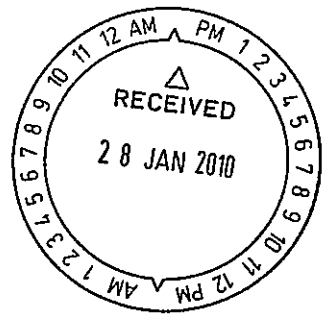

Freedom of Information Amendment (Reform) Bill 2009 and Information Commissioner Bill 2009.

Submission to the Senate Finance and Public Administration Committee.

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FOI Reform

This submission is in response to the Committee's examination of the Reform Bills, introduced in December 2009, and the questions posed:

1. Whether the Bills contain measures effective to ensure that the right of access to documents is as comprehensive as it can be.

2. Whether the improvements to the request process are efficient and could be further improved.

3. Whether the measures will assist in the creation of a pro-disclosure culture with respect to government and what further measures may be appropriate.

4. Assessment of the functions, powers and resources of the Information Commissioner.

General comments

Welcome reform

The proposed reforms are a welcome and important advance in the direction of open transparent and accountable government. The proposed framework- a strong statement of objects that gives the Act a democratic purpose, clearer indications of a pro-disclosure bias for some decisions, more proactive publication of information, FOI applications as a last resort mechanism for access, the Information Commissioner model, and announced plans to use privacy legislation as the vehicle for access to a person's personal information – should in future focus the FOI and use of the Act on the primary goal of facilitating access to non-personal information in order to promote more open, transparent and participative government.

The limited effect of the FOI Act to date in achieving this result is evidenced by the fact that the Annual Report on the operation of the Act lists only 4660 applications for documents concerning policy and decision making were made to all agencies during the year ending 30 June 2009. Although this was a small increase in the requests of this kind compared to the previous year, it is hardly a resounding positive comment on legislation aimed at increasing public participation in government affairs.

The law, and the way it has been implemented, cost, delay and a prevailing culture of secrecy in many quarters have all played a part in this situation. Reform initiatives are commendable and long overdue.

Slow and limited review process

The Bills constitute phase two in a three stage process - the first, the abolition of conclusive certificates; the third to be a review of legislation in the hands of the Minister within two years after commencement of the Reform legislation.

The reform process has been slow and laboured, with little public discussion and debate of issues and options, primarily because Government proposals have revolved around words to be used in legislation to deliver on ALP pre-election commitments. These were to implement "key findings" of the Australian Law Reform Commission Report 1995/77 *Open Government* to revise the Freedom of Information Act, to rationalise exemption provisions, abolish conclusive certificates, review charges and establish an information commissioner.

With the debate framed around proposed amendments to the Act, there has been little apparent interest in Government in examining or engaging in public discussion about broader ranging reform options.

By way of contrast, in less time than the two years it has taken the Commonwealth Government to get to this point in phase two, fundamental review of FOI laws have been undertaken in Queensland, NSW and Tasmania. All three processes resulted in complete rewrite of the law, mostly in simpler, modern plain English, with new renamed laws enacted by each parliament.

Delivering ALP election commitment

The Commonwealth Bills largely deliver on the election commitment, although "rationalising exemption provisions" turns out to be a limited exercise. The new statement of the public interest test, where that applies, is welcome, now stating clearly some relevant and irrelevant considerations. For the rest "rationalising" involves proposing repeal of two rarely used exemptions (Executive Council documents and documents prepared in accordance with companies and securities legislation), a sub-section relating to documents concerning the conduct of industrial relations, and some changes in respect of the exemption concerning management of the economy; and providing for exemption

provisions to appear in two boxes-absolute and conditional, the latter for those exemptions that include consideration of the public interest in disclosure and non-disclosure.

Selective approach to ALRC Report recommendations

The Government has been highly selective in picking up "key" recommendations from the 106 contained in the ALRC. Report.

While in some instances it has gone beyond what was recommended, for example in abolishing application fees entirely, and in earlier legislation, abolishing conclusive certificates, many other ALRC recommendations have not been acted upon. Some have been overtaken by the lapse of time. Others relate purely to administrative matters.

