



## SIERRA LEONE KIMBERLEY PROCESS REPORT

2022

SUBMITTED BY: MOHAMED BAH

**KP FOCAL POINT - SIERRA LEONE** 

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#### **EXECUTIVE SUMMARY**

The Kimberley Process Annual Report is a requirement in the KP Administrative Document (AD), which requires all its members to prepare and forward to the Chair of the Working Group on Monitoring, information on an annual basis on the way in which they are implementing the requirements of the KPCS.

The Ministry of Mines and Mineral Resources formulates the Policies, whilst the National Minerals Agency (NMA) carries out the implementation of these policies. The NMA is the official export and import authority of diamonds for Sierra Leone. The Directorate of Precious Minerals Trading a directorate within the NMA is responsible for implementing the requirements set out in the Kimberly Process Certification Scheme and are also responsible for all matters relating to precious minerals trading in Sierra Leone.

In 2022, the total diamond exported for both industrial and artisanal mines was 688,970 carats. This figure is 22% less than the 2021 exports (841,831.7 carats). No diamonds were imported into Sierra Leone during the reporting period. A total of 92 Kimberley Process Certificates (KPC) were issued in 2022 to facilitate the exports and is 9 certificates less than those issued in 2021. Sierra Leone traded with nine of its KP trading partners: Switzerland, the EU (represented by 2 countries) and Israel, being the three largest trading partners, imported circa 47.76%, 29.61%, and 19.36% of total exports respectively

A new diamond export procedure has been adopted at the Directorate of Precious Minerals Trading and is fully operational. There is also a new Standard Operating Procedure for the export of diamonds being implemented at the Lungi International Airport. The DPMT is constantly reviewing its internal controls to ensure that they are streamlined and effective.

The Kimberley Process Certification Scheme (KPCS) conducted its fourth Peer Review Visit to Sierra Leone from 17 – 21 October 2022 in line with the Kimberley Process Certification Scheme's provisions. The final report has been submitted to the Chair of Working Group on Monitoring.

Sierra Leone subscribed to several international and regional initiatives with implications on diamond mining and trade.

#### 1. INSTITUTIONAL FRAMEWORK

#### 1.1. CONSTANT

The Ministry of Mines and Mineral Resources (MMMR) is the political authority and policy framers for the National Minerals Agency (NMA) that is responsible for the implementation of the Kimberley Process Certification Scheme. The Ministry has the overall mandate to make policies in the mining sector. Therefore, the Minister, Deputy Minister and Permanent Secretary of the Ministry of Mines are all signatories to the KP Certificate. This is to ensure that all diamonds leaving the shores of Sierra Leone are endorsed by the Political and Administrative authorities in the Ministry of Mines and Mineral Resources.

The NMA has the responsibility to implement policies adopted by the Ministry including the KPCS. The Directorate of Precious Minerals (DPMT) within the National Minerals Agency (NMA) is the custodian of the KP Certificates and is responsible for the valuation of diamonds. NMA is the designated exporting and importing authority of the Republic of Sierra Leone.

The DPMT processes the issuance of the KP Certificate and later forwards them to the Office of the Director General (ODG) of NMA for validation and onward transmission to the Ministry of Mines and Mineral Resources for final approval. The ODG cross-checks and verifies what the PMT has done before the KP certificate is submitted to the Minister for final signature. Added to the cross-checking and verification exercise mandate the ODG has, there is now a Mining Cadastral and Administrative System (MCAS) that instantly updates diamond valuation figures, taxes and royalties owed to the Government of Sierra Leone.

The NMA houses the MCAS which centralizes all the information on the diamond mining and trading companies, the general public has access to non-confidential information by signing in on the Online Repository Portal. This is geared towards enhancing transparency in the mining sector.

Staff at the PMT can now utilize the valuation module in the MCAS to input valuation figures, revenue generated, consignee address, KP number, etc. Bar codes are generated to help provide details of a typical shipment. Custom Officers and NMA staff at the Freetown International Airport can scan these bar codes and verify shipment documents

NMA has Regional Offices that aid in the administration of various mining rights. Mining rights which include: - Artisanal Mining Licenses, Small-scale Mining Licenses and Large-scale Mining License; Diamond Buying Agents License, Financial Supporter License for Artisanal and Small-scale Miners; Exporter License issued to exporters of artisanal diamond exports. The Regional Offices of NMA have the responsibility to also verify production and maintain statistics on trading of diamonds by all licensees.

