Discrimination against Women

Fifty-second session
9-27 July 2012

Concluding observations of the Committee on the Elimination of Discrimination against Women

Jamaica

1. The Committee considered the combined sixth and seventh periodic report of Jamaica (CEDAW/C/JAM/6-7) at its 1047th and 1048th meetings on 13 July 2012 (see CEDAW/C/SR.1047 and 1048). The Committee’s list of issues and questions is contained in CEDAW/C/JAM/Q/6-7 and the responses of the Government of Jamaica thereto are contained in CEDAW/C/JAM/Q/6-7/Add.1.

A. Introduction

2. The Committee appreciates the State party’s submission of its combined sixth and seventh periodic report, which followed the Committee’s guidelines for the preparation of reports and which took into account the Committee’s previous concluding comments, but lacked sufficient data disaggregated by sex. The Committee expresses its appreciation for the written replies to the list of issues and questions raised by its pre-session working group and for the introductory statement and further clarification provided in response to the questions posed orally by the Committee.

3. The Committee also expresses its appreciation for the constructive dialogue with the high-level delegation from Jamaica which updated developments on the status of the implementation of the Convention on the Elimination of All Forms of Discrimination against Women (the Convention) in the State party since the consideration of its report in 2006.

B. Positive aspects

4. The Committee notes with appreciation that the December 2011 elections in Jamaica resulted in the appointment of a woman Prime Minister, H.E. Portia Simpson Miller, as well as four women cabinet ministers. The Committee also notes with appreciation the improved number of women Senators in Parliament (25 per cent) as well as the high number of women heads of missions in the Jamaica Foreign Service (10 out of 19).

5. The Committee welcomes the adoption of legislative measures aimed at eliminating discrimination against women, including:
   (a) The Charter of Fundamental Rights and Freedoms (Constitutional Amendment Act) (2011) which provides a right to non-discrimination in a number of areas;
   (b) The Sexual Offences Act (2011), Child Pornography Prevention Act (2010), Cybercrimes Act (2010) and Trafficking in Persons (Prevention, Suppression and Punishment) Act (2007), which aim to promote gender equality and eliminate violence against women and girls; and
   (c) The National Minimum Wage (Amendment) Order (2011), which is intended to improve the financial status of women in Jamaica.

6. The Committee welcomes the State party’s accession to the following international human rights treaties since 2006:
   (b) International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, in 2008; and


8. The Committee notes with appreciation that the State party has achieved universal access to education at the primary and lower secondary levels and welcomes the high literacy rate of girls and high rate of entry by them to universities.

C. Principal areas of concern and recommendations

9. The Committee recalls the obligation of the State party to systematically and continuously implement all the provisions of the Convention. The Committee views the concerns and recommendations identified in the present concluding observations as requiring the priority attention of the State party between now and the submission of the next periodic report. Consequently, the Committee urges the State party to focus on those areas in its implementation activities and to report on actions taken and results achieved in its next periodic report. The Committee calls upon the State party to disseminate the present concluding observations to all relevant ministries, to the Parliament, as well as to
the judiciary, so as to ensure their full implementation.

Parliament

10. While reaffirming that the Government has the primary responsibility and is particularly accountable for the full implementation of the obligations of the State party under the Convention, the Committee stresses that the Convention is binding on all branches of the State apparatus. It invites the State party to encourage its Parliament, in line with its procedures, where appropriate, to take the necessary steps with regard to the implementation of the present concluding observations between now and the State party’s next reporting process under the Convention.

Definition of discrimination against women

11. The Committee welcomes the recent adoption of the Charter of Fundamental Rights and Freedoms (Constitutional Amendment Act) (2011), which provides protection for a broader range of human rights and fundamental freedoms and lifts the restrictions from the previous Constitution regarding the scope of the right to non-discrimination. However, the Committee is concerned that while the amendment prohibits discrimination on the grounds of “being male or female”, the list of grounds included is restrictive so that women who face discrimination on grounds not listed are not protected, thus limiting the scope of protection for some women. The Committee is also concerned that there is no legal definition of discrimination against women in the Constitution or other legislation, in accordance with article 1 of the Convention. The Committee is concerned that the definition of discrimination does not encompass both direct and indirect discrimination and does not cover discrimination by both public and private actors, in accordance with articles 1 and 2 of the Convention.

