House of Lords
House of Commons

Joint Committee on Statutory Instruments

Fifty-fourth Report of Session 2017–19

Drawing special attention to:

Scotland Act 1998 (Specification of Functions and Transfer of Property etc.) Order 2019 **(S.I. 2019/183)**

National Health Service (Clinical Negligence Scheme for General Practice) Regulations 2019 **(S.I. 2019/334)**

Railways (Interoperability) (Amendment) (EU Exit) Regulations 2019 **(S.I. 2019/345)**

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Joint Committee on Statutory Instruments

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Lord Lexden (*Conservative*)

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The full constitution and powers of the Committee are set out in House of Commons Standing Order No. 151 and House of Lords Standing Order No. 73, available on the Internet via www.parliament.uk/jcsi.

Remit

The Joint Committee on Statutory Instruments (JCSI) is appointed to consider statutory instruments made in exercise of powers granted by Act of Parliament. Instruments not laid before Parliament are included within the Committee's remit; but local instruments and instruments made by devolved administrations are not considered by JCSI unless they are required to be laid before Parliament.

The role of the JCSI, whose membership is drawn from both Houses of Parliament, is to assess the technical qualities of each instrument that falls within its remit and to decide whether to draw the special attention of each House to any instrument on one or more of the following grounds:

i that it imposes, or sets the amount of, a charge on public revenue or that it requires payment for a licence, consent or service to be made to the Exchequer, a government department or a public or local authority, or sets the amount of the payment;

ii that its parent legislation says that it cannot be challenged in the courts;

iii that it appears to have retrospective effect without the express authority of the parent legislation;

iv that there appears to have been unjustifiable delay in publishing it or laying it before Parliament;

v that there appears to have been unjustifiable delay in sending a notification under the proviso to section 4(1) of the Statutory Instruments Act 1946, where the instrument has come into force before it has been laid;

vi that there appears to be doubt about whether there is power to make it or that it appears to make an unusual or unexpected use of the power to make;

vii that its form or meaning needs to be explained;

viii that its drafting appears to be defective;

ix any other ground which does not go to its merits or the policy behind it.

The Committee usually meets weekly when Parliament is sitting.

Publications

The reports of the Committee are published by Order of both Houses. All publications of the Committee are on the Internet at www.parliament.uk/jcsi.

Committee staff

The current staff of the Committee are Jeanne Delebarre (Commons Clerk), Jane White (Lords Clerk) and Liz Booth (Committee Assistant). Advisory Counsel: Daniel Greenberg, Klara Banaszak, Peter Brooksbank, Philip Davies and Vanessa MacNair (Commons); James Cooper, Nicholas Beach, John Crane and Ché Diamond (Lords).

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Instruments reported

At its meeting on 27 March 2019 the Committee scrutinised a number of Instruments in accordance with Standing Orders. It was agreed that the special attention of both Houses should be drawn to three of those considered. The Instruments and the grounds for reporting them are given below. The relevant Departmental memoranda, are published as appendices to this report.

1 S.I. 2019/183: Reported for defective drafting

Scotland Act 1998 (Specification of Functions and Transfer of Property etc.) Order 2019

1.1 **The Committee draws the special attention of both Houses to this Order on the ground that it is defectively drafted in three related respects.**

1.2 This Order forms part of a programme of work to complete the devolution of forestry to Scotland. It provides for the transfer of certain rights, interests and liabilities held by the Forestry Commissioners to the Scottish Ministers. Article 4(3)(a) makes provision about the rights and liabilities to which the Order applies but does not make equivalent provision for "interests" (which are mentioned separately in article 4(1)(a)). The Committee asked the Scotland Office to explain the omission. In a memorandum printed at Appendix 1, the Department acknowledges that article 4(3)(a) should have referred to "interests" for consistency with article 4(1)(a). (The Department believes that the provisions will work in practice as drafted, in particular because interests are not expected to arise after the transfer or in connection with employment contracts, but undertakes to monitor the situation.) **The Committee accordingly reports regulation 4 for defective drafting, acknowledged by the Department.**

2 S.I. 2019/334: Reported for defective drafting

National Health Service (Clinical Negligence Scheme for General Practice) Regulations 2019

2.1 **The Committee draws the special attention of both Houses to these Regulations on the ground that they are defectively drafted in two respects.**

2.2 These Regulations set up an indemnity scheme for general practice which provides cover for future clinical negligence liabilities in respect of activities carried out for the purposes of the National Health Service in England.

