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28 August 2020

SOM200235.E

Somalia: Identity documents, including national ID cards, passports and driver's licences, and the requirements and procedures to obtain them; percentage of the population that holds some form of identity document; whether such documents are accepted elsewhere (2018-July 2020)

Research Directorate, Immigration and Refugee Board of Canada

1. Overview

According to a presentation given [in June 2019 (ID4Africa n.d.)] by Hassan Omar Mahadallah, a senior advisor of the Somali National Identity Program and member of the Somali Constitution Review Commission, Somalia is an "ID Dark Zone," a region that has no formal "legal, secure, reliable, inclusive, and verifiable identification system" (Mahadallah [2019], 7). The Reciprocity Schedule for Somalia by the US Department of State indicates that there is "no recognized competent civil authority to issue civil documents" (US n.d.). A country of origin information report on South and Central Somalia by the Netherlands'

Ministry of Foreign Affairs states that identity documents play "little or no role" in South and Central Somalia and that Somali citizens do not require identity documents for domestic travel (Netherlands Mar. 2019, 28).

2. Issuing Authorities

According to a 2019 World Bank project grant and appraisal report, which includes a project to develop a new Somali entity to administer a digital ID system, ID registries in Somalia are "disconnected" and lead to Somalis relying on a "patchwork of non-interoperable systems and documents," which are limited to specific municipalities, states or benefit programs run by international organizations (World Bank 22 Feb. 2019, 9, 18).

In correspondence with the Research Directorate, the UNHCR's office in Mogadishu provided the following information on issuing authorities:

	Document	Population	Issuing Authority
Somaliland	National ID card	All citizens	Somaliland Ministry of Interior
	Identity document	Refugees and asylum-seekers	National Displacement and Refugee Agency (NDRA) and UNHCR
	Visas and resident ID	Other foreigners	Immigration authorities
	Work permit	Workers	Somaliland Ministry of Labour and Social Affairs
	Passport	All citizens	
Banadir [Banaadir, Benadir, Benaadir]	ID card	All citizens	Banadir Regional Administration [(BRA)]
	Passport	All citizens	Immigration Office [Immigration and Naturalization Directorate (IND)]
Puntland	Puntland ID card	Host community and internally displaced persons (IDPs) in towns such as Bossaso, Garowe, Galkayo and Gardo	

	Document	Population	Issuing Authority
	Refugee and asylum-seeker certificate, respectively	Refugees and asylum-seekers	Puntland, Ministry of Interior Federal Affairs Department and UNHCR

(UN 1 June 2020)

3. ID Cards

The Dutch report, citing a Somali government official, states that the Somali National Identity Program is being developed (Netherlands Mar. 2019, 28). Sources describe the program as a "foundational identification system based on biometric data" (Xinhua News Agency 4 July 2018; Radio Dalsan 3 July 2018). According to the presentation by Mahadallah, the program aims to create "only foundational numbers and ID card[s]," which will serve as the "breeding documents for all functional documents," such as driver's licenses, passports, and voter's registration cards, among others, and will carry no biographical information such as age, gender, place of birth or religion (Mahadallah [2019], 5). The World Bank project grant and appraisal report indicates that as of January 2019, the technical components of the systems were "not yet operational" and work on registration, including drafting a legal and regulatory framework, establishing a dedicated authority to manage the program and developing implementation strategies, "will begin" (World Bank 22 Feb. 2019, 77-78).

3.1 National Identity Card [Passport ID Card] and Passport Issued by the IND, Including Requirements and Procedure

Sources indicate that a national identity card is issued to those applying for a Somali passport (Somali Public Agenda 23 Apr. 2020; Netherlands Mar. 2019, 30). The Dutch report indicates that the national identity card is issued at the same time as the passport and that there is no separate application requirement or procedure; applicants indicate on their passport application forms whether they wish to receive the passport only, a national identity card only or both documents (Netherlands Mar. 2019, 30). The same source states that the card does not "yet" function as a national ID card (Netherlands Mar. 2019, 30). A feasibility report on a national identification system for Somalia by the World Bank et al. indicates that while the card states that it can act as proof of citizenship, there is no legislation or "wide acceptance" of the card to act as such (World Bank, et al. 2016, 64).