Legal complaint mechanisms

12. The Committee urges the State party to enact comprehensive national legislation to ensure the principle of equality between women and men with specific provisions prohibiting discrimination against women, in line with the definition contained in article 1 of the Convention, and a definition of discrimination that encompasses both direct and indirect discrimination, and discrimination in all areas of life, including the public and private spheres, for all women, in accordance with article 2 (e) of the Convention, and the Committee’s general recommendation No. 28.

National machinery for the advancement of women

13. While noting that the State party has an Office of the Public Defender, which has certain investigative powers relating to constitutional rights, the Committee is concerned about the absence of a complaints mechanism for women to report cases of discrimination and the lack of an independent national human rights institution in the State party.

14. The Committee recommends that the State party:

(a) Establish a complaints mechanism and ensure that women have easy and affordable access to that mechanism to report discrimination and violations of their rights;

(b) Ensure that women have effective access to justice, including through the provision of legal aid, where relevant, in all parts of the country;

(c) Consider establishing an independent national human rights institution in accordance with the principles relating to the status of national institutions for the promotion and protection of human rights (Paris Principles) or another specialized body, such as an ombudsperson’s office specialized in women’s issues, with authority to consider and issue opinions and make recommendations on complaints submitted by women alleging violations of their human rights.

Temporary special measures

15. While noting that gender mainstreaming has been advanced through the approval of the national policy for gender equality in 2011 and that gender focal points have been designated in key Government ministries, the Committee is concerned about the ambitious mandates and the limited financial and human resources allocated to the Bureau of Women’s Affairs, the national machinery for the advancement of women in Jamaica.

16. Recalling its general recommendation No. 6 (1988) on effective national machinery and dissemination, and the guidance provided in the Beijing Platform for Action on the necessary conditions for the effective functioning of national mechanisms, the Committee recommends that the State party strengthen the capacity of the Bureau of Women’s Affairs, including by providing adequate human, technical and financial resources and establishing clear and well-defined responsibilities, to coordinate and oversee the preparation and implementation of legislation, policies and programmes in the field of gender equality.
temporary special measures and is opting for the gradual recognition of equal opportunities through the elimination of stereotypes over time.

18. The Committee urges the State party to:

(a) Take steps to achieve substantive equality between women and men, including the adoption of quotas and temporary special measures, in the public and private sectors, in accordance with article 4, paragraph 1, of the Convention and the Committee’s general recommendation No. 25 (2004);

(b) Strengthen measures to address cultural barriers that prevent women from entering decision-making and management positions, to remove discriminatory practices and promote proportionate representation of women in principal positions;

(c) Encourage political parties to nominate higher numbers of women as candidates and create an enabling environment for the political participation of women by, inter alia, educating potential young women leaders and strengthening women’s wings in political parties.

Stereotypes and discriminatory practices

19. The Committee is deeply concerned about the persistence of stereotypes and the adverse cultural norms and traditional practices concerning the roles and identities of women and men in the family and in society, which undermine women’s social status and hamper their equal participation in all avenues of life. It also notes with concern that such negative beliefs and harmful practices have been justified by the State party as being cultural despite their adverse effect on the full realization of women’s human rights, particularly as regards issues of non-discrimination and violence against women.

20. The Committee calls on the State party to adopt a comprehensive strategy and to take sustained measures to address and eliminate the negative stereotypes and adverse traditional beliefs and practices that discriminate against women, in accordance with articles 2 (f) and 5 (a) of the Convention. Such measures should include awareness-raising and public educational campaigns on the subject, targeting both men and women, political and community leaders, and Government officials and practitioners, including through the media and the use of curriculums, which continue to perpetuate negative gender stereotypes in schools.

Violence against women

21. The Committee is concerned that although the Domestic Violence (Amendment) Act, 2004 creates a regime of protection orders and occupation orders to protect women from domestic violence and widens the range of persons who can seek relief under the legislation, the incidence of domestic violence remains high. The Committee is also concerned that the Sexual Offences Act, 2009 protects against marital rape only in certain circumstances and that rape within a marriage is not always criminalized. The Committee is concerned about the high prevalence of sexual harassment in the workplace and in society at large and the absence of legislation in this regard. The Committee is further concerned that:

(a) Gender-based violence is reportedly widespread and cases are underreported due to the prevalence of social and cultural norms;

(b) There is insufficient awareness and training among judges, prosecutors, police officers and health professionals on violence against women;

(c) Despite the 2008 reproductive health survey on intimate partner violence, there is limited data available on violence against women and no systematic process to collect such data; and

(d) A number of factors continue to deter women from reporting and pursuing sexual offences cases, including victims’ and witnesses’ fear of reprisals or retaliation and delays in the judicial process.

