

November 2014

DISTINGUISHING BETWEEN GOVERNMENT  
PROGRAM & PARTISAN POLITICAL ADVERTISING:  
AN UPDATE TO OUR 1996 REPORT

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The Honourable Linda Reid  
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Dear Madame Speaker:

I have the honour to transmit to the Legislative Assembly of British Columbia this update to our 1996 report, *Public Communications: Distinguishing Between Government Program and Partisan Political Communications*.

In this report, we include a review of policy, instructions and legislation of partisan government communications across several jurisdictions with similar governance roots to British Columbia.

The report contains two recommendations which pertain to establishing policy for partisan political information in public government communications and ensuring oversight so any policy, guidance or legislation are followed through to an effective resolution.

I encourage government to review this updated study of partisan advertising practices and to create and adhere to formal guidance. Guidance will help protect civil servants who may be asked to perform duties that could be considered partisan.

Carol Bellringer, FCA  
Auditor General  
Victoria, British Columbia  
November 2014

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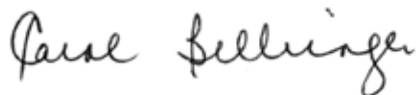
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**IT IS GENERALLY AGREED THAT GOVERNMENTS** should not use public money to fund advertising that promotes political interests. However, governments should inform the public about their programs, services, policies and any associated changes. The line between providing useful information and partisan government advertising can, however, be blurry. Our research for this report across numerous jurisdictions demonstrates that it is indeed a grey area. Clarity is needed to delineate what type of publicly funded advertising is acceptable and what is not.

Currently, there is no clear guidance in BC around government partisan advertising. Guidance would assist civil servants responsible for communicating public services and protect them if asked to perform duties that could be considered partisan.

This report is an update to my Office's 1996 report, [Public Communications: Distinguishing Between Government Program and Partisan Political Communications.](#) Eighteen years later, we make the same recommendation to government as in our original report, as well as one additional recommendation. I encourage government to review our updated study, and implement our recommendations to create and adhere to formal guidance.



Carol Bellringer, FCA  
Auditor General  
November 2014



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**MONEY SPENT ON GOVERNMENT ADVERTISING** is a topic of on-going debate. The debate continues in British Columbia because there are no clear guidelines regarding partisan communications, including advertising, in government.

This report is a follow-up to our 1996 report, *[Public Communications: Distinguishing Between Government Program and Partisan Political Communications](#)*. In this report, we include a review of policy, instructions and legislation of partisan government communications across several jurisdictions with similar governance roots to British Columbia.

It is a generally agreed upon principle that government should not use its position of influence or public funds and resources to support an electoral campaign. Government spends public money to inform taxpayers about its programs, but citizens should not pay for communications that are of a partisan political nature.

This report contains two recommendations. They pertain to establishing policy for partisan political information in public government communications and ensuring oversight so any policy, guidance or legislation are followed through to an effective resolution.

As in our 1996 review, we recommend that government:

- 1** establish a general policy that explicitly prohibits the use of partisan political information in public government communications, and provide specific guidelines which set out criteria as to information that should or should not be included in public government communications.

In addition, we also recommend that government:

- 2** ensure that the policy and guidance to be established is adhered to.

## BACKGROUND

During and after an election campaign, political parties and independent politicians typically comment on the merits of government priorities, direction, programs and services. Whether critical or appraising, such commentary, messaging, advertising or publicity is paid for by the respective political party. It cannot be paid for with public money. Sitting governments cannot use their position of influence or public funds and resources to support an electoral campaign.

In British Columbia (BC), no guidance or policy yet exists on the separation between informing the public of government programs and partisan advertising. Public servants are often responsible for producing government communications. They need to remain impartial, and deliver on what they are asked to produce. Without formal guidance or policy, it can be challenging for them to determine what public communication is appropriate, and when boundaries are crossed into partisan promotion.

Monies spent on government advertising and the source of those funds is an on-going debate. Therefore, our Office is following up on our 1996 report, [Public Communications: Distinguishing Between Government Program and Partisan Political Communications](#), with this review of policy and legislation regarding partisan communication in government.

