations and Non-Compliant (NC) on 12 Recommendations. Out of the 11 Immediate Outcomes (IOs), the Republic of Madagascar was rated Moderate Level of Effectiveness on I.O. 6 and Low Level of Effectiveness on the others. Table 1 summarizes the outcomes of technical compliance in the MER of Madagascar.
- 2. This follow-up report assesses the progress made by Madagascar to address the technical compliance deficiencies identified in its MER. New Technical Compliance (TC) re-ratings are given where sufficient progress has been made. The report does not cover the progress made by the Republic of Madagascar in improving its effectiveness.
- 3. The following experts (assisted by Simon Ogwal Kajura, Chris Likomwa, Bhushan Jomadar, Estazia Wilson from the Secretariat) assessed Madagascar's request for TC re-ratings and prepared its follow-up report:
 - Mrs Abby Dinka (Ethiopia)
 - Mr. Wondwosen Abebe (Ethiopia)
 - Ms Tanvi Keerodhur (Mauritius)
 - Ms. Preeya Raghoonundun (Mauritius)
 - Mrs. Nomfanelo Kunene-Thobela (Eswatini)
 - Mr. Deng Philip Ton (South Sudan) and
 - Mr. Thomas Mongella (Tanzania).
- 4. Section III of this report summarises the progress made by Madagascar on technical compliance. Section IV sets out conclusions and contains a table of Recommendations for which a new rating has been given.

II. KEY FINDINGS OF THE MUTUAL EVALUATION REPORT

5. The MER¹ rated the Republic of Madagascar's technical compliance as set out in Table 1. In light of these results, Madagascar was placed in the enhanced follow-up process².

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

Table 1. Technical Compliance Ratings³ September 2018

6. Madagascar has made significant overall progress in resolving the technical compliance shortcomings identified in its MER and ratings for 8 Recommendations have been upgraded. Table 2 indicates the technical compliance re-ratings following the Task Force decision on April 2024.

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

Table 2: Technical compliance re-ratings as at September 2024.

³ There are four possible levels of technical compliance: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

¹ Mutual Evaluation Report of Madagascar- <u>https://www.esaamlg.org/reports/Madagascar%20MER.pdf</u>

² Enhanced follow-up is based on the traditional ESAAMLG policy for members with significant shortcomings (in technical compliance or effectiveness) in their AML/CFT/CPF systems and involves a more intense follow-up process.

III. OVERVIEW OF PROGRESS IN TECHNICAL COMPLIANCE

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

- 7. Since the adoption of the MER in September 2018, Madagascar has taken measures aimed at addressing the technical compliance deficiencies identified in the MER. This section of the report summarises progress made by Madagascar to improve its technical compliance by addressing the TC deficiencies identified in the MER.
- 8. ESAAMLG welcomes the steps that Madagascar has taken to improve its technical compliance deficiencies. Following this progress, Madagascar has been re-rated Largely Compliant with Recommendations 24 while the rating for Recommendation 28 is maintained at PC.

3.1.1 Recommendation 24 – Transparency and Beneficial Owners of Legal Entities (Originally rated PC- Re-rated to LC)

- 9. Recommendation 24 was rated non-compliant in the 2nd Round of MER in 2018. During the 2nd Round, not all companies under the Malagasy law were registered in the Trade and Companies Register (i.e. undeclared partnerships). Madagascar had also not conducted an assessment of the risks associated with different types of legal persons, in particular undeclared partnerships. The Trade and Companies Register did not include any information on beneficial owners, while companies were not required to keep a record of their basic and beneficial ownership information. The analysis below will demonstrate progress made by the Malagasy authorities to address the deficiencies identified in this Recommendation.
- 10. *Criterion* 24.1 (*Met*)- This Criterion was rated as Partly Met in the MER as Madagascar did not have a mechanism that identifies and describes the different types, forms and basic features of legal entities and the procedures for creating such legal persons. RNCS (National Register of Companies and Trading) makes available to the public a website "RNCS Mada" the information relating to (a) the different types, forms and basic features of legal persons in the country as provided under Law 2003_036: (i) Partnerships: limited partnerships (SCS), general partnership (SNC), joint venture, economic interest grouping (GIE), de facto partnership; (ii) corporations: limited liability company (SARL), public limited company (SA), limited partnership with shares (SCA)s https://www.rcsmada.mg/index.php?pgdown=statut&pgmenu=Informations