22. Recalling its general recommendation No. 19 (1992) on violence against women, the Committee urges the State party to:

(a) Ensure the strict enforcement of the Domestic Violence Act, the Sexual Offences Act, 2009 and all other legislation intended to protect women from violence;

(b) Amend the Sexual Offences Act, 2009 with a view to criminalizing all marital rape, with no restrictive conditions, within a clear time frame;

(c) Collect and compile comprehensive data on violence against women, disaggregated by sex, age and the relationship between the victim and perpetrator, and carry out an in-depth analysis of the findings and utilize them to develop and implement a comprehensive strategy to combat violence against women;

(d) Institute a programme of public awareness to encourage the reporting of domestic and sexual violence against women and girls and ensure that all such acts are effectively investigated, victims and witnesses are protected, and perpetrators are prosecuted and sentenced within a reasonable time frame;

(e) Strengthen victim assistance and support programmes by providing women victims of violence with legal aid, medical support, mental health services, rehabilitation services, and shelters as appropriate in all areas of the country;

(f) Provide comprehensive training on combating violence against women, including domestic and sexual violence, for
relevant professionals, including targeted training for judges, prosecutors, lawyers and police officers on the application of protection orders under the Domestic Violence Act. Enhance training for health professionals on standardized procedures for dealing with victims of violence in a gender-sensitive manner;

(g) Approve and implement the draft sexual harassment policy and consider urgently adopting comprehensive legislation to combat sexual harassment.

Trafficking and exploitation of prostitution

23. While noting the enactment of the Trafficking in Persons (Prevention, Suppression and Punishment) Act, 2007, the Proceeds of Crime Act, 2007, the Cybercrime Act, 2010 and the Child Pornography (Prevention) Act, 2010, as well as the recent establishment by the Cabinet of an interministerial committee to oversee measures to reduce trafficking in persons, the Committee is concerned about the reportedly high incidence of transnational and internal trafficking and sexual exploitation of women and girls and the apparent low rate of prosecutions and convictions of perpetrators. The Committee regrets the limited data on transnational and internal trafficking and sexual exploitation and the inadequate measures to support victims of such violations. It is concerned that increased levels of poverty heighten the vulnerability of women and girls to trafficking and sexual exploitation and that insufficient economic measures are in place to discourage and prevent the trafficking and sexual exploitation of women and girls.

24. The Committee recommends that the State party:

(a) Strengthen measures to prevent and effectively respond to incidents of transnational and internal trafficking and sexual exploitation, including through awareness-raising initiatives, the prosecution and punishment of offenders, and the establishment of specific support and rehabilitation programmes for victims;

(b) Systematically gather and analyse sex-disaggregated data and information on trafficking and sexual exploitation, including prostitution;

(c) Strengthen measures aimed at addressing the conditions (for example, poverty and high unemployment) that make women and girls more vulnerable to trafficking and may also drive them into prostitution;

(d) Enhance support services for victims of trafficking and sexual exploitation, including alternative employment opportunities, to facilitate the reintegration into society of women and girls who wish to leave prostitution.

Education

25. The Committee welcomes the achievement of the State party in the area of girls’ education, including high literacy and performance rates compared with the rates for boys. The Committee appreciates the fact that the State party has achieved universal access at the primary and lower secondary levels. It also notes with appreciation that the State party ratified, in 2006, the 1960 Convention against Discrimination in Education of the United Nations Educational, Scientific and Cultural Organization (UNESCO). However, it is concerned about the persistence of structural and other barriers to quality education for girls and young women, including early pregnancy and teenage motherhood and societal attitudes, that result in a higher dropout rate for girls in secondary education. The Committee is further concerned that despite the National Safe Schools Policy, there are reportedly high levels of violence in schools, which negatively affects school attendance and community life. The Committee notes with concern that women and girls are underrepresented in technical disciplines and traditionally male-dominated fields of study.

