



COVERSHEET

Minister	Hon Erica Stanford	Portfolio	Immigration
Title of Cabinet paper	Immigration Financial Sustainability and System Integrity Amendment Bill	Date to be published	10 April 2025

List of documents that have been proactively released

Date	Title	Author
3 April 2025	Immigration (Fiscal Sustainability and System integrity) Amendment Bill: Approval for Introduction LEG-22-MIN-0044 Minute	Cabinet Office
26 March 2025	Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Approval for Introduction	Office of the Minister of Immigration
26 March 2025	REQ-0009920 Immigration Amendment Bill: final Cabinet paper and Bill for lodgement	MBIE
24 February 2025	REQ-0009651 Immigration Amendment Bill - draft Cabinet paper and Bill for ministerial consultation	MBIE
12 February 2025	REQ-0008378 Immigration (Fiscal Sustainability and System Integrity) Amendment Bill - drafting decisions	MBIE
21 January 2025	REQ-0007504 Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Exposure draft feedback	MBIE
18 November 2024	REQ-0005172 Immigration amendment Bill: documents for release for targeted consultation	MBIE
13 November 2024	Immigration Amendment Legislation - Addition to Bill and Planning for Future Reviews ECO-24-MIN-0255 Minute	Cabinet Office
13 November 2024	Immigration Amendment Legislation - Addition to Bill and Planning for Future Reviews	Office of the Minister of Immigration
2 November 2024	REQ-0005823 Cabinet paper for lodgement: Immigration Amendment Legislation - addition to Bill and planning for future reviews	MBIE
24 October 2024	REQ-0005298 Draft Cabinet paper amending the definition of mass arrival	MBIE
8 October 2024	REQ-0004179 Immigration Amendment Bill – Mass Arrivals definition and transitional arrangements proposals	MBIE
20 September 2024	Immigration (Fiscal Sustainability and System Integrity) Amendment Bill: Policy Proposals ECO-24-MIN-0198 Minute	Cabinet Office
12 September 2024	Immigration Financial Sustainability and System Integrity Amendment Bill - policy proposals	Office of the Minister of Immigration
6 September 2024	2425-0891 Immigration Amendment Bill: Cabinet paper for lodgement	MBIE
22 August 2024	2425-0747 Immigration Amendment Bill: draft Cabinet paper for Ministerial consultation	MBIE
13 August 2024	2024-0352 Immigration Amendment Bill: draft Cabinet paper for feedback	MBIE
17 July 2024	2024-0286 Immigration Amendment Bill: update for meeting on 17 July 2024	MBIE

2 July 2024	2324-3802 Fiscal Sustainability Amendment Bill - update and key decisions	MBIE
4 April 2024	2324-2168 Proposed Immigration (Fiscal Sustainability) Amendment Bill: scope and timeframes	MBIE

Information redacted	YES
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Any information redacted in this document is redacted in accordance with MBIE's policy on Proactive Release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it at this time.

Some information has been withheld for the reasons of: national security or defence, privacy of natural persons, confidential advice to Government, information subject to an obligation of confidence, free and frank expression of opinion and legal professional privilege.

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BRIEFING

Immigration Amendment Bill: draft Cabinet paper for feedback

Date:	13 August 2024	Priority:	Medium
Security classification:	In Confidence	Tracking number:	2425-0352

Action sought		
	Action sought	Deadline
Hon Erica Stanford Minister of Immigration	Agree to: <ul style="list-style-type: none">provide feedback on the draft Cabinet paper annexed to this briefingdiscuss it with officials at the meeting of 19 August.	19 August 2024

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Stacey O'Dowd	Manager, Immigration (Border & Funding) Policy	Privacy of natural persons	✓
Christine Hyndman	Principal Advisor, Immigration (Border & Funding) Policy	Privacy of natural persons	

The following departments/agencies have been consulted
Parliamentary Counsel Office; the Departments of Corrections, and the Prime Minister and Cabinet; the Ministries of Education, Foreign Affairs and Trade, Health, Housing and Urban Development, Justice (Courts, Offences and Penalties, Human Rights), Primary Industries, and Transport; Inland Revenue; the New Zealand Customs Service, the New Zealand Police, and the Treasury; and within MBIE: Employment Services, Immigration Compliance and Investigations, Immigration New Zealand; Tourism Policy, and Workplace Relations and Safety Policy (including Accident Compensation Corporation Policy).

