[redacted]

From: [redacted]
Sent: 18 June 2014 17:25
To: [redacted] (Defra)
Cc: [redacted] (Defra); [redacted] (Defra)
Subject: RE: Mitigation Subgroup progress & LAG agenda
Attachments: Copy of LAG risk register with scores [redacted].xls

[redacted]

Thanks for this. I agree with your suggestion of putting more specific content into the table. I've suggested how I would do this for child neurodevelopment only in the attached. NB the only cells I've changed from the version you sent are those highlighted yellow.

[redacted]

On Jun 18 2014, [redacted] (Defra) wrote:

>I'm definitely not saying that this should be abandoned.
>
>
>
>I don't want to step on toes on health issues as ultimately those will
>be for FSA, but it was easier to begin there simply as it comes first
>in the table.
>
>
>
>I've had another look at your report and your conclusion on para 4.3.3
>and wonder if a little more clarity around how the risks are being
>described in the table will help us go forward here?
>
>
>
>You and [redacted] say:
>
>"It is concluded that consumption of meat from wild game animals killed
>using lead ammunition poses non-trivial risks to some high-level
>consumers of wild game in the UK, though the risks are small for the
>general population who consume wild game infrequently. ...."
>
>
>
>So if some of that went into the table it would help to assign the risk
>to that group of people, which I would think would make it easier to
>allocate a category to the risk? - I've entered text in the table
>attached.
>
>
>
>I'm happy to join any discussion on 25/6 that PERASG feel would benefit
>their deliberations.

>
>
>
[redacted]
>
>
>
>-----Original Message-----
>From: [redacted]
>Sent: 18 June 2014 14:00
>To: [redacted] (Defra)
>Cc: [redacted]
>Subject: RE: Mitigation Subgroup progress & LAG agenda
>
>
>
>Dear [redacted]
>
>
>
>Thanks for this. Although you say that the risk assessment process is
>simple and straightforward, I don't find it so because the process we
>are using has no quantitative definitions of terms. Maybe you are
>suggesting that we abandon the PPM method and use something else? But I
>take it for now that you are not.
>
>
>
>If we are sticking with PPM, the process has two stages each requiring
>a separate score. The overall score is not a matter for expert
>judgement but comes out of the two component scores (which may be). For
>"Current likelihood", is the criterion the risk of the deficit
>occurring AT ALL (i.e. to any individual). Or is there a number of
>individuals affected that is part of this part of the assessment? Is it
>the risk of 0.69% to 1.6% of children being affected at or above the
>BMR?- for neurodevelopment I think you are saying that it is, but the
>guidance doesn't say. I would rate the probability of that as >50%. I
>had assumed that the number of individuals affected was only taken into
>account in the "Current impact" score- but I think you are saying that
>it comes into both. For "Current impact" is there any guidance of what
>"significant" and "some" mean in terms of numbers of individuals? I
>think we can take it that "Current impact" assessment only involves
>numbers of individuals in this case because adoption of the EFSA BMR
>surely means that the effect on those affected to >BMR is "significant"?
>
>
>
>Best wishes
>
>
>
[redacted]
>
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>

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>
>.
>
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>
>I agree with you about the need to drive forward the mitigation side,
>which is why I think it highly regrettable that the Mitigation Subgroup
>decided that it wanted the do PRESG's job for it.
>
>
>
> I had taken it that the number of individuals affected , but maybe
>you This not possible to apply logically until
>
>
>
>>> the question "likelihood of what?" is answered. For example, does
>
>"High"
>
>
>
>>> mean a greater than 50% chance of any one child having a reduction
>>> in
>
>
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>
>
>>> attainment at or greater than the BMR, or ten children, or a
>>> hundred,
>
>
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>
>
>>> or a thousand, etc? The guidance does not say. As the guidance is
>
>
>
>>> currently framed, one would need to assume that a >50% chance of
>>> even
>
>
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>
>
>>> one child being so affected would cause the current likelihood to be
>
>rated "High".
>
>
>
>On Jun 18 2014, [redacted] (Defra) wrote:
>

