ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 57

Division/Agency: Exports Division

Topic: New American Food Safety Modernization Act

Proof Hansard page: 76 (23.02.2015)

Senator BULLOCK asked:

Senator BULLOCK: I was going to ask a very modest question about the implications for Australia of the regulations to the new American Food Safety Modernization Act, but I am sure that has been subsumed into the enormity of Senator Cameron's questions. I just thought I would let you know I will be looking out for that when I read the answers to his questions on notice.

Senator Colbeck: It might be worth taking it as a separate question on notice. We will take it as a specific question on notice.

Answer:

On page 76 Mr Read responded to this by saying 'It is probably worth, though, just touching on the Food Safety Modernization Act being implemented in the US presently. It provides a different dynamic in terms of the regulatory regime operating across a range of commodities, including seafood and dairy and so forth. The opportunity provided to Australia as a consequence of that particular change has been for the US, in the FDA department, to assess the equivalency of our systems in Australia against the comparability principles that are captured in that particular Food Safety Modernization Act. We have commenced that process. The United States has been to Australia and reviewed our systems in detail. Equally, we will do a comparative review of the systems operating in the US. What it is providing to us that we have not had before is it will reduce the burden of inspections from the United States in terms of our agriculture and food sectors.'

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 58

Division/Agency: Exports Division

Topic: Macro Meats in Russia

Proof Hansard page: 77 (23.02.2015)

Senator RHIANNON asked:

Senator RHIANNON: Considering what happened with Macro Meats in Russia, how are you responding to that experience with what is now being attempted in China?

Mr Read: In terms of the incidents in Russia, we have done thorough reviews of the systems that are operating at that particular plant. I do not have the detail with me, but there were a range of corresponding corrective actions put in place to reduce the likelihood of that sort of occurrence again.

Senator RHIANNON: Could you take on notice what those corrective actions were, please?

Mr Read: Certainly.

Answer:

The corrective actions implemented by Macro Meats in response to Russia's findings included:

- the implementation of improved Standard Operating Procedures;
- the development of enhanced Work Instructions;
- the retraining of operators;
- increased daily product quality assurance checks; and
- increased frequency of microbiological sampling of kangaroo meat.

As this action is designed to enhance the system overall, it will also provide benefit for any product which may be exported to other markets, including China.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 59

Division/Agency: Exports Division

Topic: Contamination of Kangaroo meat since 2013

Proof Hansard page: 77-78 (23.02.2015)

Senator RHIANNON asked:

Senator RHIANNON: Which countries have raised concerns about the contamination of kangaroo meat since 2013?

Mr Read: Can we take it on notice?

Senator RHIANNON: If you could take that on notice and as part of that what are the specific concerns raised by each country, and also how you have responded to that? What is being done now to reopen the kangaroo products market in Russia?

Mr Read: We are communicating with Rosselkhoznadzor, which is a veterinary agency in Russia, as to the corrective actions that have been put in place with the Australian plant.

Senator RHIANNON: You spoke in the past tense, I think, so you are saying corrective actions have already been implemented?

Mr Read: Correct.

Senator RHIANNON: And they are satisfactory?

Mr Read: Yes.

Senator RHIANNON: And what were they?

Mr Read: As I said, I do not have those details, but we will provide those on notice.

Answer:

Since 2013, concerns about the unsatisfactory bacterial contamination of kangaroo meat have been raised by the European Union and Russia. On each occasion, the department conducted a full investigation into the issue raised and, where required, implemented corrective action. The findings of the investigations and the actions taken, if applicable, were reported back to the country which raised the concerns.

Question: 59 (continued)

Regarding regaining access to the Russian market for the establishment that was recently suspended, the department has provided Russian authorities with evidence and assurances that the issues identified have been addressed. This included providing details of corrective actions and offering to provide any additional information required. The department has requested that Russian authorities re-list the establishment. The department has also requested Russian authorities conduct an audit of other kangaroo establishments that are seeking to access the Russian market.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 60

Division/Agency: Exports Division

Topic: Contamination of Kangaroo meat since 2013

Proof Hansard page: 78 (23.02.2015)

Senator RHIANNON asked:

Senator RHIANNON: Sorry; can I just clarify? I thought it was about the meat. There was contamination before it was exported from Australia. Are you saying that the contamination occurred in Russia?

