

CAA Targeted Engagement or Consultation Assessment – Temporary Airspace Changes

Title of airspace change proposal	Virgin Orbit Flight from Spaceport Cornwall (Southern TDA)
Change sponsor	Virgin Orbit
Project reference	ACP 2021 031
Case study commencement date	18 May 2022
Case study report as at	19 October 2022
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the ‘status’ column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

Targeted Engagement (or Consultation) Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p><i>(Has the change sponsor liaised with CAA Flight Ops on stakeholder identification?)</i></p> <p>The table “A11 Stakeholder Table” from the report entitled “Virgin Orbit Operations from Spaceport Cornwall, Southern Trajectory v4.0” (henceforth known as “the report”), the sponsor identifies the following stakeholders for this ACP:</p> <ul style="list-style-type: none"> • Airlines UK • Airspace4All • British Airways • British Business and General Aviation Association (BBGA) • General Aviation Alliance (GAA) • Ministry of Defence 	

	<ul style="list-style-type: none"> • (RAF/Navy) Kevin McMorrow (Navy) Military Airspace Manager Swanwick • Defence Airspace Air Traffic Management • NATS • Qinetiq • United States Air Force • Eurocontrol • Irish Aviation Authority • Portuguese Space Agency • Head of Airspace Modernisation, CAA • Maritime and Coastguard Agency • RVL Group 	
2	Has the change sponsor explained the engagement (or consultation) methodology / approach used?	YES
	<p><i>(Has the change sponsor shared their strategy/approach with the CAA for comment in advance of conducting their engagement (or consultation) activity?)</i></p> <p><i>(Has the change sponsor undertaken multiple rounds of engagement?)</i></p> <p>Section nine of the report details how the sponsor conducted their engagement and the reasons for their methodology. The sponsor describes their heavy reliance on virtual methodology (web conference meetings, emails and phone calls as the sponsor is USA-based).</p> <p>The sponsor details four periods of engagement. The chronology of the events is supported by a table (9.3.1):</p> <ul style="list-style-type: none"> • Ahead of the formal engagement period, the sponsor carried out preliminary engagement to gauge impact on airspace users and airspace managers (30 August 2021- 1 September 2021). • The formal engagement period took place between 10 September 2021- 15 November 2021 (just over nine weeks) In this time key stakeholders were gathered for an initial stakeholder meeting. Responses with additional stakeholders (MCA and QinetiQ) were collated after the close date (2-8 December 2021). • Further engagement with key stakeholders-This period was furthering discussions with key stakeholders between 10 February 2022 and 8 March 2022. • Further weekly LoA/operational meetings with stakeholders have taken place from 10 February 2022- present day. More iterative and nuanced discussions with key stakeholders (Eurocontrol, Portuguese airspace/space representatives, Spanish airspace/space representatives MCA, IAA, and MoD) took place sometime after the initial formal engagement period. Discussions are still ongoing with 	

	these parties with regards to and LoA and air traffic matters at the time of submission.	
3	What materials have been used by the change sponsor during the targeted engagement (or consultation)?	YES
	<p><i>(Has the change sponsor shared their materials with the CAA for comment in advance of conducting their engagement (or consultation) activity?)</i></p> <p><i>(Has the material clearly articulated what is being proposed and the impacts of the proposal?)</i></p> <p>The sponsor has included engagement materials in the report (sections 1-8). The materials contained the following information:</p> <ol style="list-style-type: none"> 1. Background and general information- Details of both initial proposals for a North and South trajectory, a description of Launcher One and it's rocket launch system with Cosmic Girl. 2. Description of the 'Captive Carry' phase- What the purpose of this phase is and what happens on the day of launch- This section describes what happens during this phase and how the TDA sections will be promulgated via NOTAM/NOTMAR on the day. It also details how the sponsor will mitigate risk during this phase using on-the-day statistical analysis. 3. Environmental Assessment and Impact Under 7000ft- Summarises assessment of environmental impacts according to the Assessment of Environmental Effects (AEE), completed for the issuance of the CAA operator licence. The sponsor provides a table which details it's analysis of impact on noise and vibration; biodiversity; marine environment; Environmental Effects due to major disasters/accidents and cumulative effects. Below this section is a paragraph which details the nil anticipated impact on flights under 7000ft over land. 4. Temporary Danger Area Sequence- This section details what will happen in each area of the different TDA areas (five in total). For each area it also details: <ul style="list-style-type: none"> • The duration of activation- How long the portion of airspace is activated for • The size of the TDA- Dimensions and illustrative example on map • Hazards- Identified risks and likelihood of occurrence • Safety case- Who is assessing the safety case Probability of impact to aircraft • TDA responsibility- Which aviation authority and/or ANSP is responsible for the order and 	

