



What price deregulation?

The economic costs of the
Retained EU Law Bill

Wildlife and
Countryside



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Introduction

The rushed, unnecessary overhaul of much of the UK's regulatory framework through the Retained EU Law (Revocation and Reform) Bill will entail significant environmental and social costs.¹ It will also carry a high price tag.

In the words of the Regulatory Policy Committee (RPC), *"changing or sunseting each piece of legislation could impact on many businesses significantly"*. Overall, the RPC found that the Government's assessment of business impacts from the Retained EU Law Bill was *"not fit for purpose"*², with RPC being unable to validate the Government's estimates of equivalent annual net direct cost to business due to the low quality of the information provided.³ RPC also concluded that the Government assessment failed to fully consider the full impacts of the Bill on trade, investment and across the devolved administrations.

In the absence of proper Government economic analysis, this paper estimates the potential cost of changes to a small number of environmental regulations that may be enabled by the REUL Bill.

The Bill is intended to *"save, repeal, replace, restate or assimilate"* retained EU law (known as REUL) applying in the UK.⁴ Whilst the wholesale repeal of the protections we all rely on for clean air, clean water and access to green space seem unlikely, clause 15 of the Bill effectively builds in a deregulatory direction for replacement regulation. By precluding anything that would *"increase regulatory burdens"*, even if that burden amounts only to *"administrative inconvenience"* or reduced *"profitability"* for business, clause 15 ensures that replacement regulations will have to pass a strict deregulatory test. Ministers are also free to replace regulations with voluntary provisions, which may bear little resemblance to the original rules or their intended purposes, and have been shown to be ineffective.⁵

Weaker environmental protection seems highly likely to result from the Retained EU Law Bill.⁶

Working from figures calculated by the Economics for the Environment Consultancy ([eftec](https://www.eefc.org.uk/)), we estimate below the costs of four key environmental regulations being weakened as a result of the Bill. These are

¹ Environmental and social impacts are set out in Link's December 2022 report 'What price deregulation?' https://www.wcl.org.uk/docs/What_price_deregulation_Link_briefing_12_12_22.pdf

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118976/RP_C-CO-5223_1_IA_f_-_opinion.pdf

³ In a December 2022 letter to the Chair of the Business, Energy and Industrial Strategy, the Secretary of State for Business, Energy and Industrial Strategy suggests that further analysis of economic impacts will only take place on the Bill is passed and individual regulations are being considered for repeal or replacement: <https://committees.parliament.uk/publications/33409/documents/181538/default/>

⁴ <https://bills.parliament.uk/bills/3340/publications>

⁵ See RSPB paper: <https://www.rspb.org.uk/globalassets/downloads/documents/positions/economics/using-regulation-as-a-last-resort.pdf>

⁶ See evidence given by expert witnesses on clause 15 during the Commons committee stage of the Bill: https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156_Retained_EU_Law_1st-8th_Compilation_29_11_2022.pdf

regulations which we know Ministers are keen to amend through the powers conferred by the Bill, with a view to rewriting to make their provisions less stringent.⁷ Our figures suggest that:

- Weakening the Conservation of Habitats and Species Regulations 2017 could lead to loss of public benefits worth £1.04 billion over thirty years.
- Weakening the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 could lead to loss of public benefits worth £20.6 billion over thirty years (figures are England only).
- Weakening the National Emission Ceilings Regulations 2018 could lead to a loss of health benefits worth £44.9 billion over thirty years.
- Weakening the REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) Regulations could lead to a loss of health benefits worth £3.6 billion over thirty years, and a lost market opportunity for UK firms worth £12.8 billion over thirty years.

Note from eftec: These figures apply to the UK, unless otherwise stated. All values are calculated in present values following the HMT Green Book guidance (with a standard 3.5% discount rate, declining to 3% after 30 years). The complexity of the data means there is generally a moderate level of confidence in the results.

Overall, if these four regulations were weakened as a result of the Retained EU Law Bill, the result could be a loss of benefits worth over £80 billion over thirty years.