The Dutch report states, citing a confidential report from February 2018, that the Somali passport currently in circulation was first issued in 2014, and that the application and issuance procedure has been in place since 1 January 2014 (Netherlands Mar. 2019, 29, 30). The UNHCR office in Mogadishu indicated that the Somali government began to issue the biometric passport in December 2013 (UN 1 June 2020). The Dutch report further states, citing a confidential source, that all passports have been printed at the issuing centre in Mogadishu since 1 January 2014; however, the same source reports, citing another confidential source, that "no new passports were issued in the last two to three months of 2018," explaining that this was not the first such interruption, as the "production of Somali passports is outsourced to an external party outside Somalia, which stops production if there is a payment delay" (Netherlands Mar. 2019, 29, 30).

The Dutch report provides the following information on the procedure to apply for a passport:

- Applicants must appear in person;
- Applicants must submit a birth certificate and a judicial document extract, which is issued by the Criminal Investigation Department (CID), a department of the Somali police which has access to criminal records;
- Residents of Banadir must also submit a regional ID Card [see section 3.2 of this Response];
- The mother's name is required on the application form, as there is little diversity in male names;
- Applicants must complete a personal identification form. IND staff checks the form and accompanying documents, and enters the information into the passport database; and
- Applicants pay a fee of US\$98.50 for a passport for an adult or US\$55 for a passport for a minor ("under the age of 15") and US\$8 for the national identity card (Netherlands Mar. 2019, 29, 30).

The UNHCR office in Mogadishu indicated that a clearance letter from the district office and a letter of good conduct from CID is required to obtain a passport and that a passport costs approximately US\$150 (UN 1 June 2020).

In correspondence with the Research Directorate, the Executive Director of Somali Public Agenda, a non-profit research organization which aims to "advance understanding and improvement of public administration and public services in Somalia" (Somali Public Agenda n.d.), indicated that the passport and national identity card will be issued approximately one week after completing the application process (Somali Public Agenda 23 Apr. 2020). Corroborating information could not be found among the sources consulted by the Research

Directorate within the time constraints of this Response. For additional information about the Somali passport, including its appearance, see Response to Information Request SOM105248 of March 2016.

3.2 Banadir ID Card, Including Requirements and Procedure

Sources indicate that authorities in Mogadishu [1] started issuing a National ID card in 2014 and then stopped (Somali Public Agenda 23 Apr. 2020; UN, et al. Apr. 2016, 42). A 2016 report on internal displacement profiling in Mogadishu conducted by the Internally Displaced Person (IDP) Working Group of the Somalia Protection Cluster, which includes Somali authorities, local and international NGOs and UN partners, states that authorities affirmed that the process to issue the ID card "would resume in 2016" (UN, et al. Apr. 2016, 42). The World Bank et al. reports that authorities in Mogadishu introduced "various ID card initiatives" but "changes in administration resulted in reinventing the wheel" (World Bank, et al. 2016, 63).

According to the Dutch report, the local authorities in Banadir started a registrar service in 2015 (Netherlands Mar. 2019, 31). The World Bank et al. indicates that the Mogadishu municipality of the Banadir region introduced a new identity card system in 2016, used to determine identity and to obtain a passport, a bank account or a SIM card; the municipal government is "trying" to make the identity card mandatory (World Bank, et al. 2016, 63). The same source describes the ID as a plastic card with an embedded chip, but that the chip has no function (World Bank, et al. 2016, 63). The World Bank et al. further indicates that the "citizen number" on the card is the serial number of the card and that the card has no unique ID number (World Bank, et al. 2016, 63). Corroborating information could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

The World Bank et al. indicates that breeder documents, including a birth certificate and a certificate of identity confirmation or police report, are required to obtain the ID card (World Bank, et al. 2016, 63). The same source states that the ID card costs US\$17, in addition to the costs for the breeder documents (US\$18 for a birth certification and US\$24 for a certificate of identity confirmation or police report) (World Bank, et al. 2016, 63). In contrast, the Dutch report indicates that the Banadir ID card is required to obtain a birth certificate, which in turn is required by the IND for passport applications (Netherlands Mar. 2019, 30-31).

