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APAK
Association of Pension Administrators of Kenya

**ASSOCIATION OF PENSION ADMINISTRATORS OF
KENYA
(APAK)**

MEMORANDUM ON THE NSSF BILL 2013

**SUBMITTED TO:-
THE CHAIRPERSON, PARLIAMENTARY COMMITTEE ON
LABOUR**

THRU'

THE CLERK OF THE NATIONAL ASSEMBLY

OCTOBER 10, 2013

We, the undermentioned members of the Association of Pension Administrators of Kenya (**APAK**) hereby submit this memorandum to the Clerk of the National Assembly, on the National Social Security Pension Trust Bill, 2012 for consideration by the Parliamentary Committee on Labour & Social Welfare.

1. **CENTRAL BANK OF KENYA PENSION SCHEME**
2. **KENYA PIPELINE PENSION SCHEMES**
3. **KENYA PIPELINE PENSION SCHEMES**
4. **KPLC STAFF RETIREMENT BENEFITS SCHEME**
5. **KPA PENSION SCHEME**
6. **KPA PENSION SCHEME**
7. **KRA PENSION SCHEME**
8. **KRA PENSION SCHEME**
9. **TELEPOSTA PENSION SCHEME**
10. **MASENO UNIVERSITY RBS**
11. **NSIS STAFF SUPERANNUATION SCHEME**
12. **NSIS STAFF SUPERANNUATION SCHEME**
13. **LOCAL AUTHORITIES PENSIONS TRUST**

EXECUTIVE SUMMARY

The Association of Pension Administrators of Kenya (APAK) is the premier association representing pension administrators in Kenya. It is mandated to promote and advocate for the welfare and promote better standards within the pensions administration sector. National Social Security Fund ("the Nssf") is a statutory provident fund established under the NSSF Act Cap 258 which was enacted on the 23rd November 1965. It was established and intended to be merely a 1st Pillar scheme offering **basic social security to complement other occupational based social welfare programmes.**

Whereas we as individual and collective members of APAK **support** the noble initiative of converting the NSSF into a Pension scheme, and welcome the good provisions contained in the Bill, **we remain apprehensive that certain ill drafted provisions in the Bill are certain to erode any anticipated gains and ultimately hurt the industry.**

It is imperative that any Bill approved by the legislature as a matter of principle and national interest, incorporate a complete overhaul to the existing NSSF framework to strengthen its structures, improve efficiency and capacity as well as allow complete opting out for all persons who are members of a scheme registered and under the oversight of the Retirement Benefits Authority under the Retirement Benefits Act No. 3 of 1997. **NSSF should co-exist alongside and not at the cost of all other 1,216 occupational retirement schemes**

Sadly, **the Bill in its current form does not address these concerns and it only serves to increase the wage bill, overtax the employers/workers compounding the effects of the VAT Act 2013 and may likely lead to a political backlash from the electorate.**

It is therefore imperative that the legislature subjects the Bill to scrutiny so as to address these concerns as it is evident that the Bill has numerous issues that need to be addressed key amongst them include:-

- a) **Inconsistencies with various other laws** as well as the constitution; (e.g the Public Service Superannuation Scheme Act No. 8 of 2012, The RBA Act No. 3 of 1997, the County Governments Act No. 17 of 2012 amongst others)
- b) Mandatory enrolment into NSSF of **ALL** persons (including the Government) in Kenya **without regard to employees already enrolled in registered retirement benefits schemes;**
- c) Unaffordable and duplicated contribution rates (at 12%) which shall be **an additional wage burden and a huge strain on already over taxed employers/workers** especially those already contributing to occupational retirement schemes;
- d) Unclear, vague and overly broad contracting out procedures;
- e) Weaknesses in the Board structure and inadequate minimum qualifications of members of the Board.

These concerns should be viewed as against the industry statistics. According to the Retirement Benefits Authority's 2012 Annual Report, the value of the retirement benefits sector was estimated at Kshs. 522.6 billion as at June 2012. Out of this **only Kshs.110.9 billion is held by National Social Security Fund (NSSF) while the remainder of Kshs. 412 Billion is in the possession of occupational schemes and held by registered fund managers.** If the Bill is enacted with its current flaws, it shall automatically lead to a collapse of all other schemes and be likened to the proverbial killing of the goose that lays the golden egg!