To put this figure in context, it is worth highlighting that the Department for the Environment, Food and Rural Affairs' annual budget for 2023-24 is currently set at £7.3 billion.⁸ It is striking that benefits worth an equivalent sum to a decade of crucial environmental spending could be lost to the UK over a thirty-year period as a result of just four regulations being weakened. The deregulatory agenda carried forward by the Retained EU Law Bill places a halter around the UK's ambitions for sustainable growth.

This illustrates an abiding truth about the economic consequences of deregulation, set out in oral evidence on the Retained EU Law Bill Committee. In many circumstances, *"If you take a deregulatory approach, it does not reduce costs; it simply transfers them from the businesses responsible for delivering them to the public."*⁹

There is also inconsistency in the government thinking and commitments at such a critical time for the economy. As the Dasgupta's review on economics of biodiversity commissioned by Treasury shows, our

⁷ See for example remarks about the Habitats and Species Regulations made by the then Defra Secretary of State when giving evidence to the Environmental Audit Committee in June 2022 (questions 17 and 29):

<https://committees.parliament.uk/oralevidence/10501/html/>

See also remarks about the Water Framework Directive made by the Defra Secretary of State when giving evidence to the Environment and Climate Change Committee in November 2022 (page 13):

<https://committees.parliament.uk/oralevidence/11979/pdf/>

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118417/CC_S1022065440-001_SECURE_HMT_Autumn_Statement_November_2022_Web_accessible_1_.pdf see tables 2.1 and 2.2

⁹ https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156_Retained_EU_Law_1st-8th_Compilation_29_11_2022.pdf



economy is embedded in nature.¹⁰ The then Chancellor, Rishi Sunak tweeted *"It's vital that we protect our environment and foster a nature-positive economy"*.¹¹ At a time when the UK economy is in recession and people face the biggest drop in disposable income on record we risk making things even worse by further undermining our economic prosperity.

The below case studies cover the costs to the public of weakening just four environmental regulations, amongst over 1,000 now at risk as a result of the Bill.¹² When combined with wider environmental deregulation, and the enervation of regulations covering human health and consumer and workers' protections, these impacts form just the tip of the iceberg.

The indirect costs, arising from the business uncertainty created by the Bill, will also be considerable.¹³

Direct and indirect costs from the large-scale deregulation that can be reasonably expected if the Bill passes into law also form just part of the picture. The opportunity costs of thousands of hours of civil service and Parliamentary time spent analysing laws simply because of their provenance (with no regard to evidence of their efficacy) will have an economic price. In the appendix to this report, we explore these Government opportunity costs further.

In sum, to quote a November 2022 open letter opposing the Bill signed by the Institute of Directors, the Trade Union Congress and other representatives from employers, lawyers, environmental groups and civic society: *"Making these changes will prove costly and bureaucratic and would undermine the certainty and stability workers and businesses need if the economy is to prosper"*.¹⁴

The economic cost of the Retained EU Law Bill looks set to be just as unpalatable as its environmental and social impacts.

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf

¹¹ <https://twitter.com/rishisunak/status/1401147120162328579?lang=en-GB>

¹² See evidence given by Defra Secretary of State to Environment and Climate Change Committee in December 2022: <https://committees.parliament.uk/oralevidence/11979/html/>

¹³ See evidence given by expert witnesses to the Public Bill Committee, p18, 19, 35 and 36: https://publications.parliament.uk/pa/bills/cbill/58-03/0156/PBC156_Retained_EU_Law_1st-8th_Compilation_29_11_2022.pdf

¹⁴ Letter published by Financial Times on 23.11.22 <https://www.ft.com/content/b894b195-6adc-48eb-80c3-efe7f818d452>

Case studies

Costs from weakened Habitats Regulations

£1.04 billion cost over thirty years

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are habitat protection designations under the EU-derived Habitats Regulations. They provide the most effective site protection for nature, precluding all development that could harm the site, except in exceptional circumstances. Other habitat protection designations, such as the Site of Special Scientific Interest (SSSI) designation, are weaker, lacking the stringent legal protection afforded by the Habitats Regulations.¹⁵

