

## Executive Summary

1. This report summarises the AML/CFT measures in place in New Zealand as at the date of the on-site visit from 26 February to 15 March 2020. It analyses the level of compliance with the FATF 40 Recommendations and the level of effectiveness of New Zealand's AML/CFT system, and provides recommendations on how the system could be strengthened.

### Key Findings

- a) New Zealand has a robust understanding of its money laundering and terrorist financing (ML/TF) risks. It has established a comprehensive multi-tiered risk assessment process, with its national risk assessment (NRA) undergoing two full cycles. National AML/CFT policies and activities address identified ML/TF risks to a substantial extent. Authorities have taken action to respond to emerging TF risks in the context of a lower overall risk profile. Domestic co-ordination and co-operation are strengths of New Zealand's AML/CFT system.
- b) New Zealand's law enforcement agencies (LEAs) regularly use financial intelligence. The New Zealand Police Financial Intelligence Unit (FIU) produces and disseminates a wide range of financial intelligence products, which generally support the operational needs of competent authorities. However, New Zealand authorities could benefit from better exploiting the potential of financial intelligence to detect criminal activity by persons not already known to law enforcement.
- c) New Zealand identifies and pursues parallel money laundering investigations alongside investigations of significant proceeds-generating. Its authorities are adequately skilled and trained to conduct financial investigations with a wide range of investigative tools available to them. Financial investigations are increasingly being used to support prosecution on money laundering charges and the number of prosecutions into ML have increased since 2018.

- d) New Zealand Police has a strong focus on confiscation of proceeds of crime, backed by a top-level target for the volume of criminal assets to be restrained (NZD 500 million by 2021). The skilled Asset Recovery Unit (ARU) works in co-operation with investigative authorities to initiate parallel restraint and forfeiture proceedings in response to identified crime and financial intelligence. New Zealand has pursued international asset recovery cases that involve significant volumes of inbound and outbound proceeds.
- e) There is sound co-operation and co-ordination between New Zealand Police's National Security Group (NSG), Financial Crime Group (FCG) (including the NZPFIU) and other relevant agencies on monitoring possible Terrorist Financing. Following the 2019 Christchurch attacks, New Zealand demonstrated its capacity and effectiveness in undertaking and supporting terrorism financing investigations. New Zealand has not prosecuted any terrorism financing cases, which is consistent with its generally low TF risk profile.
- f) There is a strong legislative framework for the implementation of targeted financial sanctions (TFS) without delay. However, reporting entities have a variable understanding of TFS, due to limited guidance and outreach by relevant authorities, as well as the lack of a mandate for supervisors to undertake supervision of TFS implementation. No assets have been frozen in New Zealand pursuant to TFS regimes. While this may be consistent with New Zealand's risk profile, it could also reflect the limited TFS guidance, and the lack of outreach and supervision on TFS. New Zealand authorities have prosecuted a contravention of export restrictions under UNSC DPRK sanctions.
- g) New Zealand covers financial institutions (FIs), designated non-financial businesses and professions (DNFBPs) and most virtual asset service providers (VASPs) as reporting entities under the *Anti-Money Laundering and Countering the Financing of Terrorism Act 2009* (AML/CFT Act). There remain some gaps in the AML/CFT Act, which impact New Zealand's overall effectiveness. Reporting entities' understanding and implementation of their AML/CFT obligations is mixed, with a better understanding and implementation in larger and more sophisticated reporting entities.
- h) New Zealand's three AML/CFT supervisors have a good understanding of the inherent ML/TF risk profiles of their respective sectors. The scope and depth of supervision for each financial sector are broadly commensurate with their respective risk levels, except for the banking sector, where the scope and depth of inspections does not adequately reflect the risk and complexity of the banks inspected. There is scope to improve the range of sanction powers available to the supervisors and for the supervisors to impose sanctions that are more effective, proportionate and dissuasive.

