



Financial Planning
Institute of Southern Africa

THE PROFESSIONAL STANDARD

Understanding CPD under BN 194 of 2017 and linking it with FPI membership CPD requirements.

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Introduction

The Financial Services Board (FSB) now the Financial Sector Conduct Authority (FSCA) published Board Notice (BN) 194 of 2017 *via* the Government Gazette in December 2017. The said BN came into effective 1 April 2018 and repeals¹ BN 105 of 2008; 106 of 2008 and BN 102 of 2012.

Brief Background into Regulatory CPD

The Financial Planning Institute of Southern Africa NPC (FPI) has been approving CPD activities as it relates to the Financial Planner Competency Profile and FPI Code of Ethics and Practice Standards for more than 30 years. The FSCA started investigating CPD as a competency requirement for persons licensed under section 8 of the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act) as early as 2004.

The then FSB engaged in many conversations and consultations over the years with Professional Bodies, Industry Bodies, employers etc. regarding the competency requirements needed as referred to under the act. Various Board Notices (FSB sub-ordinate legislation) saw the light, but CPD never really took off the ground from a regulatory point of view. Regulatory CPD hours only became a reality effective 1 June 2018 as described in chapter 4 of BN 194 of 2017.

It was originally envisaged by the Regulator that product knowledge would have been tested via Level II regulatory examinations (RE). This all changed when the Regulator started to investigate other competency models that could deliver the same results, but via more sustainable competency models. The Regulatory Impact Assessment (RIA)² is a very insightful document to read. RE Level II examinations are in essence replaced by:

- Class of Business training (section 29 (4) of BN 194 of 2017);
- Product Specific training (section 29 (5) of BN 194 of 2017) and
- CPD hours (Chapter 4 section 31 – 34 of BN 194 of 2017)

The Regulator also investigated other CPD models such as the one followed by SARS for tax practitioners (section 240A of the Tax Administration Act finds application). But, the Regulator has many roles to regulate – the model followed by SARS was therefore not a natural fit for the Financial Services Industry.

¹ Chapter 7 section 51 of BN 194 of 2017

² See [FSCA's website](#)

After wide consultation with interest groups, the Regulator published the first draft of the new fit and proper requirements in October 2016 for public comment. All comments were considered by the Regulator and the new fit and proper requirements came out in December 2017 via BN 194 as mentioned above.

Understanding CPD

The FPI investigated [CPD practices](#) across 69 Professional Bodies during 2015 to establish best practices for CPD. This research was instrumental in assisting the then FSB and other interested parties to realise that CPD in South Africa is already regulated by SAQA for professional bodies. SAQA regulates Voluntary Professional Bodies (like the FPI) and Statutory Professional Bodies (like IRBA.) All statutory professional bodies are Regulators, but, not all Regulators (like our regulator) are Statutory Professional Bodies. The policies laid down by SAQA for professional bodies as it relates to CPD were therefore of interest to the FSB. Discussions that followed between SAQA and the then FSB was instrumental in arriving at the conclusion that SAQA Recognised Professional Bodies could assist in approving CPD Activities for the Financial Services Sector as defined in section 1 of BN 194 of 2017 today.

Definitions of CPD and related activities

CPD has a few definitions. BN 194 only defines CPD as *Continuous Professional Development* which is not a definition but rather just a description of what CPD stands for. CPD is though defined by professional bodies. The FPI defines CPD as *“as a process of lifelong learning whereby an individual systematically engages in activities that maintain abilities, skills and knowledge required for a professional practice as described and guided by the FPI”*

For the purposes of CPD as described in BN 194, it is important to note that the FPI is South African Qualifications Authority (SAQA) Recognised Professional Body.

Other pertinent definitions to take note off:

In order to understand what FAIS CPD (CPD as per BN 194) entails, we need to start in the definition section of the said Board Notice:

“Assessed” in relation to competency requirements, means the structured process of gathering reliable evidence to determine the level of a person’s competence in relation to a pre-determined standard and the extent to which the person’s competence meet the pre-determined standard;

“class of business” means the respective classes of business set out in Table 1 in Annexure Four;

“class of business training” means the training referred to in section 29(4) in respect of a class of business and which training is provided and assessed by an accredited provider or an education institution;

“Competence” means having the skills, knowledge and expertise needed for the proper discharge of a person’s responsibilities in the performance of his or her functions;

“CPD” means continuous professional development;

“CPD activity” means an activity that is-

- (a) accredited by a Professional Body who confirmed that the activity is verifiable and
- (b) allocated a hour value or a part thereof by that Professional Body and
- (c) verifiable,

and excludes-

- (i) an activity performed towards a qualification; and
- (ii) product specific training.