<u>%20G%C3%A9n%C3%A9rales</u>; and (b) the processes for the creation of legal persons are found at the following link and any person can access this information <u>https://www.rcsmada.mg/index.php?pgdown=guide.</u> Art 3 to 6 of the Commercial Code, provides for the processes for the creation of legal persons, requiring the applicant to disclose the name of the shareholders, directors, registered business place, etc prior to the registration of the company. Moreover, Art IV-29 of the Initial Finance Law, legal entities or their agents should declare to the Directorate General of Taxes using the form provided, information related to BO at the time of filing their taxes or within 30 days of incorporation and updating the same at the time of their annual statements or income or within 30 days. *Therefore, c24.1 is considered Met.*

- 11. *Criterion* 24.2 (*Not Met*)- This Criterion was rated as Not Met in the MER. Madagascar has not yet assessed the ML/TF risks associated with all types of legal persons created in the country. Although Madagascar indicated that they have carried out an NRA, the exercise did not cover ML/TF risk assessment of legal persons. *Therefore, the rating for c24.2 remains Not Met.*
- 12. Criterion 24.3 (Met)- This Criterion was rated as Mostly Met in the MER. The deficiency identified in the MER were that for some companies, the law allowed the partners of a corporation to decide that it would not be registered or the subject of any publicity measure for undeclared partnerships. Article 5-1 of Law no. 99-025 provides for the registration, amongst others, of commercial companies and economic interest groups having their headquarters in Madagascar; commercial companies which are subsidiaries or branches having headquarters outside of Madagascar and public industrial and commercial establishments. In addition, Law no. 2001-026 of 3 September 2004 on The Partnership Agreement and Civil Society requires civil societies to be registered. At the time of the assessment there used to be the National Trade and Companies Register which was kept by the registry of each court of instance and also a national register with the Ministry of Justice which containing the information in the local registers. With the amendment of the Commercial Code, all companies created in Madagascar are now registered in the National Trade and Companies Register (RNCS). Information relating the companies pursuant to Art 3 to 9 of the Commercial Code, all registered companies are required to provide information on their legal form, specific legal status, trade name, nature of the activity, the address of the registered office, proof of incorporation, basic regulating powers, and a list of directors. All this information is readily available to any member of the public by way of inspection of the Register, and if they desire, they can apply for copies of the records in the Register in hard copies which are provided upon payment of a fee as provided in the same law. The different types of companies that can

be registered in Madagascar are listed and that information can be accessed through the following link: <u>https://www.rcsmada.mg/index.php?pgdown=liste2</u>. *Therefore, c24.3 is considered Met.*

- 13. *Criterion* 24.4 (*Met*)- This Criterion was rated as Not Met in the MER Companies were not obliged to keep information such as the corporate name; proof of incorporation, legal form and status, address of their registered office, operating rules and list of members of the board of directors. Although Article 562 of the law no. 2003-036 refers to a register of nominal shares of a public limited company, however, there are no record keeping obligations. Art 3 to 9 of the Commercial Code requires companies to maintain a register of their members or shareholders and state the category of shares held by each member or shareholder and the amount. This information should be kept at the level of the company registered office address in Madagascar and should be made available for inspection which includes the name, proof of incorporation, form, status and address and place of business amongst others. *Therefore, c24.4 is considered Met.*
- 14. Criterion 24.5 (Met)- This Criterion was rated as Partly Met in the MER as there was no obligation on the register to respect deadlines for updates on a timely basis. Art 55 of the Decree No. 2008-440 requires any legal entity registered in Madagascar to file its constitutive documents indicating the name of the company, the registered head office address, their form, the article of associations on the same date they have been registered. Any conversion of a legal entity should be filed within eight days under Art 56 of the same Decree. Moreover, Art 57 of Decree No. 2008-440 any change of share capital should be filed within eight days with the RNCS. Lastly, any change of director, shareholder, articles of association, change in registered office address are to be filed within eight days of the change that has occurred under Art 58 of the Decree No. 2008-440. In addition, the minutes of the Board meetings are to be filed within two months of the date of the Board meetings. The RNCS upon receiving this information verifies the information provided prior to updating their records and with these requirements the RNCS information on legal persons created in Madagascar are accurate and updated on a timely basis. While for change in the transfer of the registered office address the company will have to notify the RNCS within 15 days of the change. *Therefore, c24.5 is considered Met.*
- 15. *Criteria* 24.6 (*Met*)- This Criterion was rated as Not Met in the MER as there was no mechanism to ensure that information on beneficial owners of a company is obtained by that company and available, or that beneficial owners

can be identified in a timely manner by the competent authorities. Madagascar uses the following mechanisms to ensure that BO information on the company is obtained and available at a specific location: (a)Under Art IV-28 of the Initial Finance Law legal entities are required to keep the register of BO, referred to as the special register, which should contain accurate and up-to-date information relating to the identity of the BO, the nature, terms and extent of the control exercised over the legal entity and the date the natural person ceased to be the BO of the legal entity; (b)Pursuant to Art IV-(a) Art 22 of the Initial Finance Law 2024 requires the central registrar of BO under the authority of the Directorate General of Taxes to collect, retain, manage, and have data quality control and the provision of information on the BO of legal entities. For the above purposes the legal entity shall carry reasonable due diligence to ensure that the information contained in the special register is accurate and up to date. Madagascar has adopted the requirements of criterion 24.6 (a) & (b). *Therefore, c24.6 is considered Met.*