2.3 Regulation 7 specifies matters to which the Secretary of State must have regard in determining the amount of payments to be made under the scheme. Regulation 7(7) covers the situation where a claim is determined other than by a court; for example, by arbitration. The Committee asked the Department of Health and Social Care to explain why "person or body" is used in regulation 7(7) given that the Interpretation Act 1978 defines "person" as including a body of persons corporate or unincorporate. In a memorandum printed at Appendix 2, the Department acknowledges that the reference to "body" is an error and undertakes to rectify the error at the next available opportunity. The Committee refers

to its Thirty-ninth Report of Session 2017–19 (in relation to S.I. 2018/1093) and reiterates its concern that while some legislation uses "person" alone and presumably relies on the 1978 Act, other legislation chooses to use both words, which is unnecessary and casts doubt on the scope of references to "person" alone. **The Committee accordingly reports regulation 7(7) for defective drafting, acknowledged by the Department.**

2.4 Regulation 7(7)(b) states that in determining the amount of any payment the Secretary of State must have regard to any legal or associated costs incurred by the claimant in connection with the claim. The Committee asked the Department whether paragraph (b) should refer only to the eligible person's contribution to those costs. In its memorandum, the Department accepts that it could have referred to any contribution payable by the eligible person towards the claimant's costs but considers that the regulation can be made to operate as intended. The Committee believes that the intention could and should have been expressed precisely and **accordingly reports regulation 7(7)(b) for defective drafting.**

3 S.I. 2019/345: Reported for defective drafting and for failure to comply with proper legislative practice

Railways (Interoperability) (Amendment) (EU Exit) Regulations 2019

3.1 **The Committee draws the special attention of both Houses to these Regulations on the grounds that they are defectively drafted in three specific respects and generally in relation to the number of minor errors, and that they fail to comply with proper legislative practice in one respect.**

3.2 This instrument corrects deficiencies in retained EU law relating to the interoperability of the European rail system arising from Brexit. They provide, inter alia, for amendments to ensure that the current regulatory framework remains operable in UK law and for systems and components assessed against EU standards to be unilaterally recognised in the United Kingdom in some circumstances.

3.3 New Schedules inserted by this instrument into the Railways (Interoperability) Regulations 2011 (SI 2011/3066) transpose into domestic legislation Annexes of Directive 2008/57/EC (safety standards, interoperability requirements, verification procedures, and similar matters relating to rail projects). The Committee noticed that some of the new Schedules appear to impose obligations in ways not usually seen in UK legislation.

3.4 In new Schedule 2 (inserted by Schedule 1), while most obligations are imposed with the usual "must", the ninth indent of paragraph 2.4.1 provides that an emergency lighting system having a sufficient intensity and duration "is an absolute requirement on board trains". The Committee asked the Department for Transport to explain whether the latter obligation is intended to have a different meaning from the others. In a memorandum printed at Appendix 3, the Department confirms that it is not and undertakes to correct it. **The Committee accordingly reports paragraph 2.4.1 of new Schedule 2 for defective drafting, acknowledged by the Department.**

3.5 In contrast, a number of provisions in new Schedules 4, 7 and 8 (inserted by Schedules 3, 6 and 7) are expressed as mere declaratives, as in "the designated body draws up the UK certificate of verification" or "the assessment procedures…will draw upon the modules

defined in the NTSN" or "the staff of the body are bound by professional secrecy". It was not clear to the Committee whether these declarative sentences were intended to be obligations at all – and if so, how such obligations were imposed. It therefore asked the Department to explain its intentions in relation to a number of provisions drafted in this declarative style.