CHAIR: No.

Mr Read: The issue in Russia, and again it is on notice, as I recall—and I may need to correct this—I think there was a micro-detection issue on the product. I think we have gone back to the plant because the obligations in terms of the product run right through to the point of harvest. We have looked at that full supply chain and identified areas where we can actually get improvements to lower some of those micro-levels that may well have been present. We will provide that information on notice.

Senator RHIANNON: So it was from Australia, and that is what you think. You will take it on notice to clarify what you have done to eliminate that problem?

Mr Read: Correct.

Answer:

The response to QoN58 details the corrective action implemented by Macro Meats in response to Russia's findings which included:

- the implementation of improved Standard Operating Procedures;
- the development of enhanced Work Instructions;
- the retraining of operators;
- increased daily product quality assurance checks; and
- increased frequency of microbiological sampling of kangaroo meat.

The department has verified that these actions are effective and sustainable.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 61

Division/Agency: Exports Division

Topic: ESCAS report

Proof Hansard page: 111 -112 (23.02.2015)

Senator RHIANNON asked:

Dr Clegg: Animals Australia and the RSPCA are the two agencies that have reported animal welfare incidents under ESCAS arrangements.

Ms Evans: I think I also need to clarify that your statement about the proportion the detection of non-compliance as being predominantly by animal welfare groups, according to our statistics, is not quite right. report that we released in January provides some statistics on that. We have only 19 per cent coming from external or third parties. The largest share is determined by the department and the next largest share is self-reported by the exporters.

Senator BACK: What are those figures?

Ms Evans: I am looking at the page 24 of the ESCAS report that was released in January. 47 per cent of the detection of ESCAS noncompliances were Department of Agriculture determined; 32 per cent are self-reported; 19 per cent are by the external or third-party reporters; and the balance, which is just three per cent, is from the auditors themselves.

Senator RHIANNON: But is it not the case that the animal-welfare-related incidents, which are essentially what we are addressing, they are the ones that fall into the 'other' category, and the 'other' category is what covers the animal welfare groups? That is why I used the expression, 'The vast majority of welfare breaches have been detected by animal welfare groups.' Isn't that the case?

Ms Evans: We would have to take that on notice, because you are taking a breakdown of the statistics, which we may not have to hand. Certainly, we looked at the system overall and those compliance statistics that I just read out relate to the system overall.

Senator RHIANNON: Just to go through it, the figures that I have was that 22 per cent are reported by others, that is with regard to noncompliance incidents. This is from the ESCAS report 2015—I think that is the one that you are talking about too.

Question: 61 (continued)

Ms Evans: It is. Are you able to give me a page reference so that I can look at the same statistics as

you?

Senator BACK: The 19 plus three is 22.

Senator RHIANNON: That is the 22. Then I understand that the vast majority of animal welfare breaches are by the others. When you talk about noncompliance, there is lots of noncompliance.

Ms Evans: Again, I would have to take that on notice.

Senator RHIANNON: Thank you. I just wondered why that was not discussed in the ESCAS report. That would seem to be quite significant, analysing this data. I have given an interpretation. You might challenge the interpretation—that is fair enough, and I look forward to the answers to questions on notice. But this has not been analysed within the ESCAS report, which seems surprising, considering that, in essence, this is what it is all about. Why was it not explored? This is where we get to the heart of the matter.

Ms Evans: The report is simply a presentation of the facts, rather than going terribly much beyond that. Perhaps Dr Clegg may want to add to that. Otherwise we can, again, take that on notice, to go back and have a look at that particular question.

Senator RHIANNON: Just to add to that, could you clarify if it is the case that the majority of the animal-welfare-related incidents fall into the 'other' category, when we are looking at noncompliance.