3.3 Somaliland National ID, Including Requirements and Procedure

The UNHCR office in Mogadishu stated that every Somaliland citizen has the right to obtain a national ID (UN 1 June 2020). Article 2 of Somaliland's Voter's Registration (Amendments and Additions) Law, Law No. 37/2007 (2014), translated and annotated by Somalilandlaw.com, a "not-for-profit, independent website" aiming to "disseminate information about the Constitution and laws" of Somaliland, edited by Ibrahim Hashi Jama, a lawyer (Somalilandlaw.com n.d.), defines an identity card as a "card confirming citizenship" [2] (Somalilandlaw.com 3 Mar. 2016, 6). The Somaliland Diaspora Agency (SLDA), an "autonomous public body" established by presidential decree (Somaliland n.d.a), indicates that the national ID is the "first requirement" for obtaining business licenses, applying for the Somaliland passport and starting "other projects" (Somaliland n.d.b).

The Somaliland Citizenship Law provides the following:

Article 2: Citizenship by birth

1. A Somaliland citizen by birth is anyone whose father is a descendent of persons who resided in the territory of Somaliland on 26 June 1960 and before.
2. A Somaliland citizen by birth may acquire the citizenship of another country (dual nationality) without losing his Somaliland citizenship.
3. Unless he has not voluntarily renounced the right to Somaliland citizenship, any adult progeny of a male Somaliland citizen, who resides in a foreign country or is a citizen of another country or is a refugee in another country may acquire Somaliland citizenship on his first return to the territory of Somaliland.

...

Article 4: Conferment of citizenship on a person who is an alien or a refugee

1. Any alien or refugee who is lawfully resident in the territory of Somaliland and who applies for Somaliland citizenship may be granted such citizenship when he fulfils the following conditions:
 - a. He must be an adult.
 - b. He must have resided lawfully in the territory of Somaliland for an unbroken period of no less than 10 years.
 - c. He must be known for his good character and behaviour.
 - d. He must not have been subject of a sentence for an offence proven in a court, and must not have

participated in activities which were contrary to the sovereignty of Somaliland.

- e. He must have been taxpayer during his period of residence in the territory of Somaliland.
 - f. He must submit a declaration in which he is renouncing his previous citizenship, and must, at the same time, make the oath set out in Article 6 of this Law.
2. Any person whose mother is a Somaliland citizen and has been proved to have no father may be granted citizenship if he applies for it and fulfils the conditions set out in this Law at paragraph 1 of this Article.

Article 5: Procedure for conferment of citizenship

1. The conferment of citizenship as set out in Article 4 shall be undertaken by the President who shall issue it in a decree after he has considered the advice of the National Citizenship Committee. The Committee shall consist of 12 members of the Council of Ministers and the Minister of Internal Affairs shall act as its Chairm [*sic*]
2. The members of the (National) Citizenship Committee shall be citizens who are known for their honesty and who are representative of the wider society of Somaliland. (Somaliland 2002, bold in original)

The UNHCR office in Mogadishu indicated that as of May 2020, the National Citizenship Committee had not been established (UN 1 June 2020).