3.6 In its memorandum, the Department explains that it intends the wording in each of these provisions to impose obligations on the relevant bodies. It notes that the regulations which introduce the Schedules in question require things to be done "in accordance with" a Schedule, or state that a Schedule "applies to" a body, or provide for what should happen if a body "is not meeting the criteria specified in" a Schedule. The Department asserts that the provisions in the Schedules should be understood to be substantive requirements on the basis of such introductory words. The Committee does not accept this argument. It appears to the Committee that using declarative sentences to impose legal obligations blurs the line between operative and inoperative provisions in a way that is likely to confuse, and that such confusion is not mitigated by the fact that the Schedule as a whole is expressed to apply or is required to be complied with. The Committee also reiterates that as a matter of normal usage, "will" is a word of prediction and not obligation (as noted in its First Special Report of Session 2013–14). The Department acknowledges that the drafting of the relevant provisions could be improved and undertakes to correct them. **The Committee accordingly reports paragraphs 2.3.1, 2.3.2 and 3.2 of new Schedule 4 (inserted by Schedule 3), paragraph 2 of new Schedule 7 (inserted by Schedule 6) and paragraph 7 of new Schedule 8 (inserted by Schedule 7) for defective drafting, acknowledged by the Department.**

3.7 The Committee noticed that the numbering of some of the paragraphs in the new Schedules also departs from normal UK drafting practice in cases where sub-paragraphs have not been assigned a unique number (see for instance paragraphs 2.1.1, 2.4.1 and 2.4.3 of new Schedule 2, inserted by Schedule 1). The Committee asked the Department to explain why this had been done. In its memorandum, the Department explains that it chose to copy out the provisions of the Directive and to change them as little as possible —as to both substance and numbering—"to assist stakeholders in understanding how the processes and procedures will still be broadly similar and continue to work after exit day in a comparable way, and to keep, as far as possible, the current processes and procedures in place". The Committee is not persuaded by this reasoning. It reiterates the comments made by the Statutory Instruments Committee in its Eleventh Report of Session 2017–19: The Committee expects, both in relation to retained EU law and more generally, that new domestic legislation will comply with best practice in relation to UK legislative drafting, and be clear and justiciable. Relying on copy-out to justify the inclusion in UK legislation of provisions that do not conform to domestic legislative drafting practice or meet required standards of clarity will not be acceptable after exit day, even in relation to legislation that originally derives from EU law. In this case, the Committee does not accept that renumbering the relevant provisions would prevent stakeholders from recognising that the substance of the new UK scheme remains broadly similar to the current EU scheme. **The Committee accordingly reports paragraphs 2.1.1, 2.4.1, 2.4.3 of new Schedule 2 (inserted by Schedule 1), paragraph 1 of new Schedule 5 (inserted by Schedule 4), and the other paragraphs in the new Schedules the provisions of which are not individually numbered, for failing to comply with proper legislative practice.**

3.8 Paragraph 2.4(c)(iii) of new Schedule 4 refers to "the certificate of verification… signed by the EU notified body responsible for the UK verification". The Committee was surprised that there might be circumstances when a body appointed by an EU member State would be "responsible for" UK verification procedures and asked the Department to clarify the circumstances in which this might arise. In its memorandum, the Department acknowledges that this is an error and undertakes to correct it. **The Committee accordingly reports paragraph 2.4(c)(iii) of new Schedule 4 for defective drafting, acknowledged by the Department.**

3.9 The Committee also asked the Department to explain the reason for the large number of apparent drafting errors contained in this instrument. In its memorandum, the Department apologises for these errors and undertakes to correct them as soon as reasonably practicable. **The Committee accordingly reports the Regulations for defective drafting due to the prevalence of minor drafting errors, acknowledged by the Department.**

3.10 As to the Department's intention to consider whether the error in paragraph 2.4(c)(iii) of Schedule 4 and any of the minor drafting errors mentioned above may be suitable for amendment by correction slip, the Committee's view is that the former is not and the latter should be decided having regard to the Committee's First Special Report of Session 2017–19.

3.11 The Department's memorandum also helpfully clarifies that where an interoperability constituent in relation to which an EU declaration of conformity has been made no longer meets the essential requirements relevant to its type (as required by new regulation 23(1)(a) (inserted by regulation 27)), it will no longer be possible to rely on the EU declaration.

Instruments not reported

At its meeting on 27 March 2019 the Committee considered the Instruments set out in the Annex to this Report, none of which were required to be reported to both Houses.

