

GISTED RISK ASSESSMENT

EN30 Gisted Risk Assessment

1. This is an open gisted version of the “NPCC Assessment of the Risks Relating to the Restriction Order Application in respect of EN30” (“the risk assessment”). The report seeks to identify and assess risks to EN30 were his/her real identity to be made public.
2. The risk assessment is dated 16 August 2018. It was prepared by Richard Clarke.
3. The risk assessment sets out the following definition of terms. These terms are used throughout the risk assessment to describe the risk assessor’s conclusions:

“THREAT:-

A statement of intention or circumstances that lead to a conclusion that one entity may inflict injury, damage or other hostile action against another, either personally or through third parties.

- **Low** – The circumstances portrayed lead the assessor to conclude that the potential for injury, damage or hostile action is limited based on the information available at that time.
- **Medium** – Protagonists may have carried out research to fulfil a desire to inflict injury, damage or other hostile action against another. Protagonists may be prepared to implement threat if the situation presents itself and there is some evidence that they have exhibited the potential for such behaviours previously.
- **High** – Protagonists may have carried out extensive research and there is evidence that they have exhibited such behaviours previously. Protagonists are highly motivated to carry out threat and are unlikely to desist until the threat is realised or other factors intervene.

RISK:-

The likelihood of the threat materialising.

- **Low** – Unlikely.
- **Medium** – Possible.
- **High** – Likely.

HARM:-

Includes mental, physical and professional harm. This will be construed widely so as to embrace interference with private life, including workplace, home life, family and friends.

- **Low** – The impact would have a limited effect upon the officer and could be readily mitigated.
- **Medium** – Would reasonably be expected to impact on the welfare of the officer.
- **High** – Risk of significant impact on the officer.”

Executive Summary

4. In the decade before EN30 joined the National Public Order Intelligence Unit, EN30 was employed in a sensitive policing role. During this period, EN30 used only his/her true identity and not a pseudonym. The risk assessor has made enquiries regarding the current threat to individuals involved in this arena. Accordingly, the risk assessor has concluded that the threat to EN30 and others in this arena is high. Similarly, the degree of harm that those who were the subject of the policing role are able to inflict is high. However, provided that the Inquiry does not reveal details of EN30's previous role, it is the opinion of the risk assessor that the risk of the threat materialising is low. However, this risk increases in the event that any image is published of EN30, as the chances of recognition increase. Careful consideration needs to be given to protecting EN30's visual appearance. Furthermore, if the Inquiry were to reveal EN30's previous role, then the risk assessor anticipates that the risks to EN30 and others would escalate significantly.
5. EN30 was employed on the National Public Order Intelligence Unit as a cover officer to manage undercover officers who were deployed into the animal rights and environmental protest movements.
6. EN30 was not an undercover officer and did not personally infiltrate any of the groups associated with these movements.
7. The risk of physical harm being inflicted on EN30 by animal rights and environmental activists has been carefully examined and the risk assessor has concluded that the likelihood of this happening is low.
8. There is evidence that the traditional and non-traditional media will endeavour to publish any material that they can obtain regarding Special Demonstration Squad and National Public Order Intelligence Unit officers. There is evidence that details of former Special Demonstration Squad officers have been publicised in both the traditional and non-traditional media once the Inquiry have released information regarding that individual. There is also evidence that the non-traditional media has published details of a former National Public Order Intelligence Unit officer once their details were discovered on a social media site. Such a course of action is likely to interfere with EN30's right to privacy.
9. The risk assessor has formed the opinion that there is a medium risk that extreme left wing activists will interfere with EN30's right to privacy in the event that EN30's true identity is revealed.

Applicant / Officer Details

10. The risk assessment sets out details of EN30's true identity and police career. The risk assessment also sets out details of EN30's family circumstances.
11. Open source investigation reveals that EN30 is unlikely to be traced through internet-based enquiries without particular knowledge of EN30's family circumstances. No images of EN30 could be found.

12. EN30's spouse has family who are unaware of EN30's involvement in the National Public Order Intelligence Unit.

Risks to the Applicant

Pre- National Public Order Intelligence Unit career.