Attached, please find a tabular representation of the associations' concerns as well a copy of the legal opinion from our advocates in support of our memoranda.

1.0 CASE FOR REFORM

The Association is alive to the urgent need to clean up the legacy mismanagement and corporate governance weaknesses within the NSSF as an institution and therefore welcomes most of the proposed reforms.

However, APAK notes that the Bill as drafted does not address some of the systemic challenges facing the fund and it is therefore necessary that the Bill be amended accordingly to address these issues.

It is therefore important that the NSSF Board first addresses the key administrative and governance issues within the organization prior to implementing any radical changes. Further, the restructured scheme ought to embrace a competitive market driven economy and not adopt monopolistic tendencies contrary to the law.

2.0 WEAKNESSES OF THE PROPOSED BILL

The Association is concerned that Bill has several weaknesses which if passed without being amended, risk creating greater confusion in the retirement benefits sector.

Of great importance to APAK is **the Bill's conflict or inconsistency with certain provisions of the Constitution of Kenya 2010 as well as various other Acts of Parliament such as the Retirement Benefits Act No.3 of 1997, the Public Service Superannuation Act No.8 of 2012 and the Competitions Act, Cap 12.**

Further, the Bill derogates from the fundamental concept of Devolution which is the hallmark of the 2010 Constitution. It is imperative that the proposed Bill undergoes a major overhaul and is aligned to the Constitution, the Retirement Benefits Authority and other host of relevant statutes as well as receives proper stakeholder input from the Public, RBA, AKI, APAK, Kenya Law Reform Commission, CIC, Public Service Commission and others before presentation to the National Assembly.

a) **Mandatory Enrolment into the New Pension Scheme**

The Bill as drafted, advocates for a **mandatory registration of ALL employees in NSSF**. This shall lead to a violation of the constitutionally enshrined freedom of choice as well as contravene pre-existing labour agreements protected under **Art. 41 of the constitution as well as in the Labour Relations Act No. 14 of 2007**. Consequently, if unattended, this shall expose the government to numerous complaints, labour disputes/strikes and possible litigation as was witnessed during the attempts to legislate on new NHIF rates.

The Bill under **S. 2 adopts a wide definition of the terms employee/employer**. Consequently, this compels **every person in any** form of employment (including the government and its permanent & pensionable staff) to join the scheme. Shall this proposed plan be affected, then, all employers, including the government shall be forced to **make double contributions** in respect of their pension savings and consequently lead to an inflated wage bill and additional expenditure by the exchequer.

Further, as the government has been listed as an employer, it shall face an increased wage burden on unbudgeted expenditure as it shall be forced to contribute **TWICE**. (i.e., to its Public Service Superannuation scheme as well as to NSSF). An increased wage bill shall result in less development expenditure and thereby reneging on the Government's development projects.

In order to remedy this problem, it is proposed that the Bill at S. 18 be amended to provide that all persons who are employed within the country shall join a retirement benefits scheme registered and approved by the Retirement Benefits Authority. This shall either be the NSSF or any other occupational retirement scheme and shall help achieve the intended goal enshrined under Art. 43 of the Constitution without unduly creating a constitutional, fiscal and political crisis.

This approach will also be in line with the models adopted by other East African States within the **East African Common Market Protocol** who have liberalized their pension sector with the 1st Pillar Schemes offering just but a safety net for the vulnerable in the society. Tanzania has adopted a similar approach where the NSSF Tanzania is under the supervision and regulation of the Tanzania Regulatory Law and operates as just but one of the many occupational

retirement benefit schemes and competes with other statutory and non-statutory funds.

Whereas a contracting out provision if relevant, the Association is concerned that this provision imposes **vague and undocumented requirements** to be met by the scheme/employers prior to approval for contracting out. The conditions are also **overly broad** and under the 4th Schedule, it not certain who shall issue the "*prescribed requirements*" and that "*the scheme should comply with any prescribed requirements*"

b) Unreasonable 'Contracting out procedures'

S. 21 (2) (a) of the Bill attempts to provide for an option for employers contributing to a registered scheme to contract out of Tier II NSSF contributions. Whereas an option to opt out is welcome and necessary, the procedure as laid down in the reference scheme test is cumbersome, vague and too broad.

