The National Resilience Strategy
Response to Consultation

September 2021 │Version 1.0

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Introduction

About ENA

Energy Networks Association (ENA) represents the owners and operators of licenses for the transmission and/or distribution of energy in the UK and Ireland. Our members control and maintain the critical national infrastructure that delivers these vital services into customers' homes and businesses.

ENA's overriding goals are to promote UK and Ireland energy networks ensuring our networks are the safest, most reliable, most efficient and sustainable in the world. We influence decision-makers on issues that are important to our members. These include:

1. Regulation and the wider representation in UK, Ireland and the rest of Europe
2. Cost-efficient engineering services and related businesses for the benefit of members
3. Safety, health and environment across the gas and electricity industries
4. The development and deployment of smart technology
5. Innovation strategy, reporting and collaboration in GB

As the voice of the energy networks sector, ENA acts as a strategic focus and channel of communication for the industry[1]. We promote interests and good standing of the industry and provide a forum of discussion among company members.

Our members

Membership of Energy Networks Association is open to all owners and operators of energy networks in the UK.

► Companies which operate smaller networks or are licence holders in the islands around the UK and Ireland can be associates of ENA too. This gives them access to the expertise and knowledge available through ENA.

► Companies and organisations with an interest in the UK transmission and distribution market are now able to directly benefit from the work of ENA through associate status.

About You Section

1.   Name Lauren Fisher

2.   Email address **lauren.fisher@energynetworks.org**

3.   In what context are you responding (please select all that apply):

     c. **As a representative of a business, firm or trade body**

    i.   Please give an indication of the size of the organisation (approximate no. of employees) **50**

    ii.   With which sector is the organisation most closely related? **Electricity and Gas Distribution and Transmission Networks**

    iii.   Please give the name of the business, firm or trade body d. As a representative of an academic or research organisation i. Please give the name of this organisation e. Other (please specify) **Energy Networks Association**

4.   Which of the following most closely describes your level of knowledge of risk and resilience related issues? (please select one of the following):

    a. Good insight into some aspects of resilience or risk management E.g. Business owner with experience of risk assessment. ENA's response to this call for evidence is on behalf of Electricity and Gas distribution and transmission network operators and supports and uses the views of our member companies.

Consultation Responses

Questions on Vision and Principles	
Question	**Answer**
1. Do you agree with the proposed vision of the Resilience Strategy? Is there anything you would add, amend, or remove?	**"Resilience" is a broad term and it is noted that Climate Change Resilience has already been discounted from the strategy, however it is important that the impacts of climate change are considered in the risk assessment and measure of resilience.** **Under Section 26 of the National Resilience Strategy Consultation document there is reference to "…a strengthened ability to assess and understand the risks we face… our systems, infrastructure, and capabilities should be proactive, adaptable, and responsive". Will this be measured? Further detailed information on standards that can be used to measure resilience capabilities is answered under the next question.** **It is important that communication of the strategy or of the risks is tailored to the audience so specific aspects can be discussed; to discuss national and societal resilience as a whole is likely to be too large a concept for local communities to take on board and may turn them off, even to the issues affecting them directly.** **It is also suggested there should be consideration of risks globally as well as nationally and regionally. The UK cannot be resilient in isolation, it needs to consider geo-political risks and then recognise the impact of these nationally and then more locally. Brexit is a good example from a resilience perspective, as Political change at a European level has been seen to have a national impact.**
2. Do you agree with the principles laid out for the strategy? Is there anything you would add, amend, or remove?	**ENA agree with the Principles set out in the Resilience Strategy.**