>
>
>>All
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>>
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>>
>
>>I share concerns about not wanting to create further delay.
>
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>
>>Managing risks is something we all do all the time; every organisation
>
>>will have its own way of doing it but it will follow the same generic
>
>>principles. Categorising the risks can be done in many ways - high,
>
>>medium, low, very low/negligible has been suggested here, but in the
>
>>past I've seen other methods - for example on the ruddy duck project
>>we
>
>
>>use a numerical categorisation where 10 is a risk which will/would
>
>>guarantee failure of the project and zero is no risk. So what you
>
>>choose to do is flexible.
>
>>
>
>>
>
>>
>
>>PERASG has identified the risks, and from the table that has been
>
>>populated, there are 9, - 4 from " An evaluation of the risks to human
>
>>health in the UK from lead derived from ammunition from lead"; 2 from
>
>>"The risks to human health through livestock feeding in areas of lead
>
>>shot deposition" and 3 from "Lead Ammunition and Wildlife in England
>
>>(UK)". With 9 risks to consider, is there a possibility that the
>
>>PERASG members who are present next week, take some time at the
>

>>beginning of the meeting to thrash this out?
>
>>
>
>>
>
>>
>
>>If you decide to use H,M,L, VL as categories then a high risk is one
>
>>which is very likely to occur (significantly greater than 50:50
>chance).
>
>>The risk is very likely to occur this year or at frequent intervals in
>
>>the foreseeable future (say the next 18 months to 3 years).
>
>>
>
>>
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>>
>
>>So taking the risk of -
>
>>
>
>>"A potential neurodevelopmental risk (of a 1 point IQ reduction) to
>
>>children that consume 0.4 to 0.7 (40-70 g total weight) gamebird meals
>
>>per week and with reductions in children's SATs writing tests scores
>>of
>
>>0.34 to 0.43 points in children that consume 3 gamebird meals (354 g
>
>>total weight) per week. An estimated 5,500-12,500 under 8 year olds
>
>>consume at least one game meal per week"
>
>>
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>>
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>>
>
>>With birth rates a little over 800,000 per year in the UK (ONS
>>figures)
>
>
>>we're talking approx. 0.69% to1.6% of children exposed to that risk
>>but
>
>
>>for those, you will need to judge whether the potential
>

>>neurodevelopmental risk is very likely to occur. If you do then you
>>may
>
>
>>choose the "high" category despite a small % of all children being
>
>>likely to be affected.
>
>>
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>>
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>>
>
>>I think this a straightforward process and needs to be kept simple.
>>If
>
>
>>you decide it's all too difficult, then LAG will have to have a
>
>>discussion around that, but if we get hung up on categorisation we
>
>>will miss the need to drive forward the mitigation side and the report
>
>>will be further delayed. I'm conscious that minutes from previous
>
>>meetings are "out there" stating that LAG hoped to deliver a report to
>
>>Ministers in early 2014; it would be good to get into a position soon
>
>>where the report can be delivered.
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>
>[redacted]
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>>-----Original Message-----
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>
>>From: [redacted]
><mailto:[redacted]]
>
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>
>>Sent: 18 June 2014 07:17

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>>
>
>>To: [redacted]
>
>>
>
>>Cc: [redacted] (Defra); [redacted]
>
>>[redacted]
>
>>
>
>>Subject: Re: Mitigation Subgroup progress & LAG agenda
>
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>
>>Dear [redacted]
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>
>>I recognise the problem you point out with the availability of some
>
>>PERASG members to do the work on risk scoring. As you say, it would be
>
>>especially valuable to have Len look at this and give us his advice.
>
>>
>
>>
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>
>>As I see it, the risk scores will only mean anything if we use agreed
>
>>definitions of the criteria and say clearly what these definitions are.
>
>>If we cannot do that, then there is no advantage to having a risk
>>score
>
>
>>at all. It would be better simply to say (as we have already in the
>
>>risk
>
>>
>
>>assessments) that e.g. "at least x thousand children in the UK are

