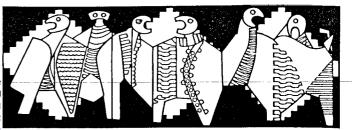
NATIONAL ARCHIVES

TE WHARE TOHU TUIIITUHINGA 0 AOTEAROA

Department of Internal Affairs

- Auckland--Regional-Office 525 Nit Wellington Highway, Auckland, New Zealand PO Box 91 220, Auckland, New Zealand Telephone (09) 270 1100 Facsimile (09) 276 4472 Web http://www.arciiives.dia.govt.nz



Based on sculpture by Arnold Wilson, Kai Rangatira, in Head Office Reading Rooil

1. AT JOB FILE

AT 98/9

2. AGENCY NAME

Ministry of Commerce Business and Registries Branch Companies Office

3. AGENCY CONTACTS

[name removed] Manager Business Development

[name removed] Auckland Business and Development Division [name removed] Christchurch Business and Development Division

4. APPRAISAL ARCHIVIST

[name removed]

5. SUMMARY DESCRIPTION OF RECORD CATEGORIES HELD BY THE COMPANIES OFFICE

The Companies Office has responsibility for three district registry functions, the registration of all corporate bodies, the maintenance of amendments to the register and the dissolution and removal of extinct entities from the register. Records are held for:

- companies (under Companies Act 1993)
- building societies
- individual and provident societies
- charitable trusts (under Charitable Trusts Act 1957)
- co-operative companies
- overseas companies operating in New Zealand
- unit trusts
- incorporated societies
- non-corporate issuers of securities
- trade unions
- friendly societies and credit unions

Wellington Head Office: 10 Mulgrave Street, Wellington, New Zealand. PO Box 12 050, Wellington, New Zealand. Telephone (04) 499 5595 Facsimile (04) 495 6210 Email national .archives@dia.govt.nz

Christchurch Regional Office: 90 Peterborough Street, Christchurch, New Zealand. PO Box 642, Christchurch, New Zealand. Telephone (03) 377 0760 Facsimile (03) 365 Dunedin Regional Office: 556 George Street, Dunedin, New Zealand. PO Box 6183, Dunedin, New Zealand. Telephone (03) 477 0404 Facsimile (03) •177

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Some-offices may-still-be-holding early bound-registers for: --- -

- •private companies
- •public companies
- mining companies
- •incorporated societies

The Companies now operate a computer database called REGIS which contains summary information on:

- Company number
- Company name
- Registered Address
- Directors
- Charges Mortgages / Debentures
- Documents Precis of documents received since c 1996
- Shareholders up to 10 20 only
- •Summary Name, Number, Status, Registered Office address, Directors (2 only)

6. APPRAISAL CIRCUMSTANCES

The initial impetus to develop a schedule for incorporations resulted from a discussion between [name removed] and myself. [name removed] indicated the Auckland Companies Office had placed a 10 year disposal date from the date the company was struck-off. Preliminary investigations revealed that no disposal schedule seemingly existed. Whilst it was National Archives practice to accept the transfer of incorporations, the period after they had been struck-off to the time they were transferred varied considerably within regions and according to particular office. Furthermore access provisions also varied with some records transferred with no restriction and others with restriction periods of up to 50 years from the date the company was struck-off. There was also specific restrictions placed on the correspondence in some instances.

In response to these circumstances, I agreed, with [name removed], to draft a disposal schedule covering the Auckland Companies Office records, specifically those placed in the Auckland Record Centre. Not long after agreeing to look into a schedule, [name removed] invited me into a meeting with [name removed] and [name removed] from the Ministry of Commerce. The benefits of a schedule were discussed but no formal agreement was entered into.

I continued doing low priority background work on developing a schedule which included meetings with [name removed], Ministry of Commerce, Head Office and [name removed], Ministry of Justice Commercial Affairs Division, Auckland Companies Office, Manager. The thrust of these meetings was to gain background details about the registration of companies.

Meanwhile [name removed] prepared a draft discussion paper entitled `Secondary Storage and National Archives'. This paper confirmed the lack of a written policy in relation to the disposal of records. It also outlined the requirements of the Archives

Act 1957 and to quote [name removed]'s Memorandum of 10 September 1997 "As far as NA are concerned I have taken a `strategic minimalist approach'. No doubt the Chief Archivist and her staff will have different views". A copy of [name removed]'s paper was sent to me on 18 September with a note that [name removed], Assistant Secretary for Business Registries Branch wanted [name removed] to negotiate a protocol with National Archives as soon as possible. A driving factor behind this appears to have been the cost of storing struck-off records.