Question		
	Question	**Answer**
1.	Is there more that the Government can do to assess risk at the national and local levels? If so, what?	**Setting clear standards for resilience will help government, regulators, and industry on clarifying resilience outcomes that government want to see achieved. Government should also consider the capacity to respond by different industry bodies as well as seeking to understand the perception of resilience within a national and local (regional) level and the responses that are required to each set of incidents.** **Government could consider public perceptions of resilience and personal resilience and what this means. As an example, within the Energy Industry, Government could produce a set of safety campaigns on energy events and recovery processes for customers to understand their own risks and provide a level of understanding how to enact their own resilience tools using common public resilience guidance at local and city Government levels.** **Continuing on from this idea ENA suggest an Annual 'Resilience Ready' or 'Winter Resilience Ready' programme could be put in place, requesting updates on the how the resilience of UK PLC can be checked, monitored and communicated and its preparedness to resist, adapt and/or recover from an event. A similar example can be found in the Climate Change Apaptation reporting, which can be reproduced for these scenarios and follow a similar process albeit in a briefer format.** **The Cabinet Office National Security Risk Assessments are already in place and the Network Operators utilise these documents and update them in accordance to the restablished electricity and gas risks. However these could be built upon by improving communication of good practice and lesson learned from events that are applicable to these specific network sector risks. Please see Appendix A.** **The use of standards can also be acquired to assess management protocols and set out good practice and targets for managing assets. The utilities are involved in the management of assets and can be seen to apply these principles for resiliency, as seen via the usage of ISO5500 / ISO55001 / IOS22301 / ISO22316 standards as examples.**
2.	Is there more that the Government can do to communicate about risk and risk appetite with organisations and individuals? If so, what	**Government could take opportunities to set up workshops / open review sessions of major incidents to understand what could be improved but also what went well / performed above expectations with all appropriate bodies/interdependencies. Examples of where**

		this has worked previously can be found in Appendix B ENA Engineering Report (EREP) 4 Issue 1 (2016). 2-way conversations with large organisations and industry trade bodies will facilitate understanding of risk and how risk is being mitigated; the mitigation measures can be used in understanding community risk and adapted to provide guidance to local communities. It is questionable whether there is adequate societal benefit in spending the time and effort needed to specifically communicate with individuals. Testing for vulnerabilities through regular stress testing could be developed. The stress tests would assess the organisation's ability to resist, absorb, and recover from shocks and stresses, and identify vulnerabilities. The stress tests should be overseen by regulators, and infrastructure operators should demonstrate that their systems and decision-making can credibly meet resilience standards for infrastructure services against a wide range of scenarios. ENA run an annual public communication 'Winter Readiness' campaign, we suggest a similar approach led by Government in promoting and encouraging small businesses and communities to think about their own vulnerabilities, interdependencies, and essential services and how they would protect them or manage without them through the utilisation of agreed emergency protocols.
3.	How could the Government make risk assessment and data more accessible by frontline personnel in an emergency?	Government opportunities (high level) to disseminate information at a local level through Local Resilience Forums (LRFs) on a range of different crises. A cohesive and complete guidance on dependencies, risks, and data for LRFs would be practicable via the Resilience Direct website. The ENA Member companies already provide LRFs a suite of documents for different events and required responses and the National Security Risk Assessment pack see Appendix A.
4.	How does your organisation assess risks around unlikely or extreme events, when there is limited or no data?	Network Operators regularly carry out exercises annually to understand risk variables around unlikely or extreme events. From these exercises the industry undertakes review sessions and workshops on lessons learned to adapt and transform and/or create practices, protocols, and frameworks to address areas where limited of no data was before. Examples of this has been seen by the creation of the following documents as proactive and reactive protocols post event, as shown in Appendix B ENA Engineering Report (EREP) 4 Issue 1 (2016). Network Operators are also involved in Government Working Group such as the BEIS Executive Energy Emergencies Committee

		(E3C) groups where assessments around risks on unlikely or extreme events take place, please see Appendix C ENA Engineering Report (EREP) 11 Section 17.
5.	How could the current local risk assessment process, managed through Local Resilience Forums, be strengthened to help local partners?	**LRFs can seek responses or escalation protocol information from central Government i.e., via Resilience Direct or Q+A Fact Sheets.** **LRF's and local government could be encouraged to liaise with local business partners in developing communication and assessment processes to improve community engagement.**