The Bill does not take into account employers who are already sponsors of an occupational retirement scheme. The Bill is silent as to whether they shall now hold all contributions in the interim period prior to RBA/KRA/Cabinet Secretary's approval or otherwise. Further, the total 90 day period awaiting approval to contract is too punitive to employers especially in DB schemes as it denies them investment income during this period.

S. 21(2)(b) & 4th Schedule 1(f), (5) the Bill provides that the opt-out may be exercised subject to a written request setting out details of the contracted out scheme "*as the Authority shall from time to time require from time to time*"... and that "*the scheme should comply with any prescribed requirements*". *The Cabinet Secretary shall, in consultation with the Authority, make regulations for the proper management of contracting-out, including the manner of making applications to the Authority by Reference Schemes and for contracting-out by employers and the communication of approval or otherwise to such scheme or employer.*

Moreover, this provision seeks to usurp the statutory powers of the RBA to determine the procedures and requirements to contract out and vest them with

the Cabinet Secretary, Social Services. It therefore complicates the entire process by having multiplicity of requirements, procedures and authorities.

This would amount to a violation of **Art. 47 of the 2010 Constitution** as it contravenes the right to **"Every person to administrative action that is expeditious, efficient, lawful, reasonable and procedurally fair"**

It is proposed by the Association that Schemes (preferably through their scheme administrators) and not employers should make the application to R.B.A for the approval to ensure efficiency, reduce bottlenecks and safeguard accrued benefits of members since most employers have never engaged directly with the RBA but all administrators have a working relationship with the RBA. Further, the Reference Scheme Test under the 4th Schedule should be very narrow, clear and concise as to what the requirements for approval are.

The association recommends that the RBA Act No. 3 of 1997 be amended to provide that all applications ought to be heard and determined by the RBA as the independent oversight authority. This will avoid bias, self interests by NSSF and procedural unfairness.

Indeed, **the Centre for Governance and Development (CGD) in its digest strongly recommends that employers with registered occupational retirement benefit schemes should be permitted to fully opt out of the Trust (NSSF)** *(see attached digest)*

c) Increased Contribution Rates

The draft Bill at S.20 seeks to increase the contribution rates from the current Kshs.400 to 12% of the Member's salary *(at 6% payable by the employer and 6% by the employee.)* Whereas this may eventually translate to enhanced benefits, (assuming transparent appointment of investment managers of scheme funds) the association is concerned that with the current high administrative costs, the increase may not be justifiable.

Further, a high rate such as the proposed **12% is too costly and unaffordable** and will eventually edge out all other occupational retirement schemes. In addition to increasing cost of labour in the country which will seriously discourage any meaningful investment in the country!

The Government of Kenya, through **Treasury Circular No.18/2010 dated 24th November 2010** (*copy annexed*) directed all public service retirement benefits schemes **that employer's contributions shall not exceed two (2) times the employee's contribution rates or 20% whichever is lower.**

Further, the circular provides that Pensionable Emoluments (*salary used to calculate pension*) must be defined as basic salary (*excluding all allowances*). The Bill uses gross salary as opposed to a basic salary meaning that the 6% will eventually be higher than had it been pegged on the basic pay alone. The Bill ought to be amended and harmonized with the policy circular to avoid inconsistencies.

The Association is greatly worried that employers (*such as county governments*) who currently remit **15%** of their employees' pensionable emoluments if forced to join the new NSSF and contribute **a further 6%** shall not only have an unbearable financial burden of contributing at the rate of **21%** but shall be contravening the express government's direction if they do! **This may not be sustainable and something has to give. Either the NSSF has to reduce to a basic contribution or the Occupational (Employer Schemes) just wind-up.**

The import of such arbitrary increase in contribution rates is that:-

- i. It will lead to violation of the government directive vide Treasury Circular No.18/2010
- ii. Employers will not be motivated to provide additional contributions to their occupational retirement benefit schemes due to the high costs and mandatory nature of the proposed NSSF;
- iii. Imminent collapse of occupational retirement benefits schemes due to the high costs of contributions.

d) Risk of Creating a Monopoly/Collapse of all Other 1,216 Schemes

As indicated above, approximately registered 1,217 retirement benefits schemes currently exist in the country.