Minister's office to complete:

- | | |
|---|--|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Noted | <input type="checkbox"/> Needs change |
| <input type="checkbox"/> Seen | <input type="checkbox"/> Overtaken by Events |
| <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

Comment



BRIEFING

Immigration Amendment Bill: draft Cabinet paper for feedback

Date:	13 August 2024	Priority:	Medium
Security classification:	In Confidence	Tracking number:	2425-0352

Purpose

To provide you with a draft Cabinet paper seeking policy decisions for the Immigration (Fiscal Sustainability and System Integrity) Amendment Bill (the Bill), for your feedback to officials (focusing on scope, approach, and draft messaging) by the end of 19 August, prior to:

- your consulting your ministerial colleagues on an updated draft and accompanying Regulatory Impact Statement (RIS) package from 21 August, and
- our submitting the final paper and RIS package to you on 5 September, for lodgement by 12 September and Cabinet Committee consideration on Wednesday 18 September 2024.

Executive summary

You met with officials on Wednesday 17 July 2024 to discuss the recommendations concerning the content and timing of the Bill set out in the briefing note 2425-0286. At that point, you agreed to a revised scope, confirmed the proposed timeframes, and directed officials to undertake some targeted consultation on the proposals with key stakeholders.

A draft Cabinet paper that reflects your direction, and also incorporates initial internal and external feedback, is attached at **Annex One** for your consideration. Subject to your feedback, we will provide you with an updated draft Cabinet paper and accompanying package of RISs for ministerial consultation.

Following that, current timeframes anticipate Cabinet's agreement in September 2024 to an exposure draft of the Bill being developed for targeted consultation later in 2024. That will be succeeded by:

- a near-final draft Bill, for BORA vet and ministerial consultation, in early 2025
- assent to the new Amendment Act in September / early October 2025, and
- updated fee and levy regulations (new rates) at the end of November 2025.

Recommended action

The Ministry of Business, Innovation and Employment recommends that you:

- a. **Note** that the draft paper *Immigration (Fiscal Sustainability and System Integrity) Amendment Bill – Policy Proposals* is attached at **ANNEX ONE** for your:
 - i. consideration and feedback, and
 - ii. discussion with officials at the meeting on Monday 19 August

Noted / Discuss

- b. **Note** that stakeholder feedback has informed the development of the proposals, and has also usefully identified areas that are likely to raise questions or to be contentious as the legislation progresses, specifically:
 - i. whether the expansion of both the levy payer base, and the purposes that a levy could fund, might contribute to an overall cumulative burden of costs charged by a range of agencies onto the same payers

- ii. what the appropriate safeguards for applications for individual warrants of commitment (WoCs) for asylum seekers should be, and
- iii. whether the ability to exercise facilitative powers (granting visas or changing conditions on visas) relating to classes of person might lead to the abuse of executive power

Noted / Discuss

c. **Note** that, following legal and agency feedback on the proposed fiscal changes, we have:

- i. Confidential advice to Government
- ii. defined the groups that would be able to be charged a levy (to “any individual or entity that can be charged a fee, or a port, an employer, or a provider of education to fee-paying international students”), and
- iii. added legislative safeguards to what the new levy could fund

Noted / Discuss

d. **Note** that, following legal, agency, and stakeholder feedback regarding the proposed requirements for making an application for an individual WoC for an asylum seeker:

- i. we have made adjustments to better reflect the balance between the individual’s and the community’s interests
- ii. specifically, these mean that the judge will need to be satisfied that:
 - i. the risk the individual poses is clearly articulated
 - ii. the need for detention has been justified, and
 - iii. the measure is the least restrictive necessary

Noted / Discuss

e. **Agree** to the changes set out in recommendations c and d above

Agree / Disagree / Discuss

f. **Note** that you directed us to undertake work on the triggers for the exercise of the facilitative powers relating to classes of persons, which need to be:

- i. usable in a wide range of circumstances, but
- ii. not so accessible that they would substitute for policy or operational planning or process design, or expose the Minister to undue lobbying

Noted / Discuss

g. **Agree** to the parameters for the exercise of the facilitative powers relating to classes of person, as set out from paragraph 36 of the paper, which include a review three years after they come into effect.