Dr Clegg: They do not. What it says on the next page, page 24, is that 'all 11 recorded instances of noncompliance reported to Agriculture by third parties were for animal welfare problems within the supply chain.' The significant animal welfare issues that have been uncovered, say, in Jordan, Kuwait and Gaza have been by Animals Australia. They are for animal welfare issues. They are not in the 'other' category.

Ms Evans: I think I have understood the question from the Senator, Dr Clegg. We can take that on notice and provide that clarity on notice. Dr Clegg was just clarifying what the report does say, which is that the instances that were reported by Animals Australia and the like were all of animal welfare. We understand that. You have asked a separate question, which is, what share overall does that represent for just animal welfare issues per se, as opposed to our broader system noncompliance issues? We need to go back and have a look at that smaller concept of noncompliance and check what proportion that is.

Answer:

a. Attached is a reproduction of the relevant table from the export Supply Chain Assurance System Report (Page 23, Table 3).

Question: 61 (continued)

The non-compliance grouping of "other" (refer to Box 2 on the attached table) is not related to animal welfare issues. It contains issues such as failure to conduct an audit in the required timeframe or not providing the department with data requested. All 14 of these non-compliances were detected by the Department of Agriculture.

The 22 non-compliances detected that have had a potential direct animal welfare impact (refer to Box 1 on the attached table) were detected by:

Auditor determined	2
Department of Agriculture	2
External/Third party report	11
Self Reported	7

- b. Refer to the answer to question a.
- c. The breakdown of reporting by various groups in relation to the category of non-compliance is analysed in the text on page 24 of the report. This included the information that all of the eleven instances of non-compliance that were reported to the Department by third parties were for animal welfare related issues.
- d. Refer to the answer to question a.

ATTACHMENT A - Extract from Page 23 of the Export Supply Chain Assurance Report - January 2015

Table 1 Types of ESCAS non-compliance

Non- compliance grouping	Non-compliance category	Potential direct animal welfare impact	Total number	Percentage of total non- compliance
Animal welfare	Non-compliance with OIE animal welfare standards	Yes	8	13.6
Movement outside of supply chain—loss	Movement of animals to a facility that is not approved under an ESCAS or compliant with OIE standards, or the location is not known	Yes	14	23.7
of control and traceability	Movement of animals to a facility that is not approved under an ESCAS, but which meets OIE animal welfare standards	No	7	11.9
	Movement of animals to a facility that is approved under an ESCAS for other exports, but is not listed in the approved ESCAS for that export	No	16	27.1
Other	Any other issue—for example failure to audit a facility within a supply chain in the required time frame, not providing the department with additional information required in an audit, or other issues without an animal welfare impact	No	14	23.7
Total			59	100

Source: Department of Agriculture 2015.

Box 1

The contents of these two lines make up the 22 instances with a potential direct animal welfare impact. These 22 instances were reported by

Auditors 2

Department identified 2

Third parties 11

Exporter self reports 7

Box 2

This line contains the "Other" category
. This category does not contain
potential direct animal welfare impacts
but rather issues such as failure to
conduct an audit in the required
timeframe or not providing the
department with data requested.

All 14 of these non-compliances were detected by the Department of Agriculture

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 62

Division/Agency: Exports Division

Topic: Categorisation of non-compliance

Proof Hansard page: 115 (23.02.2015)

Senator RHIANNON asked:

Senator RHIANNON: In terms of how you approach this, you have your ESCAS system. You have come under a lot of criticism for it. You are out there using the penalties to the best of your ability. What judgements are you making, either giving me examples or if there are guidelines you can share with us, that when you have repeat offenders or just very bad incidents, in determining when you need to go to a high level of penalties?

Dr J Cupit: We use guidelines that are available on our website. We can point you to those and provide those to you. That relates to how we categorise noncompliances—minor, major and critical noncompliances. That information is then used for each assessment for an application to export. For example, if we have a range of conditions, we do not decrease those conditions; we add to them in general times. So we are actually continuing to increase those conditions each time for each consecutive export to that market.

Answer:

The department refers to the guideline 'Management of Non-Compliance, Exporter Supply Chain Assurance System (ESCAS) for feeder and slaughter livestock' when undertaking a regulatory performance review relating to possible non-compliance with ESCAS. Such reviews may be undertaken following substantiated information as a result of a self-report from an exporter, a regulated audit report, a review initiated by the department, advice from importing country governments or a complaint from a third party.