Annex

Instrument requiring affirmative approval

S.I. 2019/554 Republic of Guinea-Bissau (Sanctions) (EU Exit) Regulations 2019

Draft instruments requiring affirmative approval

Draft S.I. Geo-Blocking Regulation (Revocation) (EU Exit) Regulations 2019

Draft S.I. Electronic Communications (Amendment etc.) (EU Exit) Regulations 2019

Draft S.I. European Union (Withdrawal) Act 2018 (Exit Day) (Amendment) Regulations 2019

Draft S.I. Food Additives, Flavourings, Enzymes and Extraction Solvents (Amendment etc.) (EU Exit) Regulations 2019

Draft S.I. Trade in Torture etc. Goods (Amendment) (EU Exit) Regulations 2019

Instruments subject to annulment

S.I. 2019/438 South Sudan (Sanctions) (EU Exit) Regulations 2019

S.I. 2019/439 Oil and Gas Authority (Levy) and Pollution Prevention and Control (Fees) (Miscellaneous Amendments) Regulations 2019

S.I. 2019/451 Aquatic Animal Health and Alien Species in Aquaculture (Amendment etc.) (EU Exit) Regulations 2019

S.I. 2019/462 Quick-frozen Foodstuffs (Amendment) (EU Exit) Regulations 2019

S.I. 2019/464 Sprouts and Seeds (Amendment) (EU Exit) Regulations 2019

S.I. 2019/466 ISIL (Da'esh) and Al-Qaida (United Nations Sanctions) (EU Exit) Regulations 2019

S.I. 2019/472 Seed Marketing and Seed Potatoes (England) (Amendment) Regulations 2019

S.I. 2019/475 Immigration and Nationality (Fees) (Refund, Waiver and Amendment) (EU Exit) Regulations 2019

S.I. 2019/476 Government Resources and Accounts Act 2000 (Estimates and Accounts) Order 2019

S.I. 2019/477 Connecting Europe Facility (Revocation) (EU Exit) Regulations 2019

S.I. 2019/484 European Union Budget, and Economic and Monetary Policy (EU Exit) Regulations 2019

S.I. 2019/485 Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) (No. 2) Regulations 2019

S.I. 2019/489 UK Statistics (Amendment etc.) (EU Exit) Regulations 2019

S.I. 2019/508 Recovery of Costs (Remand to Youth Detention Accommodation) (Amendment) Regulations 2019

S.I. 2019/516 National Health Service (Charges to Overseas Visitors) (Amendment etc.) (EU Exit) Regulations 2019

S.I. 2019/520 Public Service (Civil Servants and Others) Pensions (Amendment) Regulations 2019

S.I. 2019/522 National Health Service (Dental Charges) (Amendment) Regulations 2019

S.I. 2019/525 Guardian's Allowance Up-rating Regulations 2019

S.I. 2019/528 Greenhouse Gas Emissions Trading Scheme (Amendment) Regulations 2019

Instruments not subject to Parliamentary proceedings not laid before Parliament

S.I. 2019/427 Housing and Planning Act 2016 (Commencement No. 10 and Transitional Provision) Regulations 2019

S.I. 2019/428 Tenant Fees Act 2019 (Commencement No. 2) Regulations 2019

Appendix 1

S.I. 2019/183

Scotland Act 1998 (Specification of Functions and Transfer of Property etc.) Order 2019

1. Concerning your query "Given that article 4(1)(a) refers to the transfer of "rights and interests", explain why article 4(3)(a) does not reference "interests" of 13 March, please find below the Scotland Office's response.

2. The Government is grateful to the Committee for drawing this issue to its attention. There is an omission in Article 4(3)(a) which should have referred in three places to "interest" as well as to "right" and "liability".

3. The interpretative provision in Article 4(3)(a) does two things. Firstly, it provides that "rights" and "liabilities" include both rights and liabilities which exist immediately before the transfer, and also rights and liabilities which arise after the transfer but which do so in respect of an act or omission of the Forestry Commissioners which took place before the transfer. In the absence of a reference to "interests" in this context, the Government's view is that the term "interests" as used in Article 4(1) falls to be given its natural meaning, being such interests of the Forestry Commissioners as exist at the transfer date, but not any interests arising after that date. In practice, the Government does not consider that any "interests" (as distinct from "rights") are likely to arise after the transfer date.

4. Secondly, Article 4(3)(a) operates to exclude rights and liabilities relating to employment contracts from the rights and liabilities transferred. While the intention was also to refer to "interests" here to align the language used with that in Article 4(1), the Government does not consider that there are any "interests" (as distinct from "rights") arising in connection with any contract of employment that will, as a result of this omission, transfer to the Scottish Ministers.