A meeting with [name removed] resulted in an appraisal contract being agreed to covering 'incorporations' and a separate appraisal for insolvency files. The contract was signed on 12 November.

7. DISPOSAL OPTIONS

In developing the final disposal recommendations, a number of options were investigated. The main options included:

- Option 1 Destroy all 'incorporations'
- Option 2 Apply [name removed]'s recommendations outlined in his "strategic minimalist approach"
- Option 3 Develop alternative sampling methodology
- Option 4 Retain all 'incorporations'

OPTION I Destroy all incorporations

This was quickly rejected as it received no support and was even more draconian that [name removed]'s "strategic minimal approach".

OPTION 2 [name removed]'s "Strategic minimal

approach" [name removed] recommended that:

"Files of `dead' incorporated societies, industrial and provident societies and building societies, friendly societies, credit unions, trade unions and charitable trust boards may be of enduring historical interest. These often reflect the interests and activity of a community at local, regional or national level"

This viewpoint was agreed to by all those people I spoke to and hence [name removed]'s recommendation that they be sent to National Archives as archives was fully endorsed.

[name removed] further recommended that:

"All other incorporations be considered in two groups. Firstly those falling under the provisions of the Financial Reporting Act and companies formerly known as `public companies' under the provisions of the now repealed Companies Act 1955. Secondly, all the other incorporations, except those referred to [above].

FINANCIAL REPORTING ACT / PUBLIC COMPANIES

"This portion of the register contains incorporations that may be of greater historical interest. These are more likely to reflect the important traditional concepts of liability, aggregation of capital and separation of management and ownership. They may also be engaged in significant activity of local, regional or national interest or importance".

In terms of their disposal, [name removed] recommended that "a sample is selected of 5 dead files in each decade from incorporations removed from the register. The sample will be taken from incorporations which have been either subject to the provisions of the Financial Reporting Act or were public records under the repealed Companies Act 1955. I recommend that this sample complete with related investigation [includes legal and sections 9A/365, 34A and 67 files], compliance prosecution or liquidation files but excluding the correspondence file be deposited with National Archives no later than 6 years from removal from the register".

All those people I spoke to agreed the listed companies (or old public companies) were of significant interest and therefore warranted permanent retention. They did not agree that sampling these records was justified because of the importance of these records not only in terms of researchers interested in business history but also in relation to their importance and impact on the local, regional and national economy.

Finally [name removed] recommended that

"All other incorporations including investigative [includes legal and sections 9A/365, 34A and 67 files], prosecutions and liquidation files where relevant, be destroyed at the conclusion of 6 years after removal from the register."

This recommendation that all other incorporations other than those outlined above be destroyed was not generally acceptable to various interested parties with whom I discussed this option.

OPTION 3 Alternative Sam lin

From the discussions I had there was unanimous support for the retention of 'dead' incorporated societies, industrial and provident societies, building societies, friendly societies, credit unions, and charitable trust boards. They also argued for the retention of incorporations falling under the provisions of the Financial Reporting Act and companies formerly known as 'public companies' under the repealed Companies Act 1955 or 'listed' companies under the provisions of the Companies Act 1993.

[name removed] indicated that listed companies represented approximately 10% of all companies on the register. Given the comments supporting their retention and the quantities involved, I decided to concentrate on the `unlisted' companies and examine alternative sampling methods to those proposed by [name removed] in his `strategic minimalist approach'.

A number of alternative approaches were examined which could either be applied singly, in combination with others or could all be applied in tandem. The proposed sampling strategies included:

- setting a grandfather date
- application of a dollar threshhold and / or threshhold based on shareholdings
- application of a operating cut-off period
- maintaining specified categories of business.

All the above included the retention of a complete REGIS entry for all incorporations, particularly `unlisted' companies.

• SETTING A GRANDFATHER DATE

Under this approach all unlisted companies registered by a specified date would be retained. The difficulty was to set and obtain agreement on the grandfather date. Everyone I spoke to agreed the date would have to be post World War I and most argued for a post World War II date. In view of the comments I proposed 1960 as the grandfather date which would cover the introduction of the 1955 Companies Act.