13. In the decade before EN30 joined the National Public Order Intelligence Unit, EN30 was employed in a sensitive policing role. During this period, EN30 used only his/her true identity and not a pseudonym. The risk assessor is of the opinion that the reason for this is likely to be a vestige of poor operating practices from that era rather than an indication of limited risk.
14. The risk assessor has researched the current relevant terrorism threat levels.
15. To assist the risk assessor in the consideration of the question as to whether there is a risk to EN30 as a consequence of EN30's true identity being revealed, the risk assessor has made enquiries regarding the current threat to individuals involved in this arena. Accordingly, the risk assessor has concluded that the threat to EN30 and others in this arena is HIGH.
16. The risk assessor has noted that minimal safeguards appear to have been in place at the time and a significant number of years have passed since EN30 was involved in such work. The risk assessor is cognisant that there have been no reported repercussions to either EN30 or others involved since that time.
17. The risk assessor believes that there remains a chance that the publicity that is likely to arise after a former National Public Order Intelligence Unit officer's true identity is revealed may refresh the memories of those that EN30 and others were involved with. It is the opinion of the risk assessor that there are potential dangers associated with releasing the true identity of EN30 at a time of high media and public interest.
18. There is no evidence that photographic images of EN30 are readily available on the internet or currently in the hands of those likely to share these images. The risk assessor has considered the likelihood of EN30 being recognised from EN30's pre- National Public Order Intelligence Unit police career. The risk assessor has also considered the potential increase in risk should activists or journalists publish photographs of EN30 as a consequence of EN30's involvement with the Inquiry. The risk assessor has formed the opinion that the risk of images being obtained of EN30, of these images then being published and then EN30 being recognised from those images and identified as a police officer previously involved in sensitive policing remain LOW. Although the risks are low, it is not impossible for this chain of events to occur and the possibility should not be completely discounted as the threat is so significant.
19. The Inquiry should avoid revealing details of EN30's previous role. If the Inquiry were to reveal EN30's previous role then the risk assessor anticipates that the risks to EN30 and others would escalate significantly. In the event that EN30 were to be identified in relation to his/her previous role, then the degree of harm that might be inflicted on EN30 and others is assessed as HIGH.

The threat to EN30 and others from those connected to EN30's pre- National Public Order Intelligence Unit career.	
THREAT	HIGH
RISK	LOW
HARM	HIGH

EN30's National Public Order Intelligence Unit career.

20. EN30 was employed by the National Public Order Intelligence Unit as a cover officer, not an undercover officer, so did not personally infiltrate any activist or crime groups in his/her career. EN30 did attend some demonstrations but no infiltration took place (see EN30's statement).
21. The risk assessment sets out details of the National Public Order Intelligence Unit operations during which EN30 acted as a cover officer. EN30 acted as a cover officer, along with others, for a number of undercover officers deployed by the National Public Order Intelligence Unit, including EN34 ("Lynn Watson"), EN35, EN37 and EN42. In relation to EN35, it appears that EN30 may have only played a peripheral role in comparison to the other cover officers.

Consideration of the physical risks to EN30 from animal rights activists.

22. The risk assessor has objectively assessed the physical risks relating to EN30's role as cover officer during relevant deployments.
23. In assessing the physical risks to EN30 from animal rights activists, the risk assessor has carefully considered the arguments put forward by EN30. These considerations included a review of other material that describes or is relevant to the risks posed by animal rights activists. Having considered this material, the risk assessor has formed the opinion that the weight of the evidence that has been uncovered so far points to there being limited risk of physical harm from animal rights activists towards EN30. The evidence that has been examined by the risk assessor shows that the activists have sought to harass and intimidate those who facilitate animal experimentation.
24. The risk assessor is also of the opinion that activists who have been befriended by an undercover officer are far more likely to harbour feelings of betrayal and anger to that officer than to an officer with whom they have never come into contact, such as cover officers.
25. Whilst the material considered includes reference to reported incidents that amount to a threat of harm by such activists, there is no evidence of any actual harm being inflicted on any police officer connected to undercover work.
26. The risk assessor has considered the physical threat to EN30 from the animal rights movement and is of the opinion that, although some extremists within this movement have been convicted of serious offending, there is no evidence that any supporter has physically harmed any undercover officer or cover officer. Consequently, the risk assessor has formed the

opinion that the threat of physical harm to EN30 should his/her true identity be published by the Inquiry is LOW.