“CPD cycle” means a period of 12 months commencing on 1 June of every year and ending 31 May of the following year;

“NQF Act” means the National Qualifications Framework Act, 2008 (Act No. 67 of 2008);

“professional body” means a body recognised by SAQA as a professional body for the purposes of the NQF act;

“SAQA” has the meaning assigned to it in section 1 of the NQF Act;

“Tier 1 financial products” means the financial products listed in column A of Table 1 in Annexure Three;

“Tier 2 financial products” means the financial products listed in column B of Table 1 in Annexure Three;

“verifiable” in relation to CPD activities means activities that can be objectively verified and includes evidence of the identity of the person who partook in such activities and proof of the completion thereof”

Chapter 1 section 5 is also very important to take note of as it confirms the following:

“For an FSP, key individual and representative to remain authorised, approved or appointed that person must, as required by section 8A of the act (FAIS Act), at all times comply with the fit and proper requirements referred to in section 4 to the extent applicable to FSP’s, key individuals and representatives in the relevant categories.”

From the above it is very clear that should the regulated persons not comply with CPD requirements, he/she may be debarred in terms of section 14 of the FAIS act.

Now that we have covered the important definitions as it relates to CPD only – lets understand why CPD is important.

Why CPD is important:

Professional members³ of the FPI must at all times adhere to FPI regulations and policies. The FPI Code of Ethics and Practices Standards highlights the Principles and Standards that members must at all times adhere to. One of the Principles in the FPI Code of Ethics is Competence:

Principle 5 – COMPETENCE:

“Competence requires attaining and maintaining a high level of knowledge, skills and abilities in the provision of professional services. Competence also includes the wisdom to recognise one’s own limitations, consulting with other professionals when in doubt and referring clients to other professionals should one not have the time, ability or inclination to optimally respond to a client’s needs. Competence requires the FPI member to make a commitment to continued learning and professional development.”

It is therefore very important to understand that adherence to CPD requirements is not just another compliance requirement, but a higher purpose of professionalising the financial services sector and treating consumers fairly in that the consumer has access to a competent individual.

FSCA / FAIS Competence Requirements (Chapter 3)

For starters, it is important that FSP’s, key individuals and representatives take note of the *general competence* requirements in **section 12** of BN 194:

An FSP, key individual and representative must-

- (a) have adequate, appropriate and relevant skills, knowledge and expertise in respect of the financial services, financial products and functions that it performs;
- (b) comply with the minimum requirements set out in Part 2,3,4 and 5 of this Chapter, and
- (c) **maintain their competence** (*this refers to CPD*).

FSP’s must also take note of the Responsibilities of the FSP in **section 13** of BN 194. For ease of reference, see applicable sections below (section 13 (1)(e); 13(3)(b); 13 (4)(a)(b)(c) and 13(5))

13. (1) An FSP must establish, maintain and apply adequate policies, internal systems, control and monitoring mechanisms to ensure that it, its key individuals and representatives-

³ CFP® professional; FSA™ professional, AFP™ professional and RFP™ professional

- (e) undertake CPD to maintain and update the knowledge and skills that are appropriate for their activities

13 (3) An FSP must be able to demonstrate and record that it has evaluated and reviewed at regular and appropriate intervals-

- (a)
(b) the appropriateness of the training and CPD referred to in subsection 1(d) and (e)

13 (4) The evaluation and review contemplated in subsection (3) must, *inter alia*, take into account-

- (a) technical knowledge and its application
(b) skills and expertise and
(c) changes in the market, to financial products, financial services and legislation.”

***IMPORTANT**

The above highlights that the FSP must ensure that the CPD activities that KI's and representative attend and complete, are relevant to the financial services they deliver with consideration of the licence categories and class of business that the KI and representative are licences for.