The BC Government Communications and Public Engagement (GCPE) Office provides external communications services that cost over \$24 million in 2013/14 (\$36 million 2012/13). GCPE's role is to inform the public about government's programs and services through strategic communications planning and advice, media relations, online communications, and advertising. GCPE set standards that mandate the use of specific communication and public engagement services or practices. Ministries must follow these standards in the execution of all communication activities.

“It is a generally held view that governments spend public money to inform tax payers about government programs, but citizens should not pay for communications of a partisan political nature.”

*Public Communications: Distinguishing Between Government Program and Partisan Political Communications, Office of the Auditor General of BC, 1996*

The following examples illustrate recent government advertising campaigns.

**WorkBC:** This *advertisement* (see Exhibit 1) was a province-wide campaign to inform British Columbians of the new WorkBC website and promote the use of its labour market tools. WorkBC.ca provides information to support job seekers, students, career explorers, employers and service providers. The total budget for the campaign was \$1.2 million and it appeared in magazines (online and print), social media billboards, and on the radio.

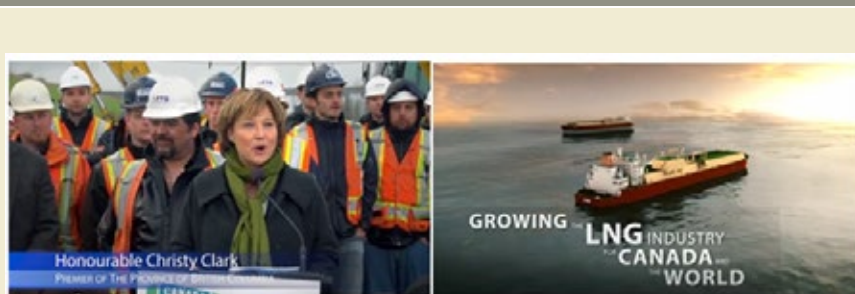
**Exhibit 1:** WorkBC.ca, a sample web based portal for government information and services.



Source: WorkBC, <http://www.workbc.ca/findyourfit>, July 21, 2014

**BC's LNG Industry:** This *advertisement* (see Exhibit 2) promotes the potential for the province to expand its role in becoming a liquid natural gas (LNG) exporter. It highlights several competitive factors, such as geography, tax rates, and fiscal stability. It also mentions several strategies that government is planning to support this growth, including workforce training, labour stability, streamlined regulations, and strategic partnerships.

**Exhibit 2:** A sample social media video related to the resource sector.



Source: Province of BC <http://www.youtube.com/watch?v=-2atUkXTFVo>, April 2, 2014



## SCOPE

Our 1996 review, *Public Communications: Distinguishing Between Government Program and Partisan Political Communications*, examined policy and legislation in other Canadian provinces at the federal level, and in Commonwealth jurisdictions including the United Kingdom, New Zealand and Australia. We took a similar approach with this work. This is not an audit, but a review of policy, instructions and legislation around partisan government communication across several jurisdictions with similar governance roots to British Columbia. We are not advocating that the Office of the Auditor General take on the role of reviewing government advertising for partisan messaging, as is done in several jurisdictions that we examined in this review.

## OVERALL OBSERVATIONS

### Overview of jurisdictions

We discovered a wide range of policies and procedures in the jurisdictions that we surveyed.

- ◆ In BC, there are no established guidelines and principles that distinguish between government program, partisan political advertising and communications for members of the public service. Overall, this is similar to what we found in 1996. Members of the Legislative Assembly (MLAs) are provided with some practical guidance by their internal guideline documents, which are limited to constituency funds and use of Legislative Assembly resources.
- ◆ Canada's national communications policy includes information on partisan communications in advertising, and forbids the use of public money for this purpose. Alberta has followed suit and adopted similar wording in its communication policies.
- ◆ We found that communications policies were not publicly available for many jurisdictions. Policies that were available were often limited to procurement rules for communications contracts. This is also similar to our 1996 findings.
- ◆ Ontario is the only province in Canada that has clear legislation around partisan advertising. The Auditor General of Ontario has to review all government advertising before it runs and declare whether it is partisan in nature, as per the *Government Advertising Act*. If it is deemed partisan, government is not allowed to run the advertising. Voluntary pre-reviews have also been completed, where the Auditor General reviews the planned content before the expenses of the advertising products are incurred. This allows the province to be proactive in managing its advertising costs, ensuring it will likely meet the standards before the final review, where the advertisements may potentially be rejected.
- ◆ The United Kingdom introduced a propriety guidance manual for civil servants that includes a section on paid advertising in 1985.
- ◆ New Zealand has had advertising guidelines in place since 1989.