Neither this government nor the Howard Government, responded to the ALRC Report in any public statement. As these bills go forward, there has been no explanation why some but not other ALRC recommendations were not acted upon. For example to bring the parliamentary departments within the scope of the Act [73]; over time to reduce the time limit for dealing with an application from 30 days to 14 days [31]; for charges to apply only in respect of documents released [88]; to amend records legislation to require chief executives of government agencies to have a duty to create "such records as are necessary to document adequately government functions, policies, decisions, procedures and transactions" [15]. Other recommendations of some significance not acted upon include 44, 55, 58 (part only), 61, 74, 75, 76, and 96.

The Committee might seek an explanation about why these recommendations were not considered "key findings" while recommendations as trivial as changing the heading of the internal working document exemption made the cut. Action on many would improve the legislation. Recommendation 73 warrants special consideration, and is referred to elsewhere in this submission.

The following comments respond to the questions raised by the Committee:

1. Are there effective measures to ensure right of access to documents is as comprehensive as it can be.

There are many positives in the Bill. However the proposals fall short of providing effective measures to ensure the right of access to documents is "as comprehensive as it can be."

Information Publication Scheme-Schedule 2 of the Reform (Amendment) Bill.

The proposed scheme is welcome but is short on detail, and lacks strong compliance requirements.

The only additional publishing requirements (proposed subsection 8(2)) beyond what is currently required, are for details of statutory appointments, and for information routinely released in response to requests under the Act. Proposed subsection 8(4) establishes that an agency may publish other information it holds. The Explanatory Memorandum states: "Agencies are generally best placed to identify information they hold which should be published taking into account the objects of the FOI Act." Proposed Section 9A requires agencies to "have regard" to the objects of the Act and to guidelines issued by the Information Commissioner in meeting the obligations to publish information."

The evidence- the current unsatisfactory state of voluntary pro-active publication- gives little confidence that agencies left to their own devices will without significant prodding, extend the range of information to be published, primarily on the web, or facilitate public access through comprehensive, easy to use search facilities.

Perhaps the intention to avoid legislative prescription regarding types of information to be published makes sense although it is difficult to understand why contracts, grants, performance information and a modernised version of the Harradine reports don't rate a mention. In addition we should be aiming for pro-active publication of policy research papers, expert reports, loans and guarantees, and ministerial and senior public servant travel and expenses.

Two points about what is proposed. One, what "must have regard to" may be open to generous interpretation, and subject to differences of opinion. It appears to mean "can't be disregarded" but not "must be acted upon." Two, proposed section 93A, according to the Explanatory Memorandum, "gives the Information Commissioner a *discretionary power* of issuing guidelines for the purposes of the FOI Act. The reference to guidelines addressing certain matters under proposed subsection 93A(2) is not intended to limit the power of the Information Commissioner to issue guidelines on other aspects of the operation or administration of the FOI Act. *An agency or Minister*

must have regard to any guidelines issued by the Information Commissioner (that is to consider the guidelines). It is not intended that the guidelines have binding effect. Proposed subsection 93A(3) provides that guidelines are not legislative instruments."

The precedents relevant to the proposed Commonwealth publication scheme are the UK scheme, in place under the Freedom of Information Act since 2000, and the scheme adopted in Queensland under the Right to information Act 2009. The UK scheme empowers the Information Commissioner to issue model schemes which spell out the types of documents to be published and, once issued, are *mandatory for agencies* http://www.ico.gov.uk/what_we_cover/freedom_of_information/publication_schemes.aspx

The Queensland Act (Section 21(3)) provides that agencies *must ensure* that publication schemes comply with Ministerial Guidelines, now issued by the Premier. http://www.rti.qld.gov.au/rti/publication_schemes.asp

The Committee should consider enhancing the publication scheme by prescribing for the publication of some types of information that many would expect to be published in this new era. Alternatively or in addition the Reform (Amendment) Bill should impose a duty, not a discretion, on the Information Commissioner to issue guidelines or model schemes; and require agencies to comply with guidelines to adopt a model unless the Commissioner dispenses with the requirement.

While the Information Commissioner under proposed Section 8F and Part VIIBT has functions relating to monitoring compliance, assisting agencies and undertaking investigations, there appears to be no provision for complaint to the Commissioner about an agency's failure to comply with the requirements of the Act concerning a publication scheme.

Documents not information

In response to the Exposure Draft I submitted in May last year that the opportunity should be taken to shift the focus in the FOI Act to a right to access "information" not documents. Relevant provisions are unamended in the Reform (Amendment) Bill.

