

RE: Response to Applicant's Document 9.34.6 Applicant's Thematic Responses to Relevant Representations– REP1-116

I am submitting this Written Response as an interested party who will directly affected by the Sea Link project and in response to the Applicant's Thematic response to my Relevant Representation - RR-041 -REP1-166.

I have wide ranging concerns across a range of the assessed topics, including the cumulative impact of numerous energy projects being allowed to take place in a totally unsuitable location. Sealink in particular will lead to the loss of high-quality farmland, construction noise, air pollution, ecological disturbance, disruption to public rights of way, increased flooding risk, traffic and road safety impacts, harm to the tourism economy, and landscape damage.

The Applicants Thematic Response is a condescending attempt to downplay the genuine concerns of the representations made about the impact of the proposed Sealink development. It relies on assumptions rather than evidence, and provides no secured community benefits. The project in its current form will permanently alter the environment, character, and wellbeing of local communities, and does not adequately avoid, minimise, or justify the level of harm proposed.

The projects focus is to maximise profit from the construction for the shareholders of the organisations that own National Grid. Just build it anywhere we can no need to worry about considering other alternative schemes if they will cost more to deliver. Maximum profit and shareholder return is the key driver.

## 7.2 – Air Quality

### 7.2.1 – Construction Dust, Fumes and Health Impacts

Open, windy landscapes and long construction periods mean dust and particulate exposure will be sustained, not short-term. Monitoring is reactive — it does not prevent harm — and no binding thresholds are proposed that would halt works.

### 7.2.2 – Impacts on Sensitive Habitats and Plant Communities

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Small increases in dust and deposition can kill specialised coastal and marsh vegetation. Reliance on generic desk modelling is inadequate; the data that drives these models is largely historical. Site specific baseline measurements and precautionary limits are needed.

## 7.3 – Construction Impacts

### 7.3.1 – Construction Compounds, Haul Roads and General Construction Footprint

Construction compounds, haul roads and long-term site access permanently change local landscapes and hydrology. The Applicant relies on “standard reinstatement” but provides no binding evidence that previously restored sites maintain pre-construction ecosystem function or farm productivity. Compounds near sensitive habitats and communities should be avoided entirely or significantly relocated.

### 7.3.2 – Limited Information on Construction Methods, Duration and Sequencing

The Applicant admits that a full construction programme depends on contractor appointment. Shareholder profit will determine the budget for the Contractor appointment so that will impact what money is available for eliminating the impacts. The Examining Authority needs a robust, staged plan showing how sensitive seasons, landfill/flood windows, and tourism peaks will be avoided.

### 7.3.3 – Construction Workforce Management & Training

“Best practice” training is promised, but no enforceable commitments or independent audits are set out to ensure contractors adhere to environmental plans. The DCO should require certified environmental training and independent compliance reporting.

### 7.3.4 – Working Hours, Weekend and Holiday Work

Allowing Saturday/Sunday working increases stress and disturbance for nearby residents and wildlife. The Applicant's claim that impacts are negligible depends on modelling of “average” days — real cumulative disturbance matters and must be restricted.

## 7.4 – Cultural Heritage

### 7.4.1 – Impacts on Local Historic Sites and Setting (Suffolk)

The Applicant's reliance on screening and topography understates the value of setting. Even if direct impact is limited, the long-term change to the experience and landscape context of villages and heritage assets is real and often irreversible. The recent archaeological discovery of a previously unknown henge monument at Friston underscores the exceptional heritage sensitivity of this landscape. This rare find highlights the area's deep prehistoric significance and demands thorough assessment to ensure that its setting, integrity, and wider cultural context are not irreversibly compromised.

### 7.4.4 – Construction Traffic Routes through Heritage Landscapes

Routing HGVs and temporary accesses through or near earthworks and archaeological features risks irreversible damage. Trenchless methods at landfall do not remove the need for careful protection inland.

### 7.4.5 – Heritage Coast Impacts (Suffolk)

Temporary marine activity and landfall operations affect the Heritage Coast's sense of place. “Temporary” visual intrusion during peak summer months is a material harm to tourism and local amenity.

## 7.5 – Geology & Hydrogeology

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### 7.5.1 – Need for Detailed Local Geology Understanding

Existing ground investigation reports are helpful but do not cover all sensitive private water supplies and shallow aquifers. More targeted site testing is required and results must be reported publicly.