The Compliance Officers (previously referred to as Mines Monitoring officers) that fall within the Directorate of Mines (DoM) are instrumental in supervising the process that leads to the issuance of the Kimberley Certificate. They are present at all levels of the diamond chain of custody, starting at the mining sites throughout the valuation process, as well as at the designated point of exit (Lungi International Airport).

The NMA Officers at the Lungi International Airport verify rough diamond export documentation before the dispatch of rough diamond consignments through the airport, which is the only designated exit point for all rough diamond exports from Sierra Leone.

The Bank of Sierra Leone, under request from NMA, keeps the bulk KP Certificate stock in its vaults, which are also used for safe keeping of other valuables belonging to the Government of Sierra Leone.

The National Revenue Authority (NRA) the umbrella body for Customs Department is also another institution that is involved in the implementation of the Kimberley Process Certification Scheme. The assigned Custom Officer to PMT is

one of the signatories to the KP Certificate. The Customs Officer is charged with the responsibility to observe the valuation process and report export duty collection information to the NRA.

There is now a Standard Operating Procedure (SOP) for the export of diamonds through the Lungi International Airport. Customs Officers and Airport Authorities at Lungi International Airport verify the export documentation. The process is reflective of the exports notification procedure done at the PMTD HQ. NMA Compliance Officers stationed at the Airport. Diamonds are informed of shipments coming to the airport for export through the MCAS. Various other sectors within the Airport KP family are then notified by the Compliance Officers of the NMA. Shipments then go through Westminster Sierra Leone Security, then Customs and finally they are handed back to the exporter right before the flight's departure.

The physical address and contact details of the Responsible Authority are as follows: -

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#### 1.2. VARIABLE

Few changes to 2021 annual report as shown below: -

- i. A review of the export procedure stipulated that the KP Certificate is no longer forwarded to the Directorate of Mines (DoM) for vetting but rather it goes directly to the Office of the Director General. The reason for that is that, there is now a valuation module in the MCAS that instantly updates the Mines Directorate or any other Directorate within the NMA, on diamond valuation figures, taxes and royalties. Hence, there is full transparency and accountability in the system.
- ii. There is now a Standard Operating Procedure (SOP) for the export of diamonds through the Lungi International Airport. Customs Officers and Airport Authorities at Lungi International Airport verify the export documentation same way so for the NMA Compliance Officers at the Airport.
- iii. Former Permanent Secretary at the Ministry of Mines and Mineral Resources has been sent on early leave and Mr. Kenei Lamin is the New Permanent Secretary and a signatory to the KP certificates

#### 2. LEGISLATIVE FRAMEWORK

The Diamond sector falls within the ambit of various mining related legislation in Sierra Leone that include; Constitution of Sierra Leone 1991, Mines and Minerals Act 2009 (MMA 2009), National Minerals Agency Act 2012, Diamond Cutting and Polishing Act, 2007, Extractive Industries Revenue Act 2018, Mines and Minerals Regulations 2009, the Environmental and Social Regulations for the Minerals Sector 2012, Mines and Minerals Operational Regulations 2012, Anti-Money Laundering and Combating of Financing of Terrorism (Amendment) Act, Cooperatives Act (Chapter 253), National Revenue Authority Act, Companies Act, Income Tax Act 2000 (And amendments), Customs Tariff Act, 1978 (And Amendments), Environment Protection Act2008, Finance Acts, Local Content Agency Act 2016, Public Financial Management Act 2016 and the Goods and Services Tax Act, 2009 among others.

#### 2.1. CONSTANT

However, many of these laws do not have specific reference to diamond mining or trade or reference to the Kimberley Process except the NMA Act 2012 (Section 14, sub-section (3c)) which made mention of it in defining the responsibilities of the Director of Precious Minerals Trading and the Diamond Cutting and Polishing Act 2007.

The Precious Minerals Trading Bill 2012 is yet to be enacted, this would repeal the Diamond Cutting and Polishing Act 2007. This bill speaks in detail about the Kimberley Process Certification Scheme.