Section 13 (5) refers to the Competency Register that the FSP must establish and maintain. This register will in essence replace the Representative Register the FSPs have and must contain the following information of all key individuals and representatives:

- all qualifications obtained
- successfully completed regulatory examinations
- product specific training
- Class of business training
- CPD

The competency register in the future, will most likely be uploaded via web services on a quarterly basis to the FSCA in XML format. Smaller FSPs who do not have the IT capabilities that bigger FSP's may have, will still be able to upload the competency register via the FSCA's e-portal. The FSCA is currently testing the Competence Register via XML format with various FSP's and will in due course notify the industry of the form, manner and intervals that the competency registers must be furnished to the Registrar.

Drill down into FAIS CPD as per Chapter 4 section 31 - 34 of BN 194 of 2017:

Who does FAIS CPD requirements apply to?

- To all FSP's Key Individuals and Representatives licenced under section 8 of the FAIS Act.

Who does it NOT apply to, in other words, who does not have to obtain FAIS CPD hours?

- FSP's Key individuals and Representatives licences for Long-term Insurance subcategory A and/or Friendly Society Benefits and
- Representatives of a CAT 1 FSP that is appointed to **only**
 - render financial services in respect of a TIER 2 financial product and/or
 - render and intermediary service in respect of a Tier 1 financial product.

What is a TIER 1 and TIER 2 product?

See column A and B of Table 1 in Annexure Three in BN 194 of 2017. Tier 1 is in essence complex financial products whereas Tier 2 is non-complex financial products with less underwriting requirements.

Quick summary of who should obtain what competency requirement:

Person	Experience	Qualifications	Exam	Class of Business	Product Specific training	CPD
CAT 1						
FSP	Yes (see Annexure 1, Table 1)	Recognised qualification Exceptions: Funeral & Friendly	RE 1: Exceptions: Funeral & Friendly	Yes Exceptions: Funeral & Friendly	Yes	Yes
KI	Yes (One (1) year management/over-sight of particular service by a CAT 1 FSP)	Recognised qualification Exceptions: Funeral & Friendly	RE 1 Exceptions: Funeral & Friendly	Yes Exceptions: Funeral & Friendly	No (see sect 29(1).	Yes
Rep	Yes (Refer to Annexure 1, Table 1)	Recognised qualification Exceptions: Funeral & Friendly; Scripted sales execution - all products - Grade 12	RE 5: Exceptions: Funeral & Friendly; Tier 2 products - all services; Tier 1 - scripted sales execution only	Yes Exceptions: Funeral & Friendly; Tier 2 products - all services; Tier 1 products - scripted sales execution only	Yes	Yes Exceptions: Funeral & Friendly; Tier 2 products - all services; Tier 1 products - intermediary services only
CAT II						
Person	Experience	Qualifications	Exam	Class of Business	Product Specific training	CPD
FSP	Yes (refer to Annexure 1, Table 2)	Recognised qualification (NQF 7 plus)	RE 1 & RE 3	Yes	No	Yes
KI	Yes (One-year management/oversight of particular service by a CAT II FSP)	Recognised qualification (NQF 7 plus)	RE 1 & RE 3	Yes	No	Yes

Rep	Yes (Refer to Annexure 1, Table 2)	Recognised qualification (NQF 7 plus)	RE 5	Yes	No	Yes
CAT IIA						
FSP	Yes (3 years in the rendering of CAT IIA financial services)	Recognised qualification (NQF 7 plus)	RE 1 & RE 3	Yes	No	Yes
KI	Yes (1 year)	Recognised qualification (NQF 7 plus)	RE 1 & RE 3	Yes	No	Yes
Rep	Yes (3 years in the rendering of CAT IIA financial services)	Recognised qualification (NQF 7 plus)	RE 5	Yes	No	Yes
CAT III						
FSP	Yes (3 years in the rendering of CAT III financial services)	Recognised qualification (NQF 7 plus)	RE 1 & RE 4	Yes	No	Yes
KI	Yes (1 year)	Recognised qualification (NQF 7 plus)	RE 1 & RE 4	Yes	No	Yes
Rep	Yes (3 years in rendering of CAT III financial services)	Recognised qualification (NQF 7 plus)	RE 5	Yes	No	Yes
CAT IV						
FSP	Yes (1 Year)	Recognised qualification	RE 1	Yes	Yes	Yes
KI	Yes (1 Year)	Recognised qualification	RE 1	Yes	Yes	Yes
Rep	Yes (1 Year)	Recognised qualification	RE 5	Yes	Yes	Yes

When does FAIS CPD come into effect?