[name removed] confirmed that the Ministry of Commerce could identify from the REGIS computer system [subject to limits of processing accuracy] the registration date of dead incorporations. This therefore appeared a viable option.

• <u>APPLICATION OF A DOLLAR THRESHHOLD OR THRESHHOLD BASED</u> ON SHAREHOLDINGS

This approach involved the retention of all unlisted companies whose:

- number of issues exceeded a given number
- value of debentures or mortgages exceeded a given dollar value
- share capital exceeded a given dollar value
- assets exceeded a certain dollar value.

Potentially these elements could be applied singly or as a combination of one or more.

At the outset, the difficulty of basing a sample on monetary value was to set the threshhold value given the need to adjust this over time for inflation. Furthermore, a company may start its life as a shell company with little assets, few shares or debentures but subsequently assume great importance. Infact all companies fluctuate

to varying degrees in value (assets, liabilities share etc) over the period of their existence, particularly those that have operated for a long period prior to being `struck off the register. Similarly the number and value of share issues may vary from company to company and over time. A selection process based on monetary value not only has to deal with inflationary changes and variable asset and liability values from one annual return to another but also needs to determine whether the threshold value (irrespective as to whether it is based on share capital, debentures etc) is to be assessed either on their value as at the time of registration and/or filing of the first annual return or at the time the company was struck off and / or filing of the last

annual return or at any point in its operations (eg filing of any annual return) so long, as at some stage it exceeds the stated threshold.

In light of these difficulties it was decided the selection of companies for retention or destruction based on monetary value would be too labour intensive and too fraught with identification problems to be effectively applied.

A selection process based on the total number of shares issued faced similar selection problems as share issues may take place at varying times in a companies life and the value of these shares may fluctuate.

APPLICATION OF AN OPERATING CUT-OFF PERIOD

This approach was based on the premise that all unlisted Companies that had been in operation that exceed a specified period of years (eg. 10 years) from the date of registration be retained. Although the 1993 Companies Act requires companies to reregister, I was advised the original registration number and date of registration was still accessible. Given this, it would be possible to determine the length of time a company had been operating prior to being `struck off.

The approach was based on the premise that a significant number of companies only last for a few years and those that remained were likely to be not only `successful' but also likely to be of broader interest to researchers. While most people agreed that many companies did not survive the first few years of operation, I was not able to get firm statistics as to the numbers or percentages involved so the actual impact of this approach in terms of retention and destruction remains an unknown.

MAINTAINING SPECIFIED TYPE OF BUSINESS

It was suggested we should try selecting certain specified types of business. This idea was fairly quickly abandoned as firstly, it proved near impossible to gain agreement on the type of business activities to keep. A glance at the Yellow Pages alone highlighted the diversity. Secondly, even if agreement on the type of business we should retain had been reached, the problems associated with identifying them by company name would have proved a time consuming task and it is unlikely every business falling into each category would have been identified.

OPTION 4 Retention of all Incorporations

The retention of all incorporations was the option favoured by most people we approached. This practice was in fact what some offices of National Archives had been applying already.

Discussions with Australian Archives revealed that the Australian Archives had three current disposal authorities (ie schedules) for the Australian Securities Commission, the body that administers the Australian Corporations Law. Before 1991 the administration of corporations laws was shared between the Commonwealth (National Companies and Securities Commission) and the States and Territories.

The disposal authorities most relevant to post 1991 Company registrations prescribe permanent retention in electronic form of the Australian Securities Commission national corporate database known as ASCOT. (Australian Securities Commission On Time). Information submitted to the Australian Securities Commission since 1991 is imaged into the DOCIMAGE Computer System consequently the schedule specifies paper versions of documents (including any documents held on magnetic media) may be destroyed but only after transfer to optical disc or equivalent storage media.

It would seem all pre 1991 records were retained also.

For details as to what is on ASCOT see Appendix 1.

Written comments from legal search agents accessing company records suggested they required access to dead companies that had been struck off for many years. [name removed], for example, were able to cite a number of examples of recent searches where the companies were still in existence but they had been `struck off the register for over 10 years.

One example was "A small company but a successful family business that had been struck off (for not filing annual returns). It had been removed for 13 years, but the owners, (company) did not know they no longer existed as a legal entity. Property had been brought in the company name using its common seal. This company needed to be reinstated as soon as possible or the land purchased could have reverted to the `crown' under `bona vacantia' clauses in the Land Transfer Act. It is also through these `bona vacantia' clauses that a company can be reinstated to the register. One reason for maintaining archival records".