26. The Committee recommends that the State party:

(a) Develop a comprehensive policy and plan of action for the reintegration of pregnant girls and young mothers into schools, including access to support services such as counselling in parenting skills and appropriate sexual and reproductive health services;

(b) Ensure appropriate budgetary allocations for the implementation of the National Safe Schools Policy and introduce the proposed amendments to the Education Act, which are aimed at strengthening school safety and security;

(c) Intensify efforts aimed at diversifying academic and vocational choices for women and take further measures to encourage them to choose non-traditional fields of education and careers, including by providing public scholarships and stipends.

Employment

27. Despite the high educational achievement of women in the country, the Committee is concerned about the reportedly low participation of women in the labour force, their high unemployment rate compared with men, their concentration in the low-paying areas of the labour market, the large gender gaps in employment opportunities affecting rural women in particular, and the horizontal and vertical gender segregation of the labour market. While recognizing the Employment (Equal Pay for Men and Women) Act, the Committee is concerned about reports that indicate that women earn less than their male counterparts for comparable work. While noting the State party’s commitment to ratifying International Labour Organization (ILO) Convention No. 189 (2011) regarding decent work for domestic workers, the Committee is concerned about the vulnerable situation of domestic workers, many of whom do not have adequate access to social benefits and are susceptible to sexual harassment in the workplace. In this context, the Committee notes with concern the lack of legislation prohibiting sexual harassment in the workplace.

28. The Committee recommends that the State party:
(a) Systematically collect data on the labour market, detailed by sector and disaggregated by sex, and analyse and
develop effective responses to the continuing lack of correlation between the high level of education attained by women
and their situation in the workplace;

(b) Develop policies with time-bound targets and indicators to eliminate occupational segregation and achieve
substantial equality between men and women in the labour market, including in traditionally male-dominated fields
through intensified technical and vocational training; promote overall employment of women and expand women ’ s
access to microcredit at low interest rates for self-employment and income-generating activities;

(c) Improve the enforcement and implementation of the Employment (Equal Pay for Men and Women) Act to eliminate
pay disparities between men and women in practice;

(d) Strengthen social protection and introduce legal measures to address sexual harassment in the workplace, especially
for women domestic workers who face challenges in claiming their right to social benefits and who are particularly
vulnerable to sexual harassment;

(e) Ratify ILO Convention No. 189 (2011) concerning decent work for domestic workers.

Health

29. The Committee welcomes the recent policy initiatives to strengthen women ’ s access to health care in the State party, including the
and the Strategic Framework for the Family Planning Programme (2006-2010). However, it is concerned about the lack of data on
women ’ s access to primary and secondary health-care services. The Committee is also concerned about the slow progress in
reducing maternal mortality and about the inadequate access to sexual and reproductive health-care services, including family
planning, which reportedly results in high incidence of teenage and unwanted pregnancies. The Committee is further concerned that
abortion is illegal in cases of pregnancies resulting from rape, incest and threats to mothers’ health and life, that abortion is criminalized
with severe penalties and that there is lack of data on the incidence of unsafe abortion and its linkages to high infant and maternal
mortality rates. The Committee also notes a growing tendency of feminization of HIV, with a disproportionately high number of young
women infected with HIV.

30. In line with article 12 of the Convention and general recommendation No. 24 (1999) on women and health, the
Committee calls on the State party to:

(a) Strengthen monitoring and data collection on women ’ s access to health care, including primary and secondary
health-care services;

(b) Improve access to and the quality of sexual and reproductive health services for women and girls, including by
ensuring free and adequate access to contraceptives;

(c) Promote education on sexual and reproductive health and rights, in particular by undertaking large-scale awareness-raising
campaigns, especially for the prevention of teenage and unwanted pregnancy and sexually transmitted diseases,
including HIV/AIDS, and by integrating age-appropriate education on sexual and reproductive health and rights at all
school levels;

(d) Remove punitive provisions imposed on women who undergo abortion, in line with the Committee ’ s General
Recommendation No. 24 (1999) on women and health, as well as legalize abortion in cases of rape, incest and threats to
mothers ’ life and health.