### 7.5.2 – Groundwater & Pollution Risks

The Applicant's qualitative risk assessment is not a substitute for detailed pollutant transport modelling. Contamination from spills, fuel storage, or drilling fluids could affect private wells — a binding compensation and mitigation mechanism must be in place.

### 7.5.3 – Trenchless Drilling Risks at Landfall

HDDs have a record of failures (fluid breakout). The Applicant must provide robust contingency plans, third party insurance and independent oversight for HDD operations.

### 7.5.4 – Coastal Geological Sensitivity

The Suffolk shoreline is active and fragile. The Applicant must demonstrate how operations will avoid increasing erosion or altering sediment transport beyond natural variability.

### 7.6 – Landfall Location

#### 7.6.2 – Suffolk Landfall and Nearby Protected Sites (Sandlings SPA, Leiston-Aldeburgh SSSI, RSPB North Warren)

Relocation of compounds is welcome but not sufficient. The Applicant must provide binding guarantees that the trenchless commitments will be strictly enforced and independently audited.

#### 7.6.3 – Beach Erosion Concerns

Modelling must be open and conservative. Local residents experience beach changes year-to-year — the Applicant must provide long-term monitoring and a liability framework for any induced erosion.

#### 7.6.4 – Marine Heritage at Landfall

The marine archaeological assessment is incomplete until all new geophysical data are analysed. Consent should require archaeologically-supervised works and stop-works protocols.

#### 7.6.5 – Aldeburgh Landfall and Public Access

Even with trenchless methods, there will be temporary landward works, compounds and access routes affecting beach users and local businesses. The Applicant's "no disruption" claim is totally unrealistic.

#### 7.6.7 – Landfall Siting & Need Case

Siting for technical reasons is understandable, but alternatives analysis must be transparent and show why less-sensitive landfalls were not technically feasible rather than dismissed for cost and shareholder profit reasons. Why cant the UK's National Grid mirror what happens in Europe.? .

#### 7.6.8 – Queries Over Aldeburgh–Friston Connection

The Applicant's corridor and substations siting rationale must be presented with clear maps of cumulative land use and alternatives assessed.

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### 7.7 – Landscape and Visual Impacts

#### 7.7.1 – Suffolk Coast and Heaths AONB

The Project lies partly in the AONB. The Applicant's conclusion of "no significant adverse effects" is hard to reconcile with the large-scale, permanent converter infrastructure and access routes. AONB status requires exceptional caution and avoidance.

#### 7.7.2 – Saxmundham Converter Station Visual Effects on Local Residences

Such development represents an irreversible loss of setting, where the scale and permanence of converter stations, Substations and pylons fundamentally alter the character of rural tranquillity. Once imposed, these structures cannot be meaningfully mitigated, and the Applicant's reliance on planting schemes ignores the reality that no screening can restore the integrity of landscapes of national importance such as the Suffolk Coast and Heaths AONB or the historic marshes near Richborough Fort. Residents will live with partial industrial views for decades. That is a serious local amenity loss.

#### 7.7.3 – Landscape Character Change (From Rural to Industrial)

The cumulative effect of converter stations, substations and overhead lines is to industrialise rural landscapes. This is not just localised visual change but a fundamental alteration of character.

#### 7.7.4 – Effectiveness of Planting as Mitigation

Planting will take many years to provide screening. Planting cannot hide tall buildings or pylons. While welcome, planting is not a substitute for avoiding prominent siting.

#### 7.7.10 – Light Pollution

Light for safety is necessary, but temporary and operational lighting must be strictly controlled to limit spread and wildlife disturbance. Lighting design should be agreed with local authorities and conservation bodies.

### 7.8 – Safety

#### 7.8.1 – Vulnerability to Attack / Sabotage

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The Applicant states it cannot comment on security details. That's reasonable but insufficient for community reassurance. There must be a public-facing summary of resilience measures, emergency response plans, and coordination with local responders, without revealing sensitive details.

### 7.9 – Onshore Mitigation

Many of the Applicant's answers rely on compensation rather than avoidance.