As per Chapter 7 of BN 194: 1 June 2018. The first FAIS CPD cycle is therefore from 1 June – 31 May 2019. This means that FSP’s KI’s and Representatives have 12 calendar months from 1 June to obtain either 6, 12 or 18 CPD hours.

How do I know whether I need 6, 12 or 18 FAIS CPD hours?

See section 33 of BN 194 as well as quick summary below:

Minimum CPD required per 12 month cycle			
Person	Single subclass within single COB	More than one subclass of business within a single COB	More than one COB
FSP	6	12	18
KI	6	12	18
Rep	6	12	18
Pro-rated minimum CPD hours if authorised, approved or appointed for a period of less than 12 months in a CPD cycle			
FSP	$[X \div 12] \times Y = Z$	<i>X = Number of annual required CPD hours</i>	
KI	$[X \div 12] \times Y = Z$	<i>Y = number of months authorised, approved or appointed during a particular CPD cycle</i>	
Rep	$[X \div 12] \times Y = Z$	<i>Z = Required pro rata CPD hours</i>	
Reduction of CPD due to maternity, paternity or adoption leave; long-term disability or caring responsibilities to care for a family member who has a long-term illness or disability			
Rep	$[X \div 12] \times Y = Z$	<i>X = Number of annual required CPD hours</i>	
		<i>Y = number of months absent from work</i>	
		<i>Z = Required pro rata CPD hours</i>	
Rules			
<i>*An FSP may not reduce the CPD hours of a representative for consecutive CPD cycles.</i>			
<i>*An FSP must ensure that key individuals and representative submit evidence of their CPD activities to the FSP within 15 days after expiry of the CPD cycle.</i>			

*IMPORTANT

FPI designated members (CFP®, FSA™, AFA™ and RFP™) must obtain 35 CPD points/hours (CPD hours and CPD points can be used interchangeably and means the same thing in an FPI and FSCA context). Twenty-five (25) of the 35 CPD hours must be verifiable (see definition of verifiable above and in the FPI's CPD policy). Eighteen (18) of the 25 verifiable FPI membership CPD hours therefore **meets the FAIS CPD** required if the FSP is of the view that the type and combination of CPD activities undertaken are relevant to the functions and role of the FSP, Key Individual and/or representative⁴.

⁴ Section 32 (1) (c) (i) of BN 194 of 2017

Pro-rated CPD hours:

A person who must start obtaining FAIS CPD hours, let's say only in November of a year, will have to obtain

$[6/12] \times 7 = 3.5$ CPD hours OR

$[12/12] \times 7 = 7$ CPD hours OR

$[18/12] \times 7 = 10.5$ CPD hours

depending on the COB the key individual or representative provides financial services⁵ in. A person who is still under supervision and/or who has not obtained all his/her competency requirements (qualification, RE, COB and PST) does not have to obtain CPD hours *yet*.

***IMPORTANT Condition 2⁶: Specific compliance periods section (4) states that a representative must comply with the applicable CPD requirements from the date on which the representative meets the class of business training requirements, examination requirements and qualification requirements (in essence the competency requirements in Chapter 3 of BN 194)**

Reduction of CPD hours:

The FPI has a specific process in place for members who could not meet their CPD obligation due to extreme circumstances. Members of the FPI must complete the necessary application and provide the necessary evidence for the FPI to consider if the member could be exempted from all or a portion of the CPD hours for that cycle.