The weakening of the Habitats Regulations could therefore leave the UK's most precious and vulnerable fragments of wildlife habitat at risk of degradation or destruction. Many terrestrial SSSIs in England are also protected as SACs or SPAs under the EU derived Habitats Regulations, relying on these overlapping EU-derived designations for strict levels of protection.¹⁶

A 2012 paper from Christie, M. and Rayment, M. "An economic assessment of the ecosystem service benefits derived from the SSSI biodiversity conservation policy in England and Wales" sets out the value the public places in SSSI's being in favourable condition.¹⁷ The paper found that the public is prepared to pay £956 million annually to secure the levels of services and benefits currently delivered by SSSI conservation activities, and a further £769 million to secure the benefits that would be delivered if SSSIs were all in favourable condition (2012 figures).¹⁸

Calculations from eftec use these figures (updated for inflation) to estimate the lost value when a protected habitat loses favourable condition.

It assumes that 0.26% of 1.6m hectares of protected habitat loses favourable condition per year for the next thirty years, with accumulating impacts. This figure is taken from the rate of loss of favourable condition in the SSSI network between 2003 and 2021.¹⁹ Weakening of the Habitats Regulations as a result of deregulation following from the Retained EU Law Bill would undermine the most effective protective element for many SSSIs and other protected habitats. The eftec calculations therefore assume that the decline seen between 2003 and 2021 across the SSSI network (0.26% of the network

¹⁵ An SSSI designation on its own allows development to proceed if the development's benefits are considered to outweigh the adverse effects on the protected site

¹⁶ See <https://ieep.eu/uploads/articles/attachments/2bfb8a50-e73d-4932-b26c-c5dbc862f2e3/finalreportsssi-benefits.pdf?v=63664509758> (p8)

¹⁷ <https://doi.org/10.1016/j.ecoser.2012.07.004>

¹⁸ Christie and Rayment used a series of deliberative valuation workshops with members of the public to estimate how much people are prepared to pay for the benefits derived from ecosystem services.

¹⁹ See figure 1.2 from

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1125613/1_Extent_and_condition_of_protected_areas.pdf Similar loss of condition was not found within the SAC network.



losing favourable condition per year) occurs across 1.6m hectares of habitats due to weaker Habitats Directive protections over the next thirty years.

The analysis suggests that 0.26% of protected habitats losing favourable condition each year, sustained a period of thirty years, could lead to the loss of services and benefits that the public value at £1.04bn.

Put simply, weakening the Habitats Regulations carries costs in excess of £1 billion.

Note – eftec’s confidence in this calculation:

This calculation has moderate confidence, as the data on areas and condition of habitats is recorded through established long term monitoring processes. The value of benefits from improving habitat condition have some uncertainty, but if anything, are likely to be an underestimate.

Costs from weakened Water Environment (Water Framework Directive) Regulations £20.3 billion cost over thirty years (England only)

A 2013 paper from the Environment Agency, based on a 2007 Defra study, estimated the economic worth provided by a healthy freshwater environment in England, using views from members of the public on how much they are willing to pay to secure the ecosystem services provided by such healthy waterbodies.²⁰

As the Environment Agency paper acknowledged, the EU-derived Water Environment (Water Framework Directive) Regulations are the primary policy driver of holistic action to prevent the further deterioration of the freshwater environment and to improve water quality. The Regulations require all waterbodies to reach good status and bring water companies, community and environmental stakeholders together behind this objective.

As such, weakening of the Water Framework Directive Regulations through the deregulatory powers conferred by the Retained EU Law Bill could likely see the further deterioration of the freshwater environment. Using the 2013 paper's figures (updated for inflation) on the value the public place on waterbodies being in good condition, eftec have calculated the cost of all waterbodies in England deteriorating to poor ecological status (currently 79% have moderate or good status).²¹

The impact of this deterioration is valued at £1.1bn per year, giving an estimated value of damage to rivers, lakes and coastal waters of £20.6 billion over thirty years as a result of weakened Water Framework Directive Regulations standards. These values apply only to England (as the baseline data is England only).