27. The risk assessor has considered the likelihood of those connected to the animal rights movement physically harming EN30 as a consequence of EN30's role on the National Public Order Intelligence Unit. EN30 did not infiltrate or even meet individuals associated to this movement, so feelings of betrayal and resentment are less likely to be directed at cover officers such as EN30 than would be the case for undercover officers. In the opinion of the risk assessor, the risk of persons associated to this movement physically harming EN30 is LOW.
28. Although there is evidence that some parties within the animal rights movement are prepared to commit serious offences in the pursuit of their ideology, these offences are directed at those connected to perceived animal abuse. There is evidence recorded by officers in the National Public Order Intelligence Unit that the threat of harm to undercover officers from activists in the animal rights movement is limited, with activists preferring to 'cold shoulder' those that they suspect of infiltrating them. Consequently, the risk assessor has formed the opinion that the degree of physical harm that those affiliated to this movement would direct towards a cover officer such as EN30 would be LOW.

The threat of physical harm to EN30 from animal rights activists if EN30's true identity is released.	
THREAT	LOW
RISK	LOW
HARM	LOW

Consideration of the physical risks to EN30 from environmental activists.

29. The risk assessor has objectively assessed the physical risks relating to EN30's role as cover officer during relevant deployments.
30. The risk assessor notes that there is evidence that activists made concerted efforts to establish whether or not EN34 ("Lynn Watson") was an undercover officer. The risk assessor has formed the opinion that although there was activist activity that was indicative of the lengths that activists will go to in efforts to reveal the true identities of undercover officers, there was no violence or hostility directed at EN34 at the time. As EN30 has never met with an activist or been seen with EN34 by activists, there is no apparent evidence of risk to EN30 from those parties.
31. In respect of the undercover operations involving EN34, the risk assessor is of the opinion that the threat from those infiltrated is LOW. The risk of repercussions from those infiltrated is assessed as LOW. Consequently, it is the opinion of the assessor that there is a LOW risk of physical harm to EN30 from those targeted or from any association to EN34.

The threat to EN30 from environmental groups.

THREAT	LOW
RISK	LOW
HARM	LOW

Consideration of the physical risks to EN30 from anarchist groups.

32. EN30 provides two examples of anarchist activity as justification for EN30's anxiety at the prospect of EN30's identity being exposed: see paragraph 17 of the gisted witness statement of EN30.
33. The first example relates to a newspaper article in the Times dated 29 April 2017. The article refers to The Informal Anarchist Federation having claimed responsibility for the damage. The Informal Anarchist Federation do not appear to be associated to any group that can be linked to EN30's work on the National Public Order Intelligence Unit.
34. The second example cited by EN30 concerns the anarchist website '325.nostate.net'. This website describes itself as an 'international informal network' for anarchists and so is taken to represent a very broad range of global anarchist groups. None of EN30's deployments on the National Public Order Intelligence Unit relate to anarchist networks and the risk assessor is therefore unable to establish a direct link between the author(s) of this website and any potential risks to EN30.
35. The risk assessor has considered the potential threat from anarchists cited in EN30's statement and has concluded that there is a LOW threat of harm to EN30 from these groups. The risk assessor is of the opinion that there is a LOW risk to EN30 from such groups and the degree of harm that might be inflicted on EN30 is similarly assessed as LOW.

The threat to EN30 from anarchist groups.	
THREAT	LOW
RISK	LOW
HARM	LOW

Consideration of the risks to EN30's private life from the extreme left wing movement.

36. There is evidence that when the Inquiry has previously released an officer's Special Demonstration Squad pseudonym, then images of this person are published by journalists and activists. This has been the case in respect of HN77 and HN81.
37. EN30 states in his/her statement that there is a risk to EN30 from such groups should a photograph of EN30 be released. There is no evidence that images of EN30 can be readily found online. There is also no evidence of activists or journalists having images of cover officers on deployment. In the case of activists, it would be difficult to think of a situation where they would have any archived photographs of a cover officer as they would not ordinarily have contact with officers performing this role.

