

Analysis and Summary of Submissions

Amendments to the dairy official assurances framework (MPI Discussion Paper No: 2016/06).

Submitter	Comment Topic	MPI response
	Question 1: Do you support this proposal for full traceability? (Please provide a sentence or two explaining your support or objection).	
Submitter 1	No. For smaller operators and occasional exporters it creates a lot more work and add costs. Additional costs will apply to all operators who have on site storage under the same RMP. Our RMP covers the factory, onsite storage as well as two off site stores. To have to do an EDec every time we move a product from one site to another is prohibitive and in my view unnecessary.	<p>There will be additional costs for using AP E-cert for operators that currently <u>do not</u> process products for export to China, EU and EEU. The proposed requirements already apply to those countries, and since the majority of exporters export to at least one of those countries, they are already legally required to do what is being proposed.</p> <p>Costs relate directly to time spent <u>submitting</u> documents in E-cert. Therefore, costs are relative to the size of an operator's operation and the complexity of products being supplied for export. Fees and charges for using AP E-cert are set out in the <i>Animal Products (Dairy Industry Fees, Charges, and Levies) Regulations 2015</i>.</p> <p>The proposal does not affect exporters who are not operators (i.e. export only and do not engage in any form of processing). These exporters will incur the same costs (i.e. \$36.80 per export certificate plus E-cert user charges).</p> <p>AP E-cert transfer documents are not required for product movements between premises within the same boundary and under the same management control.</p>
Submitter 2	Yes.	Noted.
Submitter 4	No. Some countries such as Taiwan, Thailand and the Philippines do not require an E-cert for customs clearance, therefore having to	The notice only applies to products destined for export to countries for which an official assurance (export certificate) is required.

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	provide a full traceability for dairy exported products to these countries would incur a lot of extra work when an e-cert is not required.	
Submitter 5	Yes. However, consideration should be given to an exemption for samples. Applying full traceability to benchtop or pilot plant samples, which may never get past the development phase, imposes a level of complexity and administration that is unnecessary if the destination market does not require it.	Noted. This is market-dependent. If a market requires an official assurance for samples in the same way as a commercial consignment, then an exemption cannot be justified. If a market does not require official assurance for samples then that will be a good justification for exemption from the scope of the notice.
Submitter 6	Yes.	Noted.
Submitter 7	<p>Our key concern with the proposed approach is the absence of cost benefit analysis. While this Notice is tertiary legislation, the cost of change could be very significant, given full traceability for dairy goods that are exported only applies to a handful of countries. It is not clear to us that the cost has been assessed against benefits since it is not covered in the consultation document.</p> <p>We are also concerned that full traceability through AP E-cert assumes that AP E-cert is the key traceability tool. While AP E-cert is a fundamental part of the official assurances framework, it is not clear it is the fundamental traceability tool for the dairy sector or for all the sectors administered by MPI for that matter which seems to be the underlying proposal. Neither is it clear to us that AP E-cert has been the outcome of the step-wise process proposed by the Traceability Working Group and particularly Step 8 in that process which describes the agreement of the protocols for data capture, storage and exchange for traceability.</p>	<p>MPI recognises that any new or amended standards can impose both one-off costs on industry as operators develop systems to meet the new standards, and ongoing costs for any additional requirements. For this reason, MPI has been working closely with operators on use of the AP E-cert system since 2013 to ensure that industry could implement it as efficiently as possible. This standard is the latest development of the legal framework for use of that system, which came into force on 1 September 2014.</p> <p>Availability of real-time product-movement and export-eligibility records for MPI certifiers within AP E-cert is fundamental to safeguarding MPI's official assurances for animal products. Although MPI has referred to this as 'traceability' in the consultation document and draft notice, it is a different consideration from that of the Dairy Traceability Working Group (DTWG). Information held in AP E-cert can also be used for rapid tracing of export product, which complements the objectives of the DTWG, but this is not a core purpose for AP E-cert. Additionally, information held in AP E-cert is not to be confused with operators' documented systems and standard operating procedures regarding recall and the tracing of products and ingredients.</p> <p>The primary purpose for pro-active collection of export-eligibility records is to support robust decision-making by certifiers operating under delegated authority and within their Code of Professional Conduct, and demonstrates official control of product exported with an official assurance.</p>
Submitter 8	Yes.	Noted.