Rural women

31. The Committee welcomes the efforts of the State party to reduce rural poverty, including through initiatives such as the
Programme of Advancement through Health and Education, which provides grants for vulnerable families in support of health and
education for children, persons with disabilities and the elderly, and the Jamaica Emergency Employment Programme, which provides
employment opportunities and skills training for vulnerable groups. However, the Committee notes with concern that rural women are
disproportionately affected by poverty, unemployment and gender-based violence. Rural women of all ages, including women with
disabilities, are doubly disadvantaged and, in some areas, have limited access to health and social services, skill development and
training opportunities, justice and legal aid and they also have low rates of participation in decision-making. The Committee is also
concerned that rural women are particularly vulnerable to the effects of natural disasters and climate change.

32. The Committee recommends that the State party:

(a) Strengthen programmes to address poverty and unemployment for rural women, in particular women heads of
households, and ensure that rural women have improved access to health-care and social services and the justice
system with targeted programmes for women who suffer multiple forms of discrimination owing to old age and
disabilities, including through greater access to social safety nets;

(b) Ensure that the development and implementation of policies and programmes on disaster preparedness, response to
natural disasters and the impacts of climate change, as well as other emergencies, are based on a comprehensive gender
analysis, and mainstream the concerns of women, particularly those of rural women, in all policies and programmes.

Disadvantaged groups of women
33. The Committee welcomes recent initiatives undertaken by the State party to benefit refugee women and girls, including: (a) the adoption, in 2009, of a national refugee policy that strengthens the pre-existing ad hoc framework for the determination of refugee status; (b) the introduction of a compulsory child registration initiative in 2007 and a bedside registration procedure aimed at capturing all births occurring in the country; and (c) the enactment of the Trafficking in Persons (Prevention, Suppression and Punishment) Act, 2007, which is aimed at protecting women and children. However, the Committee is concerned about the lack of a strategy or contingency planning for mass influxes of migrants and refugees, the inadequacy of services for refugees, particularly Haitian migrants and, with regard to the latter, the lack of protection from forced repatriation in the light of the moratorium on forced returns to Haiti following the earthquake in 2010. The Committee is also concerned that the State party has not acceded to the international conventions on refugees and statelessness.

34. The Committee urges the State party to develop a gender-sensitive national strategy or contingency planning for mass influxes of migrants and refugees, ensure adequate services and documentation for refugees in line with international obligations concerning non-discrimination and gender equality, and discontinue their forced repatriation, particularly in the case of Haitian migrants. The Committee recommends that the State party consider according to the 1954 Convention relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness.

35. While welcoming the State party’s ratification of the Convention on the Rights of Persons with Disabilities in 2007 and its signing of the Optional Protocol thereto, the Committee is concerned about the situation of women and girls with disabilities, including their access to education, employment and health services, including sexual and reproductive health services, and their protection from violence and abuse. The Committee is also concerned about the absence of data on women and girls with disabilities, which limits the development and implementation of policies and programmes to promote equal opportunities for them in society.

36. The Committee recommends that the State party:

(a) Systematically collect data on women and girls with disabilities and use data to develop appropriate policies and programmes to promote equal opportunities for such women and girls in education, skills training, employment and access to services, including mental, sexual and reproductive health services;

(b) Strengthen training for professionals working with women and girls with disabilities to prevent abuse and increase awareness-raising to address multiple forms of discrimination against women with disabilities;

(c) Ratify the Optional Protocol to the Convention on the Rights of Persons with Disabilities.

Marriage and family relations

37. The Committee notes with concern the prevalence of traditional stereotypes of women in relation to their role in the family. The Committee further notes with concern that while both parents are legally responsible for the maintenance of their child/children, mothers (particularly single mothers) carry a disproportionate burden of care for children because of cultural factors as well as legal and administrative inadequacies concerning child maintenance and a lack of participation by men. In this regard, the Committee notes with concern the large numbers (40 per cent) of female-headed households. The Committee is also concerned about the complicated proceedings for divorce within the State party which provides that the parties must be married for a minimum of two years and de facto separated for one year and that the courts rather than the parties would decide whether to grant the divorce based on the irreparable rupture of the marriage and only after a period of six months. The Committee is concerned that these complicated and extensive proceedings are harmful to women, particularly in cases of abusive relationships and where women may not have the same resources as men.