Questions on Responsibilities and Accountability	
Question	**Answer**
1.	Do you think that the current division of resilience responsibilities between Central Government, the Devolved Administrations, local government, and local responders is correct? If not, why?	**Yes, in principle. Additional support could be given by identifying gaps between central and local Government agencies and provide cross-regional strategies to mitigate these gaps. LRFs to be provided with these cross-organisation and cross-regional strategies for better understanding of national vs local responsibilities.**
2.	How can the UK Central Government, DAs, local and regional forms of government and local responders better collaborate on resilience?	**Proactive collaboration is key in achieving resiliency best outcomes and this can be done by strengthening protocols, providing forums that provide transparency and communication between interdependency bodies at various levels, see Appendix C (Engineering Report (EREP) 11 Issue 1 2020 Resilience and Emergency Planning Section 17), and/or utilise current platforms to their fullest potential, such as Resilience Direct as a national or local communication tool for better collaboration.** **These types of forums require an escalation process within the UK Central Government to support to achieve desired outcomes and make decisions where and when required.**
3.	What role, if any, should the UK Central government have in assuring that local areas are effectively carrying out their resilience responsibilities, whilst also respecting local responsibilities?	**It is suggested UK Central Government organise annual or regular exercising of events and lessons learned sessions to ensure the roles and responsibilities set out in procedures work, and support and promote the role of LRF's.**
4.	What do you consider the advantages and disadvantages of the current legislative basis for resilience?	**Advantages have been seen in the proactive engagement at a planning level, however it has been noted the involvement of CAT 2 responders could be promoted more in the emergency planning stage.**

Questions on Partnerships: Critical National Infrastructure (CNI) owners and Operators	
Question	**Answer**
1.	Do you think that the resilience of CNI can be further improved?	**Noted there are differences for classified CNI sites and the expectations of these sites. Reuqest there is a clear definition with roles and responsibilities, and the identification at a local level on which are *and* are not critical.**
2.	Do you think the introduction of appropriate statutory resilience standards would improve the security and resilience of CNI operators? Why?	**ENA agree that the use of appropriate statutory levels and service agreements would create a level playing field and provide a sector standard, it would also help to develop an understanding of baseline costs against providing mandatory CNI resilient aims.** **For extra information the Network Operators already follow guidance from NCSC, CPNI and Electricity System Restoration standard.** https://www.ncsc.gov.uk/section/advice-guidance/all-topics?topics=Critical%20National%20Infrastructure%20(CNI)&sort=date%2Bdesc https://www.cpni.gov.uk/ https://www.gov.uk/government/publications/introducing-a-new-electricity-system-restoration-standard
2a.	How would such standards define the necessary levels of service provision?	**Standards provide Network Operators a common approach to the structure systems they are responsible for. Please also see the answer to question 3a.**
2b.	Are there any risks associated with implementing such standards?	**Guidance does provide security, however setting a standard poses a risk that participants will only apply the minimum measures and not assess and consider additional practical applications necessary to fully mitigate site specific requirements.** **In addition setting a minimum standard may not encourage future proofing of protection or flexibility and innovation in addressing risk.**
3.	What do you think is the most effective way to test and assure the resilience of CNI?	**Stress tests involving multiple agencies and coordination at a number of levels will help test existing measures.** **Exercise scenarios and validation testing will need to be undertaken by either Government or independent companies overseeing the exercises.** **Network Operators undertake Voltage Control tests every 12months via National Grid ESO, (see Appendix D National Grid ESO Operation Communications) and participate in individual company practical exercises for example the NCSC Exercise in a Box, that can be used by individual organisations to test cyber resiliency for CNI.**

3a.	To what extent do you think regulators should play a role in testing the resilience of CNI systems and operators?	**It will benefit the Network Operators if Regulators understand and support resilience of their sector and consider the development, outlook, and associated costs for resilient networks. Network Operators and Ofgem will be developing resilience metrics for introduction in the ED3 regultory periods.** **It is worth noting within the National Infrastructure Commission Consultation Anticpate, React, Recover: Resilient infrastructure systems report there is a section concerning Regulators involvement in long term strategies and supporting development of these through promotion of cross sector sharing of best practice. It suggests regulators ensure their determinations in future price reviews are consistant with meeting short and long term resilience standards.**
4.	During an emergency, what do you think should be the role of the operators of CNI in ensuring continued provision of essential services (e.g. water, electricity, public transport)?	**CNI operators will always endeavour to maintain services throughout an emergency so long as it is safe to do so although it can be the loss of these supplies that is the cause of the emergency.** **Given the interdependencies of business, infrastructure and other utilities on electricity it is important that continuity and recovery plans do not assume or rely on an electricity supply to operate.**
4a.	How can the Government support CNI owners or operators during an emergency?	**Multiple contingency plans and scenarios for widespread events can set standards and expectations. However, limitations can be seen due to CNI being predominately private sector owned and risk appetites for contingency planning may be lower due to cost restraints.**