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	It is noted that usefulness of traceability information in AP E-Cert would be enhanced if verifiers were able to search by products manufactured or processed in a particular premises on a given date range.	MPI has a mechanism for considering ongoing improvements to E-cert and associated systems.
	Question 2: Do you support this proposal to allow flexibility on further dispatched of dairy material and dairy products before the associated transfer document is available? (Please provide a sentence or two explaining your support, objection or any comments or suggestions you wish to make).	
Submitter 1	<p>I do not support the creation of an EDec without first receiving the original. This will lead to confusion and clutter with duplicate entries.</p> <p>I do support the ability to move product or even process product without the arrival of the EDec as this is a commercial risk by the person involved so long as an EDec can be created after the departure of the goods.</p>	<p>Please note that the requirement remains that EDecs must reference the source document(s). The requirement you're referring to (i.e. clause 3.9(3)) is but one of the conditions that operators must meet if they choose to utilise the flexibility provided under clause 3.9(3). It is not a standalone provision.</p> <p>In terms of further processing and transfer, the requirement remains that consignee operators may further process but not further transfer products without the issued EDec from the consignor operators. The only exception is as stated in clause 3.9(3) and explained in the consultation paper. The exception is designed to meet particular operational needs of certain operators. It would be available to all operators. Any operators that choose to use the exception must meet all the conditions in clause 3.9(3) of the notice.</p>
Submitter 2	<p>No.</p> <p>If the dairy material is transferred into a bulk storage silo without approved transfer documentation and notification is received that the dairy material has lost eligibility the affected product increases exponentially.</p> <p>What would happen if source documents were not available when a second transfer was required or if eligibility was lost at</p>	<p>MPI does not agree that the affected product would increase exponentially because Operator C can only store the product (no further processing or further transfer is allowed from Operator C).</p> <p>It is important to note that what is being proposed will not be mandatory. As stated, it is a rather conditional exception to the general rule against further transfer without the incoming transfer document. In other words, an operator must</p>

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	"Operator A" but was transferred and processed at "Operator B" and then "Operator C"?	not further transfer a consignment without the incoming transfer document, unless he or she chooses to utilise clause 3.9(3), in which case he or she must comply with all the conditions in that clause.
Submitter 4	Yes.	Noted.
Submitter 5	The intent is good but the conditions outlined mean that we are highly unlikely to make use of this proposal. Firstly the intent of the clause is that it is used for exceptions rather than the rule, meaning that it is hard to implement a standard process. Secondly, the requirement to raise the EDec before or at the time of the transfer will be problematic, as the appropriate staff will not be available on the occasions where it will likely be necessary. The guidance material states that 'this proposal gives operators the flexibility to move products to another premises for storage during weekends when the flexibility of their authorised E-cert users may be limited'. It will also incur additional cost, as EDec have to be approved and later amended to update null eligibility to eligibility for the intended markets.	Noted.
Submitter 6	While we appreciate the approach by MPI to provide some flexibility to industry (through providing for 2-step movements in certain parts of the supply chain, the current proposal is unmanageable for us to take full advantage of.	Noted.
Submitter 7	Yes.	Noted.
Submitter 8	Yes.	Noted.
	Question 3: Do you support this proposal to remove the '48 hour rule'? (Please provide a sentence or two explaining your support, objection or any comments or suggestions you wish to make).	
Submitter 1	Yes.	Noted.
Submitter 2	No. This will weaken the system from an overseas audit perspective. In the meat system, the transfer documents must be approved	MPI is satisfied that the proposal will not weaken its official assurance system from an overseas audit perspective. There are measures in place to ensure