The current definition of the word document in the FOI Act (Section 4) includes any paper or other material on which there is writing, and in the fifth subclause (of six) extends the definition also to

cover any article on which information has been stored or recorded, either mechanically or electronically

Information in the 21st century is held primarily in electronic systems and in digital formats. The FOI Act 1982 was developed in an era when information was mostly recorded on paper and held on paper files. The Act continues to reflect this heritage, with occasional acknowledgement of a changed world.

For example the long title reads: "An Act to Give to Members of the Public Rights of Access to Official Documents of the Government of the Commonwealth and of its Agencies." The object section in the Reform (Amendment) Bill refers to (b) providing for a right of access to documents. Part III is headed "Access to Documents" and that term is used in Section 11 and other provisions particularly Section 15 which confers the right to "access a document of an agency or official document of a minister". The headings of sections in the Act including all the exemptions other than conditional, refer to documents.

Section 17 of the FOI Act (unamended by the Bills) is headed "Requests involving the use of computers". Computers are the primary storage systems for information in all government agencies, and agencies routinely, we expect, undertake a search of such systems in response to an application. Despite this, Section 17, headed as indicated, is only enlivened where the information requested is "not available in a discrete document in written form".

By way of contrast the NSW Government Information (Public Access) Act 2009 (not yet commenced) is "An Act to facilitate open access to government information". The objects in Section3 include the words "proactive release of information" and "enforceable right of access to information". A provision in the NSW FOI Act -Section 23(g) - similar to Section 17 of the Commonwealth Act will be repealed on commencement of the Act. Instead in response to an application, Section 50 will require an agency to undertake "reasonable searches as may be necessary" to locate requested information using any resources reasonably available "including resources that facilitate the retrieval of information stored electronically."

The FOI Reform (Amendment) Bill misses the opportunity to modernise the language and framework of the law. Given the extent of changes needed to address this issue, it may have to wait for the more next review in two years.

Scope of the Act

The extension of the Act to documents held by a contracted service provider is welcome (Schedule 6 Item 19)

The parliamentary departments are not subject to the FOI Act, as recommended [73] by the ALRC Open Government Report 1995. This is a significant gap in the transparency and accountability framework. These departments were allocated a total of $320 million in this year's budget. Some of these funds are for payment of salaries and certain allowances to members and senators.

The Auditor General's Report 5/2001-2002 'Parliamentarians Entitlements 1999-2000' noted there was no public reporting on some allowances and payments made to MPs and senators.

The Report continues:

> "A key area in which some overseas models reviewed, particularly those of Canada and the United States, differed from the approach currently taken in respect of the Australian Federal Parliament is that they provide for significantly greater levels of public disclosure of the guidelines and/or rules that govern entitlements' expenditure by the members of the respective legislatures; and of the costs incurred by the individual members."

The Rudd Government has introduced some changes to arrangements since and publishes (including for the first time on the web) some information about MPs travel and other payments administered by the Department of Finance and Deregulation, and has announced more will be done in this area. None of the announcements of actual or intended change refer to any plans to act on the ALRC Recommendation regarding the parliamentary departments. Departmental officials in March last year told a Senate Estimates Committee that some unnamed members have refused to comply with a requirement to certify that payments made on their behalf by Finance are correct or properly incurred.

There is a strong case for more transparency through public access to information about the operations of Parliament, particularly the management of public money, either through extension of the Act to cover the parliamentary departments or through action by the Parliament to establish appropriate rules and disclosure processes.

The Queensland Information Commissioner's submission to the Committee that argues the case for the extension of the FOI Act to

the departments notes this issue was raised and considered in a Senate Committee Report in 1978. The Government has offered no reasons for not acting on the ALRC recommendation.

Blanket and partial exclusions from the Act

Blanket exclusions for agencies from the scope of the FOI Act entirely, or in respect of certain functions mean that access rights are not as comprehensive as they can be. The only changes proposed (Reform (Amendment) Bill Schedule 6), add to limitations and exclusions. According to the Expanatory Memorandum, (Schedule 6) they introduce some limitations on access to intelligence agency information and a limited exclusion for certain documents of the Department of Defence."

Senator Ludwig told the Senate on 13 August in the debate on the conclusive certificates bill:

> "The government does recognise, though, if we go to the nub of the issue, that strong justification is needed to support wholly excluding agencies or classes of documents from the operation of the FOI Act. A total exclusion will be justified where the functions of the agency would be compromised by right of public access to information they hold. That is clearly the case for intelligence agencies."