- i) Most DNFBPs were only brought within the scope of AML/CFT regulation in 2018 as part of New Zealand's 'Phase 2'. The newly supervised Phase 2 reporting entities and VASPs are still developing their understanding of their ML/TF risks and how AML/CFT obligations apply to their business. The level of suspicious transaction report (STR) and suspicious activity report (SAR) reporting by some DNFBPs remains low. AML/CFT supervision for Phase 2 sectors is at an early stage but the rollout of new obligations has been conducted in an effective and well-managed way so far.
- j) New Zealand's legal system provides for a wide range of legal persons and arrangements, and authorities have a comprehensive understanding of the ML/TF risks associated with them. In recent years, New Zealand has implemented measures to mitigate the ML/TF risks of misuse of legal persons and arrangements, including the creation of a register of New Zealand Foreign Trusts, and residency requirements for company directors. However substantial gaps remain in relation to ensuring the availability of adequate, accurate and current beneficial ownership information, and in relation to nominee directors and shareholders.
- k) Authorities actively respond to formal and informal international co-operation requests. New Zealand has a sound legal basis to provide and seek MLA and extradition. Several different competent authorities are involved in handling extradition requests and there is no clear authority with primary responsibility. New Zealand has received positive feedback from counterparts concerning the quality and timeliness of assistance provided. LEAs and supervisors also engage in various forms of international co-operation with counterparts.

## Risks and General Situation

2. New Zealand faces ML threats from proceeds of crime generated both domestically and internationally, particularly through its financial, legal, property and cash-intensive sectors. While New Zealand is a high integrity jurisdiction with comparatively low crime rates, it has a very open economy, with free flow of capital and people and substantial ease of access to legal persons and arrangements. The major domestic proceeds-generating crimes are drugs, fraud, and tax offending. Transnational organised crime groups seek to move funds through New Zealand, its financial system, and its legal structures. Several sectors in New Zealand have also been identified as significant in terms of their scale, role, or vulnerability. These include the banking, money or value transfer services (MVTs), real estate and professional services sectors.

3. New Zealand companies and limited partnerships are vulnerable to abuse for ML/TF purposes due to the low cost with which they can be established, as well as New Zealand's reputation as a well-regulated jurisdiction. Nominees are able to provide resident director or trustee services for overseas customers. Law enforcement have

noted the abuse of New Zealand shell companies for both transnational and domestic laundering. Domestically, trusts are widely used in New Zealand and there are comparatively fewer measures to enable law enforcement to detect the abuse of trusts for ML/TF purposes.

4. For TF, the greatest risk to New Zealand for large-scale financing of terrorism remains in relation to overseas-based groups, within an overall low TF risk. However, the potential consequences of small-scale domestic TF could be very high. In particular, funds may be used within, or sent to, New Zealand to finance terrorism activity by lone actors or small cells. Following the Christchurch attacks on 15 March 2019, New Zealand's national threat level was raised to 'high' and sat at 'medium' as of March 2020. New Zealand authorities remain alert to the possibility that funds may be raised, moved or used for terrorist purposes in New Zealand.

### Overall Level of Compliance and Effectiveness

5. New Zealand has implemented an AML/CFT system that is effective in many respects. Particularly strong results are being achieved in relation to the confiscation of proceeds of crime. New Zealand also has a good understanding of its ML/TF risks, uses financial intelligence and investigates and prosecutes ML/TF activity effectively, and co-operates with its international partners well. However, major improvements are needed to strengthen supervision and implementation of preventive measures, to improve the transparency of legal persons and arrangements, and to ensure that TFS are being effectively implemented.

6. In terms of technical compliance, New Zealand fundamentally overhauled its AML/CFT regime with the introduction of the AML/CFT Act 2009. This was extended in 2018 to cover all DNFBP sectors. The Act also covers most VASPs as a type of financial institution. While this is significant progress, further work is needed to fully embed AML/CFT measures among DNFBPs, and a number of preventive measures need reform to meet the FATF Standards. New Zealand also needs to improve its technical framework in relation to TFS, beneficial ownership of legal persons and arrangements and the powers and responsibilities of supervisors.

### *Assessment of risk, co-ordination and policy setting (Chapter 2; IO.1, R.1, 2, 33 & 34)*

7. New Zealand has a robust understanding of its ML/TF risks and has established a comprehensive multi-tiered risk assessment process. This includes their NRA and four sectoral risk assessments (SRAs). The NRA is comprehensive and systematic in its identification of New Zealand's ML/TF risks and has been refined over successive updates, though there is scope for further minor improvements. New Zealand authorities share a sound understanding of their risks, with the results of the NRA and SRAs communicated to all stakeholders, including the private sector.