The FSCA followed the same principle and states in section 34 of BN 194 of 2017 what circumstances may be considered as relevant in order for a KI or representative to qualify for a reduction of CPD hours for a certain CPD cycle. (maternity, paternity or adoption leave; long-term illness or disability; the representative responsibilities to care for a family member that has a long-term illness or disability). The formula for calculating the reduces CPD hours:

$$(x/12) \times (12-y) = z$$

X = number of annual required CPD points (6, 12 or 18)

Y = number of months absent from work in a particular CPD cycle

Z = required pro rata CPD hours

⁵ Financial Services in the FAIS act includes Advice and Intermediary services

⁶ Consultation Paper – Exemption of Services under Supervision published by FSCA for public comment 2018-07-31

***IMPORTANT**

The FSP must have a CPD policy and CPD processes in place that should show that an informed decision was taken by the FSP in allowing a reduction of CPD hours for KI's and representatives. As at 1 June 2018 FSP's must have CPD policies and procedures in place. It is recommended that the FSP has some form of a CPD Committee that receives and assessed requests for Reduction in FAIS CPD hours to show the FSCA, should the FSP be audited that it applied its mind to the approval of reduction in CPD hours for certain KI's and representatives. This could also form part of the Compliance Departments Conduct of Business Report to the FSCA.

What is the General CPD requirements⁷ under BN 194?

FSP's, key individuals and representatives must ensure that they maintain the required competence (see definition of competence above) to render or manage/oversee the financial services for which they are appointed/approved/authorised.

It is also important to note that FSP's KI's and representatives must comply with the minimum CPD requirements (6,12 or 18 – see above CPD hours). This does not mean that only the minimum must be complied with – if a person wants to obtain more than the required minimum – they are at liberty to do so. FAIS CPD hours are though not transferrable to the next CPD cycle – you have to complete 6, 12 or 18 each year.

FPI members are asking if FPI CPD points/hours is sufficient for FAIS purposes?

The answer is YES IF:

The CPD hours obtained is verifiable.

To this, it is vitally important that an attendee of a CPD activity obtains proof of completion of such an activity. Such proof can be in the form of a Certificate of Completion; an assessment with a Statement of Results / Outcome that confirms that you successfully completed the approved CPD activity. We have many FSP's, KI's, representatives and even compliance officers phoning the FPI requesting proof that an individual completed a CPD activity. SAQA Professional Bodies only accredits CPD activities as being relevant to the abilities, skills and knowledge needed by a person to competently carry out his/her duties under the FAIS Act and professional body regulations. The proof must be obtained from the CPD provider.

The said proof must be kept on file by the attendee as an FSP must within 30 days after the end of each CPD Cycle (30 June) record in the competency register the CPD activities completed by KI's and representatives and the reduction of CPD hours allowed (see above).

⁷ Section 32 of BN 194 of 2017

The FSP must also obtain the relevant supporting documents (like the certificates described above) from its key individuals and representatives and keep it on record for no less than five (5) years from the end of the CPD cycle concerned.

It would do no harm for an FSP to build into its CPD policy and procedures that proof of completion of a SAQA Professional Body Accredited Verifiable CPD activity must be submitted to the FSP within 15 days after the completion of the CPD activity. This would then be more in line with the record keeping requirement for Class of Business and Product Specific training mentioned in section 29 of BN 194 of 2017. This would also assist the FSP to avoid the rush in the 30 days after the CPD cycle ends on 31 May 2019.

Let's look at the type and combination of CPD activities that are required to be completed by key individuals and representatives:

At the onset, it is important for KI's and representatives to understand their FSP's CPD policies and procedures as that is the framework that informs you how, when and what should be submitted to who.

Again, the FSP must ensure that the type and combination of CPD activities undertaken by key individuals and representatives are:

- **Relevant to the functions and role of the FSP, KI and representatives**

To this, it is vitally important that the FSP's have training plans in place that speaks to the functions and roles of KI's and representatives. One thing that is quite clear at this early stage of the new fit and proper requirements, is that it appears that the following role players within an FSP are simply not talking to each other in planning for the CPD cycle:

1. Training Departments and Compliance Departments
2. HR departments and management in planning the performance cycles and PDP's/KPI's and tracking the same in the relevant performance management systems.

It is suggested that training departments are not left to its own devices to design "training" for CPD purposes without the clear guidance received from business. The above minds (Training, compliance, HR and management) should meet at regular intervals to ensure that BN 194 is complied with at all times.