#### 2.1.1. Export and import of rough diamonds, Issuance of Certificates and Penalties

Sierra Leone passed into law the Diamond Cutting and Polishing Act in 2007. This Act provides for the control of diamond cutting and polishing, the licensing of diamond cutters and polishers and defines the rights and duties of a licensee. The Act prohibits and makes it a punishable offence for any person to cut, polish, crush or set diamonds in tools, implements for business purposes or trade in Sierra Leone without a licence.

The Act also makes reference to the Kimberley Process Certification Scheme. Licence holders have a right to import diamonds for cutting and polishing operations authorized by his licence only in accordance with the Kimberley Process Certification Scheme.

The Act gives the right to export diamonds that cannot be cut and polished in Sierra Leone for resale in accordance with the Kimberley ProcessCertification Scheme.

#### 2.1.2. Internal Controls

Sierra Leone relies on several policies that govern the mining sector including the Core Minerals Policy (2018), Artisanal Mining Policy (2018), and the Policy on the Trade of Precious Minerals 2013.

For diamonds, the key policy framework that is considered as part of the country's Internal Controls are the Policy Measures Relating to Small-scale and Artisanal Mining and Marketing of Precious, Industrial and Sand-Based Minerals (2013) (Policy on the Trade of Precious Minerals 2013).

#### 2.1.3. International and Regional Initiatives

Sierra Leone subscribes to international and regional initiatives with implications on diamond mining and trade including the Mano River Union Statute (under which the Mano River Union Regional Approach falls), the Extractive Industries Transparency Initiative (EITI), African Mining Vision, UN Guiding Principles for Business and Human Rights, IFC Performance Standards, Natural Resource Charter and Economic Community of West African States (ECOWAS) Mining Directives.

These initiatives are important for proper governance of the mining sector in line with international best practices for transparency and accountability, respect of human rights, community participation and benefits, environmental protection, use of mineral resources for economic development and linkages and efforts to eliminate smuggling and illicit trade of diamonds.

All these laws and initiates clearly showed the country's desire to ensure that diamonds and other minerals are mined, traded and exported in compliance with global best practices to prevent conflict diamonds finding their way into legitimate diamonds trade and to maximizes gains from its mineral resource endowments.

#### 2.2. VARIABLE

No changes of legislation. We are hoping that the New Mines and Minerals Development Bill 2022 and the Precious Minerals Trading Bill 2022, be enacted before the end of 2023.

#### 3. IMPORT AND EXPORT REGIME

#### 3.1. OUTGOING SHIPMENTS

The National Minerals Agency (NMA) is the responsible organization for the issuance of KP Certificates in Sierra Leone. The NMA is a wholly owned Government entity and is the official export authority of diamonds for the country.

According to the Revised Export Procedure of 2022 for Diamonds. The exporter must give Directorate of Precious Minerals Trading 48hrs notice to prepare for valuation and export documentation.

#### 3.2. INCOMING SHIPMENTS

Sierra Leone does not import diamonds in 2022. However, if imports do occur, the procedure is they are foremost checked by Customs officials from the National Revenue Authority who assess all supporting documentation attached to the bill of entry to ensure that details correspond with those of the shipment. Checks include verifying the number of packages, quantity of the goods, importer's name, the value and the commodity code on the KPC. The authenticity of the KP Certificate are also carried out in conjunction with the Compliance Officers stationed at Lungi International Airport.

#### 4. SYSTEM OF INTERNAL CONTROLS AND INDUSTRY SELF-REGULATION

Internal control is one of the most important benchmarks in the KP guidelines. This is the traceability process from Mine to Export. In countries like ours with widespread artisanal mining, it is often very difficult to reconcile production figures against export figures.

Internal control starts with the issuance of licenses at all levels from miners to dealers and to exporters. Each of these players is provided with receipts and record books to register winnings at every level in the supply chain. Some of the players in the chain deliberately refuse to report their winnings for fear of financial harassment. This is one challenge in getting accurate figures at the production level. Another challenge is that; Some Compliance Officers are often compromised because of poor conditions of service. In such a situation, it is difficult to get accurate production figures from the artisanal mining sector. Unlike the artisanal mines, the industrial sector records are well structured and it is easier to reconcile production figures with export figures.

However, it could safely be said that there is a system in place to capture all diamonds mined within Sierra Leone, that is, one must be a licensed holder (Miner, Dealer, Exporter) supplied with records and receipts books to store information. Compliance Officers are employed to inspect, verify and collect information from the record and receipt books provided. This is to ensure that diamonds exported with KP Certificates are fully compliant.