>
>>estimated to incur the EFSA Benchmark Response for neurodevelopmental
>
>>impairment because of ammunition-derived dietary lead". This seems
>>much
>
>
>>clearer and easier for a policy-maker to grasp than e.g. "the risk of
>
>>neurodevelopmental impairment because of ammunition-derived dietary
>
>>lead is assessed as Medium".
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>
>>Best wishes
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>>
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>[redacted]
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>>On Jun 18 2014, [redacted] wrote:
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>
>>>Dear [redacted],
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>>>
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>
>>> I had contact with [redacted] at the weekend and this week he will be
>
>>> working
>
>>

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>>
>
>>> in Mauritius with his mind probably on other things. But he has
>
>>
>
>>> registered all the email traffic.
>
>>
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>>>
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>>
>
>>> I would be very happy for PERASG to do the work you describe,
>
>>> although
>
>>
>
>>
>
>>> the final ownership rests with the main committee; BUT there are two
>
>>
>
>>> flies in the ointment. First is purely practical regarding the
>
>>
>
>>> availability of [redacted] and [redacted] time to get involved
>
>>
>
>>> and second the unattractiveness of delay - however logical the goal.
>
>>
>
>>> Hence I have steered around a formal referral of the matter to
>PERASG.
>
>>
>
>>>
>
>>
>
>>> That is why I have phrased things so as to encourage "those who can"
>
>>
>
>>> to have a go as you have started to do. Your approach is indeed
>
>>
>

>>> understandable and I will give more careful thought when I get home.
>
>>
>
>>> We should strive to be as clear as possible precisely what we are
>
>>
>
>>> scoring and saying - even if the impacts, for both human and
>>> wildlife
>
>>
>
>>> health in reality are rather diffuse and open ended.
>
>>
>
>>>
>
>>
>
>>> I suppose I am hoping that [redacted] and you (most probably) can give us
>
>>
>
>>> some good advice next week - and I will do what I can to see if we
>
>>> can
>
>>
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>>
>
>>> collectively arrive at a simple way of expressing the risks allied
>>> to
>
>>
>
>>> effectiveness of mitigation (options).
>
>>
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>>>
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>
>>> In the meantime I remain out of email contact in Brussels so am not
>
>>
>
>>> sure when this will "send".
>
>>
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>>>
>

>>
>
>>>But best regards to all and thank you again.
>
>>
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>>>
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>>
>
>>[redacted]
>
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>>>
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>
>>>On 16 Jun 2014, at 17:29, [redacted] [redacted]
><mailto:[redacted] wrote:
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>>
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>>>
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>>
>
>>>> Dear [redacted] Mitigation Subgroup colleagues & [redacted]
>
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>>
>
>>>> Thanks to [redacted] for circulating the draft LAG agenda. Could I please
>
>>
>
>>>> seek some clarification on an issue concerning the Risk and
>
>>
>
>>>> Mitigation Register? In [redacted] message accompanying the draft LAG
>
>>
>
>>>> Agenda, he comments that an important matter for LAG on 25 June
>>>> will
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>>
>

>>>> be "the words used to characterise the level of risk i.e. high,
>
>>
>
>>>> medium, low, negligible etc and the criteria used for deciding". I
>
>>
>
>>>> think that it has been decided to use the PPM risk register
>>>> template
>
>>
>
>>>> and the guidance therein to do this. As I said at the Mitigation
>
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>
>>>> Subgroup meeting on 16 May, I think that this is a task which
>>>> PERASG
>
>>
>
>>>> should do, with PERASG then presenting its conclusions to LAG as
>
>>
>
>>>> recommendations. Although, in her comments on the Register, [redacted]
>>>> has
>
>>
>
>>>> also suggested that PERASG should do this and [redacted] mentions it in
>
>>>> his
>
>>
>
>>
>
>>>> message to [redacted] (below), I am not aware of PERASG having been
>
>>>> asked
>
>>to do it in time for the LAG meeting.
>
>>
>
>>>> Maybe I've missed something?
>
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>>
>
>>>> Because I anticipated that I would probably be asked (as a member