Agree / Disagree / Discuss



Stacey O'Dowd
**Manager, Immigration Policy
 (Border and Funding)**
 Labour, Science and Enterprise, MBIE

Hon Erica Stanford
Minister of Immigration

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The attached draft paper reflects your direction on the scope of the Bill and feedback from agencies and external stakeholders

1. We met with you on Wednesday 17 July 2024 to discuss the recommendations about the content and timing of the Bill set out in the briefing note 2425-0286. You agreed at that meeting to:
 - a. the Bill being named the Immigration (Fiscal Sustainability and System Integrity) Amendment Bill
 - b. its scope being extended to include:
 - i. the creation of facilitative visa powers (with work on the triggers to determine when they could be used), and
 - ii. amending s 161 of the Immigration Act 2009 (the Act) following the recent Supreme Court decision, to clarify where decisions about the visa status of criminal offenders should be taken (when considering liability for deportation)
 - c. Confidential advice to Government
[REDACTED]
 - d. MBIE informing targeted stakeholders of the high-level proposals while the policy work is being developed, and
 - e. the proposed timeframes for the Bill, which are in summary: Cabinet decisions in September 2024, an exposure draft developed for targeted consultation later in 2024, Cabinet approving the Bill's introduction early in 2025, a four-month Select Committee process, and the Amendment Act receiving Royal Assent later in 2025.
2. We have now developed the draft paper attached at **Annex One**, which also reflects feedback from within wider MBIE, stakeholders, external agencies, and the Legislative Design Advisory Group. The draft paper includes a summary of the proposals (set out in its **Annex One**) and brief summaries of each of the initiatives at its **Annex Two**. We seek your feedback on this draft by the end of next Monday, 19 August 2024.
3. As set out in the table on page 9 below, we plan to turn the next draft around quickly, to maximise the time available for consultation with your colleagues (between Wednesday 21 and Friday 30 August 2024). We will give you a final version on Thursday 5 September 2024, providing you with a week for consideration before it is lodged with Cabinet office on Thursday 12 September 2024.

The paper reflects feedback from agencies and wider stakeholders

Summary of agency feedback

4. We have consulted with a wide range of agencies, and with other areas within MBIE. Much of the agency feedback has focused on the **fiscal sustainability** proposals (which we anticipate are also likely to be a focus of attention during the parliamentary process). In response, we have:

- Confidential advice to Government
[REDACTED]

- strengthened wording around the scope of both the widening of the levy payer base and the expansion of purposes that a levy could fund (see further discussion from paragraph 11 below).
5. With regard to the **regulatory integrity** proposals, we have received the most feedback on the Warrant of Commitment (WoC) changes that relate to asylum seekers, and the electronic monitoring and (new) facilitative powers proposals. This feedback is discussed further in the relevant sections below.

Summary of initial stakeholder feedback

6. Per your agreement [2425-0286], we have met with a range of interested non-governmental organisations¹ to advise them of the proposals and to prepare them for the exposure draft of the Bill later this year.
7. The stakeholders were appreciative of the early engagement, and few significant concerns were raised. The questions they raised were generally clarifying in nature, and gave a useful indication of the likely areas of interest or controversy at Select Committee, and an early heads-up regarding topics on which to focus our proactive communications.
8. Stakeholders (including immigration lawyers and the Immigration Focus Group) were uniformly supportive of the proposals to address the gap in migrant exploitation offence settings, and to strengthen judicial scrutiny around out-of-hours compliance activity. They also acknowledged that the proposals (as a package) represent a movement in a positive direction in the human rights space.
9. While the change to deportation liability for residents may mean that more residents who have committed crimes will become liable for deportation in the future, stakeholders noted that this is mitigated by the existing independent appeal rights against that deportation.
10. The fiscal sustainability, WoC and flexible powers proposals drew the most comment from stakeholders. This feedback is discussed further in the relevant sections below.