	<p>promulgation of NOTAM.</p> <ul style="list-style-type: none"> • Timelines- Timelines for the TDA related activity and communications, (leading up to and on the launch day) are explained. • Emergency plan and procedures- Virgin Orbit’s Emergency Response Process are overviewed, with a reference to the safety case. • Vertical Dimensions- Descriptions of the two vertical dimensions for TDA 1 (FL400) and TDA 2-5 (surface to unlimited) are provided. • Airspace considerations-including airspace timelines and conclusions about optimal launch times based on traffic analysis. 	
4	Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).	YES
	In section nine of the report, the sponsor states the period of engagement was 10 September 2021- 15 November 2021 (or nine weeks). No rationale is given the pursuit of a shorter engagement period, though it is evident that engagement occurred before and after the initial engagement period and still continued in order to develop operational and safety cases internationally.	
5	Was the period of engagement (or consultation) appropriate?	PARTIALLY
	The period of engagement was somewhat appropriate. Although engagement occurred before and after the main engagement period and the main timeframe for this activity captured <i>most</i> stakeholder issues and risks; new issues continued to develop over time. The table provided under 9.3 of the report provides a full chronology of engagement activity. Additional timescales for international engagement and engagement with key UK stakeholders were outside the sponsor’s control. The scope, scale and depth of engagement were unprecedented for this ACP as many stakeholders were new to the UK airspace change process and impacts took longer to articulate.	
6	Has the change sponsor accurately summarised what stakeholders have said and identified all of the issues raised during the engagement in the stakeholder engagement summary document?	YES
	<p><i>(What raw evidence has been provided to support the stakeholder engagement summary report?)</i></p> <p>The sponsor has summarised the stakeholder discussions in several parts of the report:</p> <ul style="list-style-type: none"> • Sections 9.3.2 and 9.3.3 summarise interactions with NATS, MoD (RAF and Navy as well as Qineitq). • Appendix A (Stakeholder Feedback) summarises feedback with all other identified stakeholders that were engagement with on this ACP to date. <p>Raw evidence of engagement is provided in Appendix B and is inclusive of meeting summaries with key stakeholders. Responses are</p>	

summarised below:

Airlines UK:

September 2021

- This stakeholder wanted further information about impact on NQY operations.
- They also wanted any traffic analysis once it was completed.

Sponsor Response:

- Explained why Virgin Orbit chose Newquay as a location, primarily because of it's closeness to the ocean and no overflight of land.
- Traffic Analysis will be addressed once it is completed.

Airspace4All:

December 2021

- No issues or objections from this stakeholder recorded via email

British Business and General Aviation Association (BBGA):

- The BBGA stated they would pass on information to their members, no further correspondence received.

General Aviation Alliance (GAA):

- Over email, the stakeholder asked if the ACP was 10nmi of the UK coastline. Following response, the GAA stated "no further comment"

Sponsor Response:

- Confirmed that ACP has no impact with 10nmi of the coastline.

Eurocontrol:

29 March 2021

- Meeting with NATS, DAATM, Eurocontrol and IAA.
- Pros/cons of drop point locations.
- Priority of flights.
- airspace control.

2 September 2021

- Discussed launch procedures.
- LoA development.
- Eurocontrol requested additional information on vertical dimensions and offered to facilitate a meeting with the Portuguese.
- Stated that NOTAMs will be needed at least 3 days.
- Stated that the sponsor should understand and consider TANGO routes.

1 November 2021

- Eurocontrol completed initial airspace analysis and identified that 00:00 and 06:00 were the least impactful time.