- ◆ In Australia, national guidelines were adopted in 2006 and revised in 2008, and most Australian states modelled their policy and guidelines on the national example. Two states (New South Wales and the Australian Capital Territory) also have legislation prohibiting partisan communication in government advertising.

## Common principles

While the policies around government advertising vary widely between jurisdictions, most guidance is based on a set of principles written directly into policy, guidance, or legislation. Below are some examples of common themes found in these principles.

### *Clear language that puts partisan communications out of bounds*

Most policies or legislation clearly state that partisan messaging is not allowed in government advertising. For example, principle three of Australia's [\*Guidelines on Information and Advertising Campaigns by Australian Government Departments and Agencies\*](#) says "campaign materials should be objective and not directed at promoting party political interests." The U.K.'s Cabinet Office Proprietary Guidance has a "Paid Publicity Dos and Don'ts" section, which advises users to "stick to facts and avoid political bias." The guidance also states that information campaigns "should not be directed towards a political end or be of a political nature", "should not be partial", "should not promote (i.e., sell) a government policy", and "should not influence public opinion on a matter which is, in the United Kingdom, a matter of public controversy."

In Ontario's [\*Government Advertising Act\*](#), principles three to five state that advertising "must not include the name, voice or image of a member of the Executive Council or a member of the Assembly", "must not be partisan" and "must not be a primary objective of the item to foster a positive impression of the governing party or a negative impression of a person or entity who is critical of the government."

### *Explicit, principle-based language to define advertising goals*

While some principles state what the communication should not do, others point to what it should do: provide truthful, accurate and politically neutral information about government programs and services.

Principle one and two in Australia's guidelines are that "campaigns should be relevant to government responsibilities" and "campaign materials should be presented in an objective, fair and accessible manner and be designed to meet the objectives of the campaign." New Zealand's [\*Guidelines for Government Advertising\*](#) state that advertising should: "inform the public of proposed/new/revised/ or existing government policies; inform the public of government services available to them; advise the public of new/revised/existing entitlements or responsibilities; encourage the public to adopt certain kinds of social behaviour generally regarded as being in the public interest (e.g., road safety advertising)."

## *Defining government communications and explaining exceptions*

Most guidance that we examined defines what constitutes government advertising and communications, and explains what kinds of notices are not considered ads.

For example, Australia’s guidelines say that “an advertising campaign involves paid media placement and is designed to inform, educate, motivate or change behaviour. Large-scale recruitment advertising not related to specific job vacancies and with a degree of creative content may be considered an advertising campaign.”

The U.K.’s handbook defines paid publicity as “paid advertising in the press, on radio and on television; government-produced or sponsored software and video material; leaflet campaigns; material placed on the internet; and exhibitions, etc.”

## *Independent oversight*

Independent oversight for evaluating content and auditing expenditures was present in a few examples that we examined for both legislated and non-legislated government advertising policy.

In the Australian Capital Territory, the [\*Government Agencies \(Campaign Advertising\) Act 2009\*](#) states that the minister must appoint a reviewer for advertising that is not a public servant and that has expertise in media and advertising, legal, and/or government administration. The reviewer is appointed for a three-year term, and the appointment must be approved by the legislature by a two-thirds majority vote.

On the national level in Australia, oversight is the responsibility of an Independent Communications Committee, which must review any advertising campaign costing more than \$250,000. Australia’s Department of Finance and Regulation also releases a report on advertising expenditures twice a year.

In Ontario, all government advertising must be reviewed by the Office of the Auditor General, as per the [\*Government Advertising Act\*](#) introduced in 2004. If the Auditor General deems the advertisement to be partisan in nature, it is not allowed to run. The Office issues guidelines for government and conducts about 600 reviews a year. The Auditor General also accounts for all money spent on advertising by government and reports annually on government’s compliance with the Act and its advertising spending. Manitoba (2008) and British Columbia (2013) introduced private members’ bills similar to Ontario’s legislation, but those draft bills did not make it to second reading.