38. In order to publicise images of EN30, the activists or journalists would need to obtain them first. In order to do this that activists or journalists would have to either find where EN30 now resides or works and photograph them at these locations, or wait until they are called to give evidence at the Inquiry and endeavour to photograph them arriving or leaving the venue. Other opportunities may present themselves too. None of these potential opportunities to obtain images are necessarily insurmountable.
39. The extreme left wing have a history of publishing all known details of officers with links to the Special Demonstration Squad and National Public Order Intelligence Unit. Examples of this activity can be found on a number of activist and extremist websites such as ARSpycatcher, the Undercover Research Group and Contrainfo.
40. For example, the Undercover Research Group have a webpage dedicated to Paul Hogan, a Scottish officer who was exposed after mentioning his managerial involvement in the National Public Order Intelligence Unit on a social media site. However, the risk assessor is not aware of any evidence that he has been subject to any threats of harm from the extreme left wing.
41. Based on the evidence that is currently available, the risk assessor has formed the opinion that the threat to EN30's private life should EN30's true identity be published is MEDIUM.
42. In terms of the risk to EN30 from the extreme left wing should his/her true identity be revealed, the risk assessor has formed the opinion that it is likely that the non-traditional media will seek to publicise any information that they are able to obtain regarding former National Public Order Intelligence Unit officers. The risk assessor has reached that conclusion based on the behaviours of the non-traditional media previously, for example when Paul Hogan was exposed on the Undercover Research Group website. The risk assessor is of the opinion that exposure of EN30's identity through the non-traditional media increases the risk that extreme left wing activists will impinge on EN30's right to privacy. Therefore, the risk to EN30's right to privacy from the extreme left wing is MEDIUM.
43. It is the opinion of the risk assessor that should action be taken against EN30 by the extreme left wing, then the action is likely to disrupt EN30's right to a private life in terms of publicity surrounding EN30's identity. For these reasons, the risk assessor is of the opinion that the degree of harm that might be inflicted on EN30's private life is MEDIUM.

The threat to EN30's private life from the extreme left wing movement.	
THREAT	MEDIUM
RISK	MEDIUM
HARM	MEDIUM

Consideration of Alternative Solutions to Restriction Orders

44. The risk assessor has considered what the current risk of harm to the officer is, given what is presently known about EN30. The factors considered by the risk assessor include the following:

- a. There is currently a low risk of harm to EN30. Although EN30 had a sensitive policing role before joining the National Public Order Intelligence Unit, this has not led to any repercussions for EN30 or others.
 - b. Through EN30's lawyer, EN30 has been asked about his/her online presence. EN30 reports that he/she does not engage in social media activity.
 - c. As EN30 did not meet or associate with any activists, the risk assessor does not believe that activists hold any photographic images of him/her.
45. The risk assessor has considered the increase in risk, if any, if the Inquiry restricts the cover name but publishes the officer's real name.
- a. There is a chance that the publicity that is likely to arise after this officer's true identity is revealed may refresh the memories of those that EN30 and others were involved with during EN30's pre- National Public Order Intelligence Unit career. However, given the passage of time and the fact there have been no repercussions since, it is the risk assessor's opinion that publishing EN30's true identity does not in itself increase the risk to EN30 in respect of this element.
 - b. Some of those involved in animal rights activism were involved in serious criminality. It is the opinion of the risk assessor that this concern should be balanced both against EN30's role as a cover officer and the evidence recorded by National Public Order Intelligence Unit officers that provides that there is limited risk of physical harm from animal rights activists. EN30 did not personally meet or infiltrate any activists in the animal rights or environmental arenas. Activists are unlikely to harbour the same feelings of resentment and betrayal towards an officer that they never met as one that they befriended and accepted into their movement. However, there is evidence that once a former Special Demonstration Squad officer's name has been published by the Inquiry or a National Public Order Intelligence Unit officer's true identity is discovered by another means, then the traditional and non-traditional media will immediately make efforts to publish a profile of that officer, together with any photographic image that they may have. It is the opinion of the risk assessor that revealing EN30's true identity will increase the risk of interference with EN30's private life from animal rights activists.
 - c. The Undercover Policing Inquiry is of significant interest to the media. Publishing EN30's true name and links to the National Public Order Intelligence Unit is likely to generate media interest and it is the opinion of the risk assessor that this may also lead to intrusion into EN30's private life.
 - d. Should animal rights activists or journalists publish imagery of EN30 in either the non-traditional or traditional media, then this may increase the risks that EN30 would be recognised by those with whom EN30 was involved in his/her pre- National Public Order Intelligence Unit career. This will increase the risks to EN30 and others. Although the risks of being recognised and then associated to that pre National Public Order Intelligence Unit work are slight, the consequences of such a connection being made fall at the most severe end of the harm spectrum and the Inquiry is urged to consider this issue with the utmost care.