8. National AML/CFT policies and activities address the identified ML/TF risks to a large extent, although New Zealand's policy response has not completely addressed the risks associated with beneficial ownership, and New Zealand should undertake further supervisory activity against unregistered MVTs providers. The objectives and activities of the supervisors and LEAs to prevent, detect and respond to ML/TF are informed by the risk assessments. Authorities have also taken action to respond to emerging TF risks, in the context of New Zealand's overall lower risk profile for TF. New Zealand has introduced enhanced measures in certain circumstances and allows

for simplified measures in specific justified circumstances. New Zealand has granted a large number of exemptions from AML/CFT requirements but is not clear that some historical and transitional exemptions granted are based on proven low ML/TF risks or applied in strictly limited and justified circumstances.

9. Domestic co-ordination and co-operation are strengths of New Zealand's AML/CFT system. Competent authorities have a strong tradition of co-ordination and collaboration, and continually work to improve the flow of information between authorities.

***Financial intelligence, ML investigations, prosecutions and confiscation  
(Chapter 3; IO.6, 7, 8; R.1, 3, 4, 29–32)***

10. New Zealand's law enforcement agencies routinely conduct parallel financial investigations and regularly use financial intelligence to support investigations, trace assets, enforce forfeiture orders and identify risks. LEAs obtain financial information both from the FIU, via direct access to the FIU's database, and through requests to financial institutions and DNFBPs.

11. The Police FIU is well-situated to understand law enforcement priorities and strategic objectives, and its collaborative relationship with LEAs is a key strength. The FIU produces and disseminates a wide range of financial intelligence products, which generally support the operational needs of competent authorities.

12. The FIU's approach to prioritisation and targeting relies on feedback from police units, in response to strategic intelligence and raw financial intelligence, to refine the FIU's priorities for deeper analysis. New Zealand authorities could nevertheless upgrade their analytical tools to better exploit the potential of financial intelligence to detect criminal activity by persons who are not already of interest to law enforcement, and to take advantage of reports on international funds transfers and large cash transactions.

13. Most SARs and PTRs are received from banks and MVTS, with a limited number received from DNFBPs and TCSPs. In relation to criminal activity, the financial intelligence that the FIU receives is generally in line with New Zealand's risk profile.

14. New Zealand authorities use various multi-agency groups to co-operate and exchange information and financial intelligence. This includes a public-private partnership with financial institutions used by Police and Customs to conduct joint operations at both the tactical and strategic level.

15. New Zealand identifies and pursues parallel money laundering investigations alongside investigations of significant proceeds-generating its authorities are adequately skilled and trained to conduct financial investigations with a wide range of investigative tools are available to them. Operational agencies actively co-operate and share information and resources.

16. Financial investigations are increasingly being used to support prosecution on money laundering charges and the number of prosecutions into money laundering have increased since 2018. This is a result of policy and operational measures put in place to address the stronger focus on asset recovery as compared to prosecution of money laundering offences.

17. The operating strategy of New Zealand's Police reflects a strong and committed focus on confiscation of the proceeds of crime. National strategy documents identify a target volume of criminal assets to be restrained (NZD 500 million by 2021), and the

Criminal Proceeds (Recovery) Act 2009 (CPRA) provides a civil confiscation framework to detect and trace the widest range of criminal proceeds and benefits of crime. New Zealand Police has established a skilled Asset Recovery Unit (ARU), which works in co-operation with domestic and foreign investigative authorities to initiate parallel restraint and forfeiture proceedings in response to identified crime and financial intelligence. New Zealand also pursues asset sharing or repatriation transnationally and has pursued international asset recovery cases that involve significant volumes of inbound and outbound proceeds. This is supported by a sophisticated and effective asset management system managed by the Official Assignee that works to maintain the value of assets seized.

18. New Zealand Customs Service conducts operations, investigations and pursues intelligence to detect non-declared cash, but only a small portion of this is confiscated and the penalties applied are not sufficiently dissuasive.

***Terrorist and proliferation financing (Chapter 4; IO.9, 10, 11; R. 1, 4, 5–8, 30, 31 & 39.)***

19. New Zealand has dedicated units with responsibility for monitoring possible terrorism financing within the FIU and in the National Security Group (NSG) of the New Zealand Police. There is strong co-operation and co-ordination between the NSG and the Police's Financial Crime Group (FCG, which includes the FIU) and other relevant agencies, and the NSG draws on financial investigation expertise from within the FCG as required. New Zealand Police have established standard operating procedures for managing terrorism financing investigations. Authorities demonstrated their capacity and effectiveness in undertaking and supporting terrorism financing investigations following the Christchurch attacks.