- 16. *Criteria* 24.7 (*Met*)- This Criterion was rated as Not Met in the MER. Art IV-29 of the Initial Finance Law, legal entities or their agents, are required to declare to the Directorate General of Taxes using the form provided information related to BO at the time of filing their taxes or within 30 days of incorporation and updating the same at the time of their annual statements or income or within 30 days when the legal entity or the agent becomes aware that there has been a change of information on the BO. These mechanisms provided ensure that information captured on BO is as accurate and up-to-date as possible. *Therefore, c*24.7 *is considered Met.*
- 17. *Criteria* 24.8 (*Met*)- This Criterion was rated as Not Met in the MER. Under Art IV-29 of the Initial Finance Law, legal entities registered in Madagascar or their agents, are required to declare BO information to the Directorate General of Taxes using the form provided. This is done at the time of filing their taxes or within 30 days of incorporation and updating the same at the time of their annual statements or income or within 30 days of the legal entity or the agent becoming aware that there has been a change of BO. Based on the above, all basic information and BO information is available at the office of the Directorate General of Taxes for providing further assistance to the authorities. *Therefore, the rating for c24.8 is considered Met.*
- 18. *Criteria* 24.9 (*Met*)- This Criterion was rated as Not Met in the MER. Art IV.39 of the Finance Law 2024 requires all persons (directors and administrators, etc.,) involved in the legal entities to keep the register of directors and administrators and supporting documents for at least five years

after the date of the dissolution of the company. Furthermore, Article 17 of the AML/CFT law 2018 requires all reporting persons to maintain all necessary records on transactions, both domestic and international for at least 5 years after the closure of the accounts or termination of the business relationship. *Therefore, c24.9 is considered Met.*

- 19. *Criteria* 24.10 (*Met*)- This Criterion was rated as Met in the MER but has been reviewed on account of the new legal framework in Madagascar. Art 25 of the AML/CFT law gives powers to SAMIFIN, the competent supervisor and any other competent authorities for accessing any information held by reporting institutions and that information could be related to basic and BO information. *Therefore, the rating for c24.10 remains Met.*
- 20. *Criteria* 24.11 (*Not Met*)- This Criterion was rated as Not Met in the MER. Art 53 of the Commercial Code still allows for the use of bearer shares in Madagascar, the authorities informed that there are some measures that have been put in place for the cross-border transportation of these instrument and considering the risk and context of Madagascar the scope of use is limited. However, Madagascar has not informed of the mechanism(s) as laid out under criterion 24.11 to ensure that they are not misused for ML/TF purposes within the jurisdiction. *Therefore, the rating for c24.11 remains Not Met.*
- 21. *Criteria* 24.12 (*N*/*A*)- This Criterion was rated as Not Met in the MER. This criterion is N/A since the authorities informed that nominee directors/shareholders are not allowed in Madagascar. *Therefore, c24.12 is considered Not Applicable.*
- 22. Criteria 24.13 (Partly Met)- This Criterion was rated as Partly Met in the MER. Art 42 and 43 of the AML/CFT law 2028 provides for administrative sanctions related to breaches of obligations and is limited to ML only. Art IV. 40 of the Finance Law 2024 only provides for monetary sanctions found in the Tax Code at Article 20.01.52. Article 20.01.52 of the Tax Code provides for monetary penalties for failure to file mandatory documents/declaration with regards to the register of BO to the Director General of Taxes. The monetary penalties are applicable only to legal persons. Therefore, the rating for c24.13 remains Partly Met.
- 23. *Criteria* 24.14 (*Met*)- This Criterion was rated as Partly Met as there was No information relating to the implementation of international cooperation in relation to basic and BO information. Madagascar has the legal basis for rapidly providing the widest possible range of information through MLA or

other forms of international cooperation by facilitating access by foreign competent authorities to basic information and BO information held by the RNCS and the Directorate General of Taxes under Art 9 & 10 of the Law n° 2017-027 on international cooperation in criminal matters. The law 2017-017on international cooperation provides for the exchange of any information on criminal matters. *Therefore, c24.14 is considered Met.*