46. The risk assessor has considered what measures other than an order restricting EN30's real name, such as the use of screens, could be taken to avoid or reduce the increase in risk described above.
- a. If the Inquiry were able to avoid highlighting EN30's previous role, the risks associated with that role may be reduced.
 - b. Screens and/or other measures that might reduce risk of visual identification would further help ameliorate the risks associated with publishing EN30's true identity.
 - c. Consideration may be given to ensuring that EN30 can enter and egress from the venue where EN30 is due to give evidence, without being seen or photographed.
 - d. The use of voice modulation software would disguise any regional accent that EN30 might carry.
 - e. Activists may express an interest in, and may seek to disrupt, the current careers of former National Public Order Intelligence Unit officers. This is certainly the case in respect of Andy Coles. Questions that relate to current employment should be avoided.

Range of Options Potentially Available to Home Force

47. The risk assessor has considered a range of options before reaching a recommendation in the event of an unsuccessful restriction application to protect the identity of EN30. Consultation with Protected Persons Unit staff reveals a tiered response to protecting persons that are under threat. Those measures are categorised as "lower response", "middle response" and "higher response".
48. Enquiries with EN30's home force reveal that they are prepared to provide a proportionate response to safeguard EN30 once the level of risk is known and the Inquiry Chair has indicated his decision regarding the restriction order application. In the event that the Inquiry Chair is not minded to grant a restriction order in respect of EN30's true identity, then it is the opinion of the risk assessor that action in the 'Lower' response range may be the most appropriate response. This opinion is purely stated for the benefit of the Inquiry Chair and does not in any way bind EN30's home force to a particular course of action.

Conclusions

49. The risk assessor has formed the opinion that although the threat from those with whom EN30 was concerned in EN30's pre- National Public Order Intelligence Unit role is high and the physical harm that they can cause is high, the risk of there being an association made between EN30's true identity and that role, now that a significant period of time has elapsed, is currently low.
50. It may be of benefit to EN30's and others' future safety if the Inquiry is able to avoid publicly disclosing EN30's previous role and puts measures in place to prevent EN30's visual appearance and any regional accent from being displayed to the public.

51. In the event of a connection being made between EN30's true identity and EN30's previous role, the risk assessor would anticipate that EN30's home force would need to consider protective measures in the higher range.
52. There is strong evidence that as soon as a decision relating to the identity of an officer connected to the Special Demonstration Squad or National Public Order Intelligence Unit is published then the non-traditional and traditional media will endeavour to publish whatever information they have about that individual. It is probable that activists and journalists do not currently have an image of EN30 and one is unlikely to be found on the internet. This is likely to lead to circumstances whereby activists and journalists will endeavour to obtain such imagery. If the activists or journalists are successful in their endeavours and publish photographs of EN30, then this will increase the risk of EN30 being recognised.
53. It is assessed that there is a low threat of physical harm to EN30 from activists involved in environmental issues, from parties involved in animal rights activism and from those involved in anarchism if EN30's true identity is revealed.
54. The risk assessor has formed the opinion that there is a medium risk that extreme left wing activists will interfere with EN30's right to privacy in the event that EN30's true identity is revealed.
55. In the event that EN30 is not granted a restriction order in respect of his/her true identity, then the Inquiry is asked to consider the use of screens or other solutions to protect EN30 from visual identification, to carefully consider how EN30 might enter and exit from the place where the evidence will be heard without being identified and to consider the use of voice modulation software.