20. New Zealand has not prosecuted any terrorism financing cases to date, which is consistent with its risk profile, as articulated in the NRA (investigation of the 2019 Christchurch attack did not find a TF case to prosecute). New Zealand has taken steps to understand its TF risk exposure following the emergence of the foreign terrorist fighter threat, and took steps commensurate with these risks, including to improve co-ordination among relevant agencies.

21. There is a sound legislative framework for the implementation of TFS without delay, which gives immediate and automatic effect to UN Security Council designations under New Zealand law. New Zealand has also made active use of designations by the Prime Minister pursuant to its implementation of UNSCR 1373 in the Terrorism Suppression Act 2002 in relation to global and regional terrorist organisations.

22. Currently no competent authority has a mandate to undertake supervision of financial institutions or DNFBPs for compliance with their TFS obligations. The level of understanding of TFS obligations among reporting entities is variable, due to the absence of supervision and the limited guidance and outreach by relevant authorities. At the time of the on-site visit, a proportion of reporting entities, mainly DNFBPs, did not receive notification of updates to counter-terrorism TFS lists, nor was there a process in place to notify reporting entities of updates to Iran and DPRK TFS lists. Together with the lack of supervision, this lessened the impact of measures applied in response to older cases of proliferation connected to New Zealand.

23. No assets have been frozen in New Zealand pursuant to any TFS regimes. While this may be consistent with New Zealand's risk profile, it could also reflect the limited guidance and the lack of outreach to and supervision of reporting entities for TFS. New

Zealand authorities have prosecuted a contravention of export restrictions under UNSC DPRK sanctions.

### *Preventive measures (Chapter 5; IO.4; R.9–23)*

24. New Zealand covers FIs, DNFBPs and most VASPs under the AML/CFT Act as reporting entities. However there are moderate shortcomings in the AML/CFT Act, particularly in relation to political exposed persons (PEPs), MVTs, wire transfers, internal controls, higher-risk countries, AML/CFT obligations for dealers in precious metals and stones (DPMS), the definition of trust and company service providers (TCSP), and real estate customer due diligence (CDD) obligations, which impact New Zealand's overall compliance and effectiveness.

25. Reporting entities' overall understanding and implementation of their AML/CFT obligations is mixed. Larger and more sophisticated reporting entities have a better understanding of their ML/TF risks and AML/CFT obligations, while newly supervised DNFBPs (Phase 2 reporting entities) and VASPs are largely still developing their understanding of their ML/TF risks and their awareness of obligations.

26. The implementation of AML/CFT controls by banks and other large FIs is generally of a good standard. However, there are areas that could be enhanced, including PEPs and sanctions screening, CDD on existing customers, and group-wide risk management. The level of implementation of AML/CFT rules in the MVTs sector is variable. The AML/CFT controls implemented by Phase 2 reporting entities are less sophisticated than those of sectors where AML/CFT rules are longer-established and are still developing. The implementation of AML/CFT controls by casinos and TCSPs could also be enhanced further.

27. The level of STR and SAR reporting by DNFBPs remains low, particularly by TCSPs, law firms, accounting practices and real estate agents. The challenges faced by reporting entities in the registration and filing process with the FIU portal presents a barrier to effective reporting.

### *Supervision (Chapter 6; IO.3; R.14, R.26–28, 34, 35)*

28. New Zealand has three supervisors (the Reserve Bank of New Zealand (RBNZ), the Financial Markets Authority (FMA) and the Department of Internal Affairs (DIA)) which oversee compliance with AML/CFT obligations. However, no agency has a mandate to supervise the implementation of TFS obligations.

29. New Zealand authorities generally apply effective licensing and registration measures for FIs and VASPs, although some technical deficiencies were identified. Licensing bodies for DNFBP sectors apply licensing and screening measures to a varying degree, and TCSPs, high-value dealers, and some accounting practices are not subject to licensing or registration requirements.