### 7.10 – Traffic and Transport

#### 7.10.1 – Local Road Suitability (Suffolk)

Rural roads lack resilience. The Applicant's routing plans must include firm restrictions, HGV size limits, enforced diversion signage, and local traffic calming during construction.

#### 7.10.2 – Saxmundham, Leiston, Friston Impact

Local services (ambulance, fire service, school transport) use the same roads. Even if "statistical" impacts are low, real-world incidents and delays will happen and must be mitigated.

#### 7.10.10 – A256 Bellmouth & Road Safety

Design compliance is necessary but not sufficient. A real-world risk assessment (including local road user behaviour) must be completed and published.

## 7.11 – Noise & Vibration

### 7.11.1 – Construction Noise Suffolk

Noise modelling underestimates open-field transmission. There must be enforceable noise limits and a complaints/penalty mechanism.

### 7.12 – Health & Wellbeing

#### 7.12.1 – General Health and Wellbeing Impacts

The Applicant's statements that no "significant" impacts are predicted underplay chronic stress, sleep disturbance, and anxiety caused by prolonged construction. Cumulative minor harms become major for vulnerable residents and must be assessed qualitatively as well as quantitatively.

#### 7.12.2 – Mental Health and Social Cohesion

Long-term disruption, uncertainty, and loss of amenity undermine community cohesion and mental health; compensatory measures and community support programmes must be funded and secured.

### 7.13 – Socio-Economics / Tourism / Jobs / Housing

#### 7.13.1 & 7.13.2 – Impact of Suffolk and Kent Onshore Scheme on Tourism

Tourism relies on tranquil landscapes and coastal amenity. These qualities will be undermined for years.

The Applicant uses non-comparable case studies to downplay impacts.

#### 7.13.3 – Loss of Tourism Jobs & Local Employment Opportunities

The Applicant cannot guarantee local employment for specialist work. There is a need for binding local P Guide to employment targets, training,

Tourism businesses may suffer multi-year downturns, which the assessment ignores. Long-term community investment, and guarantees against tourism business losses are required.

#### 7.13.4 – Impact on Local House Prices

Compensation through compulsory purchase codes does not address general property value reductions.

Many residents will be financially harmed without compensation.

#### 7.13.5 – Economic Benefits Being Transient

Most benefits are short-term construction jobs for non-local workers.

Local communities receive long-term loss with no guaranteed lasting benefits.

### 7.14 – Ecology & Biodiversity

7.14.1 to 7.14.45 – This is a huge topic that needs individual attention to each of the 45 sections.

Three months of surveys are insufficient to cover such an important topic.

Pegwell Bay is a critical wildlife site requiring greater protection. Impacts on Seals in Pegwell Bay are underwater noise, lights, and vessels. They can disturb seals even at >1 km distance.

East Suffolk's protected areas AONB, SSSI, SPA etc have already been badly impacted by both Sizewell C and Scottish Power's pre-works

### 7.15 – PRoW / Walking & Cycling

#### 7.15.1 – PRoW Impacts

Temporary closures are not trivial; they reduce accessibility and local amenity. Alternatives must be equal in distance, safety and experience, and must be implemented before closures.

#### 7.15.2 – B1121 Road/Pedestrian Safety

Local pedestrian safety must be guaranteed with segregated routes where HGVs will be present; signage and enforcement alone are not enough.

### 7.16 – Water Environment & Flood Risk

#### 7.16.1 – Friston Substation & Suffolk Floodplain

Placing major infrastructure in floodplains is risky; the FRA relies on engineered measures and assumptions that might not hold under extreme events. Independent flood model validation and third-party guarantees against damage are required.

#### 7.16.2 – Kent Flood Risk & Drainage

Increased impermeable surface will increase runoff; the Applicant must show long-term maintenance funding for sustainable drainage systems and compensation for third-party impacts.

### 7.17 – Fisheries & Marine Economy

#### 7.17.1 – Fisheries Disruption

Fishing grounds are limited and heavily used. Short-term displacement can have permanent livelihood impacts. The Applicant's compensation mechanisms must be transparent, timely, and adequate to cover gear loss and displaced effort.

#### 7.17.2 – Reporting and Communication with Fishers

Real-time reporting of cable positions, protective measures, and timely compensation claims handling must be formalised in agreements with fisheries groups.