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	before product departure and this works well and has been accepted by overseas auditors.	confidence; for example, it is still a requirement that products cannot be further transferred by a consignee until the approved incoming EDec has been received from the consignor. Also, any reconciliation of information or traceability could be achieved through the operators' processes and systems. There is nothing stopping operators, as contractual partners, from including timeframes that is similar to the 48 hour rule.
Submitter 4	Yes.	Noted.
Submitter 5	Yes.	Noted.
Submitter 6	Yes.	Noted.
Submitter 7	Yes.	Noted.
	Question: 4 Do you support this proposal to incorporate the Help File into the Notice by reference? (Please provide a sentence or two explaining your support, objection or any comments or suggestions you wish to make).	
Submitter 1	Yes.	Noted.
Submitter 2	No comment.	Noted.
Submitter 5	We ask that if the Help Files are to be incorporated that there be a better mechanism for notifying of updates. We note that changes are now highlighted but the way that updates are notified needs to be reviewed. Consideration should be made of using the notification service used for OMAR and other regulatory updates.	Incorporating certain parts of the Help File into the Notice imposes on MPI the obligation under the Act to notify exporters, operators/E-cert users whenever any of these parts are amended. MPI will ensure that updates to any parts of the Help File with legal effect will be dealt with as if they were updates to other standards.
Submitter 6	No. We don't consider it appropriate for a file that provides instructions on how to comply with the law becomes law itself. It is our understanding that the Regulations Review Committee (2004 Inquiry into use of incorporation by reference) has established the general principle that "material should be incorporated by reference only in limited cases where there are compelling reasons for doing so". We do not think that incorporation of the Help File meets this threshold. Although the Discussion Paper states that the Help File plays a fundamental role in ensuring correct and accurate information is supplied in the prescribed manner, it also suggests that incorporation will not have any	<p>The AP E-cert Help File has always been, by nature, a mixture of guidelines and technical operational requirements/instructions that carry operational consequences if not complied with. MPI maintains that it is necessary to give legal effect to the technical operational requirements/instructions in the AP E-cert Help File. This will ensure that AP E-cert is used appropriately and MPI receives the exact information it requires to inform decisions for issuing official assurances.</p> <p>MPI agrees that material incorporated by reference into a legal instrument should be treated as if it were a legal standard in its own right.</p>

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	operational consequences on operators and exporters, as they are already using it as a condition for using E-Cert. It is, therefore, unclear why it is necessary to incorporate the Help File, or what legal outcome is intended to be achieved. We also have concerns that the amendment of these files will not be fully notified or consulted. To date Help Files has been updated a number of times without notification, provision of an amendment summary or indication within the document of what has been amended. If Help Files are to be incorporated amendments should be notified to affected parties clearly setting out what the changes are.	MPI has identified the exact parts of the Help File that are to be incorporated by reference and these have been highlighted all throughout the document. This ensures that guidance is left alone and only material intended to be a legal requirement is incorporated. Incorporating these parts into the Notice imposes on MPI the obligation under the Act to notify exporters, operators/E-cert users whenever any of these parts are amended. MPI has also made access to the E-cert Help File easier. The Help File is now published on the food safety website and it will be password protected. Therefore, operators do not have to be an approved AP E-cert user to access it. Making the document password-protected ensures that potentially sensitive information in the document is protected from those who are not approved to access it.
Submitter 7	In our view, it is inappropriate to pick up a document that has been developed as a guideline and include it by reference as law. This is not 'minimum effective regulation' as is required by Government. Neither does it make any attempt to differentiate between what might better be 'prescribed' in law and what should remain guidance. We do not support incorporating the Help File by reference for the above reasons and suggests this proposal requires substantially further work to determine the appropriateness or otherwise of requiring elements of the AP E-Cert to be prescribed.	Refer to the response to Submitter 6 above.
	General comments	
Submitter 2	Will MPI update all OMARs to reflect that the AP E-cert system must be used?	No. It is this notice that prescribes the use of AP E-cert not OMARs.
Submitter 3	Clause 1.3.(2). Transition period It is understood that MPI aim to have this issued early April and industry fully compliant by July 1st 2016. Please clarify/ confirm the 4 month transition period as this currently is contradictory to the intended date of full compliance. Further to this we request a transition time of 5 months to allow for additional training for our	MPI accepts that a longer implementation time will ease the transition for industry. The notice will come into force on 1 September 2016, two years from the implementation date of the interim notice issued in 2014. This gives industry a 5-month implementation period.