5. The Government will however monitor the situation closely with a view to determining whether there is a need for further action to be taken to remedy any unintended consequences arising as a result of these omissions.

Scotland Office

19 March 2019

Appendix 2

S.I. 2019/334

National Health Service (Clinical Negligence Scheme for General Practice) Regulations 2019

1. In its letter to the Department of 13 March 2019, the Committee requested a memorandum on the following points:

> *In regulation 7(7), (i) explain why "person or body" is used given section 5 of the Interpretation Act 1978, and (ii) whether paragraph (b) should refer to the eligible person's contribution to the costs incurred by the claimant.*

2. The Department responds to the Committee's points as follows.

In regulation 7(7), why "person or body" is used given section 5 of the Interpretation Act 1978

3. Given section 5 of the Interpretation Act 1978 (as read with Schedule 1 to that Act), by virtue of which "person" includes a body of persons corporate or unincorporate, the reference to "person or body" in regulation 7(7) should simply be to "person". The reference to "or body" is an error and will be rectified at the next available opportunity. The Department apologises to the Committee for the error, which was an oversight.

Whether paragraph (b) should refer to the eligible person's contribution to the costs incurred by the claimant

4. Regulation 7(7) is intended to cover situations where claims are determined other than by the court, for example by arbitration. When assessing payments that are to be made from the scheme in respect of such claims, the Secretary of State must, amongst other things, take into account the legal and other costs incurred by the claimant in connection with the claim.

5. This is relevant in terms of determining the total amount payable under the scheme where the arbitration determination is that costs are payable, but where those costs have not been quantified and are to be agreed. The Department accepts that it may have been possible to refer to any contribution payable by the eligible person towards the legal or associated costs incurred by the claimant, but considers that the Regulations as drafted will operate as intended in relation to the scenario described above.

Department of Health and Social Care

19 March 2019

Appendix 3

S.I. 2019/345

Railways (Interoperability) (Amendment) (EU Exit) Regulations 2019

1. By a letter dated 13 March 2019, the Joint Committee on Statutory Instruments requested a memorandum on a number of points in relation to the above mentioned instrument.

> *(1) Explain whether regulation 23(2)(a) will continue to apply to an EU declaration of conformity or suitability which appears to the Safety Authority to fail to meet the essential requirements relating to it, as envisaged by regulation 29 of the Regulations being amended.*

2. The requirement in regulation 23(1) of the 2011 Interoperability Regulations as amended by the current instrument that interoperability constituents must comply with the essential requirements in order to be placed on the UK market after exit will apply to a constituent with an EC declaration of conformity or suitability for use as well as constituents with a UK declaration. Regulation 23(2) only qualifies regulation 23(1)(c), and not the whole of paragraph (1) (it is only regulation 23(1)(c) that is described as being "subject to paragraph (2)"), and so the requirement for a constituent to comply with the essential requirements will apply in both scenarios. If a manufacturer wishes to place on the UK market an interoperability constituent with an EC declaration, and the Safety Authority has given notice under regulation 29 of an incorrect declaration, then this will be because the Safety Authority considers the essential requirements are no longer met and therefore the EU declaration will not be able to be relied upon for the purposes of placing on the market. There are also powers in the Regulations to deal with the prohibition of interoperability constituents with either EC or UK declarations where the Safety Authority considers that those declarations have been improperly made (regulation 41).

> *(2) Explain whether, in Schedule 1, ninth indent of paragraph 2.4.1 of new Schedule 2, the obligation imposed by the phrase "is an absolute requirement" is intended to have a different meaning from the obligations imposed by "must" elsewhere in that Schedule.*

3. In relation to question 2, and the subsequent questions and comments which relate to the drafting of the Schedules, the Department makes the following observations. In drafting the Regulations, the Department decided to copy out the contents of the Annexes to the 2008 EU Directive into Schedules to the 2011 Regulations. The Department made an exception to that approach where changes were needed to deal with provisions which would become inoperable after the UK's exit from the EU. As a matter of policy, the Department chose this approach because it wanted to change as little as possible to assist stakeholders in understanding how the processes and procedures will still be broadly similar and continue to work after exit day in a comparable way, and to keep, as far as possible, the current processes and procedures in place.