Expansion of levy charging and levy expenditure purposes

More people and entities will be liable to pay a levy

11. Agency concerns around the expansion of levy charging largely came down to whether cumulative future charging burdens, with different names and purposes, might nonetheless fall on the same individuals or groups, and potentially lead to unintended outcomes, such as discouraging some tourists from holidaying in New Zealand. Potential demand impacts will be carefully considered as part of the fee and levy review to determine the specific groups to be charged and the levy of charges.
12. The Cabinet paper therefore proposes that primary legislation set out the broad categories of groups that could be charged a levy. They are proposed to be:
- a. a person or entity that is already able to be charged in the immigration system (e.g. fee payers)
 - b. a port (that receives, or plans to receive, international travellers i.e. an airport or maritime port)
 - c. an employer of temporary migrants, or
 - d. a provider of education to fee-paying international students.

¹ Business New Zealand, the Employers and Manufacturers Association, the Office of the Ombudsman, the Council of Trade Unions, the Casey Review Focus Group, the New Zealand Law Society, and Immigration New Zealand's (INZ's) Immigration Focus Group.

13. These changes would be reflected in the policy work for the 2025 fee and levy review (as Cabinet can make policy decisions based on the new legislation before it is enacted). The Amendment Regulations bringing the new charges into effect would be taken to the Executive Council after the new legislation is in place.

Levy revenue can fund more purposes

14. There was also considerable interest across agencies in the proposal to expand what levy revenue could be spent on, and the legal constraints around levy charging and expenditure. As you are aware, fees charged in the Public Sector² must directly recover actual costs: they may not be set to make a profit, although the costs recovered may be averaged across groups and (using memorandum accounts) across time periods.
15. Levy charges and the expenditure of levy revenue are broader, but there must be a “nexus” of connection between who is charged and what is funded by the resulting revenue, and the charge should be approximately proportionate to the likely benefit, or cost incurred. (For example, the levies on petrol fund both roading infrastructure and the Accident Compensation Corporation (ACC), each of which have a nexus with drivers.)
16. If these broad design conditions are not addressed, Confidential advice to Government
Charges which fund services that are not related to the payers are taxes, which must be established in primary legislation.³
17. Proposals are less developed regarding what the funding could be spent on. We have identified some possible areas for investigation, including levying temporary visa applicants as a contribution to ACC costs, levying parent visa holders as a contribution to health sector costs, and levying employers as a contribution to skills training costs.
18. The Cabinet paper proposes that Cabinet agree to the broad purposes that funding could contribute, and a broad range of design safeguards, Legal professional privilege. It also proposes that Cabinet note that a future levy would not come into effect until the fee and levy review in 2026.
19. Across both levy proposals, there was significant stakeholder interest in who would be charged, at what rates, and what for what purposes (all elements that will be determined as part of future fee and levy reviews, rather than at the point of the enabling legislation).
20. Stakeholders were concerned about increasing pressures on businesses (including tourism businesses) as a result of the cumulative costs arising from wider government fee and levy increases. The cumulative impact of charges will be taken into account as part of the levy setting process.

Warrant of Commitment changes

21. We had previously proposed that applications for individual WoCs should mirror the requirements established for group WoCs through the Amendment Paper that modified the Immigration (Mass Arrivals) Bill.
22. Those requirements include that the Immigration Compliance Officer identify how the proposed detention will be for the least amount of time necessary to achieve the outcomes of the detention, and how the proposed location of the detention meets the Government’s obligations under the New Zealand Bill of Rights Act 1990, and New Zealand’s obligations under the 1951 Convention Relating to the Status of Refugees and any other relevant international obligations.

² Guidelines for Setting Charges in the Public Sector (2017) New Zealand Treasury
<https://www.treasury.govt.nz/publications/guide/guidelines-setting-charges-public-sector>

³ For example, the Auckland Regional Fuel Tax, which funded public and non-petrol-vehicle transport, so could not be a levy, was established in the Land Transport Management Act 2003.