[name removed] of Legal Services (Dunedin) Ltd is a frequent visitor of National Archives Dunedin and advised [name removed] that when searching files of defunct companies at National Archives, she normally requires the following information:

- last annual return
- last return of directors and company secretary
- last notice registered office location
- details of why, how and when the company is struck off.

It was generally agreed the REGIS system does not provide all the details required. Furthermore the computerisation of the Central Registry did not take place until 1983 and the completeness (and accuracy) of early records may vary as initially information captured was limited to incorporation name, number, type of incorporation and status. The current system REGIS was not introduced until c1989 according to [name removed].

[name removed] asked a few solicitors for their opinion. Their main concern (along with that of [name removed]) was "that a company can be restored to the register. There is no time limit as long as you have a valid reason for restoration. In this instance, we do not believe you can destroy the files" "it is our opinion that unless a file could be stored completely on microfiche or the like, the physical file could not be destroyed in case it was required for restoration".

Other legal searchers contracted included [name removed] and [name removed]. All the firms indicated that they are required for various reasons to make historical searches for companies that have been struck off, whether it be because the company has been struck off for not filing an annual return, gone into receivership, liquidated etc. In sum, the reason for the searches varied and the information sought also varied, some needing to see the actual constitution and articles of association and others were interested in the correspondence. The type of company searched varied as did the period after which the company was struck off. In view of these variables, it was argued a sample would not meet their requirements and they urged all records be permanently retained.

In addition to legal searchers, a number of people who had written business histories or used business records were approached for their views. They included:

- [name removed] former head of University History Department and author of various business histories including Makers of Fortune.
- [name removed], Head of Policy and Senior Historian at Historic Places Trust; author of numerous local and business histories, and member of National Archives Advisory Board.
- [name removed], professional historian and author of Quality Bakers of New Zealand.
- [name removed], businessman and author of various local and business histories.
- [name removed], author of the History of Mobil and Secretary of Professional Historians Association of New Zealand.
- [name removed], currently Deputy Head of Department of the University of Auckland Economics Department.

Their written comments are in Appendix 2 but some comments are paraphrased below:

* It is not only historians who can make use of such archives, it is possible to use them for strategic review purposes by firms themselves

or their successors, as well as being of interest to a range of people concerned with the analysis of policy issues and development.

Company records are fairly central in any business history"there is a particular importance in being able to track the ownership of a particular company"

- * "The files of the Registrar of companies are the key source of basic facts on which history can be built"
- * "The registration of charges is on a par with the registration of mortgages in the Land Transfer Office, the registration of a ship mortgage against a ship register...."

"Every company is unique - it has its own sector of trade, its own directors and staff, produces and sells its type of goods and services and creates its own sense of identity. Sampling for companies would be as short-sighted as sampling, say birth, deaths and marriages"

• "The initial registration as notified in the [name removed] record only the subscribers to the Memorandum and nothing further. In addition, I suspect that very few libraries retain the [name removed]".

Comment: A bibliographic search revealed few libraries in fact do maintain the [name removed] and those that hold them have incomplete sets. For details of information appearing in the [name removed] see Appendix 3.

"In short, the records are unique, not duplicated elsewhere in the government system, have considerable legal significance, and MUST be preserved"

"The Company files are also used by genealogists to locate information concerning the interest of their forebears in various companies whether it be as owner, director or shareholder".

In conclusion there is a reasonably large "community of interest" in preserving the company files albeit for difference purposes. It is also noteworthy that Australian Archives have deemed records of incorporations sufficiently valuable to warrant their retention particularly given their strong emphasis on maintaining records for `evidential' rather than informational' reasons. Whilst it is acknowledged the amount of records generated is large, this is not sufficient justification in itself to warrant their destruction, consequently, in view of the legal, evidential and information values attached to incorporations, it is recommended they all be preserved as archives.

8. TRANSFER CRITERIA

Files of incorporations removed from the register are known as "dead files" or "struck off files". These are in effect closed records. To assist the storage of `dead files' some offices allocated a separate `dead number'. Up until 31 October 1995 the "dead

numbers" were allocated on a regional basis and manually recorded in a `dead' book. These numbers are not recorded on the REGIS computer system. From 1 November 1995 dead numbers have been allocated by the REGIS system which retains that information. However not all offices have used this number. E.g. Hamilton Office.