According to the Retirement Benefits Authority's 2012 Annual Report, the value of the retirement benefits sector was estimated at Kshs. 522.6 billion as at June

2012. Out of this only Kshs.110.9 billion is held by National Social Security Fund (NSSF) while the remainder of Kshs. 412 Billion is in the possession of occupational schemes and held by registered fund managers. If the Bill is enacted with its current flaws, it shall automatically lead to a collapse of all other schemes and be likened to the proverbial killing of the goose that lays the golden egg!

The future of such voluntary schemes would be in doubt as the burden of double contributions would be too high for employers and employees. Most other schemes would therefore collapse and or be wound up leading to massive job losses and risk a collapse of the financial sector as pension funds have been an important source of funds to the national economy.

The proposed Bill would therefore create a monopoly and lead to unfair market practices against the provisions of the Competitions Act, Cap 12 of the Laws of Kenya. Eventually, this would jeopardize the right to Social Security as guaranteed by the Constitution.

It is therefore imperative that in order to foster productive competition in the social security market place, the Bill ought to be amended to avoid creating a monopoly in the market

e) Conflict with Public Service Superannuation Scheme Act No.8 of 2012

Section 60 of the Public Service Superannuation Scheme Act No.8 of 2012 which amends S.45 of the NSSF Act Cap 258 by inserting S.43 (1A) **expressly prohibits the application of the NSSF Act on persons in the employment of the "Public Service"**. However, the NSSF Bill by revoking the Act but retaining the scheme to which it enlists the employees in the public service as members, attempts to exercise an illegality and contravene the law by disregarding the intention of the legislature in the express provisions of S.45 (1A) of the NSSF Act which clearly in no uncertain terms ousts the jurisdiction of the NSSF Act and Fund from applying on officers in the employment of the Public Service Commission.

f) Good Governance and the Application of The Retirement Benefits Authority (RBA)

The Retirement Benefits Authority (RBA) was established by the RBA Act No.3 of 1997 and is mandated to:

- Regulate and supervise the establishment and management of retirement benefits schemes.
- Protect the interest of members and sponsors of retirement benefits schemes.
- Promote the development of the retirement benefits industry.

The RBA is therefore the oversight authority established by Government to oversee the operations of all retirement benefits schemes in the country in order to ensure proper and effective corporate governance.

However, the Bill at S. 71 provides that "*the requirements of the Act are in addition to the requirement of the RBA Act*". This is an attempt to oust the application of the Retirement Benefits Act as well as establish the NSSF as a body not subject to the scrutiny of the Industry regulator. This is an illegality as funds held in the scheme are member's funds and by not being subject to oversight and supervision of the RBA the Bill opens a portal for mismanagement of scheme funds contrary to the fiduciary responsibility on Trustees.

The association welcomes the media reports on proposals by the Task Force, State Corporations recommending that the NSSF be immediately brought within the ambit of the RBA . **The bill should be amended to provide that the new scheme shall be fully compliant with the provisions of RBA Act.**

Further, to ensure that the scheme funds are prudently invested and managed, the Bill should be amended to provide for competitive recruitment of its top management and Trustees as well as set a threshold required for persons to be appointed Trustees as they are public officers. The requirements of Chapter on Leadership and Integrity ought to apply to such persons.

g) Deregistration of Exempt Persons

The Bill in its proposed 1st Schedule (Exempt Persons) seeks to illegally alter the 2nd Schedule (Exempt Persons) of the NSSF Act Cap 258 and under S.2 of the Second Schedule, compel persons who were exempt from membership by law to register with the new scheme. This de-registration of exempt persons is illegal since the NSSF Act Cap 258 in 1965 was cognizant of already existing pension schemes under the diverse legal frameworks.

These *inter alia* include:

- a) Persons in a scheme subject to the Pensions Act
- b) Persons in the Service of any University or College superannuation scheme
- c) Exempted persons under any international convention
- d) Non- Civilian members of the armed forces, Kenya Police Force, Prison Services, National Youth Service

The attempt by the management of NSSF to arbitrarily take away the exempt status of these groups and compel such persons to register as members is inconsistent with **Articles 47(1) of the Constitution**. It is important to note that majority of these groups were either exempted by a preceding Act of Parliament or have superior occupational retirement benefit schemes. Compelling them to join the fund jeopardizes their membership and vested benefits enjoyed in the superior scheme and ultimately violates **Article 43(1) (e) of the Constitution** which provides that every person has the right to social security.