23. MBIE Compliance staff and litigators expressed concerns that simply duplicating the mass arrivals WoC safeguards would not achieve the transparency outcomes sought, and could inadvertently make it more difficult to appropriately detain individuals who pose an actual risk to the community. On the other hand, the Casey Review Focus Group were concerned that the relevant sections do not presume that liberty is the default option for any individual asylum seeker.
24. In seeking to balance these perspectives, the proposed requirements for making an application for an individual WoC for an asylum seeker have been clarified and reduced, to set out that the Compliance Officer must provide enough detail that, in making a decision to detain an asylum seeker, the judge is satisfied that:
 - the risk the individual poses is clearly articulated;
 - the need for detention has been justified; and
 - the measure is the least restrictive necessary.
25. Regarding the proposal to provide judges with more discretion when a WoC is applied for, feedback from the Casey Review Focus Group suggests that the repeal of section 317(5)(d) of the Act is unlikely to go far enough for the group. As above, the Casey Review Focus Group's view is that the entire section should be reviewed, and the onus of the section reversed, so that there is a presumption of liberty unless INZ is able to demonstrate that circumstances require detention.
26. We may provide you with further advice on this issue (the design of the WoC application, and / or the section as a whole) as the Bill progresses.

Electronic monitoring (a lesser form of detention)

27. We have had wide-ranging discussions with the Department of Corrections, and Te Whakatairanga Service Delivery (TWSD) in MBIE (responsible for immigration compliance functions), over the electronic monitoring (ankle bracelets) proposals. As you will note, the paper allows 12 months for implementation, allowing for the negotiating of a contract and the establishment of agreed processes. Confidential advice to Government

Costing details will depend on design – for example, MBIE may need to consider where and how people might be accommodated, as well the administration of restrictions on their liberty once they have an address.

Facilitative powers to grant visas or amend conditions on visas

29. The Cabinet paper proposes to enable the Minister of Immigration to exercise flexible powers in response to circumstances that are exceptional, or outside the agency's control, and that pose operational challenges to the immigration system. The proposed flexible powers can only be used to benefit the recipients. They are a subset of the powers that Parliament granted to the Minister of Immigration, then extended, while COVID-19 was posing challenges to the immigration system.
30. Broadly, they will enable the Minister to (in unusual or exceptional circumstances) grant visas to, or amend the conditions on the visas of, classes of people. This will substitute for the only mechanisms envisaged by the Act, namely individual applications for visas, or for variations of visa conditions, that are decided on an individual basis.
31. For example, if a natural disaster (such as a major earthquake), or a major political event, (such as a coup or invasion), occurred in another country, and international flights were disrupted, the Minister could make a class Special Direction to extend the temporary visa expiry dates of all citizens trapped here by a month, to ensure that they did not become overstayers in the interim.