10 February 2022 (meeting)

- Eurocontrol provided insight on Tango routes.
- Request from Eurocontrol how the aircraft will be controlled (to NATS and MoD stakeholders).

Irish Aviation Authority (IAA)

The sponsor had four meetings with this stakeholder. The first on the 29 March 2021 was attended by several stakeholders and is described above with Eurocontrol.

31 August 2021 Meeting with MCA and IAA

- Focussed mainly on marine life
- Asked the sponsor for urgent engagement with them and the regulator

3 September 2021 Follow up meeting

- IAA stated lower density in Shanwick
- Recognition of government- to- government engagement
- Description of the sonic boom impact to Ireland was requested
- Airworthiness certificates for the 747 were requested
- Regular meetings with the IAA and sponsor requested

4 March 2022 Follow up meeting with IAA

- Mutual agreement to work lower-level tasks whilst government to government work continues
- Notification method/LoA discussed
Updated coordinates supplied
- IAA wished to see alignment of 'phraseology' with ATC and the sponsor agreed to bring 747 pilots to the next meeting

Portuguese Space Agency (PSA)/Portuguese Air Traffic Control Organisation

The sponsor met virtually with the PSA/Portuguese Air Traffic Organisation in September 2021 and again in February 2022. In the latter meeting, they met alongside Eurocontrol

25 February 2022 Sponsor with PSA Portuguese Air Traffic Organisation and Eurocontrol

- The Santa Maria FIR will be impacted by the new TDA shape
- Sponsor communicated that buffer in place and safety on flights parallel to the trajectory were discussed
- Sponsor confirmed debris will fall into the TDA from a near vertical trajectory and will be above FL600 when it enters the TDA
- The stakeholders requested real time launch information on the day

22 September 2022

- Discussed TDA flight planning information
- Indicated that the chosen route could affect Canary Island traffic and stated the need for early co-ordination
- PSA mentioned heavy maritime traffic in the area
- PSA discussed internally with airspace, maritime, air force and civil protection

North Atlantic stakeholder community (NAT SPG)

- Concerns of airspace closures were discussed, with the sponsor invited to present the proposal to the NAT SPG.

Sponsor's Response:

- The meeting has not occurred to date, but the sponsor is following up.

RVL Group

- Email discussions with RVL Group on operations from Newquay. No negative comments were received.

MoD (RAF/Navy)/QinetiQ

8 December 2021

- Stated that hazard areas will affect traffic flow across the FIR and affect military activity in military danger areas (D701 and D064).
- D701 is subject to an agreement with NATS. Greater clarity is requested on whether the range and the route overlap.
- QinetiQ operate the range and should be included as a stakeholder.
- The MoD are unsighted as to where commercial space launches sit within the national priorities list.
- A collaborative approach, with neighbouring ANSPs needs to be developed alongside protocols.

- Robust 'check fire' arrangements will need to be produced alongside other robust communications to ensure minimal impact on Air Policing operations.
- There will be an impact on the airspace management within/adjacent to the FIR. The Military Airspace Management Cell manage launch requests and have a four month lead-in time.

Sponsor's Responses:

- The sponsor will work to MoD to deconflict launches and have already reduced their launch window.
- Virgin Orbit will propose a notification and scheduling agreement with MoD for transparency.
- Virgin Orbit met with MoD and QinetiQ to discuss launch operations and trajectory. The launch is thought not to impact military danger areas. Virgin Orbit will continue to work directly with MoD space managers.
- Virgin has sought clarification from DfT and CAA on space launch priority.
- Co-ordination with the Military Air Management Cell is not seen as an issue for timing there are few launches.