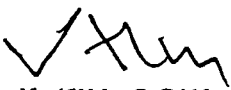
Pursuant to the foregoing, it is our humble submission that NSSF at the earliest possible time considers the concerns of the Association of Pension Administrators of Kenya on behalf of the key players and stakeholders in the industry noting to promote the spirit of the Constitution of Kenya 2010. It is therefore our humble submission that the proposed Bill be amended accordingly taking into consideration the concerns raised herein.

CONCLUSION

To this end, APAK humbly submits as follows;-

1. The Bill ought to embrace the existence of the RBA Act No 3 of 1997 hence any mandatory pension scheme should be entrenched in and regulated by the RBA Act and not the Bill as proposed;
2. Additionally, the proposed contribution rates of 12% under the Bill would in effect result in the provision of inferior benefits to members of occupational retirement benefits schemes and this would result in a violation of Art 43 of the Constitution.
3. Whilst APAK supports the envisaged NSSF, it should however, in the interest of other existing retirement benefits schemes **NOT** be allowed to exercise monopolistic tendencies. NSSF should therefore exist in competition alongside other retirement benefit schemes; consequently, the Bill should be amended to allow an automatic exemption of all persons who are already registered in a registered retirement benefits scheme approved by the RBA.
4. There is need to engage ALL the stakeholders in the pensions industry/sector so as to allow them air their views on the Bill and have their contributions incorporated in the Bill. This is in line with good Corporate Governance and industry best practice.
5. It is further opined that consequent to the Bill, the RBA Act No.3 of 1997 ought to be amended to provide that all employers must enlist their employees in a retirement benefit scheme of their choice or the NSSF. This is in line with international best practice industry standards. Consequently, the Retirement Benefits Authority (RBA) should be mandated to **FULLY** oversee the activities of NSSF in accordance with the provisions of the RBA Act;

ASSOCIATION OF PENSIONS ADMINISTRATORS OF KENYA (APAK)


H. K. KILI, OGW
CHAIRMAN, APAK

No.	Issues	Provision in NSSF BILL, 2013	Problem	Remedy
1	<p>"Contracting -out by employer"</p> <ul style="list-style-type: none"> ✓ 60+ Days waiting period. ✓ Broad Requirements ✓ Unclear regulator ✓ Employers and not Schemes to apply. ✓ KRA Approval for Income Tax Exemption ✓ Cabinet secretary (Social Security) making regulations for contracting out! 	<p>S. 21(2) (a) The Bill provides that "the employer shall make written request of its intention to opt out to the Authority at least 60 days before opting to contract-out"...</p> <p>S. 21(2)(b) & 4th Schedule 1(f). (5) The Bill provides that the opt-out may be exercised subject to a written request setting out details of the contracted out scheme "as the Authority shall from time to time require from time to time"... and that "the scheme should</p>	<ul style="list-style-type: none"> ✓ The Bill does not take into account employers who are already sponsors of an occupational retirement scheme. The Bill is silent as to whether they shall now hold all contributions in the interim period prior to RBA approval or otherwise. ✓ The total 90 day period awaiting approval to contract is too punitive to employers especially in DB schemes as it denies them investment income during this period. ✓ This provision imposes vague and undocumented requirements to be met by the scheme prior to approval for contracting out. ✓ The conditions are also overly broad and under the 4th Schedule, it not certain who shall issue the "prescribed requirements" ✓ This provision seeks to take 	<ul style="list-style-type: none"> ✓ The provision should be amended to allow employers who are already sponsors to continue making remittances pending approval to contract out. ✓ The waiting period should be reduced to a maximum of 30 days so as to safeguard the members' benefits by minimizing the loss of investment income period. ✓ Schemes and not employers should make the application to R.B.A for the approval to ensure efficiency, reduce bottlenecks and safeguard accrued benefits of members. ✓ The Reference Scheme Test under the 4th Schedule should be very narrow, clear and concise as to what the