When dead files of incorporations are transferred to National Archives it is important that 'dead' (or closed) regional files are transferred to the National Archives Office nearest to the regional companies office that registered them. This means that regional "dead" (or closed) incorporations registered and/or "closed" by:

- the Christchurch Companies Office will be transferred to National Archives Christchurch (includes ex Hokitika records)
- the Dunedin Companies Office will be transferred to National Archives Dunedin (includes ex Invercargill records)
- the Napier and Wellington Companies offices' will be transferred to National Archives Wellington (includes ex New Plymouth records)
- Auckland and Hamilton Offices will be transferred to National Archives Auckland.

Where regional offices maintained manual registers of "closed" files and indexes these should be sent to National Archives along with the closed regional files of incorporations.

Because the practice of filing "closed" (ie "dead" or Struck off') records varies from office to office it is important each Companies Office contacts the National Archives Office to whom files are to be transferred before boxing and listing the records for transfer. This will ensure that transfer details and procedures can be agreed to well in advance. However, irrespective of whether a "dead" number is allocated and used for filing as in the case of Auckland regional files, or the registered regional company number is used to file the record, as in the case of Hamilton incorporations, the above mentioned transfer guidelines shall apply. It is also important that regionally `registered' or `dead' files are kept physically separate from nationally `registered' or `dead' files (i.e. not intermingled when boxed and listed for transfer to National Archives).

Suggestions for transfer in the case of Companies Office registries using a `dead' number system for filing

Where files of incorporations are removed from the register and stored in 'dead' number order, it is recommended that they are boxed and listed in dead number order. 'Dead' files of incorporations that have been allocated 'dead' numbers by regional offices should be kept separate from those 'dead' files of incorporations allocated numbers by the REGIS system. Similarly 'dead' files of incorporations allocated 'dead' numbers by a regional office should not be interfiled with those 'dead' files registered locally by another regional office (or have their order rearranged in any way).

It is further recommended that transfer lists should provide the following minimum details:

- Dead number regional or national files from both systems should not be physically or intellectually integrated but remain separate.
- Registered Company number.
- Last registered name.

It would be useful to know when the Company was originally registered (year only) and date it was struck off the register.

Where available a record of all company name changes should be provided.

In addition to a list of files in dead number order reflecting the order in which the files are boxed, an alphabetical list of dead incorporations should be provided which details the company name, the register number and dead number.

Files should be boxed in 'dead' number order and a list should be provided indicating the range of 'dead' files of incorporations in each box. It is suggested the 'dead' number list above should be used to record the box number.

<u>Suggestions for the Transfer Procedures where files of incorporations are maintained in local register number order</u>

In some offices files were not given a `closed' or `dead' number when they are struck off. The usual practice is for the office to retain the register number and box (i.e. effectively batch) the files when the incorporation is struck off the register.

Consequently, it is possible to have, for example in box 20, the following incorporations 1979/1 Company A 1953/20

Company B 1979/3 Company C

1941/75 Company D

Where the above information is computerised, this does not present any access problems as it is possible to enter the company name and get the computer to locate the relevant company, company number and box it is located in. Even where it is necessary to rebox the records in standard archives containers, it is relatively simple to change the box number the incorporation is located in. However, a manual list is not acceptable particularly where there are a significant number of boxes involved as it may be necessary to check every page of the list before locating the relevant file.

In addition to the above computerised listing, it is recommended that:

- manual nominal card indexes of incorporations be transferred as normally these not only include the registered file and name of companies on the register and those struck off but also details of name changes.
- manual registers of incorporations be transferred.

Note: National Archives will provide boxes to transfer records in and unless standard National Archives boxes are used, files of incorporations will not be accepted for transfer.

9. ACCESS PROVISIONS

[has been removed]

11. RESEARCH VALUE

The potential research use for incorporation files is very diverse. The activities that the various entities are engaged in may be significant at the local, regional or national level. Details recorded on the files are of potential use for a wide range of disciplines; particularly business historians, genealogists and economic historians.

The responses in Appendix 2 attest to their research value. Appendix 6 includes potential uses of business records and the use for specific types of business papers. Not all these papers appear on `incorporation files' but many do, either in a summary form or in an ad hoc fashion (rather than systematically appearing on all files). In many cases the papers gathered by the companies office are the only surviving record of a particular entity and documentary evidence of its legal status and activities.