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	<p>authorised users along with supplementary support to 3rd Party Storage facilities used by us.</p> <p>Clause 3.9 Diverted to unintended premises Please clarify how the consignor should be held responsible to ensure the consignee does not process or dispatch the diverted dairy product or material. It is reasonable to require the consignor to provide immediate notification to the diverted premises requesting that they do not process or further dispatch the product until transfer documentation has been amended, however it is difficult for the consignor to be able to fully control and ultimately ensure the diverted premises adhere to this request. Please consider a change in wording to provide a more reasonable allocation of responsibility placed on the consignor.</p>	<p>MPI has amended the relevant provisions imposing responsibilities on both parties. The consignee is responsible for notifying the consignor if they receive a consignment and they are not listed as the “consignee” in the associated transfer document. Upon being notified by the consignee, the consignor is responsible for correcting the transfer document. If a consignee decides to accept a consignment that was not intended for them or not expecting then they are bound by the responsibility to notify the consignor.</p>
Submitter 5	<p>Section 1.2 Incorporation of material by reference (1) b) We do not support the incorporation of the current edition of the ‘Code of Professional Conduct for Veterinarians’. The Code is written for veterinarians and includes such topics as animal welfare and dispensing of veterinary medicines. We would instead suggest that a section on ethics and professional standards be included either in the AP E-Cert Help Files, or the Notice itself.</p>	<p>MPI has decided not to incorporate the current edition of the ‘Code of Professional Conduct for Veterinarians’. However, MPI has identified specific certification principles that E-cert users should follow to protect the integrity of the official assurance system. These principles are expressly set out in clause 3.4(3) of the notice.</p>
	<p>Section 2.1.3 Record Keeping Requirements (1) c) insert word ‘of’</p>	<p>Done.</p>
	<p>Section 3.9 Unintended Premises (2) a) It is unrealistic to expect the consignor to assume responsibility for ensuring that dairy material/products that get delivered to an unintended premise are not processed until the associated transfer document is amended. This is best illustrated using an example of industry practice. We send milk permeate to a wide number of a certain buyer’s sites. The permeate is transported by the buyer tankers, who assume ownership when they pick it up. The buyer tanker driver advises our staff of the destination site, and we consequently raise a transfer document to that site. Occasionally the tanker will be diverted to another site after it has left. Normal practice is for the buyer to advise us of the</p>	<p>As stated, MPI has amended the relevant provisions imposing responsibilities on both parties. The consignee is responsible for notifying the consignor if they receive a consignment and they are not listed as the “consignee” in the associated transfer document. Upon being notified by the consignee, the consignor is responsible for correcting the transfer document. If a consignee decides to accept a consignment that was not intended for them or not expecting then they are bound by the responsibility to notify the consignor.</p>

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	change, and the EDec is amended. However this does not always happen, and we have no visibility of the fact that the milk permeate has been sent to a different destination. It is unreasonable to expect that we assume responsibility for preventing the buyer from further processing the milk permeate, as they no longer own the material.	
Submitter 6	<p>Section 3.1 Object of this part</p> <p>Sub clause (1) a) mandates the use of AP E-cert to trace movements of dairy material and dairy products (excluding fluid streams for further processing). We do not support the mandating of AP E-Cert as a traceability system, as this is contrary to the position and recommendations of the Dairy Traceability Working Group. The clause should be removed from the notice and sub points i) and ii) should be moved to sub clause (1) b). The Dairy Traceability Working Group recommended in their report¹ published on the MPI website that a government mandated national traceability system was not in the best interest of New Zealand, and recommended that AP E-cert as an official assurances system used on a government to government context and not a Traceability system (section 6.2).</p>	<p>As stated above, ‘traceability’ in this context, within AP E-cert, is intended to support a robust export assurance system. There is facility to trace product within the system for market-access and recall purposes, but the core purpose of the linking of electronic records within the system is to ensure MPI certifiers have access to robust and verified information about consignments’ export eligibility before certifying product on behalf of the New Zealand government.</p>
	<p>Section 3.8 Availability of transfer documents before dispatch</p> <p>Sub clause (1) requires the outbound transfer documents to be “approved” before or by time of transfer, which will be difficult to achieve. The reconnection of transfer documents (daisy chaining of EDecs) at a later point in time will incur cost as they must be approved by an official assurance verifier.</p> <p>Due to the points above, there will be little value in us pursuing the flexibility MPI is trying to provide. A more workable solution would be that the transfer documents be submitted within a “48 hour” time frame in a “raised” status and therefore the reconnection of transfer documents could be done by an authorised user and not require approval by the official assurance verifier.</p>	<p>MPI considers that it is necessary for the relevant transfer document to be in approved form before or at time of transfer from Operator B to Operator C. This is because an approved transfer document:</p> <ul style="list-style-type: none"> - cannot be easily manipulated; and - is an express command to the consignee that the product cannot be further processed or transferred.