Matters that may involve possible serious non-compliance such as criminal or fraudulent activity are referred to the Investigations and Enforcement Unit of the Department of Agriculture for further consideration and possible action.

The guidelines are available through the department's website at http://www.agriculture.gov.au/export/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance.

The department's ESCAS Reform Taskforce is also reviewing these guidelines as part of the ESCAS reform. A key aim of the guideline review is to provide a greater understanding across an industry wide stakeholder base about the steps the department takes in defining noncompliant activity.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 63

Division/Agency: Exports Division

Topic: Shipments of Kangaroo meat to Russia

Proof Hansard page: Written

Senator RHIANNON asked:

Senator RHIANNON:

- 1. May I please have the results of the tests for kangaroos that found Russian shipments of kangaroo meats were contaminated for a third time in 2014?
- 2. If the actual results are not available, may I please have details about the type and levels of contamination found in those kangaroo meat shipments to Russia?
- 3. May I have details of the resources, funding and personnel currently being engaged to address the current Russian ban on imports of kangaroo meat?
- 4. May I have an update of which other countries have raised concerns about kangaroo contamination? Has any other contamination been found?

- 1. The Department of Agriculture is unable to provide the actual test results.
- 2. Regarding the detection of contamination for a third time, Russian authorities advised the Department of Agriculture in May 2014 that 'excess total viable plate count (aerobic and facultative anaerobic microorganisms)' were detected in a shipment of kangaroo meat imported into the Russian Federation from an Australian establishment.
- 3. Several officers from three different areas of the Department of Agriculture with different responsibilities for market access contributed around 40 hours to actions to address the current Russian ban on imports of kangaroo meat.
- 4. One instance of bacterial contamination of kangaroo meat was raised by the European Union.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 64

Division/Agency: Exports Division

Topic: Shipments of Kangaroo meat to Russia

Proof Hansard page: Written

Senator RHIANNON asked:

Senator RHIANNON:

- 1. I have previously been advised that kangaroo meat for human consumption is not tested for zoonotic diseases such as Toxoplasma gondii or and that this is not a requirement for any importing country. Is this still currently the case?
- 2. Since 2013, which countries have raised concerns about contamination in kangaroo meat? What are the details of those concerns?

- 1. Yes, this is currently the case.
- 2. Since 2013, concerns about the unsatisfactory bacterial contamination of kangaroo meat were raised by the European Union and by Russia.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 65

Division/Agency: Exports Division

Topic: ASEL standards in WA

Proof Hansard page: Written

Senator RHIANNON asked:

- 1. Under the Australian Standards for the export of livestock (ASEL) who is responsible for on board ship inspections of livestock vessels in Western Australian ports?
 - a. How independent are these inspections?
 - b. Aare they paid for by the exporter?
 - c. If so does this mean there is a conflict of interest?
- 2. How often are such inspections supposed to be performed?
- 3. How many were performed in the past year, on which ships and by whom?
- 4. How many inspectors are there in WA who are authorised to perform on board ship inspections?
- 5. May I have an up to date list of reported concerns/complaints recorded from such inspections, the details and outcomes?

Answer:

Under the Australian Standards for the Export of livestock (ASEL), the Australian Maritime Safety Authority (AMSA), a statutory authority under the Department of Infrastructure and Regional Development, is responsible for monitoring flagged vessels' compliance with safety and environment protection standards, including the safe carriage of livestock as cargo. Inspections of livestock vessels are undertaken under Marine Orders Part 43 administered by AMSA. Questions relating to livestock vessel inspections should be directed to AMSA.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 66

Division/Agency: Exports Division

Topic: ESCAS report

Proof Hansard page: Written

Senator RHIANNON asked:

- 1. In the ESCAS Report Summary (page 3), it states that: 'Before ESCAS was introduced the Australian Government had little knowledge about the fate of animals once they arrived in the importing country.'
 - a. Does this mean Government agencies have been unaware of repeated reports since 2002 by Animals Australia of cruelty to animals in importing countries, one of which resulted in the cattle trade to Egypt being severely regulated?
- Regarding the Government's report on the ESCAS review, why were the following issues
 <u>not</u> addressed, given their ongoing detrimental impact on the welfare of animals in
 importing countries:
 - a. Considering the ineffective or non-existent animal welfare legislation in importing countries, which prevents Australia being able to impose any animal welfare requirements on these sovereign nations why was this not addressed?
 - b. The very basic nature of the OIE recommendations (misleadingly described throughout the report as 'international animal welfare standards'), which fall far below Australian animal welfare standards for the handling and slaughter of livestock, and are not compulsory in importing countries why was this not addressed?
- 3. Considering the ESCAS Report 2015 sets out that 47% of non-compliance incidents have been detected by the Department of Agriculture, 31% reported by exporters and 22% reported by "others", why have details of "other" not been included?
 - a. Is it correct that <u>all animal-welfare related incidents fall into the "other" category</u>?
 - b. Is it correct that since the implementation of ESCAS in 2011, the vast majority of animal welfare breaches have been detected by Animals Australia (an independent, not for profit charity) and other animal protection groups, rather than through ESCAS?
 - c. Why is this important factor not discussed by the ESCAS Report 2015?

Question: 66 (continued)

- d. What is the acknowledgement of the significant role played by private charitable organisations, such as Animals Australia, in leading investigations into animal welfare abuse?
- e. Considering that there are a number of export locations that have not been investigated by Animals Australia (probably due to resource constraints), which in turn means that the rate of compliance with animal welfare requirements in these places is unknown, and considering that the ESCAS Report 2015 acknowledged the extent of non-compliance in overseas/importing markets cannot be determined, what is being done to improve the monitoring and enforcement of animal welfare compliance as part of the live export trade?
- 4. Considering the Department of Agriculture's 2013-14 Annual Report indicates that the Live Animal Exports Division has an ongoing role of consulting with the government and industry representatives is the Division prepared to also consult with animal protection groups on an ongoing basis given their prominence in discussions on the live export trade and their role in on-the-ground investigations into animal welfare breaches?
 - a. Considering the ESCAS Report 2015 (p46) notes that only 3 animal protection groups were consulted, compared to approximately 25 animal industries are there plans to expand the number of animal protection groups that will be consulted?
 - b. If not, why not?
- 5. Considering around 80,000 dairy animals (or "breeder" animals) exported live from Australia per year are not covered under ESCAS, meaning there is no guarantee these animals will not end up in unapproved supply chains/slaughterhouses.
 - a. What is being done to ensure the protection of the welfare of these animals in destination countries?
 - b. What advice or information does the Department have about the animal welfare outcomes of these animals?
 - c. Considering the ESCAS Report 2015 does not adequately acknowledge the welfare concerns of animals aboard vessels, and mortality reports used by the industry are an inadequate measure of animal welfare on their own and the ESCAS Report 2015 acknowledges there is a reluctance within the live export industry to self-report problems, is there consideration or discussion about the need for an Independent Officer of Animal Welfare?
 - d. Will the work of private charitable organisations and industry self-reporting continue to be relied upon to expose breaches of animal welfare requirements?

Answer:

1.

a. No. The intent of this sentence was to inform readers that before ESCAS, after unloading in the importing country, exporters were not required to provide any information about where feeder/slaughter livestock were on-sold, handled, transported or slaughtered.

Question: 66 (continued)

2.