Wider Critical Sectors	
Question	**Answer**
1. What role, if any, does your business or sector play in national resilience?	**Network Operators / CAT 2 responders deliver a prioritised response to national resilience planning. The Network Operators has support from ENA in developing resilience and emergency planning policies and processes, and work closely alongside BEIS Exective Energy Emergency Committee (E3C) and its associated groups in delivering key resilience work plans.** Network Operators also receive support from ENA as a conduit to other Government and regulatory bodies and agencies on areas of work that will have a resilience impact on the ability to manage network operations. For example, ENA is engaged with Ofcom in their Spectrum allocation review work, and with DCMS on their legacy technology changes i.e., 2G/3G Sunset with with their Electronic Communications Resilience & Response Group (EC-RRG) to understand the risks to Operational Telecommunications resiliency.
2. What are the risks that your business is most concerned about?	**Network Operators are aware of and have measures in place to mitigate the impact of a extensive range of hazards however the primary focus is the risk of storms on the operation of the network and maintenance of supply. Wind storms can damage overhead lines directly or through the toppling of trees onto the lines, lightning can strike overhead line structures causing physical damage and tripping and high rainfall can cause pluvial and fluvial flooding impacting Gas and Electricity ground mounted assets.** **There is also a heavy Public Switch Telephone Network (PSTN) focus on specific network issues, such as communicating with operational teams and remote equipment and finding a viable alternative or resilient public telecommunications system to mitigate the loss of this specific service during a power cut.** **In addition to the above, JRC are working closely with ENA and it's members on the Public Switch Telephone Network Switch Off (PSTN). ENA agree and support the following JRC response to the consultation under this section:** *"Government needs take greater account of the interconnected nature of infrastructure on which society depends, e.g., telecommunications, energy, supply, water supply, etc. in particular the lack of systemic resilience where critical national infrastructure such as Energy Networks utilise resilient (but soon to be withdrawn - PSTN) telecommunications infrastructure to enable operational integrity. There are fundamental differences between the regulatory environment under which Public Telecommunications Network Operators function and those applicable to both Energy Network Operators and Water Suppliers - specifically telecommunications services are provided on a 'reasonable endeavours'*

		basis and as such their systems and service is not designed with specific resilience meaning that they are exposed to power outage. Moving forward as the UK seeks to transition to a low carbon economy to address the risks and uncertainties presented by Climate Change and noting that Digitalisation and Data are a key enabler of such a transition it becomes increasingly critical for the Energy Networks to have a robust and resilient operational telecommunications control capability on which it can depend."
3.	What information, tools or guidance could the Government provide to help your business better assess or prepare for these types of risk?	**Network Operators already utilise the Cabinet Office National Security Risk Assessements in developing their resilience and recovery policies.** **In 2018 Network Operators worked with BEIS to conduct a Resilience Maturity Model exercise; this is due to be re-evaluated in 2021, see Appendix E for the BEIS Resilience Maturity Model Analysis.**
4.	What is your business' approach to building resilience in any key supply chains that your business is part of?	**Network Operators have post Brexit plans in place, which saw increased stock levels. Following Brexit, Covid-19 and the Suez events, while stock levels remained sufficient, it has been agreed to action a review on supply chain risks.** **It is important to highlight that Network Operators are only as reliant as their supply chain counterparts also being resilient / robust.** **Under the NEWSAC Agreement Network Operators have an ability to provide clarity on releasing resources/supplies, receiving resources/supplies and this is done on a Pre and Post winter basis. The objective is to ensure expectations on Stocks of Spares and update companies internal information in an event.** **See Appendix F – NEWSAC Mutual Aid docmuent, G – NEWSAC Register of Special Resources and H – NEWSAC Event Log template.**