>>>> of
>
>>
>
>>>> PERASG) to complete this part of the Risk Register, I have tried to
>
>>
>
>>>> do so using "Guidance for completing the PPM risk register
>template".
>
>>
>
>>>> Unfortunately, I have found the prescribed method impossible to use
>
>>
>
>>>> for the risks as they are presently defined and with the guidance
>
>>available.
>
>>
>
>>>> I think that PERASG would need to do the following things before we
>
>>
>
>>>> could apply the framework:
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>>
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>>>>
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>>
>
>>>> (1) define each risk more precisely. For example, for the risk
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>>
>
>>>> "Neurodevelopmental risk in children", I think that the
>"consequence"
>
>>
>
>>>> for which we are assessing the "current likelihood" should be
>>>> "Lower
>
>>
>
>>>> attainment on IQ and SATs tests equivalent to at least the BMR
>
>>
>
>>>> defined by EFSA (2010). This is a 1 point deficit in IQ, expected
>
>>

>
>>>> from consumption of 0.4 to 0.7 gamebird meals per week (40-70 g
>
>>>> total
>
>>
>
>>
>
>>>> weight), or the equivalent reduction in SATs writing test score,
>
>>
>
>>>> expected from consumption of 0.13 to 0.21 gamebird meals per week
>
>>
>
>>>> (12.7 to 20.4 g total weight)." The present draft of the register
>>>> is
>
>>
>
>>>> nearly there for these definitions as regards human health, but
>>>> they
>
>>
>
>>>> need some refinement (as indicated here for this example) to match
>
>>
>
>>>> the human health RA and EFSA (2010) more precisely.
>
>>
>
>>>>
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>>
>
>>>> (2) "Current likelihood". This not possible to apply logically
>>>> until
>
>>
>
>>>> the question "likelihood of what?" is answered. For example, does
>
>>"High"
>
>>
>
>>>> mean a greater than 50% chance of any one child having a reduction
>
>>>> in
>
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>

>>
>
>>>> attainment at or greater than the BMR, or ten children, or a
>
>>>> hundred,
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>
>>
>
>>>> or a thousand, etc? The guidance does not say. As the guidance is
>
>>
>
>>>> currently framed, one would need to assume that a >50% chance of
>
>>>> even
>
>>
>
>>
>
>>>> one child being so affected would cause the current likelihood to
>>>> be
>
>>rated "High".
>
>>
>
>>>> Given that thousands of children are exposed to >1 game meal per
>
>>
>
>>>> week, which is higher than the level expected to incur the BMR, it
>
>>
>
>>>> seems certain to me that "High" is the correct score. That
>
>>>> conclusion
>
>>
>
>>
>
>>>> is indicated because the guidance leaves quantification of impact
>
>>
>
>>>> entirely to another section ("Current impact")- see next. I note
>
>>>> that
>
>>
>
>>

>
>>>> the Mitigation Subgroup (excluding me) scored this "Medium", but I
>
>>>> do
>
>>
>
>>
>
>>>> not understand how you answered "likelihood of what?" question.
>
>>>> Maybe
>
>>
>
>>
>
>>>> you can explain.
>
>>
>
>>>>
>
>>
>
>>>> (3) "Current impact". According to the guidance, this is (as I
>
>>
>
>>>> understand it) the only section that allows for a quantitative
>
>>
>
>>>> estimate of the magnitude of the effect in terms of numbers of
>
>>
>
>>>> individuals affected. However, the categories (High, Medium etc) do
>
>>
>
>>>> not have numerical definitions, so PERASG would need to define
>>>> these
>
>>
>
>>>> ourselves or get additional guidance. The guidance says that
>
>>
>
>>>> "significant public health concerns" warrant a score of High, some
>
>>
>
>>>> public health effects warrants Medium, minor or reversible health
>