38. The Committee, recalling article 16 of the Convention, as well as its general recommendation No. 21 (1994) on equality in marriage and family relations, recommends that the State party:

(a) Amend the legal provisions and administrative forms that discriminate against women in relation to family life; strengthen protection and support for women in common-law unions; and strengthen its efforts to eliminate stereotypical attitudes regarding the roles of women and men in the family through awareness-raising campaigns;

(b) Strengthen the provision of parental education, with the aim of promoting the shared responsibility of both parents in relation to the care and maintenance of the child;

(c) Review the legislation and procedures for child maintenance and urgently address challenges to ensure that single mothers are provided with adequate and timely child maintenance; and

(d) Review the legislation and proceedings regarding divorce with the view to simplifying the process and ensuring that women are not placed in disadvantaged or harmful positions due to restrictive legal proceedings.

Optional Protocol to the Convention

39. The Committee encourages the State party to ratify the Optional Protocol to the Convention as soon as possible in order to facilitate the full enjoyment of the rights guaranteed under the Convention.

Beijing Declaration and Platform for Action

40. The Committee urges the State party, in the implementation of its obligations under the Convention, to fully utilize the Beijing Declaration and Platform for Action, which reinforce the provisions of the Convention, and requests the State party to include information thereon along with its next periodic report.
Dissemination

41. The Committee requests the wide dissemination in Jamaica of the present concluding observations, including to Government officials, politicians, parliamentarians and women’s and human rights organizations, to enhance awareness of the steps that have been taken to ensure de jure and de facto equality of women and the further steps that are required in that regard. The Committee recommends that the dissemination extend to the local community level. The State party is encouraged to organize a series of meetings to discuss the progress achieved in the implementation of the present observations. The Committee requests the State party to disseminate widely, in particular to women’s and human rights organizations, the Committee’s general recommendations, the Beijing Declaration and Platform for Action and the outcome of the twenty-third special session of the General Assembly on the theme “Women 2000: gender equality, development and peace for the twenty first century.”

Ratification of other treaties

42. The Committee notes that the adherence of Jamaica to the nine major international human rights instruments would enhance the enjoyment by women of their human rights and fundamental freedoms in all aspects of life. The Committee therefore encourages the Government of Jamaica to consider ratifying the treaties to which it is not yet a party, namely the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment and the International Convention for the Protection of All Persons from Enforced Disappearance.

Follow-up to concluding observations

43. The Committee requests the State party to provide, within two years, written information on the steps taken to implement the recommendations contained in paragraphs 23 (b) to (g) and 39 (c) and (d) above.

Technical assistance

44. The Committee encourages the State party to consider seeking cooperation and technical assistance, including from international sources, in the development and implementation of a comprehensive programme aimed at the implementation of the above recommendations and the Convention as a whole. The Committee also calls upon the State party to strengthen further its cooperation with specialized agencies and programmes of the United Nations system, including the United Nations Entity for Gender Equality and the Empowerment of Women (UN - Women), the United Nations Statistics Division, the United Nations Development Programme, the United Nations Children’s Fund, the United Nations Population Fund, the World Health Organization, the Office of the United Nations High Commissioner for Refugees and the Office of the United Nations High Commissioner for Human Rights.

Preparation of the next report

45. The Committee requests the State party to ensure the wide participation of all ministries and public bodies in the preparation of its next periodic report and, at the same time, to consult a variety of women’s and human rights organizations.

46. The Committee requests the State party to respond to the concerns expressed in the present concluding observations in its next periodic report under article 18 of the Convention. The Committee invites the State party to submit its next periodic report in July 2016.

47. The Committee invites the State party to follow the harmonized guidelines on reporting under the international human rights treaties, including the guidelines on a common core document and treaty-specific documents, approved at the fifth Inter-Committee Meeting of the human rights treaty bodies, in June 2006 (HRI/GEN/2/Rev.6, chap. I). The treaty-specific reporting guidelines adopted by the Committee at its fortieth session in January 2008 (A/63/38, part one, annex I) must be applied in conjunction with the harmonized reporting guidelines on a common core document. Together, they constitute the harmonized guidelines on reporting under the Convention on the Elimination of All Forms of Discrimination against Women. The treaty-specific document should be limited to 40 pages, while the common core document should not exceed 80 pages.