The Voter's Registration (Amendments and Additions) Law, translated and annotated by Somalilandlaw.com, reads as follows:

Article 17: Verification of the citizen

The verification of the citizen(*ship*) shall be conducted as follows:

1. Any person wishing to be registered (*as a citizen*) shall have his identity verified by a Sultan [3], an Akil [4], a member (*of one*) of the two House of Parliament or of the Districts Councils, a village Head, a person engaged in business in the district, (*or*) a village prayer leader, and (*then*) approved by a Court Representative after he has administered an oath to the relevant above mentioned verifier.
2. When the citizenship of the person registering himself is confirmed, the officer at the centre shall enter the particulars of the citizen in the official Registration Form, which shall entitle the citizen to be issued with an Identity Card.

Article 18: Citizenship registration process

The beginning of the process of the registration of citizens shall be based on (*the*

steps set out in) the following provisions which must be finalised:

1. When the Identity Card registration is being conducted, the person's (*entitlement to*) Somaliland citizenship must be verified.
2. When the citizenship of the person to be registered is verified, his particulars shall be entered in the official form.
3. Any person whose citizenship has been verified shall be issued, in the same place, with an Identity Card.
4. Any person who is unsuccessful in having (*one of*) the persons referred to in clause 1 of Article 17 verify his citizenship shall be informed to bring with him a well-known person owning immovable (*real*) property in the district/country, who can verify that the person is a Somaliland citizen and can pledge his property as surety

...

Article 21: Citizenship registration form

The registration form shall serve as the basis of the citizen Identity Card registration, and shall have recorded on it, as a minimum, the following particulars of the citizen:

1. The name of the citizen in four [5].
2. The name of the mother in three.
3. The year and place of birth.
4. Male or female (*gender*).
5. Marital Status.
6. The signature of the citizen or an indication that he is unable to sign.
7. The unique number of the citizenship registration.

Article 22: Particulars recorded on the Identity Card

The Citizenship Identity Card shall have recorded on it the following particulars:

1. The name in four.
2. The date of birth.
3. The photograph of the citizen.
4. The number of the Identity Card (ID Card).
5. The place of birth[.]
6. Gender (Male or female).
7. It shall contain –
 - a. the information of the eye scan of the citizen, (*and*)

- b. the information of the finger-prints of the citizen.
(Somalilandlaw.com 3 Mar. 2016, bold and italics in original)

The SLDA, an "autonomous public body" established by presidential decree (Somaliland n.d.a), provides the following procedure for a Somaliland citizen residing overseas to obtain a National ID:

- Complete [a]pplication [f]orm ([a]vailable at the Diaspora Agency [o]ffice);
- A copy of your foreign passport;
- Short interview ([a]nswering few basic questions) for proving of your citizenship (Only if you are not recognized by the Diaspora Agency [t]eam);
- Get stamped Confirmation Letter;
- Go to the Civil Registration Department of Hargeisa Municipality;
- Get your National Identity Card from the Civil Registration Department of the Ministry of Interior;
- The whole process may take you ... 1-2 days. (Somaliland n.d.b)

3.4 Puntland State ID

According to the World Bank et al., the purpose of the Puntland state ID is to distinguish residents from non-residents of Puntland; it is provided by the Ministry of Interior and is issued from regional centres in Garowe, Bosaso, Qardho and Burtinle (World Bank, et al. 2016, 63). An article by MinnPost, a Minnesota-based non-profit online publication providing news about Minnesota (MinnPost n.d.), indicates that in 2007, a medical laboratory technician in Minneapolis co-founded PII Tech, LCC, a "public-private partnership-based company," and secured a contract from the Puntland government to issue driver's licenses and state IDs (MinnPost 2 July 2019). The same source states that residents are "generally" not required to obtain identification cards in Puntland, and people "usually" bring a relative or friend well-known in the community when necessary; however, since ID cards are required for transferring money and for some jobs with the government and international organizations, there has been an increased demand for residents to obtain IDs (MinnPost 2 July 2019). Corroborating information could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

The World Bank et al. indicates that the card contains biometric information, including fingerprints and iris scans, as well as photo and signature; however, the card "does not meet international standards on security" (World

Bank, et al. 2016, 64). The same report states that the card costs US\$16, making it "unaffordable for a majority of people in Puntland" (World Bank, et al. 2016, 63-64).