### 7.18 – Marine Traffic & Navigation

#### 7.18.1 – Increased Vessel Movements and Safety

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Cable-laying barges and support vessels increase marine traffic and collision risk for small craft. The Applicant must fund navigation notices, local awareness campaigns and ensure dedicated marine coordination.

#### 7.18.2 – Impact on Recreational Water Users

Local recreational boaters and anglers face disruption; notices and alternative safe routes must be provided.

### 7.19 – Marine Ecology

#### 7.19.1 – Impact on Fish from Marine Cable Construction

The Applicant's conclusion of "no significant impact" lacks detailed evidence.

Marine noise, vibration, and seabed disturbance will disrupt fish behaviour and spawning and cause changes in benthic habitats.

There is a need for seasonal restrictions and post-construction monitoring.

#### 7.20 – Marine Archaeology

##### 7.20.1 – Impact on Maritime Heritage

Pegwell Bay and the Suffolk coast have rich maritime archaeology.

Construction risks direct disturbance, scour, and sediment removal.

##### 7.20.2 – Adequacy of Surveys

Surveys are incomplete and rely on broad geophysical data.

Important heritage assets may remain undiscovered before works begin.

A full archaeological assessment of new geophysical surveys is required and must include archaeological watch on-site with stop-works protocols.

#### 7.21 – Cable Protection & Future Maintenance

##### 7.21.1 – Cable Protection Methods and Risk of Dragging/Exposure

The Applicant must clearly state when external protection is used, where, and the consequences for fishing; unprotected cables can become hazards after storms.

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##### 7.21.2 – Maintenance Regime and Long-Term Monitoring

Long-term monitoring and a funded maintenance plan published and enforceable by the DCO is necessary to avoid future hazards and fishing conflicts.

#### 7.22 – Shipping, Port & Harbour Impacts

##### 7.22.1 – Local Port / Harbour Disruption

Port operations may be affected by project vessels; consultation with local ports must be strengthened and risk assessed.

##### 7.22.2 – Economic Impacts on Local Maritime Services

Small contractors and harbour businesses may lose work or face restricted operations; compensation and scheduling must protect local livelihoods.

#### 7.23 – Recreation & Leisure

##### 7.23.1 – Impacts on Beaches, Country Parks and Recreational Sites

Disruption to access, noise and marine activity will deter visitors. The Applicant's reliance on evidence that other projects did not cause long-term tourism loss is not conclusive for local, small-scale recreation economies.

##### 7.23.2 – Sports Clubs, Golf Courses and Water-Based Leisure

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These users will face severance and access issues; the Applicant must fund clear, high-quality alternatives during works.

#### 7.24 – Climate & Greenhouse Gases

##### 7.24.2 – SF6, GIS Choices and Lifecycle Emissions

Promises of SF6-free options are positive but must be guaranteed and contractually binding. The Applicant should publish lifecycle carbon estimates including construction and embodied emissions.

#### 7.25 – Community Benefits

##### 7.25.1 – Lack of Secured Community Benefits

Voluntary promises are not enforceable. The DCO must include a binding community benefits package or the Examining Authority should reject reliance on vague commitments.

##### 7.25.2 – Delivery & Governance of Benefits

A locally-chaired community fund, with transparent criteria and long-term funding, is required before consent.

#### 7.26 – Alternatives, Site Selection & Assessment of Options (FULL SECTION)

##### 7.26.1 – Inadequate Consideration of Reasonable Alternatives

The Applicant repeatedly states that the chosen locations represent the “most suitable” or “least harmful” options, but the evidence provided does not convincingly demonstrate that all reasonable alternatives were properly assessed. In particular, alternatives appear to have been constrained by the Applicant's own operational preferences rather than by environmental, community or cumulative impact considerations. Preference to provide the highest return for the shareholder of the companies that own The National Grid.

A proper alternatives assessment must be independent, transparent, and environmentally-led, not simply a justification of pre-selected locations.

##### 7.26.2 – Avoidance Hierarchy Not Properly Applied

National Policy makes clear that the first principle should be avoidance of harm — yet in multiple topic areas (landscape, BMV land, tourism areas, bird habitats, flood zones), the Applicant appears to have prioritised “minimisation” rather than “avoidance”.

Avoidance should always be the default, especially where highly sensitive receptors (AONB, SPA, SSSIs, Heritage Coast, tourism hotspots) are involved.