24. *Criteria* 24.15 (*Partly Met*)- This Criterion was rated as Partly Met as there was no information relating to the quality of assistance. Art 10 of the Law n° 2017-027 on international cooperation in criminal matters requires the transmission of the information spontaneously to an authority or a competent authority of a foreign state. Under the above provision, the competent authorities are required to provide the accurate information, while SAMIFIN pursuant to Art 24 of the AML/CFT law 2018 is required to share information on judicial mutual assistance or any other international request for cooperation, there is no information on the monitoring of the quality of assistance for MLA under the Ministry of Justice. *Therefore, c24.15 is considered Partly Met.*

Weighting and conclusion

25. Madagascar has addressed the deficiencies identified in criterion 24.1, 24.3, 24.4, 24.5, 24.6, 24.7, 24.8, 24.9, 24.10 & 24.14, and partly addressed criterion 24.13 and 24.15 while criterion 24.12 is not applicable. There are some deficiencies since Madagascar is yet to assess the ML/TF risks associated with all types of legal persons created in the country, in addition bearer shares are still allowed in Madagascar with no mechanism(s) to ensure that they are not misused for ML/TF purposes (t the risk and context of Madagascar and there is no monitoring of the quality of assistance for MLA under the Ministry of Justice The Reviewers are of the view that the deficiencies are minor and *recommend that Recommendation 24 should be re-rated from PC to LC*.

3.1.2 Recommendation 28 – Regulation and Control of Designated Non-Financial Businesses and Professions (Rated PC- maintained at PC

26. Under its Second Round MER, the Republic of Madagascar was assessed on the requirements of Rec 28. Madagascar has made some amendments to its legal and institutional framework to address the deficiencies identified in the MER. The analysis will show whether the amendments that have been made to AML/CFT Law are consistent with the requirements of R.28.

- 27. Criteria 28.1 (Met)- This Criterion was rated as Partly Met in the MER. The main deficiency identified was that surveillance did not extend to compliance by gaming institutions with their AML / CFT obligations. (a) Art 21 of the AML/CFT law 2018 requires that an applicant for operating a casino or gaming activities apply to the Ministry of Finance, in collaboration with the Ministry of Interior, and obtain a permit/licence to open and operate a casino or gaming activities; (b) Art 31 of the AML/CFT law 2018 provides that supervisory authorities and control authorities for financial institutions and DNFBPS should take the necessary measures to prevent criminals or their associates from acceding approved professional status or to attain significant holdings or monitoring role, to become actual beneficial owners of such holdings or to occupy positions of responsibility in the entity.; (c) Supervision of casino or gaming activities is carried out by a unit with the National Police under the Ministry of Interior which also covers AML/CFT matters. SAMIFIN has issued a specific Directive for casinos and gambling houses in accordance with the provisions of the AML/CFT law 2018. Therefore, the rating for c28.1 is considered Met.
- 28. Criteria 28.2 (Met)- This Criterion was rated Not Met in the MER. (a)The Ministry of Finance and the Ministry of Interior monitor compliance with AML/CFT requirements for casino; (b)Real estate agents have been designated as DNFBPs and are supervised for AML/CFT requirements by SAMIFIN; (c) DPMS are now considered as reporting institutions consequent to the amendment brought to the AML/CFT Act in 2024 and SAMIFIN has now been designated as the competent authority responsible for monitoring compliance of the sector for AML/CFT requirements; (d) The National Chamber of Notaries ensures that entities providing relevant legal services in line with the activities under the FATF standards are required to comply with AML/CFT requirements and the Order of Accountant and Financial Professions (OECFM) has established a Guidance (AML/CFT manual) for their professionals; (e) TCSPs have only been designated as DNFBPs as from 1 Feb 2024 further to the amendment in Art 2 of the AML/CFT law 2018. In the recent amendment to the Act and pursuant to Art 31 of the amendment to the AML/CFT law enacted in Feb 2024, SAMIFIN has now been designated as the competent authority responsible for monitoring compliance of the above sectors for AML/CFT requirements. *Therefore, c28.2 is considered Met.*
- 29. *Criteria* 28.3 (*Met*)- This Criterion was rated as Partly Met given that it was not explicit that the disciplinary power of the Board of the Order extends to the lawyers in respect of their obligations under the AML law. All DNFBPS are designated as reporting entities under the AML/CFT Act as amended.