12. QUANTITY RECOMMENDED FOR DISPOSAL

It is estimated that the total quantity of dead incorporations currently held by Ministry of Commerce, Business and Development branch is approximately 4,000 to 4,500 linear metres all of which is recommended for transfer as archives.

13. **DISPOSAL PROVISIONS**

For details of the disposal recommendations see the attached disposal schedule.

[name removed] recommended that files of incorporations be transferred as soon as practicable but no later than 6 years after removal from the register. This is based on the premise that public and Ministry of Commerce requirements to access the files for official / administrative purposes is `low'. No accurate figures on the level of access seems to be available, however, I do suspect what National Archives and Ministry of Commerce define as low differs considerably. The current rate of retrieval on Auckland incorporations currently stored at National Archives, Auckland is high in terms of our government loan criteria. We are receiving over 60 requests per month to loan files.

A further reason for not reducing the transfer period is the fact there is currently no limitation on the period a company may be restored to the register. It was suggested very few incorporations are restored that have been removed for more than 6 years. This argument is inconclusive as no systematic statistics appear to be available.

Until more accurate data can be gathered, I have recommended that the existing practice of 10 years from removal from the register continue to be applied as the transfer date. It is recommended, that this be reviewed within a 2 year period during which time accurate figures can be gathered. These figures can then be assessed to determine if the transfer period should be reduced. The two year review period will also permit the Companies Office time to manage down client expectations as to the need to see the paper record rather than obtaining details from the electronic register (REGIS). Finally, it will test the impact of the proposed policy that Companies will

in future be restored to the register without pulling the file and where Companies are restored to the register a new file will be created and cross-referenced to the old file.

The schedule specifies no records may be transferred or accepted as public archives until 10 years after they have been struck off the register. In practice this means that all records struck off in 1987 may not be transferred until 1998 and only one transfer from each Companies Office will be accepted each year as we do not want to be drip feed with multiple small transfers each year.

To test the assertion that very few records are required 6 years after being struck off for administrative purposes by the Companies Office or by firms wishing to restore companies to the register (or like purposes) it is proposed that alternative arrangements for Auckland files of incorporations allocated a regional dead number may apply subject to the Ministry of Commerce Business and Registries Branch agreement. The proposed arrangement if agreed to may be applied from 1 December 1998 when the existing storage agreement expires.

Incorporation files which have been struck off and allocated an Auckland dead number (not a national number) and have been struck off for 6 to 10 years may be stored at National Archives Auckland and will not be subject to any storage charges. However, all requests for access to files (i.e. by the public or Companies Office) will be subject to a \$22.50 (GST exclusive) retrieval fee. National Archives will not retrieve any files unless authorised to do so by a recognised (i.e. approved Companies official). All requests will be made available through National Archives reading room unless otherwise requested they be loaned back to the Companies Office. Where records are loaned back to the Companies Office it shall be at the Companies Office expense and their responsibility to organise the pick up and return of the requested files. National Archives requires 24 hours written notice to retrieve a file. Anyone turning up to examine a file with less than 24 hours written notice will be advised either the file is not available or if resources permit that it will be made available but an urgent fee of \$10 will apply. A similar charge will apply to all urgent loans.

This arrangement saves the Ministry of Commerce the cost of storing the records and the transport costs of moving them to alternative storage and then returning them to National Archives, Auckland. It also provides a means whereby the level of retrieval on files less than 10 years but more than 6 years from date struck off can be gauged. It shall be the responsibility of National Archives Auckland to maintain a record of loans.

At the end of two years this arrangement will be reviewed along with the review of the 10 years disposal period as set out in the disposal schedule.

It should be stressed that those records that are 6 to 10 old years from the struck off date shall not be deemed public archives but storage records and as such remain owned and under the custody of the Ministry of Commerce. As a consequence they may be removed from storage (but at the Ministry of Commerce expense) and all Official Information and other requests for access shall be diverted to the Ministry of Commerce.

Under the terms of the Companies Disposal Schedule files of incorporations that are over 10 years old shall be transferred to National Archives as public archives subject to meeting all transfer requirements (e.g. correctly boxed and listed).

14. APPRECIATION

[name removed] provided invaluable assistance, firstly, by stimulating discussion through his paper `Secondary Storage and National Archives and secondly, through his provision of background information and answers to questions raised during the course of the appraisal.