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MMU Investigation Process Manual: Further Consultation Paper

Dear Kenny

I refer to the above consultation paper and welcome this opportunity to respond. We note that this is a continuation of the previous consultation on the process manual published in December 2010. It was our understanding at the time that this would replace the existing process in AIP/SEM/511/07.

The current consultation states that its “purpose ...is to consult on an investigation process manual that would complement and clarify the existing process followed by the MMU when carrying out such investigations. These existing processes are already described in previous documents published during the design of the SEM; the proposals contained herein are not intended to replace these existing procedures”.

Thus it is necessary to refer to multiple documents (AIP/SEM/31/06; 62/06; 82/06; 143/06; 217/06; and 511/07) to try and understand what the MMU’s investigation process and procedures are and it is unclear which take precedence when there are potential conflicts or inconsistencies. This does not help to clarify the existing process and therefore we strongly suggest that one overarching and comprehensive MMU process manual be compiled and published for further consultation.

Yours sincerely



Kevin Hannafin
Regulation Manager