Casinos, Legal professionals and accountants are required to be monitored and supervised for AML/CFT supervision by their licensing authority (Art 12 of the AML/CFT act 2018). Pursuant to Art 31 of the amendment to the AML/CFT law brought in effect in Feb 2024, SAMIFIN has now been designated as the competent authority responsible for monitoring compliance for AML/CFT requirements for the real estate sector, DPMS and TCSPs. *Therefore, the rating for c28.3 is Met.*

- 30. *Criteria 28.4 (a)(Met)-* This Criterion was rated as Partly Met in the MER. (a) Casinos, legal professionals and accountants are being supervised by their relevant supervisor and SRBs respectively while SAMIFIN has now been designated as the supervisor for real estate agents and TCSPS. In addition, Art 31 of the AML/CFT law empowers the supervisory authorities or SRBs to take: (i)any necessary measures to identify the BO in order to prevent criminals from holding or having control of those entities; (ii) issue directive for implementation of reporting obligations; (iii) impose effective, proportionate and dissuasive administrative sanctions; and (iv) refer non-compliance to criminal courts, if necessary. *Therefore, the rating for c28.4 (a) is considered Met.*
- 31. *Criteria* 28.4 (b)(Met)- The sub-criterion was rated as Partly Met in the MER. Casinos are being monitored for compliance with AML/CFT requirements by the Ministry of Finance and since Casinos are designated as reporting entities they are required to submit information on directors, shareholders and beneficial owners. Real estate agents, DPMS and TCSPs are designated as DNFBPs and are now regulated and supervised pursuant to the amendment to the AML/CFT Law brought in February 2024. The National Chamber of Notaries is a SRB and ensures that entities providing notarial services comply with AML/CFT requirements which includes provision for disclosure and monitoring of shareholders, directors and beneficial owners. The Order of Accountant and Financial Profession is a SRB and has established an AML/CFT guidance for the profession which provides for AML/CFT requirements with regards to disclosure and monitoring of shareholders, directors and beneficial owners. In addition, the AML/CFT law 2018, Art 31 provides that supervisory authorities and control authorities for financial institutions and DNFBPS should take the necessary measures to prevent criminals or their associates from acceding approved professional status or to attain significant holdings or monitoring role, to become actual beneficial owners of such holdings or to occupy positions of responsibility in the entity. Therefore, the rating for c28.4 (b) is considered Met.

- 32. *Criteria 28.4 (c)(Met)-* This Criterion was rated as Partly Met in the MER. Article 31 of the AML/CFT Law 2018 authorises DNFBP supervisors to impose sanctions for failure to comply with AML/CFT/PF requirements. The amendment brought in Feb 2024 to the AML/CFT law 2018 now empowers SAMIFIN to supervise the remaining DNFBPS and impose sanctions for non-compliance. Moreover, the provisions under Art 42 to Art 51 provides for a range of proportionate and dissuasive sanctions, whether criminal, civil and/or administrative for natural and legal persons. *Therefore, the rating for c28.4(c) is considered Met.*
- 33. *Criteria 28.5 (Partly Met)-* This Criterion was rated as Not Met in the MER. The Reviewers take note that the Order of Accountant and Financial Professions (OECFM), Notaries Chamber, Lawyer Order, in collaboration with SAMIFIN are establishing their roadmap in implementation of Risk Based Supervision on AML/CFT. The amendment of the AML/CFT law 2018 in February 2024 now provides for an addition to Art 31, as part of their supervisory mission towards DNFBPS, the regulatory and supervisory authorities shall adopt the risk-based approach to supervision and issue measures, the implementation modalities of which shall be laid down by regulation. In view of the fact that the prescribed Regulations have not yet been enacted, risk- based AML/CFT supervision is not yet established in the DNFBP sectors. *Therefore, the rating for c28.5 is considered Partly Met.*

Weighting and conclusion

34. Madagascar has addressed the identified deficiencies in criterion 28.1, 28.2, 28.3 &28.4 and partly addressed the deficiencies in criterion 28.5. The Reviewers are of the view that the deficiencies are moderate and *recommend that the ratings of Recommendation 28 be maintained at PC*.

3.1.3 CONCLUSION

- 35. Madagascar has made progress in addressing some of the technical compliance deficiencies identified in its MER. Reviewers considered information provided and are in support of the request for re-rating for Recommendation 24 from previously PC to LC, but maintaining the rating of Recommendation 28 at PC.
- 36. Considering the overall progress made by Madagascar since the adoption of its MER, its technical compliance with the FATF Recommendations has been revised as shown in Table 4.1 below.

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

Table 4.1: Technical Compliance Re-rating, March/April 2025