>>
>
>>>> effects is Low and negligible health effects is Very Low.
>
>>
>
>>>> "Significant" and "some" are not defined. However, even in the
>
>>
>
>>>> absence of a definition I think we can rule out Low and Very Low
>>>> for
>
>>"Neurodevelopmental risk in children"
>
>>
>
>>>> because the impact has to be either "significant" or "some" with
>
>>
>
>>>> thousands of children exposed to >1 game meal per week and thereby
>
>>
>
>>>> being expect to incur the EFSA BMR or equivalent. The BMR itself
>>>> has
>
>>
>
>>>> already passed an EFSA test of significance. Applying the "current
>
>>risk rating"
>
>>
>
>>>> guidance (the little chart) indicates that the overall risk rating
>
>>>> is
>
>>
>
>>
>
>>>> therefore "High".
>
>>
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>>>>
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>>
>
>>>> These steps to define risks and terms precisely would need to be
>
>>
>

>>>> followed for all risks, including the wildlife ones.
>
>>
>
>>>>
>
>>
>
>>>> The example I've gone through above indicates that considerably
>>>> more
>
>>
>
>>>> precision in definitions will be needed before the PPM template can
>
>>
>
>>>> be applied in a valid way. I think [redacted] offered at the 16 May
>
>>
>
>>>> meeting to be a consultant on how the method should be applied.
>
>>>> Maybe
>
>>
>
>>
>
>>>> she (or perhaps [redacted] as an expert on risk assessment- so I've
>
>>
>
>>>> copied him in) will either have the necessary definitions to hand
>>>> or
>
>>
>
>>>> can point out where my logic has gone awry.
>
>>
>
>>>>
>
>>
>
>>>> So I'm very much agreeing with [redacted] that the definitions of risk
>>>> and
>
>>
>
>>>> criteria for defining them are important. This is important enough
>
>>
>
>>>> that we should to try to achieve some precision in advance of the

>
>>>> LAG
>
>>
>
>>
>
>>>> meeting and with the help and advice of PERASG and other experts.
>
>>
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>>>>
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>>
>
>>>> Best wishes
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>>
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>>>>
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>>
>
>>>> [redacted]
>
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>
>>>> On Jun 9 2014, [redacted] wrote:
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>>
>
>>>>
>
>>
>
>>>>> Dear[redacted], I was speaking to [redacted] earlier about arrangements for
>
>>
>
>>>>> the LAG meeting on 25th June. He told me that he had heard nothing
>
>>
>
>>>>> further from you about the circulated note of the last subgroup
>
>>
>
>>>>> meeting or the proposed draft risk management register circulated

>
>>>>> by
>
>>[redacted]
>
>>
>
>>>>>
>
>>
>
>>>>> As you know I do think it appropriate that [redacted] and the PERA
>
>>>>> subgroup
>
>>
>
>>
>
>>>>> have the opportunity to comment on the proposed register and
>
>>
>
>>>>> especially the "scoring" of the risks etc - and it would be
>
>>
>
>>>>> preferable if they have sight of a draft approved by you. I
>
>>
>
>>>>> appreciate that [redacted] and [redacted] are
>
>>
>
>>>>> the three [redacted] who are not on the [redacted], and I do
>
>>
>
>>>>> not know if they would wish to be involved - equally how [redacted] would
>
>>
>
>>>>> wish to handle this or what his feelings are? But I think the
>
>>
>
>>>>> opportunity should be there for the authors of the risk
>>>>> assessments
>
>>
>
>>>>> to have their say if they want to take it.
>
>>
>

>>>>>
>
>>
>
>>>>> The register will in any case have to be included and opened up
>>>>> for
>
>>
>
>>>>> discussion by the main committee on 25th and it would be
>
>>>>> appropriate
>
>>
>
>>
>
>>>>> to circulate it to all members of the committee at the end of next
>
>>
>
>>>>> week together with a draft agenda and details of arrangements etc.
>
>>
>
>>>>>
>
>>
>
>>>>> Hence how are you getting on - or are you happy for it to be
>
>>
>
>>>>> circulated as per [redacted] version?
>
>>
>
>>>>>
>
>>
>
>>>>> Kind regards and looking forward to hearing from you,
>
>>
>
>>>>>
>
>>
>
>>>>> [redacted]
>
>>
>
>>>>>
>
>>