##### 7.26.3 – Lack of Transparent Comparative Analysis

The Applicant provides narrative statements that other alignments or locations were “less feasible”, but no structured scoring matrix, weighting system, or transparent cost-benefit method is provided. Without comparative scoring, the Examining Authority cannot be confident that alternatives were assessed consistently or objectively. Shareholder profit is the driving force behind the choices being made by National Grid.

##### 7.26.4 – Failure to Fully Consider Cumulative Infrastructure Burdens

Both Suffolk and Kent are already handling multiple NSIPs. Alternative locations which would ease cumulative stress on communities appear not to have been seriously considered.

Selecting a route or site based solely on electrical efficiency ignores the lived reality that one area may already be disproportionately burdened.

##### 7.26.5 – Insufficient Explanation for Rejection of Offshore Alternatives

Offshore routing and landing alternatives appear to have been dismissed prematurely. Where offshore solutions could minimise community impacts, the Applicant should justify with transparent engineering and environmental evidence why these alternatives were discounted.

#### 7.26.6 – Alternatives Should Account for Climate Resilience

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Flood-prone areas, eroding coasts, and high-risk hydrology zones should be avoided for long-term infrastructure. The Applicant has not shown that future climate scenarios were fully integrated into site selection.

#### 7.27 – Whole-Life Design, Materials & Sustainability

##### 7.27.1 – Use of Low-Carbon Construction Materials

The Applicant makes general commitments to sustainability but provides no detailed requirement for low carbon materials, recycled steel, low-carbon concrete substitutes, or sustainable procurement. For a nationally significant project, material choices should clearly reflect best modern standards.

##### 7.27.2 – Energy Efficiency & Operational Carbon

The Applicant has not provided a full breakdown of operational carbon, including energy consumption for cooling, maintenance and auxiliary systems at the converter and substation sites. Full lifecycle assessments are essential to ensure the project supports net-zero objectives.

##### 7.27.3 – End-of-Life, Decommissioning & Circular Economy

There is no detailed strategy for decommissioning or recycling at end-of-life. Given the long lifespan and large material volumes involved, the Applicant should provide a dedicated plan demonstrating how future removal or repowering will be managed without burdening local communities or councils.

##### 7.27.4 – Green Infrastructure & Habitat Integration

Planting plans are not equivalent to genuine green infrastructure. The design should embed ecological corridors, natural drainage systems, pollinator-friendly planting, and long-term biodiversity enhancements, not simply “visual screening”. This has not been properly integrated.

#### 7.28 – Health & Emergency Planning

##### 7.28.1 – Health Services and Emergency Response Capacity

Large-scale construction places extra burden on local NHS, ambulance and emergency services. The Applicant must fund enhanced capacity items (ambulance standby arrangements, local training), and provide clear EMS coordination plans.

#### 7.29 – Major Accidents & Disasters

##### 7.29.1 – Fire Risks from Increased Footfall & Infrastructure

Increased recreational use and removed vegetation near compound fences increase fire risk. The Applicant must produce site-specific fire mitigation and interface with local fire services for prevention and response protocols.

##### 7.29.2 – Targeted Attacks and Emergency Preparedness

A clear, public-facing emergency plan (without giving away security-sensitive detail) is needed showing evacuation routes, shelter-in-place plans and community notification methods.

#### 7.30 – EMF (Electromagnetic Fields)

##### 7.30.1 – Measures for EMF Exposure

“Within guidance” comments do not address public perception and long-term exposure concerns. The Applicant must provide field measurements at receptor points and publish them, plus set low, precautionary limits and buffers around dwellings and PRow.

#### 7.31 – Programme, Timing and Ecological Seasons

##### 7.31.6 – Timeline, Tourism & Workforce Accommodation

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A prolonged timeline risks peak-season impacts for tourism and housing shortages due to construction workforce demand. The Applicant must require workforce accommodation plans that do not displace local housing. There is already a shortage of accommodation for the Sizewell workforce leading to profiteering by people buying up property to rent out at the expense of local residents.

##### 7.31.7 – Sequencing and Bird Breeding/Wintering Seasons

Construction must be scheduled to avoid sensitive bird seasons; where not possible, strict avoidance and habitat compensation is required with long-term monitoring.