According to the UNHCR office in Mogadishu, applicants are required to submit a birth certificate (UN 1 June 2020). The World Bank, et al. provides the following issuance procedure:

Registration is conducted at the municipal level, and the data is then sent onward to the state government for processing, storage, and management in the state databases. The cardholder is verified by the Local Authority, which has a verification process used to identify each person applying for the Puntland ID Card. The Local Authority sends a "Proof Form" to the verified person, and then he/she comes to apply for the Puntland ID Card. During this process, double verification is carried out, and it is the responsibility of the registration clerks to ensure that the data collected from the applicant matches the data on the card and is entered into the system. After issuance of the card, a clerk crosschecks the data on the card with the data in the form. (World Bank, et al. 2016, 63-64)

4. Driver's Licenses

4.1 Mogadishu

The UNHCR office in Mogadishu indicated that applicants can apply for the driver's license in person at the "'Fisha traffic'" office of the Ministry of Public Transport in Mogadishu and by providing personal information including "their full name, their mother's name, and the date and place of birth" (UN 1 June 2020). The Somali Public Agenda Executive Director stated that a criminal record clearance from CID and an eyesight and body exam from the Mogadishu Health Department is required to apply for a driver's license, followed by two-day mandatory training "for about two days," and an oral and practical test (Somali Public Agenda 23 Apr. 2020). The same source indicated that the driver's license will be issued a week after passing the practical test, and further noted that the driver's license expires in three years, but is renewable (Somali Public Agenda 23 Apr. 2020).

4.2 Somaliland

The SLDA indicates that the Ministry of Transport and Roads Development is responsible for issuing driver's licenses in Somaliland (Somaliland n.d.c). The Road Traffic Act (L/r56/2013) [Traffic Law No56/2013], as presented by the Ministry of Transport and Roads Development, provides the following:

- Article 57 "states that no person may drive without a driver's license document";
- Article 63 states that the "[r]enewal of a [d]riving [l]icense shall be valid for a period of five (5) years, from the date of issue"; and
- Article 58 indicates that applicants must complete "[p]hysical and [m]ental [r]equirements for the [a]cceptance of a [n]ational [l]icense" (Somaliland 30 Mar. 2020).

The same law, as summarized by the SLDA, provides that the applicant must be 18 years old and the driver "must have [a] valid license, and [v]ehicle [r]egistration [b]ook, and must be [a] taxpayer having the respective six-month road tax sticker attached on the front mirror" (Somaliland n.d.c). According to a 30 March 2020 press release issued by the Ministry of Transport and Roads Development, drivers cannot drive with an expired license (Somaliland 30 Mar. 2020).

The SLDA provides the following procedure to obtain a driver's license:

- Complete application form (Available at the Transport Department Office);
- Two passport photos;
- Sight test and blood group testimony;
- Passing driving test;
- Pay license fees of SL [Somaliland] Shillings ... 520,000 [6] and SL Shillings 580,000 for light vehicles and heavy trucks respectively, plus other fees for relevant services;
- The driving license valid for one year will be issued for you by the Ministry of Roads Development;
- Annual renewal fees for driving licenses of light vehicles and heavy trucks are SL Shillings 130,000 and 140,000 respectively;
- The whole process may take 2-3 days. (Somaliland n.d.c)

The UNHCR office in Mogadishu, citing a Somalilander lawyer with a refugee client who met with the Director of the Somaliland Ministry of Transportation and Development of Roads in 2020, stated that refugees and asylum seekers can obtain a driver's license by presenting their documents, including the "relevant UNHCR certificates [and] a security clearance from the immigration authorities" (UN 1 June 2020).