- **Contributes to the skill, knowledge, expertise and professional and ethical standards of the FSP, KI and representative**

BN 194 does not state that 5 out of the 18 FAIS CPD hours must for instance be towards Ethics and Practice standards. It does though state that the CPD activities must contribute to the professional and ethical standards of key individuals and representatives. It is therefore a good idea for the FSP to perhaps state in its own CPD policy

that a certain percentage (e.g. 15% of the total CPD hours: 1/6 or 2/12 or 3/18) of the CPD hours must be towards professional and ethical standards.

FSP's in looking for guidance in developing CPD activities that "speaks" to the activities and roles of a financial planner and/or financial advisor, can look at the FPI's Financial Planner and Financial Advisor Competency Profiles and Curriculum documents⁸ to establish what Abilities, Skills and Knowledge are needed to be and remain competent in his/her role and activities. It would also assist FSP's greatly if their KI's and representatives are designated members of the FPI as they are then subject to the FPI's policies and procedures and will also have access to the FPI's membership benefits that includes developed CPD programmes that speak to the abilities, skills and knowledge needed by a financial planner and/or financial advisor (CFP® and FSA™ designations) to competently provide / deliver financial services.

- **Address any identified needs/gaps in the technical knowledge of the FSP, key individual/s or representative/s; the generic knowledge and understanding of the environment in which the financial service is rendered or managed or oversee and the knowledge and understanding of applicable laws.**

These gaps can only be identified via ongoing performance appraisals and PDP meetings and hopefully not when it is too late (e.g. FSP received a valid FAIS ombud complaint that highlights the representatives' lack of technical knowledge or knowledge and understanding of the latest tax updates for instance). CPD activities that will be of great assistance in this instance are Regulatory Updates. Just a reminder: the FSP, key individual/representative must at all times ensure that any / all CPD activities they attend are approved by a SAQA Recognised Professional Body as verifiable CPD before they register (and possibly pay) to attend a CPD event.

- **Adequately considers changing internal and external conditions relevant to the classes and subclasses of business, the category of financial services and the financial products for which the FSP, key individual or representative is authorised, approved or appointed**

The above bullet point refers specifically to *changing internal and external conditions relevant to the COB* – lets explain by way of an example: if a representative is only licenced for short-term commercial lines and attends a CPD activity that is relevant to Collective Investment Schemes – then that CPD activity will not be relevant to the COB that the representative is licenced for.

It is important to note that not all CPD activities MUST be mapped to a particular class of business. Computer skills training programmes (an update on financial analysis software (FINTECH)) is an important skill to have in order to competently provide financial services. A training activity like this – cannot be pinned/mapped to a specific COB, but is relevant to all.

⁸ See www.fpi.co.za or contact certification@fpi.co.za for copies of the competency profiles and curriculum documents

Important for the FSP to take note of:

During the FSCA's audits the policies and procedures that FSP's put in place regarding CPD and the tracking of CPD activities for key individuals and representatives will be inspected. We have to remember that the CPD requirement kicked in 1 June 2018 and assumes that the FSP's already have CPD policies and procedures in place. If it is not in place yet – FSP's are already in non-compliance with BN 194 of 2017 as it relates to the CPD requirement.

The FSP's CPD policies and procedures must include:

- How the FSP will ensure that the key individuals and representatives' abilities, skills and knowledge are maintained as it relates to their functions and roles
- Training plans for each CPD cycle (here it is NB that the above parties meet on a regular basis to do the necessary planning for each cycle (training department, compliance, HR and management)
 - The training plans must ensure the professional standards and practices of the FSP, key individual and representatives are improved (the whole idea behind professionalising the financial industry)

In conclusion:

For FPI members, CPD compliance is not new and the FPI has been approving and working with CPD for over 30 years. For members, the main thing to remember is that 18 of your 25 verifiable CPD points/hours are acceptable for FAIS CPD hours if you as an FSP can map it to your training plan/CPD policy OR if you as a key individual or representative can map it back / into your KPI's / training plan that the FSP has for you.

As an FPI member – you can store all evidence regarding the completion of CPD activities in your membership profile and you can make use of the FPI's competency register. For more information on FPI products that can assist with regulatory record keeping and compliance – please contact our membership department at membership@fpi.co.za

THE END