The ALRC recommended [74, 75] that those agencies already excluded in Schedule 2 of the FOI Act in whole (other than intelligence agencies) or in part, should be required to justify the exclusion or removed from the Schedule, and for repeal of part of the Schedule. Nothing has been said about these aspects of the reform process. This appears to have been left been in the hands of the proposed review in two year's time.

In the light of Senator Ludwig's comments at that time the review should examine how agencies such as the New Zealand Security Intelligence Service and the CIA manage to cope without functions being compromised, even though they are covered by their access to government information legislation.

Exemptions

The proposed changes to bring forward the open access period from 30 years to 20 years for most Commonwealth records is welcome. However the Government has not acted to limit the period during which the Cabinet document exemption can be claimed, in line with practice in the states. NSW (since 1988) and

other jurisdictions have stipulated that a document can be claimed as a cabinet document for 10 years after it was created, and thereafter would only be exempt if another exemption applied. As annual releases of cabinet papers by the Archives Authority illustrate, the vast majority of cabinet papers are not controversial. Any that contain sensitive information after 10 years would be likely to be covered by other exemption provisions.

Nothing in the Reform (Amendment) Act will affect the absolute nature of exemptions in Section 33 of the FOI Act for documents that would or could be expected to damage international relations or contain information provided in confidence by a foreign government.

In the case of both these exemptions, the personal interest of the applicant in obtaining access to a document, the triviality of the information at one extreme, or the strength of the public interest in disclosure on the other, or the fact that information communicated in confidence may now be in the public domain in the country from whence it came, are all irrelevant considerations.

More tightly drawn exemptions, a public interest test or even a requirement for some assessment of a confidentiality claim would provide more balance. On this point, proposed changes to the Archives Act in the Bill (Item 35-proposed paragraph 33(1)(b)) will require the decision maker to be satisfied that a reasonable basis exists for maintaining the confidence of the information, where a foreign entity advises that a document is still confidential.

Several changes have been made to the business affairs exemption (proposed section 47) from the Exposure Draft, with an absolute exemption for trade secrets and information that has a commercial value that would be destroyed or diminished by disclosure. This retains the status quo, the Exposure Draft having indicated that a public interest test should apply to documents of this kind. While an exemption for a trade secret without any additional test appears reasonable, there seems little justification for not subjecting information of commercial value that would be *diminished* (meaning reduced even to a slight or inconsequential degree) to a public interest test.

Proposed Section 47F (personal privacy exemption) relies on the definition of the term personal information. The definition should exclude information about ministers or public servants that relates to the conduct of official functions, (along the lines of the WA FOI

Act Schedule 1 Clause 3): in effect information that would simply reveal the name of a public servant carrying out duties, or conduct in the exercise of functions.

Public interest

The link between the object section (proposed section 3) and the statement of relevant and irrelevant public interest factors (proposed subsection 11B) should assist to promote disclosure of documents that come within a conditional exemption category.

With regard to irrelevant considerations, the factors in proposed section 11B(4) include most of the broad theoretical claims referred to by Justice Davies in Re Howard in 1985, with the notable exception of "frankness and candour." This "public interest" consideration should not be left where it currently stands with some precedents supporting and others generally rejecting it as relevant to an exemption claim.

As Deputy President Forgie in McKinnon and Department of Families, Housing, Community Services and Indigenous Affairs [2008] AATA 161 commented, public servants have a duty to provide honest, comprehensive advice in the course of government decision making.

Yet arguments along these lines continue to be put, as illustrated by submissions in a recent ADT case (Haneef v Secretary Department of Prime Minister and Cabinet [2009] AATA 777).

Senior Member McCabe [37-41] took a contrary view to the Department on an internal working document claim, that disclosing material in draft form might cause public servants to be less forthright in the future in giving advice or that the public would be misled or misinformed by release of a document that was not a final departmental position.

Similarly [58-60] Senior Member McCabe commented that another document claimed exempt on public interest grounds gave an uncontroversial picture of the bureaucracy's thinking at a particular point in time; the nature of the information and the context in which it is provided made it clear that it was not a final view; there was little danger of it misleading anyone, and disclosure would not deter diligent public servants from making similar comments in the future. Regarding disclosure of part of a document of a preliminary nature that did not pretend to represent a concluded view, Senior Member McCabe said [83] he could not see how the disclosure would have the effect of chilling or discouraging the provision of

advice.