4.3 Puntland

MinnPost indicates that drivers in Puntland are required to carry licenses (MinnPost 2 July 2019). The UNHCR office in Mogadishu stated that the Puntland Ministry of Public Works and Transport started issuing driver's licenses in 2012 (UN 1 June 2020). The same source indicates that applicants must be at least 18 years old and must undergo training and complete a test (UN 1 June 2020). Further and corroborating information could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

5. Prevalence of Identity Documents

According to the 2018 World Bank's Global Identification for Development (ID4D) Dataset [7], 77 percent of the Somali population or 11,739,625 individuals out of a total population of 15,181,925 were without identification (World Bank Apr. 2018). Corroborating information could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

Sources indicate that the cost of the Somali passport is beyond the means of "[m]ost Somalis" (Australia 13 June 2017, para. 5.21) or "a vast majority of Somali citizens" (World Bank, et al. 2016, 23). The Dutch report indicates that 350,000 passports have been printed at the Mogadishu issuing centre since 1 January 2014 (Netherlands Mar. 2019, 30).

6. Recognition of Somali Identity Documents

According to the *Country Reports on Terrorism 2018* by the US Bureau of Counterterrorism, Somali identity documents are not recognized by "[m]ost" countries (US 1 Nov. 2019, 43). Australia's Department of Foreign Affairs and Trade (DFAT) indicates that the "majority of countries" do not recognize the Somali passport (Australia 13 June 2017, para. 5.21).

Norway's Immigration Appeal Boards (Utlendingsnemnda, UNE) indicates that as of 1 August 2018, Norwegian authorities recognized some Somali passports as travel documents, including Somali passports issued after 1 January 2014 at Somali embassies or in the Banadir region (Norway 17 Mar. 2020). The same source states that the UNE "do[es] not place importance" on other Somali IDs (Norway 17 Mar. 2020). Media sources report that as of April 2019, Belgium recognized Somalia's diplomatic and service passports [issued respectively to

diplomats and their dependents for official travel and government employees for work-related travel (Hiiraan Online 1 Apr. 2019)] (Hiiraan Online 1 Apr. 2019; Xinhua News Agency 24 Apr. 2019). A 2015 survey of EU countries compiled by the EU's European Migration Network (EMN), a "network of migration and asylum experts" that "gathers objective, policy-relevant, comparable and up-to-date information and knowledge on emerging issues relating to asylum and migration in Europe" (EU n.d.), indicates that out of the fifteen countries [8] which responded, Latvia reported that it accepts the Somali passport as a valid travel document (EU 23 Mar. 2015). Further and corroborating information on acceptance of the Somali passport, including conditions, could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

The UNHCR office in Mogadishu stated that the Somaliland passport is not recognized as an international travel document (UN 1 June 2020). The Institute for Security Studies (ISS), an African non-profit organization which provides "timely and credible analysis, practical training and technical assistance to governments and civil society" (ISS n.d.), states that "only a handful" of countries accept the Somaliland passport and that sometimes Somaliland residents travel to Garowe, the capital of Puntland, to obtain the Somali passport in order to travel abroad (ISS Nov. 2019, 15, 28). The UNHCR office in Mogadishu noted that the "majority" of Somaliland citizens also have the Somali passport (UN 1 June 2020).

Media sources indicate that the following countries accept the Somaliland passport:

- United Arab Emirates (UAE), Ethiopia and Djibouti (*The Taiwan Times* 6 July 2020; Somaliland Sun 5 Apr. 2018; SomTribune 23 Feb. 2016);
- Kenya (*The Taiwan Times* 6 July 2020; SomTribune 23 Feb. 2016; Horn Diplomat 20 Apr. 2018);
- South Africa, South Sudan, Belgium, and France (SomTribune 23 Feb. 2016; Horn Diplomat 20 Apr. 2018).