3 May 2022 (DAATM)

- Emergency stores need expanding.
- No detail available on the decision points to divert, eject stores round to BSD (Boscombe Down) etc.
- No mention of any need to fuel dump.
- Has QinetiQ agreed the use of BSD in accordance with JSP360 charges?
- Assumption that emergency aircraft will be controlled by 78 Sqn but remains unconfirmed. A diverting aircraft with/without a hung launcher may not in itself be an emergency but will still require an ATS.
- The wide launch window is very wide, and fine detail planning is not possible until last minute. Setting priorities/assessing impact is difficult as MoD/defence priority may be set at short notice.
- QinetiQ and MoD are keen to understand the impact of the blocking of oceanic entry points on D701. A notification and scheduling agreement between Virgin Orbit/QinetiQ and MoD are yet to be suggested.
- There is no acknowledgement of disruption to BSD, noting that BSD plan to switch to night flying for all Stn ops during the period. It is assumed that the Stn will be managing any adverse popn impact generated in search of commercial activity. It is assumed that the use of BSD is in accordance with JSP360 charges.
- No discussion of D064 (used for training launches) and D701.
- No communication planning. No clear comms plan/comms card. It is assumed that the call sign COSMIC GIRL has been approved for use by CAA and IAA?
- UK SPOC should be included in planning discussions; ASACS liaison required to reassure NATO Air Policing.

- Clear Range procedures will be difficult as there are no obvious primary radar sources. Cosmic Girl only has a weather radar and TCAS.
- What is the available Irish radar coverage?
- Foreign Long Range Aviation (LRA) should be considered as a risk, requiring a quick reaction alert response. Without a clear TDA management process, LRA mitigation will be challenging.

Sponsor's Responses:

- Virgin Orbit has included decision points in the Safety Case currently under review by CAA. A decision to divert would be made once it becomes clear that a Spaceport Cornwall landing is not possible.
- Fuel dump is addressed within nominal procedures and the Boeing flight manual, which forms part of the safety case.
- Virgin Orbit is in early discussions with BSD, changes to be agreed outside of the ACP process.
- The control of the aircraft along the flight path is an open action. A diversion to BSD is not considered an emergency event.
- MoD have priority in the event of an emergency. Virgin Orbit accept a launch scrub may happen if notice is given to do stand down.
- Virgin Orbit is awaiting track information from NATS, but impact is expected to be low.
- Notifications are specified in 6.2 of the engagement materials. MoD can be added to an official agreement and/or notification plan.
- Virgin Orbit seeks two training flights before the launch. A request has been made to the MoD to use D064, for pilot training which does not require a TDA. A Second request is a full mission rehearsal and does not require the use of D064.
- Each Virgin Orbit flight plan uses OBT01 as the call sign. The communications plan to the Mission Control Centre is outside of the ACP scope. SATCOM is used for primary comms. ATC communication will occur via the aircraft VHF radio.
- Virgin will reach out to the UK SPOC.
- Range control has been addressed within the Safety Case.
- Radar coverage is currently being discussed with the IAA.
- Virgin Orbit is considering the provision of further time for the Decision Point. A primary date is reserved with 2 consecutive backup dates. The TDA will be activated for the 3 days and released once a launch takes place. This will allow flights to plan accordingly.
- A "Go" is always in effect for the launch until a "No Go" is warranted. Launch scrubs are communicated immediately via email, phone calls and (if close enough to the launch event) on the hot line with stakeholders.
- The TDA starts at the aircraft entering the racetrack which is denoted with the red dot in the image provided (clarification will be added to the ACP document). From that point to dropping the rocket is a total of 19 minutes allowing 11 minutes in reserve. The rocket TDA is activated at the same time but will run for an hour.

NATS

2 September 2021- Initial stakeholder meeting

- Feedback from Oceanic and airlines should be sought.
- Co-ordination between London, Shannon and SOTA will make co-ordination complete.
- Separation distances need to be understood.
- Traffic is heavy in SOTA area so timing will be important, and day of launch should be considered.
- Impact on Azores/Canary Islands should be considered.
- Discussed the different LoAs that may be required.
- Consider the economic impact on airlines that need to reroute.
- Example of LoA with FAA to be sent.