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	<p>Section 3.9 Unintended premises Sub clause (2) a) is drafted as the responsibility of the consignor. Where dairy material or dairy products are diverted to an RMP premises that it was not intended for, this is not typically visible to the consignor. This responsibility should be jointly of the consignor and consignee. Consignee should be responsible for notifying the Consignor that the products were diverted and that new Transfer documents are required.</p>	<p>As stated, MPI has amended the relevant provisions imposing responsibilities on both parties. The consignee is responsible for notifying the consignor if they receive a consignment and they are not listed as the “consignee” in the associated transfer document. Upon being notified by the consignee, the consignor is responsible for correcting the transfer document. If a consignee decides to accept a consignment that was not intended for them or not expecting then they are bound by the responsibility to notify the consignor.</p>
	<p>Section 3.10 Extending list of eligible countries Sub clause (1) requires clarity regarding reinstatement of eligibility through extension. Reinstatement would be where an eligible country has for some reason dropped off the transfer document, whereas extension would be where something like additional testing has been undertaken in order to render the product now eligible for a specific country. If it is intended to include reinstatement the clause will need to be amended, this could be via wording similar to the following, “Where a dairy operator wishes to add or reinstate a country to the list of eligible countries...” If it is not intended to be included reinstatement needs to be covered elsewhere.</p>	<p>MPI does not agree that a provision relating to re-instatement is necessary. Where this happens, it will be an operational matter for the operator to provide necessary evidence to support any claim of past eligibility. Generally, MPI will not readily accept a reinstatement request from an operator if the product has already left that operator’s premises and is outside their control because the operator cannot be expected to fully know what has happened to the product after it has left them. Reinstatement will therefore have to include evidence from the new operator in control of the product to ascertain whether the product still meet the requirements of the country which is the subject of the re-instatement.</p>
	<p>Section 4.2.1 Who may raise eligibility declarations a. Sub clause (3) a) requires that an authorised user have knowledge of the Certification Principals in the Veterinary Council of New Zealand’s Code of professional conduct for Veterinarians (Code). As authorised users are not veterinarians it is not expected that the users are familiar with the Code in full and on review of the code Certification Principals are not discussed in detail. We ask that the specific relevant clauses be reproduced or clearly referenced in the Notice.</p>	<p>As stated, MPI has decided not to incorporate the current edition of the ‘Code of Professional Conduct for Veterinarians’. However, MPI has identified specific certification principles that E-cert users should follow to protect the integrity of the official assurance system. These principles are expressly set out in clause 3.4(3) of the notice.</p>
	<p>Section 12.3 Business continuity plan – paper transfer documents a. Sub clause (2) allows 5 working days upon restoration of access to AP E-cert for any paper transfer documents to be</p>	<p>MPI considers the proposed 5 working days to be reasonable.</p>