There were other instances where the Department's claims were overruled including rejection of an argument [125] about a deleted word on grounds that disclosure would be damaging to national security, withdrawn after Senior Member McCabe pointed out the word had been disclosed to the applicant in another document; and several claims of confidentiality, and personal information claims for names of individuals, already in the public domain. (Media reports indicate the Department has appealed the decision to the Federal Court.)

Special Minister of State Senator Ludwig told the Australian Institute of Administrative Law Forum in Canberra in August 2009:

> "I know that some in the Australian Public Service feel that FOI reforms may inhibit their ability to provide frank and fearless advice. But I believe that the tradition of frank and fearless advice is more robust than that. I believe that our public servants will work professionally within the new FOI framework as they do within other accountability mechanisms. It is beyond dispute that it is in the public interest for ministers to receive written advice on matters relating to their administrative and policy responsibilities. In any given case, whether or not the exemption may be sustained will depend on the subject matter of the document and the circumstances around the Government's consideration of the document, including whether a Government position has been announced. Political sensitivity will not be an argument against disclosure."

Neither should a perceived danger that public servants in future will not be frank and candid. Frankness and candour may still have a place in the law particularly where disclosure of some information to an individual may run a risk of harassment, or danger to safety of public servants or others. It should not be an available "public interest: consideration favouring nondisclosure in the context of deliberative process or other documents concerning advice documents.

2. Are the improvements to the request process efficient and could they be further improved?

Online applications should be facilitated as a result of the proposed changes. Even if an application fee was payable all agencies should be required to offer on-line payment options- many don't.

Fees and charges

The Government has announced changes to fees and charges. Some (the abolition of application fees) are contained in the Reform (Amendment) Bill Schedule 6. Other aspects of the changes are set out in the Exposure Draft Freedom of Information Fees and Charges Amendment Regulation, released for public comment in December.

This is an issue relevant to whether access rights are as comprehensive as they can be, given cost has been seen as a major impediment to access to non-personal documents.

My submission on the Exposure Draft raised whether abolishing the application fee while retaining a modified charging regime is the best way to address the problem of high costs for users of the FOI Act, at the lowest administrative cost to Government. Under the proposed scheme, significant resources will still be required to keep track of time, consider a range of related issues and communicate with applicants about charges, for relatively little return. The total amount collected in charges in the year to June 2009 by all agencies, as reported in the Annual report on the operation of the Act was $262,000. Overall agencies estimate FOI cost $30 million to administer.

A more cost effective approach might have been to retain an application fee for non-personal applications (an administratively simple process) and abolish charges. Tasmania has already decided to go this way in the Right to Information Act to commence 1 July 2010.

This is another area where the Information Commissioner should have powers to issue directions with which an agency must comply.

3. Will the measures assist in the creation of a pro-disclosure culture with respect to government and what further measures may be appropriate.

The Bills have a welcome pro-disclosure emphasis. However legislation can only make a small contribution to day to day management of pro-active publication, and the processing of applications under the Act. "Tone at the top" as exhibited by ongoing leadership and reinforcement of the message by ministers

and senior public servants will be essential if the system is to move in the direction of more transparency and less secrecy.

As the former Clerk, Harry Evans told the Committee hearing in Sydney in December concerning the proposed resolution for the appointment of an independent arbiter to assess public interest immunity claims:

> "A large part of the problem is that Public Service departments have an instinctive reaction to withhold information from disclosure. If a committee or the Senate itself asks for something and there a vague idea that it is sensitive in some way or it is something that has not been published, the instinctive reaction of government departments is to say, 'No, you can't have it,' and then to think up some plausible reasons why you cannot have it."

This is the problem that many FOI applicants also face, particularly when seeking access to documents concerning policy and government decisions. Legislation to the extent possible, and leadership within government need to address it.

An element of the context in which public servants operate, which contributes to excessive caution concerning disclosure, is the existence of over 500 secrecy provisions in Commonwealth acts, in particular Section 70 of the Crimes Act. The ALRC has completed a review of these provisions in a yet to be released report. Action to address this issue will be needed to assist the process of culture change.

Some improvements could be made to the Reform (Amendment) Bill to emphasise independent, objective decision-making, and the pro-disclosure spirit and intention of the Act, by amending Section 23 of the Act and adding offence provisions.