Appendix A: List of Third Party Stakeholders Contact Details

56. Appendix A contains a list of third party stakeholders and their contact details.

Appendix B: CV of NPCC Assessor and Quality Assurance Assessor

57. Appendix B sets out the CV of Richard Clarke.

Appendix C: Limitations of Risk Assessment

58. The purpose of this report is to provide a risk assessment to accompany an application to the Undercover Policing Inquiry for anonymity.
59. This report seeks to identify and assess risks to the officer or ex-officer concerned were their cover identity/identities or real identity to be made public.
60. Whilst consideration has been given to ways in which risks may be mitigated, any recommendations made are solely to assist the Inquiry and should not be relied upon by the officer or ex-officer concerned or the relevant Home Force(s) for the preparation or implementation of any risk management plan or for any other purpose.
61. The assessment contained in this report is the opinion of the author based on the material made available to the author.

62. The application for anonymity has been designed on the basis that it is officer led and supported by a solicitor representing the officer. This has an advantage that the officer is at the heart of the process and that the risks they perceive are central to any assessment. However, it does have the disadvantage that the starting premise for any assessment is reliant upon the officer's recollection of events and understanding of risk to themselves and third parties.
63. The amount of material provided to the author relating to the officer or ex-officer concerned is likely to be incomplete because:
- a. Whilst National Public Order Intelligence Unit documents held by Operation Elter have been reviewed, to date the Elter team have only been able to index a limited amount of the archived material recovered. Accordingly it is not known whether the remainder of the archive contains material relevant to this particular risk assessment.
 - b. It has not been possible to examine every document indexed by Operation Elter because of the volume of material and the time constraints within which this risk assessment has been prepared.
 - c. There is not one national repository of police intelligence or information that can be relied upon as containing all information that may be relevant to the assessment of risk to any particular officer or ex-officer. Home Force(s) and specialised departments have their own systems and databases and the NPCC Assessors have arranged for proportionate research to be conducted, but have not arranged for searches to be conducted of every police database.
 - d. The NPCC Assessors have utilised the Operational Security Advisors (OPSY) network to conduct proportionate research into particular National Public Order Intelligence Unit deployments with the relevant Home Force(s) concerned. The NPCC Assessors are reliant upon the research and information provided to them by the Home Force(s) and the OPSY network.
 - e. Officers deployed by the National Public Order Intelligence Unit are likely to have had deployments before and after their National Public Order Intelligence Unit service. These other deployments may have been in various teams or departments around the country, or even abroad. The NPCC assessors have utilised the Operational Security Advisors (OPSY) network to conduct proportionate research into such activity with the relevant Home Force(s) and the NPCC Assessors are reliant upon the research and information provided to them by the Home Force(s) and the OPSY network.
64. The identification of any risk in this report is not intended to represent or imply that the officer or ex-officer concerned faces no other risks other than those specifically mentioned in this report, because of the limitations set out above.
65. The NPCC assessors have set out third party equities, although the list appended to this report is unlikely to be a full and complete list of third party equities due to the limitations already referred to.

66. Although the NPCC assessors have also endeavoured to identify potential risks to third parties, that is not the purpose of this report and will not always be possible due to the limitations already referred to.
67. Attention is drawn to the following factors which limit the completeness of the risk assessment in relation to the particular subject of this report:
- It is not reasonable or proportionate for every activist in the groups mentioned to be subject of extensive higher tier research. As such, only those who appear to be worthy of further research have been subjected to such.

Appendix D: Schedule of Supporting Documentation

68. Appendix D lists the document references together with a description of each document relied on in the risk assessment.

Appendix E: Declaration

69. Appendix E contains the following declaration:

- “1. I understand that my duty in providing this written report and giving evidence is to help the Inquiry, and that this duty overrides any obligation to the subject of this report. I confirm that I have complied and will continue to comply with my duty.
2. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
3. I will advise the Inquiry if there is any change in circumstances which affect my answers.
4. I have fully referenced the sources of all information I have relied upon during the preparation of this report.
5. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
6. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
7. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including the solicitors acting for the subject of this report.
8. I will notify the Inquiry immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
9. I understand that my report will be submitted to the Inquiry, that it will form the basis of my evidence and that I may be asked questions about it in writing or orally at a hearing.”

70. Appendix E also includes the following signed and dated statement of truth: "I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer."

ENDS