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	<p>entered before they are cancelled. Depending on the duration of an outage 5 working days may not be sufficient and there should be allowance in this sub clause for the Director-General to extend this period upon application.</p> <p>Section 12.4.3 Export certificate data to be entered into AP E-cert when transmission resumes Sub clause (1) requires export certification data to be entered within 1 working day of AP E-cert becoming available, similar to our comment on section 12.3 sub clause (2), depending on the duration of outage there should be an allowance in the sub clause for the Director-General to extend this period upon application.</p>	<p>MPI considers the proposed 1 working day to be reasonable.</p>
Submitter 7	<p>Clause 1.3.(2). Transitional period MPI proposes a transitional period of 4 months for three reasons: most exporters and RMP operators should already be familiar with the traceability system, operating a single traceability system simplifies the process for all involved and MPI understands that a number of major companies are already defaulting to full traceability. We are concerned that the reasons are expressed in generalities with no evidence to sustain the claims and no mechanism for non-MPI persons to check the extent of the statements. While most exporters might be familiar with full traceability we wonder if all RMP operators are as familiar given RMP operators can include producers. Operating a single system can have both costs and benefits and these have not been explored especially in relation to costs. It is not clear how many companies out of those registered as RMP holders are defaulting to full traceability. We might expect the larger companies are the 'number of companies' defaulting to using AP E-cert more broadly, this might be only a handful of companies where larger cost structures can more easily absorb increased costs. On the basis of the foregoing, a 12 month transition is a general rule of thumb which should be the minimum applied in this</p>	<p>Information upon which we are basing our judgement comes from the industry, specifically from a sub-committee of the Dairy Products Safety Advisory Council made up of industry representatives. A recent Systems Audit of the transition to AP E-cert supported this view.</p> <p>The notice will come into force on 1 September 2016 instead of 1 August as originally proposed. MPI considers that this extended transition period is a reasonable timeframe for implementation.</p>

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	instance to accommodate those not as familiar with the requirements. Allowing for earlier transition should companies/RMP holders choose to do so will accommodate the balance.	
Submitter 8	Section 2.1.1(1)(b) The document refers to ‘separation’ This is a term where further guidance or clarification should be documented as requirements for separation can be interpreted differently. For instance is separation in the inventory control system sufficient, or is this intended to be a physical separation. It is noted that historically in the dairy industry the former separation in inventory systems has been considered sufficient.	Separation means physical separation as opposed to separation in inventory systems. Physical separation ensures that products are not accidentally dispatched. Additional specific rules for separation are OMAR-driven.
	Section 3.8 (3) Transfers before documents are available This section refers to both ‘null’ eligibility and ‘NZ’ eligibility. It is not clear if the eligibility on the EDec is intended to be left blank, or recorded as NZ.	The field cannot be left blank, hence, eligibility must be recorded as “NZ”.
	Section 3.10 Extending the list of eligible countries As per questions in relation to the current version of this clause, further clarification is needed on the expectations for extending eligibility for current Part 4 markets, specifically to the EU or EEU. Is this prohibited through the OMAR separation restrictions or is this allowed if they can show it did meet the requirements?	It is possible to extend eligibility to EU and EEU. This would be considered on a case by case basis which involve reconciliation of information and investigation on whether the relevant OMAR requirements have been complied with at all stages.
	4.2.1 & 4.3.2 Principles of Certification Veterinary Council of New Zealand We have concerns that there are references to a document, which is specific to vets, that is not readily available or easy to locate. The Code of Conduct that we can locate does not have the term certification principles, and each person that googled the term for preparation of this document found different material. This should be replaced with an MPI Code of Conduct for AP E-cert users and Official Assurance Verifiers.	MPI has decided not to incorporate the current edition of the ‘Code of Professional Conduct for Veterinarians’. However, MPI has identified specific certification principles that verifiers should follow to protect the integrity of the official assurance system. These principles are expressly set out in clause 4.3.2(1)(d) of the notice.
	4.2.2(3) makes reference to the requirements in 4.2.2(3).	
	Section 4.2.3 contains the process for removing the ability to make eligibility declarations.	This is a power for the MPI Director-General and MPI has a procedure in place for it, which includes verifier recommendations. The procedure will be communicated to recognised agencies.

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	It is noted that this process is still not supported by a framework for verifiers to recommend this, or guidance on when this is required to occur.	
	4.3.2(1)b)iii) makes reference to section 3.17; there is no 3.17, this should be 3.14.	This has been corrected.
	5.5(4) states that the OA Verifier “may keep copies ... for 3 months”. Why is there a time limit on how long these records are kept?	MPI has deleted the requirement to keep records for 3 months as this will not be needed due to the records being available in E-cert.
	Section 5.6 requires clarification. It prevents the use of transfer documents being raised on the basis of copies but then says that the OA Verifier can allow the use of scanned or faxed documents.	Outgoing transfer documents cannot be raised from a source document that is a copy. The other provisions are exceptions to this general rule and situations in which they apply are specified accordingly.
	It was noted that the sections with the requirements for certified copies of FICs is not present in this version of the OAS.	This has been corrected.