Note – eftec's confidence in the calculation:

Moderate to good confidence. This data does not include loss of revenue to tourism and recreation businesses as a result of water pollution. In addition, failing bathing water directive standards can have a major effect on spending by visitors to coastal communities²². The values identified may therefore be an underestimate of the full impacts on water environments.

²⁰ <https://www.gov.uk/government/publications/updating-the-national-water-environment-benefit-survey-values-summary-of-the-peer-review> Public willingness to pay for ecosystem benefits was estimated through survey work.

See also:

<https://www.gov.uk/government/publications/enabling-a-natural-capital-approach-enca-guidance/enabling-a-natural-capital-approach-guidance#economic-valuation>

²¹ The 79% figure comes from 2019 Water Framework Directive classification data, the latest full data set available for England. A description of the data can be found here:

<https://www.gov.uk/government/publications/state-of-the-water-environment-indicator-b3-supporting-evidence/state-of-the-water-environment-indicator-b3-supporting-evidence>

The full data set can be found here:

<https://environment.data.gov.uk/portalstg/home/item.html?id=bcec2775501841d7a4dacef57e291b61>

²² See for examples [The value of bathing waters and the influence of bathing water quality: Literature Review \(www.gov.scot\)](#)

Costs from weakened National Emission Ceilings Regulations

£44.9 billion cost over thirty years

A 2022 paper from Imperial College considered the health impacts of the achievement of targets to reduce air pollution in the UK by 2030. The paper estimated that achieving these targets would provide health benefits to the UK population that have an economic worth of £3.3 billion per year.²³ This figure represents the total economic worth of reduced deaths, reduced illness, reduced demands on the NHS and increased worker productivity across the economy as a result of improved health from less air pollution.

The EU-derived National Emission Ceilings Regulations, putting caps on national emissions of five key pollutants (PM2.5, NO_x, SO₂, ammonia and NMVOCs), is the main UK policy driver to meeting these targets, securing ongoing improvements to air quality and unlocking these health and consequent economic benefits.

Using Imperial's data, eftec have calculated the impact of such ongoing air quality improvements over thirty years, assuming a 1% reduction in emissions against 2005 levels per year. This produces a figure of £44.9 billion.²⁴

This long-term progress on air quality would be jeopardised by any weakening of the National Emission Ceilings Regulations, following the passage of Retained EU Law Bill into law. As such health benefits worth £44.9 billion over thirty years are put at risk by the deregulation the Bill seeks to deliver.

Note – eftec's confidence in this calculation:

This calculation has moderate confidence for two reasons. Firstly, it assumes the relationship from emissions to health impacts to economic benefits is linear. In reality this relationship is non-linear, with greater benefit occurring further into the future. Secondly, it assumes the benefits of NECD emissions reductions in line with reduction targets start to be realised straight away, which is unlikely. Even though policies to reduce air pollution can take effect in relatively short timescales, there is likely to be a lag in the realisation of emissions reduction targets. This means the PV figures are likely to be a slight overestimate. The other parameters in this calculation (e.g. time periods, UK climate and geography, the order of magnitude change in emissions changes) are very similar to the situation in which impacts of REUL will occur.

²³ <https://s40026.pcdn.co/wp-content/uploads/The-Pathway-to-Healthy-Air-in-the-UK.pdf> (p16)

²⁴ Please note that, unlike the chemical impacts case study below, eftec have not subtracted reduced compliance costs for businesses from health impacts. This is because actions to improve air quality have varying direct costs for different businesses - some businesses will actively and immediately benefit from shifts in transport methods and car types, others will not. An overall zero figure is deemed appropriate for direct business costs across the board.

Costs from weakened chemical regulation

£3.6 billion cost over thirty years

The European Chemicals Agency (ECHA) recently published its 'Costs and benefits of REACH restrictions' report, which investigated societal impacts of EU REACH restrictions.²⁵ The report estimated that REACH restrictions provide health benefits (such as reduced number of cancer cases) that have an economic worth of €2.1 billion annually (2021 prices) across the EU. This analysis has been applied to the UK by eftec. Their calculations suggest that the continued implementation of REACH restrictions (through UK REACH Regulations) may lead to health benefits to the UK population of £373 million per year.