#### 7.32 – Monitoring, Compliance & Enforcement

##### 7.32.1 – Independent Monitoring and Public Reporting

The Applicant proposes monitoring, but this must be independent, frequent, and publicly available. Enforcement mechanisms and fines for breaches should be explicit in the DCO.

##### 7.32.2 – Adaptive Management & Triggers for Stop-Works

There must be predetermined environmental triggers (noise, dust, sediment, EMF, archaeology) which require suspension of work pending investigation and remediation.

#### 7.33 – Coordination with Other Projects

##### 7.33.4 – Strategic Coordination across NSIPs

Coordination so far appears limited to operational meetings and shared documents. Residents need a strategic programme that staggers construction windows, shares compounds where feasible, and reduces cumulative impacts — that has not been demonstrated.

##### 7.33.x – Cumulative Visual & Amenity Effects

Multiple projects in the same landscape multiply harm; the Applicant's discrete assessments for each project fail to capture the real combined loss of tranquillity and character.

#### 7.34 – Inter-Project Cumulative Effects

##### 7.34.1 – Fisheries Cumulative Effects

Multiple submarine cables and marine works will push fishers into narrower grounds; the Applicant must demonstrate realistic, enforceable compensation and relocation support.

#### 7.34.2 – Friston and Regional Cumulative Effects

When combined with other substation and converter projects, Friston becomes a major industrial hub — the cumulative landscape, traffic, ecological and socio-economic effects are not adequately assessed or mitigated.

#### 7.35 – Residual Effects & Long-Term Community Burden

##### 7.35.1 – “Residual Impacts” Are Understated

The Environmental Statement repeatedly concludes that after mitigation, residual impacts are “not significant”. This downplays the real, permanent loss or degradation experienced by residents — especially those living near converter stations, substations, haul routes, or compound locations.

Residual impacts should be judged from the perspective of the affected community, not by technical thresholds.

##### 7.35.2 – Permanent Landscape & Character Change

Even after mitigation, the converter stations, substations, trenches, access tracks and overhead lines create a permanent industrial footprint in rural and coastal landscapes. This is a major residual impact that cannot be mitigated fully by planting or bunding.

##### 7.35.3 – Long-Term Maintenance Traffic and Noise

Residual effects include ongoing maintenance traffic, periodic inspections, and the long-term presence of operational noise. These are perpetual burdens on local amenity — the Applicant does not fully acknowledge this in its assessment.

##### 7.35.4 – Ongoing Biodiversity Impacts

Some habitats, once disturbed, will not recover fully. Functionally mature ecosystems (ancient hedgerows, coastal grasslands, saltmarsh edges) take decades or longer to return — if they ever do. The Applicant should recognise these as permanent residual losses, not temporary inconveniences.

##### 7.35.5 – Long-Term Flood & Drainage Responsibility

Residual risks also include the long-term failure or under-performance of drainage infrastructure. If drainage assets fail in 10–20 years, local residents may suffer flooding impacts. The Applicant must take permanent liability, not pass this burden to councils or residents.

##### 7.35.6 – Compounded Stress Over Decades

Where multiple NSIPs overlap (Friston, Saxmundham, Richborough, Pegwell Bay), the long-term burden on communities is much greater than the Applicant acknowledges. Residual impacts accumulate — economically, psychologically, socially, and environmentally — and must be considered as such.

Conclusion (This is a suggestion only please write in your own words)

I remain strongly opposed to the Project in its current form. The Applicant repeatedly minimises impacts, depends on unproven assumptions, and relies on non-binding mitigation and compensation. The Project, as proposed, will cause long-lasting and possibly irreversible harm to agriculture, ecology, heritage, landscape, tourism, local health and wellbeing, and the character of communities. The Examining Authority should require: robust avoidance of sensitive areas, enforceable mitigation and design protections, independently audited monitoring, binding community benefits, and much tighter sequencing/coordination and contingency plans — or refuse consent until these are secured.

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The National Grid application should be rejected. It is a flawed scheme proposed for the wrong location designed to maximise shareholder profit rather than consider other more feasible locations. Why should National Infrastructure projects be decided based on the interests of faceless shareholder of overseas companies who own the proposer rather than what is right for the country and its citizens.

Yours Sincerely

Adrian Humphreys RR-041