At the export level, the valuation of diamonds is done in the presence of the exporter and Mines Compliance Officer. The Directorate of Precious Minerals have streamlined and reduced the time for processing and valuation of diamond shipment. This is in response to the recommendations of the 2016 KP Review Visit.

Furthermore, the Directorate of Precious Minerals Trading in collaboration with the Financial Intelligence Unit (FIU) and the Bank of Sierra Leone (BSL), audits the source of funds for each and every exporter whether they are in conformity with national banking regulations. The reason for the demand for the bank statement is to comply with the Anti-Money Laundering Policy Regulation

There is a verification process that is done by the Compliance Officers at the Directorate of Precious Minerals Trading. The Compliance Officers examine and verify the chain of custody documentation for all exports. These include the source of the diamonds, the quantity (carats), the value (US\$), and determine stock. However, challenges encountered during data collection at the field level does affect real time traceability.

# 5. IMPLEMENTATION OF RECOMMENDATIONS OF KIMBERLEY PROCESS REVIEW VISITS AND/OR REVIEW MISSIONS

The Kimberley Process Certification Scheme (KPCS) conducted its fourth Peer Review Visit to Sierra Leone from 17 – 21 October 2022 in line with the Kimberley Process Certification Scheme's provisions.

The KP Review Visit (KPRV) Team met with all three pillars of the KPCS in Sierra Leone; i.e. Government Officials, Diamond Industry Stakeholders, and Civil Society Organizations.

The diamond value chain was followed from the licence stage to mining operations and up to the export point (Lungi International Airport). Interviews and physical evidence of procedural documents were collected during the Review Visit Process.

The Review Visit Team noted Sierra Leone's commitment to implementing the minimum requirements set out by the KPCS and also collaborating through the Mano River Union with its neighboring countries. The final report was submitted to the Chair of Working Group on Monitoring.

As a guideline during the course of the review process, the KPRV Team used the following: -

- KPCS Core Document
- Technical Guidelines (TGs) 1 to 15
- KP Implementation and Peer Review Checklist of 2012
- 2019 AD on Peer Review Mechanism
- Interviews
- Visits to sites
- Codified National Legislation
- Past Review Visit Report to Sierra Leone of 2016

The table below shows a summary of the recommendations from the Kimberley Review Visit Team and the progress made to date: -

Table 1: Recommendations from The KP Review Visit and Actions taken

ISSUES	FINDINGS	RECOMMENDATION FROM THE KPRV TEAM	PROGRESS MADE-TO-DATE
1. Legal Framework	Use of SOPs	PMTD uses Standard Operating Procedures (SOPs) as the guiding principle. To further strengthen the continued implementation of KPCS minimum requirements, the procedures be codified into law	Sierra Leone is considering the review of the Precious Mineral trading Bill 2012.
Import and     Export     Procedure	Sales Invoice	Invoices from Exporters should bear the following statement, as recommended by the KP AD for exporters sourcing from ASM: "The diamonds herein invoiced have been purchased from a legitimate source not involved in funding conflict and in compliance with United Nations Resolution. The seller hereby guarantees that these diamonds are conflict free, based on personal knowledge/or written guarantee, provided by the supplier of these diamonds".	Appointment Letters from Exporters now have a statement clearly indicating that the diamonds exported are conflict-free.
	Transfer of shipments to Lungi	Sierra Leone is encouraged to explore options to facilitate a secured transfer of shipments from the Bank of Sierra Leone's vault in Freetown, where the shipments are kept safe, to Lungi International Airport. This is to strengthen the chain of custody and reduce the chances of tampering	Sierra Leone is considering two approaches:  1. To procure the services of a security and logistic company to transport shipments to the airport  2. To undertake diamond valuation exercise at the Lungi International Airport.
	Signatory of KP Certificates	It is recommended to put in place a system that allows a shorter processing time, for example by authorizing a representative of the Minister to sign in his or her stead at the PTM offices.	The NMA is in talks with the Ministry of Mines and Mineral Resources to implement this recommendation.
	Importing Authority copies	The Sierra Leone KP Authority was encouraged to follow-up on Importing Authority confirmations as a best practice.	The DPMT has sent emails to Importing Authorities for confirmation of shipment documentation.
<ol><li>Internal Control</li></ol>	Inclusion of illicitly mined diamonds	The NMA Compliance Officers should not encourage dealers to facilitate the inclusion of illicitly mined diamonds into the official supply chain	Capacity building for Compliance Officers on going
	Remuneration of Compliance Officers	The issues of low remuneration and job insecurity due to short-term contracts for the NMA staff, including Compliance Officers, remain a challenge and may impact monitoring and enforcement activities in remote areas, in particular during the rainy season.	No progress on this