Table 1 charts the likely impacts of weakening REACH restrictions in the UK on these health benefits. It assumes a 50% increase in the use of and human exposure to hazardous chemicals as a result of deregulation, leading to increased deaths, increased illness, increased demands on the NHS and reduced worker productivity. The eftec calculations subtract from these health costs some reduced compliance costs from weakened regulations for UK companies. The calculations assume an overall 40% reduction in direct costs across the board for businesses, as a result of lower compliance standards.

This produces an overall estimated figure of a £3.6 bn cost over thirty years from adverse health impacts resulting from chemicals deregulation. It is worth noting that these figures do not include pesticides and other chemicals not regulated under REACH, parallel weakening of pesticide regulations could result in additional costs from increased ill health.

Table 1: Estimated impacts of weakening UK chemicals regulation

	Annual average impacts (€ million/year)	Impacts over 5 years (£ million)	Impacts over 30 years (£ million)
Adverse health impacts	-215	-1,073	-10,327
Reduced cost of compliance for UK companies	139	695	6,688
Net impact of removing UK REACH Restrictions	-76	-378	-3,639

Notes: 1) Analytical period starts in 2024; 2) All values are discounted using HMT Green Book guidance; 3) Values are given in 2022 prices.

Note – eftec's confidence in this calculation:

Moderate confidence in the calculation of £1.07 billion adverse health impacts over five years. Impacts over 30-years have also been calculated, but these are considered more speculative as it is unlikely that no regulatory system will replace REACH restrictions over this period. It should be however noted that weakened chemical regulations will cause environmental damage and associated costs, which have not been quantified here.

²⁵https://echa.europa.eu/documents/10162/13630/costs_benefits_reach_restrictions_2020_en.pdf/a96dafc1-42bc-cb8c-8960-60af21808e2e

Lost market opportunities from weakened chemical regulation £12.8bn price tag over 30 years

The REACH system, and improvements to chemical regulation as a result of it, has steadily increased the volume of 'clean' waste streams over recent years, thereby unlocking a larger market for material recycling.

A recent report investigating EU market opportunities within the plastic packaging recycling market found that further progress to increase clean plastic waste streams by 5% over the next 30 years could realise recycling market opportunities of approx. €1.3 billion (average annual value between 2021-2050).²⁶

In Table 2, efttec applies these estimates to the UK:

Table 2: Market opportunity for plastic packaging recycling of a 5-percentage point increase in the actual recycling rate

Annual market opportunity EU (€ million/year)	Annual market opportunity EU (£ million/year)	Average annual market opportunity UK (£ million/year)	UK market opportunity over 5 years (£ million)	UK market opportunity over 30 years (£ million)
1,442	1,240	266	1,328	12,786

Notes: 1) Relative GDP in 2021 has been used to scale EU impacts to the UK; 2) Values are given in 2022 prices, discounted using HMT Green Book Guidance.

This efttec analysis suggests that the UK has a recycled packaging market opportunity of £12.8bn over 30 years, if progress towards further clean waste streams is maintained. This opportunity for British recycling businesses could be directly threatened by weakening of chemical regulations as a result of the Retained EU Law Bill.

Note- efttec's confidence in this calculation:

Given the uncertainties in predicting future markets, there is a low level of confidence in these results. Note however that plastic packaging is only one out of many waste streams where recycling rates are currently low and where reduced use of hazardous chemicals may increase further opportunities for recycling.

²⁶ https://chemsec.org/app/uploads/2021/02/What-goes-around_210223.pdf

Appendix: Government opportunity costs

As the above case studies illustrate, weakening regulations as a result of the Retained EU Law Bill threatens ecosystem services, health benefits and commercial opportunities worth billions of pounds, as well as causing uncertainty for businesses.

The Bill will also generate significant additional costs in the form of civil service and parliamentary time spent working on the Bill, including time taken for each department to identify which laws to retain. This unnecessary work will present opportunity costs; every hour civil servants spend on retained EU law is one hour less than they could have spent on alleviating the cost-of-living crisis, supporting strained health services and delivering on key environmental promises.