22 September 2022 -Summary of weekly Air Traffic Management and LoA meetings to date

- Launch and recovery areas should be subject to a guarantee that activities should be contained within that zone, which will in turn reduce the buffers required by ANSPs.
- Airspace closures will have additional time buffers to allow traffic to be cleared at the start of the launch.
- The size of the launch and recovery area will create restrictions on other special use area.
- It's unlikely that the AMC will approve a booking at the same time as other Danger Area activity.
- Spaceflight has no declared priority in the airspace management protocols.
- NATS assumes that aircraft are free to operate beneath the trajectory between the aircraft hazard areas and that the CAA has approved the safety assurance containing the hazard areas.
- Network Manager (Eurocontrol) require 90 days to set up EU restrictions. NATS would need final coordinates in advance of 90 days in order to do system adaptations and simulations of route viability.
- NATS believe that if practicable for Virgin Orbit, there is a benefit in establishing a launch area for regular launches. This will decrease the notification period and reduce ANSP workload.
- The sponsor may wish to discuss with other space operators the idea of a permanent airspace structure, which will increase responsiveness to launch proposals and share financial costs of establishing such an area.
- Without information on launch timings NATS cannot assess the likely impact of the airspace closures for a launch.
- NATS identified that the current location of launch point and hazard areas for the southern trajectory prevents the use of the TANGO routes in the Shanwick FIR (particularly T9 and T290) and that impact to those routes. In addition there is a 3 year training programme for the implementation of the French ACC's 4Flight system starting from 5 April 2022 that will provide significant impact on those routes, too.
- There will be changes to traffic flow for European Flight Information Regions.
- Aircraft operators will incur additional flight distance costs and significant additional delays.

	<ul style="list-style-type: none"> • NATS assumes that there are no specific requirements for transit of the carrier aircraft and that standard horizontal and vertical separation requirements apply • NATS requires a clearer timeline on the path to activation for the TDA. NATS requests clearer approval dates so that NERL can complete necessary work. <p>Sponsor's Responses:</p> <ul style="list-style-type: none"> • Final rocket engine tuning may require the downrange area to change slightly to the 5nm range. Areas will be guaranteed after. • Coordination with any affected Danger Area will be completed prior to setting a launch date. Virgin Orbit's launch date is yet to be decided but will be based on agreements and licenses to be completed. Once a date is finalized, deconfliction with the affected danger will take place. Virgin Orbit has also created routing to avoid danger areas such as D064. • Virgin Orbit agrees aircraft are free to move in between the launch area and stage 1/fairing drop area. • Virgin Orbit is currently working on an LoA with detailed launch procedures. These will be communicated to NATS L-112 days to meet NATS' requirements for earlier notification. • Virgin Orbit agrees that a regularized launch site would be beneficial. Once rockets are upgraded, a permanent airspace change in a lower impact area will be agreed. • Virgin Orbit will look at the most utilized orbital preferences to see if they align with other operators' interests. • Launch timing is usually derived from the payload provider. They have identified a mission to be set for 2300 UTC launch time. • Virgin Orbit is working with Eurocontrol to determine impact of airlines/airspace managers, we would welcome the same from NATS. • Virgin Orbit has reduced the launch windows, proposing flying through lower impact areas and decreased the size of hazard areas. • Virgin Orbit has further reduced the impact on T9 and T290 by moving the drop point ~100nm. • The Virgin Orbit launch is a one off event, with 1 primary date and 2 back-up dates. • Real time information could mean the airspace is required for 30 mins and released immediately after. • Virgin Orbit has provided a timeline as the payload elements have been identified and elements set. 	
	Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?	YES