The Reform (Amendment) Bill contains no provisions that refer to Section 23. The section includes authority for the responsible minister on behalf of an agency to make a decision in response to a request made under the Act for access to an agency's documents. The extent to which ministers have exercised this authority since the commencement of the Act is unknown. No reference is made to decisions of this kind in the annual reports on the operation of the Act.

Freedom of information laws (other than the Victorian Act which followed the Commonwealth precedent) that came into effect after 1982 distinguish an application for agency documents from

an application for minister's documents, and confer authority on an agency officer only to make decisions on an application for documents held by an agency.

There has been, and continues, a perception of political influence in decision making, or at least over-responsiveness to ministerial concerns about dealing with applications for agency documents containing politically sensitive information. The Commonwealth Ombudsman (Annual Report 2005-2006 Chapter 7) has commented that complaints to his office concerning applications to access non-personal documents typically raised concern about the involvement of ministers and their staff in dealing with a particular application.

A minister should retain authority for the making of decisions on requests for documents held by the minister but not in respect of applications for documents held by an agency. A decision to refuse access involves the exercise of a statutory discretion, which in the case of agency documents should be made by an agency officer, objectively, in good faith and based on all relevant but no irrelevant considerations. A determination should be free of political or other influences not specified in the legislation. Removal of ministerial powers to make a decision on an application for agency documents by an amendment to Section 23 would be one step in this direction.

Independent and objective decision making would also be assisted by inclusion of offence provisions. Neither the Act nor the Reform (Amendment) Bill contain offence provisions relating to conduct in carrying out FOI functions.

All three jurisdictions that enacted new FOI laws in 2009- Queensland, NSW and Tasmania- toughened the law in this respect by including offence provisions for the first time.

Section 175(1) of the Queensland Right to Information Act creates an offence where a person gives a direction to a person authorised to make a decision under the Act that the person believes is not the decision that should be made. Section 175(3) creates a separate offence for giving a direction orally or in writing to an employee or officer or to an employee of a Minister involved in a matter under the Act, directing the person to act contrary to the requirements of the Act.

The NSW Government Information (Public Access) Act Section 9 (2)) includes a specific provision that an agency is not subject to direction or control by a minister in dealing with an application for

agency information. The Act also includes offence provisions (Sections 116-121) for acting unlawfully, directing unlawful action, improperly influencing a decision on access, misleading conduct or deception, and the concealment or destruction of government information to prevent disclosure.

Section 50 of the Tasmanian Right to Information Act creates an offence where a person deliberately obstructs or unduly influences another in the exercise of the power to make decisions in accordance with the Act; and where a person deliberately fails to disclose information the subject of an application where the information is known to the person to exist.

Provisions along these lines would strengthen the position of the determining officer in making the correct decision on an application and in the promotion of a culture consistent with the Act's object.

4. An assessment of the functions, powers and resources of the Information Commissioner.

AAT Review of Information Commissioner's Decision

There should be some limitation on an agency's right to take a decision of the Information Commissioner to the Tribunal for further review, claiming the decision is wrong (Schedule 4 Items 41 and 42 (Sections 60 and 61)). This opens the prospect of delaying tactics to avoid compliance with an unwelcome finding. One possibility might be a requirement for the Commissioner or minister to certify that the considerations involved justify further use of public resources through further review initiated by the agency.

The proposals also have the effect of changing the onus in AAT proceedings from the agency that made the determination to the party that seeks review. The Explanatory Memorandum states the Information Commissioner will not defend his decision or be a party to proceedings. This is unfair to applicants in all cases particularly where an agency seeks further review of a decision of the Commissioner. In those instances at least the Commissioner should be required to defend his decision.

Costs

With regard to costs orders (Schedule 4 Item46 Section 66) the opportunity should be taken to amend Section 66 of the Act and the current tight limits on the circumstances regarding a recommendation for payment of an applicant's costs in proceedings in the Tribunal. Annual reports on the operation of the Act for the

last two years reveal a total of $672 had been paid to a successful applicant. The Tribunal in exercising its discretion must have regard to whether the applicant has been successful and a range of other factors including financial hardship, benefit to the general public, any commercial benefit to the applicant and the reasonableness of the decision under review. Substantial success in the Tribunal should result in a cost order in favour of the applicant.

I would welcome the opportunity to develop these suggestions further or to respond to questions from Committee members.

Peter Timmins
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