- a. The report is the government's response to Recommendation 13 of the *Independent Review of Australia's Livestock Export Trade* (also known as the Farmer Review). This recommendation was for a review of the Exporter Supply Chain Assurance System (ESCAS), outlining the initial experiences and making judgements about the effectiveness of the approach in delivering animal welfare outcomes and facilitating trade. Making an assessment of the effectiveness of other countries animal welfare legislation or their implementation of OIE standards is beyond the scope of the recommendation.
- b. Refer to 2(a).
- 3. Details of the composition of the group 'others' is provided on page 23 of the report as follows:
 - a. "Third party reports (by animal welfare groups, other industry participants or members of the public) and independent audits were responsible for the remaining 22 percent of reports."
 - No. Animal welfare incidents have been detected by auditors, the Department of Agriculture, self –reported by exporters and reported by external/third parties.
 Question on Notice 61 provides more detail.
 - b. Refer to response from QoN 61
 - c. Refer to response from QoN 61
 - d. It is discussed on pages 24 and 25 of the report.
 - e. All export destinations receiving Australian feeder / slaughter livestock have an approved ESCAS. The facilities in the ESCAS are subject to regular independent audits.
- 4. The department consults with animal welfare groups on live export issues where appropriate to do so.
 - a. The three animal welfare organisations groups consulted for the ESCAS report were Animals Australia, Royal Society for the Prevention of Cruelty to Animals and World Society for the Protection of Animals. These groups are well recognised in the community. The department will continue to consult on livestock export issues with animal welfare groups as interested parties.
 - b. Refer to 4 (a)
- 5. a. Animals exported as breeding livestock become part of the importing county's herd or flock and are subject to the same animal protection requirements as all other livestock in the destination country.
 - b. The department does not require Australian exporters to monitor and trace breeder animals post arrival as they are part of the importing county's herd or flock.

Question: 66 (continued)

c. The welfare of livestock on vessels is monitored through daily reports on long haul voyages and end of voyage reports provided by on-board stockmen, veterinarians and ships' captains. The live export industry continues to regularly self-report problems. There is no consideration or discussion about the need for an Independent Officer of Animal Welfare.

d. Industry self-reporting and independent audit reports contribute to ESCAS compliance monitoring. Reports or allegations of ESCAS breaches may also be received from third parties and will be assessed in line with current guidelines for managing non-compliance.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 67

Division/Agency: Exports Division

Topic: Kangaroo meat testing

Proof Hansard page: Written

Senator RHIANNON asked:

Senator RHIANNON:

- 1. I have previously been advised that kangaroo meat for human consumption is not tested for zoonotic diseases such as Toxoplasma gondii or and that this is not a requirement for any importing country. Is this still currently the case?
- 2. Since 2013, which countries have raised concerns about contamination in kangaroo meat?

Answer:

Please refer to response in Question on Notice 64 from Additional Estimates held in February 2015.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 68

Division/Agency: Exports Division

Topic: Kangaroo export countries - lobbying

Proof Hansard page: Written

Senator RHIANNON asked:

Senator RHIANNON:

- 1. Please advise which countries are currently being lobbied to open up their markets to kangaroo product imports, and where those negotiations are up to?
- 2. What are the threats and barriers currently identified regarding the export of kangaroo products to China? May I be advised of the strategies being employed to overcome those barriers?

- 1. The Department of Agriculture is working with the kangaroo industry to gain access to China, India, the Philippines, Thailand and Ukraine. The department is working through the required approval processes in each country.
- There are a number of steps which need to be completed before trade in kangaroo to China can commence, including finalisation of a protocol, development of export certification, and approval of export establishments. These requirements are being progressed through presentations to the Chinese Government and the provision of information.

ANSWERS TO QUESTIONS ON NOTICE

Additional Estimates February 2015

Agriculture

Question: 69

Division/Agency: Exports Division

Topic: Shipments of Kangaroo meat to Russia

Proof Hansard page: Written

Senator RHIANNON asked:

Senator RHIANNON:

- 1. May I please have the results of the tests for kangaroos that found Russian shipments of kangaroo meats were contaminated for a third time in 2014?
- 2. If the actual results are not available, may I please have details about the type and levels of contamination found in those kangaroo meat shipments to Russia?
- 3. May I have details of the resources, funding and personnel currently being engaged to address the current Russian ban on imports of kangaroo meat?
- 4. May I have an update of which other countries have raised concerns about kangaroo contamination? Has any other contamination been found?

- Please refer to Question on Notice 63.
- 2. Please refer to Question on Notice 63.
- 3. Please refer to Question on Notice 63.
- 4. Please refer to Question on Notice 63.