	<p><i>(Prompt re LoAs / TOIs – see q12)</i> <i>(How has the original proposal changed (if that is the case) based on feedback received?)</i></p> <p>The sponsor has outlined and evidenced their responses to identified issues within the engagement timescales. LoAs are yet to be finalised. However, the content and required stakeholders for such an agreement have been articulated in the report (see section 9.3.3. of the report).</p> <p>Section 9.2 of the report (“Stakeholder Impact”) details what mitigations and the considerations the sponsor has had to acknowledge in order to make this ACP operational and safe. It is clear that significant collaboration, co-ordination and engagement were required between several national/international agencies (CAA, NATS, Eurocontrol, Spanish/Portuguese aviation authorities) in order for this to happen. The sponsor has identified three main areas of change whilst the ACP was being developed:-</p> <ol style="list-style-type: none"> 1. Changes in TDA time requirements- Significant CONOPs review, saw the launch window reduce from four to two hours. 2. Changes to the size and of aircraft and ship area hazards-Analysis by the sponsor’s flight safety team permitted the hazard areas to allow for smaller footprints; though the sponsor acknowledges they are still large. 3. Changes to launch window- Related to (1.), the launch time will occur at night for minimal impact on nominal airspace operations. <p>Although outside of the scope of engagement for an airspace TDA, the sponsor has contracted a marine consultancy (ABPmer) to determine impact on shipping and has included data as part of the navigational risk assessment.</p>	
8	Is the change sponsor’s response to the issues raised appropriate/adequate?	YES
	Section 9.3 of the report lays out key stakeholder feedback and responses. Responses are summarised here, under Section Six of this assessment. Responses answered the queries of stakeholders promptly. The sponsor replied to stakeholders and provided mitigations where possible (such as offering to accommodate the MoD’s requirements on communications planning). Some answers were ambiguous, mostly due to the unknown outcome of the safety case to the CAA. If issues fell outside of the scope of the ACP, the sponsor made this clear.	
9	Has the change sponsor set out how they will collate, monitor and report to the CAA on the level and content of the complaints?	PARTIALLY
	<p>Section 10 “Feedback and Contacts”) of the report detail how to contact the sponsor should they wish to make a complaint. The sponsor says it will monitor for duration of the ACP process, up to and including the launch of the rocket. Complaints will be collated by date and sender and sent to the CAA and a summary report submitted on a weekly basis.</p> <p>Para 303 of the CAP1616 process (Part 1a: Temporary changes to the notified airspace) states that complaints should be collated and</p>	

	monitored and reported to the CAA “once it has been implemented and throughout the period of operation”. The period of operation extends beyond the launch of the rocket; so complaints should cover the period beyond the launch of the rocket.	
10	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	PASS
	<p>Para 302 of the CAP1616 process states the importance of informing communities if traffic patterns are altered below 7000ft. This is aligned with the Secretary of State’s guidance to the CAA (2017 Air Navigation Guidance). Under section 3.1 of the report, the sponsor states that their aircraft will fly ‘as a typical 747’. They state that there is no impact to traffic patterns below 7000ft, once cruising. Upon TDA entry, the sponsor states although a surface to unlimited and surface to FL400 are requested; this portion of flight is over open ocean.</p> <p>Given the requirements for qualitative assessments under B83 the CAP1616 process, the sponsor has detailed their analysis of traffic patterns. No noise analysis has been conducted as there is no impact on land over 7,000ft.</p>	
11	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement (or consultation) requirements of the Temporary Airspace Change process?	YES
	<p>The Consultation and Engagement SME recommends that the proposal has met the engagement requirements of the Temporary Airspace process. The sponsor has:</p> <ul style="list-style-type: none"> • Selected stakeholders appropriately. • Clearly communicated the design and impact of the airspace constructs to stakeholders. • Maintained constructive, collaborative and iterative engagement throughout ACP development. • Demonstrated compromise and mitigation through engagement. • Explained clearly why there is no impact under 7,000ft for populations. 	
12	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.	YES
	<ul style="list-style-type: none"> • The LoA (mentioned in section 9.3.3 of the report) between the sponsor and certain airspace users (UK CAA, NATS, Eurocontrol, Enaire, Portugal ANAC, and IAA) are produced. Evidence can be provided that these documents are in draft. If the final decision is to approve the ACP, finalised and signed copies of these agreements will be required before the CAA approves activations of the TDAs. 	

- The change sponsor should inform the stakeholders of the decision (when published), likely impacts and changes to the initial design (included the decision to not use the northern trajectory) and what will happen next.
- The sponsor is required to collate, monitor and report to the CAA on stakeholder feedback received during the period of the TDA. The CAA would welcome confirmation on the level and contents of any stakeholder feedback received on a two-weekly basis throughout the duration of the TDA.)

Recommendation

- Submit outstanding engagement evidence with RVL Group.

Targeted Engagement (or Consultation) Assessment sign-off

	Name	Signature	Date
Assessment completed by Airspace Regulator (Engagement and Consultation)	[REDACTED]	[REDACTED]	19/10/2022