Media sources, citing a press release from the Somaliland Mission to the UK and the Commonwealth, indicate that Somaliland citizens with residency rights in the UK can enter the UK with a valid UK biometric residence permit or card and their Somaliland passport (Horn Diplomat 4 Sept. 2018; SomTribune 1 Sept. 2018). Further information on acceptance of the Somaliland passport, including conditions, could not be found among the sources consulted by the Research Directorate within the time constraints of this Response.

A 2019 user guide on the Graduated Driver Licensing (GDL) Exemption Program [9] by the Government of Alberta indicates that the Special Investigation Unit (SIU), which "authenticates and approves all driving licenses and documents for GDL exemption" through "a broad range of techniques and advanced forensic applications," determined that the "[n]ewer card-style" driver's license from Somalia, Somaliland and Puntland have "sufficient" security features to be accepted by the SIU (Alberta Apr. 2020).

This Response was prepared after researching publicly accessible information currently available to the Research Directorate within time constraints. This Response is not, and does not purport to be, conclusive as to the merit of any particular claim for refugee protection. Please find below the list of sources consulted in researching this Information Request.

Notes

[1] The Benadir Regional Administration (BRA) indicates that it is popularly referred to as the Mogadishu municipality (Benadir n.d.).

[2] Somalilandlaw.com indicates that the term used in the definition in Article 2 is *Kaadhka Aqoonsiga* or a "[c]ard which enables one to be recognised" as a citizen of Somaliland (Somalilandlaw.com 3 Mar. 2016, 6). However, the term "National ID" appears in English in the original Somali version of the Voter's Registration Law in Article 12, which provides that "[t]he citizen Identity Card (*National ID*) or the Voting Card shall be made of material which does not wear out or disintegrate easily and which cannot be amended or forged (hard material)," and in Article 24(1), which provides that "[t]he Ministry shall: 1. verify the citizenship of the person to be issued with an Identity Card (National ID) ... " (Somalilandlaw.com 3 Mar. 2016, 11, 16, italics in original).

[3] Somalilandlaw.com indicates that a Sultan is a traditional leader (Somalilandlaw.com 3 Mar. 2016, 14).

[4] Somalilandlaw.com states that an Akil is a traditional leader registered and accredited by the Ministry of Internal Affairs (Somalilandlaw.com 3 Mar. 2016, 14).

[5] Somalilandlaw.com describes that the "patronymic naming system" of Somaliland does not use surnames, rather individuals have a first name, followed by the first names of their father, grandfather and great grandfather (Somalilandlaw.com 3 Mar. 2016, 15). The same source states that "[i]n practice only

the first two or three (or occasionally, four) names are used. The fourth is added sometimes, for official purposes, to distinguish persons who may have the same first three names" (Somaliland.com 3 Mar. 2016, 15).

[6] *Newsweek*, an American news magazine and website, indicates that the Somaliland Shilling (SQS), the national currency of Somaliland, is not recognized by the international community (*Newsweek* 9 Mar. 2017). A September 2017 article by the BBC states that US\$1 equals 9,000 SQS (BBC 12 Sept. 2017). A January 2020 article by East African Business Week (EABW), a Uganda-based online business publication (EABW n.d.), reports an exchange rate of US\$1 for 8,000 SQS (EABW 15 Jan. 2020)

[7] The 2018 World Bank's Global Identification for Development (ID4D) Dataset is an initiative which compiles data from 198 "economies" to estimate the number of individuals without legal identity documents, using a combination of information from national ID agencies and other publicly available information, such as birth registration and voter registration rates (World Bank Apr. 2018).

[8] Survey responses were received from Austria, Belgium, Czech Republic, Estonia, Finland, France, Germany, Latvia, Lithuania, Luxembourg, Netherlands, Slovak Republic, Slovenia, Sweden and Norway (EU 23 Mar. 2015).

[9] The Graduated Driver Licensing (GDL) exemption program takes into consideration the previous driving experience of new Albertans and allows them to qualify for a road test sooner (Alberta Apr. 2020).

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