30. The AML/CFT supervisors maintain an overall good understanding of the inherent ML/TF risk profiles of their respective sectors. The scope and depth of supervision for each financial sector is broadly commensurate with their respective risk levels, except for the banking sector, where the scope and depth of inspections does not adequately reflect the risk and complexity of the banks inspected, due in part to a lack of adequate resources available to conduct AML/CFT inspections in RBNZ. AML/CFT supervision for Phase 2 sectors has been conducted in an effective and well-managed way so far but remains at an early stage and has not yet progressed from outreach and awareness-raising to inspection and enforcement.

31. Supervisors generally apply remedial actions in an effective manner. However, the range of sanctions powers available to the supervisors under the AML/CFT Act is inadequate, particularly the low range of pecuniary penalties available and the lack of administrative penalties, and the sanctions that have been applied in practice do not appear to have been fully effective, proportionate and dissuasive. Reporting entities generally have good communication and working relationships with the AML/CFT supervisors.

### *Transparency and beneficial ownership (Chapter 7; IO.5; R.24, 25)*

32. Basic information on legal persons is publicly available on a number of registers held by the Ministry of Business, Innovation and Employment (MBIE). Some types of trusts are also registered with various agencies, though New Zealand does not have a register of all domestic trusts.

33. New Zealand has a comprehensive understanding of the ML/TF risks of legal persons and legal arrangements. In recent years, New Zealand has implemented specific additional measures to mitigate the risks of misuse of legal persons and arrangements that it has identified, including creation of the register of New Zealand Foreign Trusts, the creation of an Integrity and Enforcement Team, responsible for ensuring the integrity of corporate registries, and introduction of residency requirements for company directors. New Zealand has also established an Integrity and Enforcement Team within MBIE, responsible for assuring the integrity of information held in registries. However, major gaps remain in New Zealand's framework: there are insufficient measures to mitigate the risks posed by nominee directors and shareholders; insufficient mechanisms for authorities to obtain adequate, accurate and current beneficial ownership information for legal persons and insufficient measures for adequate, accurate and current information on trusts, which are very common in New Zealand.

34. A range of sanctions are available for failures to comply with information requirements. New Zealand has effectively used its ability to deregister companies to promote compliance. However, there are insufficient sanctions applied to individuals and to breaches of information requirements for other types of structures (e.g. partnerships, trusts),

### *International co-operation (Chapter 8; IO.2; R.36–40)*

35. New Zealand has a sound legal basis to provide and to seek MLA and extradition in relation to ML/TF and associated predicate offences. New Zealand authorities actively respond to formal and informal international co-operation requests. They have received positive feedback from counterparts on the quality and timeliness of assistance provided.

36. The central authority for MLA, the Crown Law Office, has mechanisms in place to prioritise MLA requests and ensure timely responses, although these mechanisms are relatively informal. Several competent authorities are involved in handling extradition requests and there is no clear authority with primary responsibility.

37. New Zealand authorities make MLA requests to the extent needed to build cases and are willing to pursue proceeds of crime located offshore. The number of outgoing requests has been increasing in recent years. LEAs in New Zealand actively engage in various forms of international co-operation with counterparts. The AML/CFT supervisors engage in close international co-operation with foreign regulators. New Zealand also shares basic and beneficial ownership with international counterparts.

## Priority Actions

- a) Improve the availability of accurate and up-to-date beneficial ownership information on legal persons, particularly limited liability companies and partnerships, and domestic trusts, and take steps to mitigate the ML/TF risks of nominee shareholders and directors.
- b) Ensure that supervisors have a sufficient range of proportionate and dissuasive sanctions available, and that RBNZ has adequate resources to apply the appropriate scope and depth of supervision to banks.
- c) Give clear powers and mandates to appropriate agencies to supervise and enforce TFS obligations, supported by outreach to reporting entities, a point of contact for TFS-related queries, and enhanced dissemination of updates to sanctions lists.
- d) Consolidate implementation of Phase 2 of the AML/CFT Act, including by further developing DNFBPs' understanding of their risks and obligations; ensuring that they are registered with the FIU reporting system and submit reports; and progressing towards a mature supervision regime for these sectors.
- e) Improve the FIU's tools for prioritisation, database integration and analysis of financial intelligence to enhance its ability to directly identify new targets and trends. Conduct outreach to enable LEAs to make more use of FIU proactive financial intelligence products to launch investigations into new targets.
- f) Update New Zealand's laws and regulations to address gaps and vulnerabilities including: shortcomings relating to licensing and registration of FIs and DNFBPs; gaps in preventive measures (particularly for MVTs); and the authorisation of essential human needs for sanctioned individuals.
- g) Take steps to sustain the recent increase in money laundering prosecutions, by monitoring trends and outcomes through better data and statistics and considering development of ML prosecution guidelines.