	<p><i>comply with any prescribed requirements"</i></p> <p>✓ "The Cabinet Secretary shall, in consultation with the Authority, make regulations for the proper management of contracting-out, including the manner of making applications to the Authority by Reference Schemes and for contracting-out by employers and the communication of approval or otherwise to such scheme or employer."</p>	<p>away the powers of the RBA to determine the procedures and requirements to contract out and vest them with the Cabinet Secretary, Social Services. It therefore complicates the entire process by having multiplicity of requirements, procedures and authorities.</p>	<p>requirements for approval are.</p> <p>✓ This test should be anchored under the RBA Act and NOT the NSSF Bill to ensure partiality and Part 5 of the 4th Schedule should be deleted and instead these powers granted to the RBA under Cap 197.</p>
<p>2 Tax Exemption.</p>	<p>S.66(1) The Fund shall not be liable to pay income tax on its income and no tax by whatever name called shall be payable in respect of any property vested in the Fund.</p>	<p>✓ The proposal seeks to grant NSSF undue advantage by making them exempt from paying ant land associated tax such as rates, land rent e.t.c. All other occupational retirement schemes investing in property do not have similar benefits.</p>	<p>✓ The provision should be deleted or made to apply across the board to all other schemes.</p>

<p>3 Mandatory Membership including employees of the National & County Governments.</p> <ul style="list-style-type: none"> ✓ Inconsistency with other laws 	<p>S. 18(4), 70(1) + S. 2 The Bill provides that <i>All persons who are subject to the provisions of the Employment Act and are eighteen-years old or above and have not attained the pensionable age shall be members of the Pension Fund.</i> And Also includes the Government as an employer</p>	<p>✓The Provision is inconsistent with S. 60 of the Public Service Superannuation Scheme Act, 2012 which removes the application of the NSSF Act from the employees of the Public Service or the employees of the Government.</p>	<p>The provision should be amended to comply with other existing legislations.</p>
<p>4 Contribution Rates</p> <ul style="list-style-type: none"> ✓ Based on Pensionable earnings (Gross? / Basic? / + Any Allowances?) 	<p>S. 20 provides that an employer and employee shall contribute 6% of the employee's pensionable earnings each...</p>	<p>✓However, the Bill at S. 2 does not indicate whether the Pensionable earnings are pegged at the Basic pay, Gross Pay or includes any allowances</p>	<p>✓The Bill ought to be amended to clarify whether pensionable earnings includes allowances or not. ✓A high rate such as the proposed 12% is too costly and unaffordable and will eventually edge out 2nd and 3rd pillar schemes.</p>
<p>5 Exempt Persons</p> <ul style="list-style-type: none"> ✓ Previously exempt persons no-longer exempt. 	<p>S. 29 of the Bill provides for 2 classes of exempt persons.</p> <ul style="list-style-type: none"> ➤ Persons exempt under Int'l conventions 	<p>The Bill has effectively scrapped the exempt status of certain persons who were hitherto classified as exempt persons.</p>	<p>✓There's need to retain the exempt status of certain classes of persons in recognition of already existing arrangements.</p>

		<p>➤ Non residents not employed for more than 3 years.</p>		
6	Application of the RBA Act Cap 197	<p>S. 71 of the Bill provides that "the requirements of the Act are in addition to the requirement of the RBA Act"</p>	<p>✓ The marginal note to the provision indicates that the intention of the Bill is to subject it to the scrutiny and mandatory requirements of the RBA Act. However, the wording of S. 71 indicates that there is an intention to avert that where the two provisions conflict and make them supplemental provisions.</p>	
7	<p>Powers to Amend Act</p> <p>✓ Cabinet Secretary empowered to "review and Adapt the Act"</p>	<p>S. 26 (d) of the Bill seeks to grant the Cabinet Secretary powers "to review and adapt certain provisions of the Act"</p>	<p>✓ A member of the executive (Cabinet Secretary) cannot be granted powers bestowed to the Legislature to make laws or to amend substantial provisions of the Act or to make regulations that are inconsistent with the Act.</p>	<p>S. 26 (d) of the Act should be deleted</p>
8	Appointment & Qualification of Trustees	<p>S. 6 of the Bill proposes that the Cabinet Secretary shall appoint 6 persons to the Board under S. 6(d).</p>	<p>✓ However, their minimum qualifications and experience has not been legislated unlike the minimum qualification of the Managing Trustee under S. 15(7). The criteria of their appointment is open ended thereby giving the Cabinet</p>	<p>✓ The qualification and experience as members of the Board be also subject to S. 15(7) of the Bill</p>

			Secretary powers to unilaterally decide on their appointments and qualifications.	
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