4. In relation to the wording identified by the Committee, the wording at present imposes obligations in both cases. The Department recognises, however, that this is not as clear as it could be, and undertakes to bring forward amendments to clarify the position as soon as reasonably practicable.

> *(3) Explain why, given the Committee's Eleventh Report of Session 2017–19, many of the sub-paragraphs in the new Schedules inserted by these Regulations have not been assigned a distinct number in accordance with normal UK drafting practice (e.g. in paragraphs 2.1.1, 2.4.1 and 2.4.3 of new Schedule 1; paragraph 1 of new Schedule 5).*

5. Again, the Department opted to copy the Annexes directly, including the paragraph numbering, in order that the Department could reassure stakeholders that as little as possible will change. Relevant stakeholders are familiar with the current numbering and drafting of the Annexes which the Department wished to retain in the new regime.

> *(4) In new Schedule 4 (as inserted by Schedule 3), explain whether paragraphs 2.3.1, 2.3.2 and the first indent of paragraph 3.2 are intended to impose obligations and, if they are merely declarative, where the relevant obligations are imposed. Explain the same in relation to the closing lines of paragraph 2 of new Schedule 7 (as inserted by Schedule 6) and paragraph 7 of new Schedule 8 (as inserted by Schedule 7).*

6. In relation to the wording identified by the Committee, the intent is that the wording is intended to impose obligations on the relevant bodies. As noted above, this wording is copied directly from the Annexes to the Directive with only limited changes to correct inoperabilities with the intention of making only the minimum changes necessary to material with which stakeholders are familiar.

7. Schedule 4 is introduced by regulation 6(9), which sets out the substantive requirements in relation to a designated body drawing up a UK certificate of verification and requires that body to do so in accordance with Schedule 4, which set out the procedures which a body must follow to make that UK certificate of verification.

8. Schedule 7 is similarly introduced by regulation 25(2) which provides (when it comes into force) for a UK declaration of conformity to be drawn up in accordance with the requirements of Schedule 7 (previously Annex IV to Directive 2008/57/EC). So this imposes the necessary obligations to comply with the procedures described in new Schedule 7, including as described in paragraph 2.

9. Regulation 31(3) similarly introduces the new Schedule (to replace the previous cross-reference to Annex VIII of Directive 2008/57/EC). The wording of regulation 31(3), while not an exact "copy out" of article 28(2) of Directive 2008/57/EC, which it implements, nevertheless closely mirrors the language of that provision which requires Member States to "apply" the criteria provided for in Annex VIII and should therefore be understood as imposing a substantive requirement for a notified body (now an "approved body") to satisfy the criteria in Annex VIII (substantially reproduced in new Schedule 8) as a condition of being able to continue to act as an approved body. Regulation 31(7) also provides that if an approved body no longer meets the criteria specified in Schedule 8 (so in this case if it were shown the staff of the body were not bound by professional secrecy or were breaching its requirements), then the Secretary of State may terminate the body's appointment as an "approved body".

10. The Department nevertheless recognises that the drafting could be improved, and so undertakes to clarify the wording of those paragraphs in the Schedules in the instrument mentioned below.

> *(5) In paragraph 2.4(c)(iii) of new Schedule 4, as inserted by Schedule 3, clarify the circumstances in which an EU notified body would be responsible for a UK verification, having regard to the definitions of "EC certificate of verification" and "UK certificate of verification" in regulation 2(2)(f) and (bb).*

11. This is an error in the instrument for which the Department apologises. The instrument should refer to "an EC verification", rather than a "UK verification" in this instance. The Department will consider whether this error might be suitable for a correction slip but failing this undertakes to correct it in the instrument mentioned below.

> *(6) Explain the reasons for the apparent errors listed (in the table).*

12. The Department has reviewed the table in question 6 and apologises for the errors listed in the table. The Department will issue a correction slip in the appropriate cases, and amend the drafting in the other appropriate cases as soon as reasonably practicable.

13. The Department informs the Committee that the intention is to make a further instrument on rail interoperability to cover a number of matters which were omitted from this instrument for reasons of speed of delivery and which were not considered essential to be in place before exit against the possibility of a "no-deal" exit (see paragraph 6.4 of the Explanatory Memorandum). The Department aims to make that instrument as soon as is practicable, and the Department will use that instrument to correct or clarify those matters which the Committee has outlined above.

Department for Transport

19 March 2019