## Effectiveness & Technical Compliance Ratings

**Table 1. Effectiveness Ratings**

IO.1 - Risk, policy and co-ordination	IO.2 - International co-operation	IO.3 - Supervision	IO.4 - Preventive measures	IO.5 - Legal persons and arrangements	IO.6 - Financial intelligence
<b>Substantial</b>	<b>High</b>	<b>Moderate</b>	<b>Moderate</b>	<b>Moderate</b>	<b>Substantial</b>
IO.7 - ML investigation & prosecution	IO.8 - Confiscation	IO.9 - TF investigation & prosecution	IO.10 - TF preventive measures & financial sanctions	IO.11 - PF financial sanctions	
<b>Substantial</b>	<b>High</b>	<b>Substantial</b>	<b>Moderate</b>	<b>Moderate</b>	

Note: Effectiveness ratings can be either a High – HE, Substantial – SE, Moderate – ME, or Low – LE, level of effectiveness.

**Table 2. Technical Compliance Ratings**

<b>R.1</b> - assessing risk & applying risk-based approach	<b>R.2</b> - national co-operation and co-ordination	<b>R.3</b> - money laundering offence	<b>R.4</b> - confiscation & provisional measures	<b>R.5</b> - terrorist financing offence	<b>R.6</b> - targeted financial sanctions – terrorism & terrorist financing
<b>LC</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>LC</b>	<b>LC</b>
<b>R.7</b> - targeted financial sanctions - proliferation	<b>R.8</b> - non-profit organisations	<b>R.9</b> – financial institution secrecy laws	<b>R.10</b> – Customer due diligence	<b>R.11</b> – Record keeping	<b>R.12</b> – Politically exposed persons
<b>PC</b>	<b>LC</b>	<b>C</b>	<b>LC</b>	<b>LC</b>	<b>PC</b>
<b>R.13</b> – Correspondent banking	<b>R.14</b> – Money or value transfer services	<b>R.15</b> –New technologies	<b>R.16</b> –Wire transfers	<b>R.17</b> – Reliance on third parties	<b>R.18</b> – Internal controls and foreign branches and subsidiaries
<b>LC</b>	<b>PC</b>	<b>LC</b>	<b>PC</b>	<b>LC</b>	<b>PC</b>
<b>R.19</b> – Higher-risk countries	<b>R.20</b> – Reporting of suspicious transactions	<b>R.21</b> – Tipping-off and confidentiality	<b>R.22</b> - DNFBPs: Customer due diligence	<b>R.23</b> – DNFBPs: Other measures	<b>R.24</b> – Transparency & BO of legal persons
<b>PC</b>	<b>C</b>	<b>C</b>	<b>PC</b>	<b>PC</b>	<b>PC</b>
<b>R.25</b> - Transparency & BO of legal arrangements	<b>R.26</b> – Regulation and supervision of financial institutions	<b>R.27</b> – Powers of supervision	<b>R.28</b> – Regulation and supervision of DNFBPs	<b>R.29</b> – Financial intelligence units	<b>R.30</b> – Responsibilities of law enforcement and investigative authorities
<b>PC</b>	<b>PC</b>	<b>LC</b>	<b>PC</b>	<b>C</b>	<b>C</b>
<b>R.31</b> – Powers of law enforcement and investigative authorities	<b>R.32</b> – Cash couriers	<b>R.33</b> – Statistics	<b>R.34</b> – Guidance and feedback	<b>R.35</b> – Sanctions	<b>R.36</b> – International instruments
<b>LC</b>	<b>LC</b>	<b>LC</b>	<b>LC</b>	<b>LC</b>	<b>LC</b>
<b>R.37</b> – Mutual legal assistance	<b>R.38</b> – Mutual legal assistance: freezing and confiscation	<b>R.39</b> – Extradition	<b>R.40</b> – Other forms of international co-operation		
<b>LC</b>	<b>LC</b>	<b>LC</b>	<b>LC</b>		

Note: Technical compliance ratings can be either a C – compliant, LC – largely compliant, PC – partially compliant or NC – non compliant.