Porous Borders	The borders of Sierra Leone are porous, with only 25% of the official 821 crossing points being manned. To dissuade smugglers, the crossing points should be reinforced.	There is a Financial Crime Working Group that is made up: NMA, Office of National Security, FIU, Police, Military, Customs Department, etc. to carry out Threat Assessments at Border Crossing Points. The report will inform NMA of the way forward.
Artisanal Mining Licence Fees	Sierra Leone should consider lowering the fees for an artisanal mining license to increase accessibility and reduce illicit mining activities, as many citizens presently lack the financial resources to apply for a mining license. In the same vein, Artisanal Mining Cooperatives should be encouraged.	No progress on this
Sponsorship licence application	NMA need to have a Sponsorship licence application with detailed information for the applicants as the current physical copy only requests for the sponsor name, address and signature. Detailed information is however uploaded on the MCAS system. A Sponsorship licence application will reduce the risk of money laundering activities.	No progress on this

#### 6. BEST PRACTICE

The KPRV team noted best practices in Sierra Leone and these include: -

- KP Tripatite arrangement in Sierra Leone The GoSL, Diamond Producers and CSO have a functional and established working relationship, which is in line with the requirements of the KP Tripartite arrangement. SPONSORED BY GIZ, DPMT IS THE CHAIR
- ii. The Mano River Union (MRU) Regional Approach The MRU Regional Approach to the Kimberley Process (KP) initiative has been a good program involving four countries (Sierra Leone, Guinea, Liberia and Ivory Coast) which share borders and a common diamond resource. This program has increased transparency and cooperation between the countries. Training of ASM diamond miners by the MRU and initiatives working with CSO make the initiative exemplary
- iii. The Gemfair Project (Program of De Beers Groups) The project is aimed at transparency and a robust chain of custody in the mining to sale of ASM diamonds. A mobile application by Gemfair enables the diamond miners to upload information on diamonds mined as part of measures to ensure the diamonds are traceable to the source. The project enables the ASM miners to sell their diamonds through the formal channels for exports, and to receive competitive prices based on the global market price.
- iv. The Diamond Area Community Development Fund (DACDF) The DACDF channels fund to communities with the requirement for the community to submit project proposals before the release of funds, to ensure the funds are used properly.
- v. Fraudulent KP Certificates The NMA has managed to flag incidences of fraudulent KP Certificates which has reduced the incidences of fake certificates. This is commendable work as the Government moves towards eliminating fake certificates completely

### 7. STATISTICS

Table 2: Tarde Statistics with Trading Partners showing carats and value (US\$)

COUNTRY	TRADE WITH	TRADE TYPE	DATE	HS CODE	CARATS (CT)	VALUE (US\$)
	Switzerland	Export	Q1, 2022	7102.31	88446.13	23311351.79
	Switzerland	Export	Q1, 2022	7102.21	39386.82	371715.40
	Belgium	Export	Q1, 2022	7102.31	21963.32	10182353.25
	Belgium	Export	Q1, 2022	7102.21	29031.40	1057811.27
	Israel	Export	Q1, 2022	7102.31	2925.35	1800110.14
	United Arab Emirates	Export	Q1, 2022	7102.31	1317.75	983922.17
	United Arab Emirates	Export	Q1, 2022	7102.21	1445.74	29183.08
	United States of America	Export	Q1, 2022	7102.31	164.81	380814.16
	Armenia	Export	Q1, 2022	7102.31	47.93	49500.10
	Armenia	Export	Q1, 2022	7102.21	49.99	499.90
	Switzerland	Export	Q2, 2022	7102.31	95417.95	26781987.40
	Switzerland	Export	Q2, 2022	7102.21	42793.52	508278.87
	European Union	Export	Q2, 2022	7102.31	21078.91	11161792.47
Sierra Leone	European Union	Export	Q2, 2022	7102.21	20347.44	915437.27
	Israel	Export	Q2, 2022	7102.31	379.36	862837.39
	Israel	Export	Q2, 2022	7102.21	13.62	4086.00
	United Arab Emirates	Export	Q2, 2022	7102.31	2087.23	604147.40
	United Arab Emirates	Export	Q2, 2022	7102.21	136.63	2155.35
	United States of America	Export	Q2, 2022	7102.31	86.22	185199.41
	United States of America	Export	Q2, 2022	7102.21	29.24	877.20
	South Africa	Export	Q2, 2022	7102.31	49.36	53988.50
	Armenia	Export	Q2, 2022	7102.31	25.91	41293.03
	Japan	Export	Q2, 2022	7102.31	90.03	29653.58
	Japan	Export	Q2, 2022	7102.21	49.94	1354.90
	United Kingdom	Export	Q2, 2022	7102.31	9.50	23750.00
	Israel	Export	Q3, 2022	7102.31	109047.32	28545290.83
	Israel	Export	Q3, 2022	7102.21	59054.92	437413.99