32. Existing mechanisms to address that risk of a class of people suddenly overstaying (reminding people to apply for a further visa, suggesting that immigration officers consider taking a compassionate approach and waive or partially waive fees, directing INZ to prioritise those visa applications) are clunky and expensive: INZ incurs considerable costs, which fall on its own balance sheet if there are good reasons to not charge full fees.
33. Progressing the thought experiment above, if Cabinet later decided that some people trapped here should have open work rights, that could similarly be effected through a further class Special Direction. Otherwise, the people in question would have to apply for either a new visa, or to formally vary the conditions on their existing visa, and INZ staff would need to individually determine each application.
34. Onshore, volcanic eruptions or major flooding that closed Auckland airport could also be addressed through the judicious use of class Special Directions. They could, for example, extend the travel conditions of people trapped outside New Zealand, or grant new visas where visas had expired (this power was used to reinstate working holiday visas that had expired while borders were closed).
35. The potential impacts on applicants or employers from a major IT outage that meant that INZ could not receive or grant visas for a period of time could also be mitigated through use of the proposed powers.
36. We have had several discussions with Legal concerning triggers and safeguards. The objective is to make the facilitative powers usable in a wide range of circumstances, but not so accessible that they would be an easy substitute for thoughtful policy or operational planning or process design, or expose the Minister to undue lobbying. To that end, the proposed safeguards are:
 - The class powers can only be exercised by the Minister of Immigration, and the making of a class Special Direction must be in response to circumstances that are unusual, unable to be accommodated within existing frameworks, or outside the Department's control, and that pose challenges to the immigration system.
 - Each ministerial (class) Special Direction:
 - will be secondary legislation and will be able to be disallowed by the RRC, will have a duration of no more than six months, and will be notified in the Gazette and published on INZ's website;
 - will spell out the power (or powers) exercised and the class of people to whom it applies, and must be certified by the Minister of Immigration to the effect that the Minister:
 - considers that the exercise of the power or powers is reasonably necessary to manage the effects, or deal with the consequences, of the specified situation, whether in New Zealand or overseas, as existing measures are not sufficiently responsive; and
 - considers that the exercise of the power or powers will benefit, or at least not disadvantage, the people to whom it applies; and
 - has undertaken any consultation that they consider to be appropriate prior to that certification.
37. In addition, we are proposing to augment reporting, to address concerns that the class Special Direction powers might be misused:
 - the annual report would publish the number of times that class Special Directions have been used in the year, and for the previous three years (if relevant),
 - with a summary of the reasons that they were used.

38. One of the powers (the power to grant a visa in the absence of an application) will be able to be delegated to Delegated Decision Makers (DDMs) - it is substantially similar to the existing s 61 power in the Act. As is the case with s 61 decisions, its use would be governed by the judgement of those individuals, within the framework of expectations established by the Minister of Immigration.
39. Given the broad scope of these powers, we recommend a report back to Cabinet no more than three years after they come into effect, to identify whether there have been any unintended consequences and, if so, whether further legislative adjustments are merited. On the basis of that timing, we consider that any changes identified could be built into the next (regulatory) review of the Act.
40. Business stakeholders acknowledged the potential usefulness of increased flexibility, but expressed concern about the potential for abuse of broad executive powers. This may reflect a misunderstanding of the mechanisms (which were not directly related to the Border Exceptions processes employed during the period the New Zealand borders were closed). As above, the proposal includes a number of safeguards to mitigate risks of overuse, but the initial engagement with stakeholders underscored the need to highlight these safeguards in future engagements.

Confidential advice to Government

Confidential advice to Government

Confidential advice to Government

Timeframes

Development of legislation

43. We have continued to engage with the Parliamentary Counsel Office (PCO) on the ambitious timeframes proposed for the Bill.

44. Legal professional privilege

Implementation of changes

45. We are working with Operational Policy in INZ in the first instance, to determine the operational impacts on INZ (if any) of the changes and ensure that the agency is primed to immediately effect any processes that need to come into effect on Royal Assent.

46. Confidential advice to Government

47. We are proposing a three-month implementation period for the changes to WoCs for asylum seekers. As noted above, we are working with INZ and TWSD (and Corrections) to identify and plan for implementation of the electronic monitoring proposal, 12 months after Royal Assent.

Next steps

48. Following your feedback on the draft paper, we are planning to provide an updated version, plus the near-final RISs, to your office on 20 August, for ministerial consultation. The key milestones for the project are set out in the table below:

Table One: Upcoming milestones for the Cabinet paper

Date	Milestone
19 August 2024	Meeting with officials to discuss draft Cabinet paper
20 August 2024	Updated paper and Regulatory Impact Statement (RIS) package to Minister for consultation with colleagues
21 August – 30 August 2024	Ministerial consultation on draft Cabinet paper and RIS package
5 September 2024	Updated Cabinet paper and RIS to Minister
12 September 2024	Lodge with Cabinet Office
18 September 2024	ECO consideration
23 September 2024	Cabinet consideration
Late November / early December 2024	Targeted consultation with stakeholders on an exposure draft.

Annex

Annex One: Draft paper: *Immigration (Fiscal Sustainability and System Integrity) Amendment Bill – Policy Proposals*

Free and frank opinions

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Free and frank opinions

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Free and frank opinions

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