Although the full time and cost implications of the REUL Bill within these areas has not been quantified, the answer to a November 2022 Parliamentary Question illustrates the scale of the likely opportunity cost across Government. In response to a question from Emily Thornberry MP, BEIS Minister Nusrat Ghani MP stated that:

*"The Department for Business, Energy and Industrial Strategy has spent approximately £600,000 on staff activity related to the review of the department's retained EU law (REUL) in the period 1 September to 27 October 2022."*²⁷

Minister Ghani clarified that this cost only included work on retained laws falling under the scope of BEIS and did not include the cost of supporting the Bill through Parliament.

Extrapolating the £600,000 figure for approximately 2 months of work to 16 months of work up to the end of 2023, when Departments are expected to have identified which laws to retain and which to sunset, results in an estimated cost of £4.8m within BEIS alone. This assumes work on the REUL Bill remains at a similar intensity as the initial two months across the entire period.

Adjusting for the number of laws under the responsibility of each department as per the Government dashboard, we estimate a total spend of around £35.6 million on the REUL Bill across Westminster departments over the next 16 months.

The total number of laws covered by each department are outlined in the table below, based on official Retained EU Law dashboard. Note that a figure of 570 laws has been used for Defra based on the dashboard numbers on the although this is now expected to be over 1,000.²⁸ As such the estimate for

²⁷ <https://questions-statements.parliament.uk/written-questions/detail/2022-10-27/72961>

The answer to the written question has also received media attention, see 15.01.22 article in the Observer: <https://www.theguardian.com/politics/2023/jan/14/whitehall-spending-tens-of-millions-rees-mogg-bill-to-scrap-eu-laws>

²⁸ The dashboard can be found here:

<https://public.tableau.com/app/profile/governmentreporting/viz/UKGovernment-RetainedEULawDashboard/Guidance>

See evidence given by Defra Secretary of State to Environment and Climate Change Committee in December 2022 for the over 1,000 figure: <https://committees.parliament.uk/oralevidence/11979/html/>

Defra, and possibly other departments where the dashboard does not currently contain all relevant Retained EU Law, is likely to be a substantial underestimate.

Additional costs will also be generated for the Devolved Governments, who will also have to assess the impact of the deregulatory disruption resulting from the Bill.

It has been stated by a number of departments that departmental work on the REUL Bill will be carried out by existing staff on top of other workstreams²⁹ and so whilst this cost is not necessarily additional expenditure, it represents a significant opportunity cost as time spent working on the Bill will likely lead to delays in other work areas.

These estimates have been extrapolated by Link from one source and should be treated with low confidence. They do however give an indication of the extent of civil service time the Retained EU Law Bill is consuming - and will continue to consume if the Bill progresses.

Department	Total number of REUL	Spend over 2 months (Sept - Oct '22)	Spend over 16 months (Sept '22 - Dec '23)
Defra*	570	£1,075,472	£8,603,774
DfT	424	£800,000	£6,400,000
HMT	334	£630,189	£5,041,509
BEIS	318	£600,000	£4,800,000
HMRC	228	£430,189	£3,441,509
DWP	208	£392,453	£3,139,623
DHSC	137	£258,491	£2,067,925
DCMS	35	£66,038	£528,302
DLUHC	27	£50,943	£407,547

²⁹ See for example this answer to a PQ from Health Minister Will Quince MP: <https://questions-statements.parliament.uk/written-questions/detail/2022-11-16/88850>

HO	24	£45,283	£362,264
MoJ	19	£35,849	£286,792
DfE	16	£30,189	£241,509
DIT	8	£15,094	£120,755
MOD	11	£20,755	£166,038
FCDO	1	£1887	£15,094
CO	1	£1887	£15,094
Total spend		£4,454,717	£35,637,736
<i>** Note that the figure for Defra is likely to be significantly higher than the 570 currently stated on the Government's dashboard.</i>			



[Wildlife and Countryside Link](#) (Link) is the largest nature coalition in England, bringing together 67 organisations to use their joint voice for the protection the natural world.

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