Questions on Community and Local Resilience		
	Question	**Answer**
1.	Do you agree that everyone has a part to play in improving the UK's resilience? If not, why not?	ENA agree that all businesses, infrastructure operators and local councils and communities have to be partly to improving national resilience. Please see appropriate responses to Questions on Risk and Resilience, Questions on Responsibilities and Accountability and Wider critical sectors.
2.	Do you understand the types of emergencies that might impact you and other members of your community?	Network Operators are fully aware of impact on society that emergencies have.
2a.	What would help you better understand the risks that could affect your community?	As described in response to question 1 & 2 within the Risk and Resilience section, Public Service Announcements as an education and communication conduit would serve a purpose in better understanding community centric risks. LRF Consistency with engagement and education with each individual Network Operator company would also benefit in understanding community centric risks.
2b.	Do you know where to access information about emergencies that could affect you?	Yes. However, if the platforms used to access information are not updated, become obsolete or become disjointed this information could become inaccessible.
3.	Have you considered the actions you might take to prepare for or during an emergency?	Yes, the Network Operators are robust in proactive planning. Please see Appendix I – National Emergency Plan Downstream Gas Electricity, J – Electricity Supply Emergency Code (ESEC) document, K ESEC Operational Flow chart and L ENA Emergency Response Plan.
3a.	What has motivated you to plan or make preparations?	Under their licence conditions Network Operators must ensure that they can perform their functions to safely reduce, control or mitigate the effects of an emergency and maintain customer service. Understanding the impact, a loss of gas or electricity supply has on society, especially the vulnerable, provides Network Operators motivation to plan for all reasonably foreseeable events, including identified High Impact, Low Probability events. A co-ordinated and consistent approach to preparing for emergencies provides a basis for effective integration during

		emergency response and recovery for the Network Operators and customers. **Please refer to P2 Issue 7 Security of Supply found in Appendix M.**
3b.	What has stopped you from planning or making preparations?	**If a request has been made to plan or make preparations but the information on scenarios has not been clear or has provided no credibility; an example is were combined factors make the likelihood of impact from an event so rare that it is a probability that it would never occur These events would be dealt with if and when they ever happened though adaption of other emergency protocols or post-event procedures**
3c.	What would help you to be able to make a plan or prepare?	**Network Operators plan for emergency situations which threaten the operation and/or safety of the energy distribution network.** **Network Operators would also plan and prepare for situations or incidents that would pose a threat on the organisations ability to perform its functions or have negative or serious customer impact.** **Research into events that have or could cause an impact on the networks is undertaken to assess risk and develop mitigation measures through review and communication of lessons learned.**
4.	Have recent emergencies (e.g. COVID-19 pandemic, flooding, terrorist attacks) made you think differently about risks or changed the way you prepare for emergencies?	**Recent events such as Covid-19, Brexit, weather events and other network associated impacts that have affected the Network Operators have led to additional actions in re-examining current plans or the creation of new ones to determine the impact of such incidents. Network Operators maintain plans for reducing, controlling and mitigating the impact of an emergency in the aim to provide robust response protocols detailing roles and responsibilities of all key stakeholders.** **Some examples of ways in which it has changed thinking can be seen via:** - **Supply chains,** - **Identification of key sites,** - **Government expectations i.e., devolved Government** - **How activities are co-ordinated, i.e., Covid social distancing,** - **Communication plans, alerts, and information sharing, i.e., Supplier Communication Mechanisms incorporated in weather events since the introduction of DCUSA CP364 Supplier Emergency Metering Service Provision Register,** - **Facilities and equipment, i.e., PPE and induction changes due to Covid-19** **Please see Appendix N – NEWSAC Covid-19 Mutual Aid and O NEWSAC Supplier Communication Mechanisms.**

Questions on Investment	
Question	**Answer**
1.	How does your organisation invest in your approach to the risks outlined in this document? Is your investment focussed on particular stages of the risk lifecycle (for example, on prevention)?	**The Energy Industry is regulated and runs through a regulatory period mechanism. Each company provide costs and associated information to the Regulatory body (Ofgem).** **The Distribution System Operations (DSO) plan and its potential impact on resilience has been considered in industry planning, and networks and localised generation will be developed.**
2.	Has the COVID-19 pandemic impacted the way your organisation is investing, or will invest, in preparing for these risks? If so, how?	**Network Operators have noted they have taken agile actions on investments during Covid-19 and will apply these actions in future investment planning.**