United States of America	Export	Q4, 2022 Q4, 2022	7102.31	13.65	36137.43
Israel	Export	Q4, 2022	7102.21	77.62	2794.32
Israel	Export	Q4, 2022	7102.31	546.12	678873.36
United Kingdom	Export	Q4, 2022	7102.21	1610.01	151253.31
United Kingdom	Export	Q4, 2022	7102.31	1239.41	930675.17
European Union	Export	Q4, 2022	7102.21	12567.83	497994.05
European Union	Export	Q4, 2022	7102.31	13233.23	4982808.51
Switzerland	Export	Q4, 2022	7102.21	30859.60	237253.92
Switzerland	Export	Q4, 2022	7102.31	75841.59	21776814.00
United States of America	Export	Q3, 2022	7102.31	192.62	120671.30
United Kingdom	Export	Q3, 2022	7102.31	111.63	220489.60
United Arab Emirates	Export	Q3, 2022	7102.21	49.20	738.00
United Arab Emirates	Export	Q3, 2022	7102.31	369.67	766358.94
European Union	Export	Q3, 2022	7102.21	7520.10	375537.10
European Union	Export	Q3, 2022	7102.31	9261.58	3802006.59

Table 3: Exports by Mine Source for H1 and H2 of 2022

COUNTRY	PRODUCTION TYPE	DATE	CARATS (CT)	VALUE (US\$)	
LSM ASM	LSM	Jan - Jun, 2022	269718.74	51704115.98	
	ASM	Jan - Jun, 2022	97655.36	27639984.05	
Sierra Leone	ASM	Jul - Dec, 2022	41796.35	12152365.66	
	LSM	Jul - Dec, 2022	279799.75	51410744.76	
		GRAND TOTALS	688,970.20	142,907,210.45	

Table 4: Certificate count by Trading Partners

COUNTRY	TRADING PARTNER	TYPE	DATE	COUNT
	Switzerland	Export	Q1, 2022	4
	Belgium	Export	Q1, 2022	13
	Israel	Export	Q1, 2022	1
	United Arab Emirates	Export	Q1, 2022	5
	United States of America	Export	Q1, 2022	5
	Armenia	Export	Q1, 2022	1
	Switzerland	Export	Q2, 2022	2
	European Union	Export	Q2, 2022	13
	Israel	Export	Q2, 2022	3
	United Arab Emirates	Export	Q2, 2022	6
	United States of America	Export	Q2, 2022	4
	South Africa	Export	Q2, 2022	1
Sierra Leone	Armenia	Export	Q2, 2022	1
Sierra Leone	Japan	Export	Q2, 2022	1
	United Kingdom	Export	Q2, 2022	1
	United Arab Emirates	Import	Q2, 2022	1
	Israel	Export	Q3, 2022	2
	European Union	Export	Q3, 2022	4
	United Arab Emirates	Export	Q3, 2022	5
	United Kingdom	Export	Q3, 2022	1
	United States of America	Export	Q3, 2022	3
	Switzerland	Export	Q4, 2022	3
	European Union	Export	Q4, 2022	7
	United Kingdom	Export	Q4, 2022	2
	Israel	Export	Q4, 2022	2
	United States of America	Export	Q4, 2022	1
		GRAND TOTALS		92