Questions on Resilience in an Interconnected World	
Question	**Answer**
1. Where do you see the UK's resilience strengths?	**Strengths have been seen via the use of NSRA documents, CCA utilisation, acknowledgement of interdependencies and how these interact, and the proactive approaches to HILP events, national, local, and regional event planning.**
2. Are there any approaches taken by other countries to resilience that you think the UK could learn from?	**The Network Operators participate in Horizon Scanning activities to ensure lessons to be learned from international events are incorporated into the UK Network Operator risk model where suitable.**
3. Which of the UK's international relationships and programmes do you think are most important to the UK's resilience?	**Gas and Electricity supplies are supported by pipes and cables from other countries. These Interconnectors are used to balance supplies through contracts with National Grid. These connections must remain contractually resilient in order to support the UK supply during an emergency and when UK generation is insufficient to meet demand.**
4. What international risks have the greatest impact on UK resilience?	• **Interconnectors for Gas and Electricity.** • **Supply Chains.** • **Cyber Attacks** • **Climate Change / severe weather events (understanding Texas, New York, Germany events and gathering lessons learned)**
5. How can the UK encourage international partners to build resilience to global risks?	**The UK held the 2021 G7 Summit which consisted of constructive talks over a 2-day period.** **One item of note from the G7 Summit was the focus on COP26 Climate resilience and adaptation i.e., climate related disasters as seen over the Texan winter period. Government and network operators are reviewing the event to see what could be learned and to review current UK responses to cold weather events; greater global resilience could be taken forward by sharing research, findings, lessons learned, and good and bad practices on a global resilience platform.**

Questions Part 1 of the CCA

Questions on CCA Part 1		
	Question	**Answer**
1.	Does the above definition reflect your understanding of an emergency, and if not how does the definition need to be expanded within the CCA?	**Y**
2.	Is the current designation of Category 1 and 2 responders appropriate? If not, what would be the merits of changing the identities and/or status of responders within the CCA?	**Y**
3.	Are there gaps in critical representation of responder organisations?	**Y** **Telecoms and Transport**
4.	Should elected local figures (e.g. Council Leaders, MPs, Metro Mayors, Police and Crime Commissioners) have greater involvement in emergency planning and preparative exercising, response and recovery and in what way?	**N** **Keeping it consistent is key.**
Duties		
5.	Are the current duties on Category 1 and 2 responders, as described in the CCA, appropriate?	**Y**
7.	Does the framework set out in the CCA provide sufficient clarity of the different roles and responsibilities of Category 1 and 2 responders?	**Y**
Oversight and assurance		
9.	Are existing mechanisms for oversight and assurance of organisations involved in resilience adequate?	**Y**
11.	Should the CCA mandate review of local contingency plans covering a range of risk scenarios?	**Y**
12.	If you answered yes to the question above (Please rate the options below based on how appropriate they are 1 = not appropriate, 10 = highly appropriate):	**Lead Government Department review**
13.	Do the arrangements as set out in the CCA provide the LRF Chair and Secretariat with sufficient means by which they can effectively coordinate contingency planning of Category 1 and 2 responders in their area?	**Y**
Enforcement		
14.	A Minister of the Crown may use High Court or Court of Session proceedings to enforce duties under Part 1 of the CCA upon a Category 1 or 2 responder. Is this the right way to enforce obligations under the CCA if duties are not met?	**Y**

15.	Does the CCA sufficiently consider recovery arrangements? If not, how could this be improved?	Y
16.	Are the responsibilities related to information sharing and cooperation sufficient for ensuring an effective multi-agency response?	Y
18.	Are LRFs/Strategic Coordinating Groups (SCGs) 4 fulfilling a sufficient role in terms of planning, response and recovery? If not, what are the barriers to this?	Y
19.	Should specific duties be placed upon central government in Part 1 of the CCA, and if so, what would these be?	Y
20.	Would you like to note anything in regards to Part 1 of the CCA that is not captured by the questions above.	N
Scotland, Wales, and Northern Ireland		
21.	Are the responsibilities and duties set out in the CCA fit for purpose for Northern Ireland?	Y
22.	Are the responsibilities and duties set out in the CCA fit for purpose for Scotland?	Y
23.	Are the responsibilities and duties set out in the CCA fit for purpose for Wales?	Y

Questions Part 2 of the CCA

Questions on CCA Part 1		
	Question	**Answer**
24.	The CCA sets out strict conditions which must be met for emergency regulation to be made - this is known as the 'triple lock'. Are these conditions still appropriate and, if not, how could the 'triple lock' be improved?	Y
25.	Should the regional coordinator role be retained? If yes, why is this the case, and who should be eligible to fill the position?	Y
26.	Would you like to note anything in regards to Part 2 of the CCA that is not captured by the questions above?	Y
Statutory Guidance		
28.	Would you like to note anything in regards to the statutory guidance of the CCA?	N

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The voice of the networks