Similarly, New South Wales’ [\*Government Advertising Act\*](#) states that the Auditor General must audit the public advertising campaigns of at least one government agency each fiscal year. A cost benefit analysis must be conducted for campaigns likely to exceed \$1 million, and “the head of a Government agency must ensure that a peer review of a Government advertising campaign of the agency is carried out before the campaign commences if the cost of that campaign is likely to exceed \$50,000 or such other amount as may be prescribed by the regulations.” As explained in the NSW [\*Government Advertising Handbook\*](#), the review is done to assess “specific need and timing of the advertising”, “chosen creative and media options”, and “allocation of the budget, evaluation and risk management” and not necessarily partisan content.

## WHAT WE FOUND REGARDING COMMUNICATIONS POLICIES, GUIDELINES AND LEGISLATION

### British Columbia

The [\*Standards of Conduct\*](#) for provincial government employees contain guidance on appropriate political activity. Public service employees are allowed to be members of political parties, support candidates and seek election, but these activities “must be clearly separated from activities related to their employment.” The standards also state that even if employees engage in political activities, they “must remain impartial and retain the perception of impartiality in relation to their duties and responsibilities. Employees must not engage in political activities during working hours or use government facilities, equipment, or resources in support of these activities.”

These are guidelines for personal political activities, not duties that public service employees may be asked to perform as part of their jobs. The standards also state that “the honesty and integrity of the BC Public Service demands the impartiality of employees in the conduct of their duties.” However, the loyalty section of the standards states that employees “must act honestly and in good faith and place the interests of the employer ahead of their own private interests. The duty committed to in the Oath of Employment requires BC Public Service employees to serve the government of the day to the best of their ability.”

In April 2014, government introduced new [\*Standards of Conduct for Political Staff\*](#). These standards recognize their unique, partisan role, and affirm they should follow the same code of conduct as BC Public Service employees. It also provides clarity regarding how political staff should make requests and engage with BC Public Service employees, while respecting their need to remain impartial as part of their duties. The standards state that relations and communications between political staff and ministry staff should be done through the Deputy Minister’s Office.

These new standards also provide examples of appropriate and inappropriate conduct. Inappropriate conduct includes to “authorize the expenditure of public funds”, and “ask the ministry employee to do anything inconsistent with their obligations under the Standards of Conduct.” The implementation of these new [\*Standards of Conduct for Political Staff\*](#) should help avoid situations of using public funds for partisan advertising. However, BC still lacks formal guidance or policy that allows staff to determine what public communication is appropriate, and when boundaries are crossed into partisan promotion.

While there is no partisan advertising guidance available for BC public servants, there is some guidance for MLAs. [\*Members’ Guide to Policy and Resources\*](#), updated in July 2014, provides guidance related to managing constituency offices, allowances, services available to members and general information about MLA positions. In particular, the “Managing your Constituency Office” section discusses eligible and ineligible expenses and provides examples. Ineligible expenses include “politically partisan advertising or mailings” and “any costs related to partisan, political activities of the MLA, the party’s constituency association or the provincial political party.”

There is also guidance for office signage which should not display the name or logo of a political party, contain partisan political statements or use political party colours. The policy explicitly states that “members may not print or mail, at the expense of the Legislative Assembly, any material seeking financial support or containing any identification or information of a partisan, political nature.” Although this guidance does not formally define partisan communications, internal controls at the Legislative Assembly have been strengthened since 1996, and the Office of the Clerk and Financial Services staff provide policy guidance on specific expenditures, as required.

## Other Canadian jurisdictions

The Government of Canada’s communications policy states: “Institutions must not use public funds to purchase advertising in support of a political party.”

Alberta is the only province with a publicly available communications policy that addresses partisan communications. The policy states: “As outlined in the government’s Code of Conduct, partisan political matters are the exclusive domain of Ministers and their offices. Ministries focus their communication activities on issues and matters pertaining to the priorities, policies, programs and services administered by government.”

Other provinces have documents similar to British Columbia’s that address policy, protocols and procedures around government communications, but do not contain specific policy and guidance about partisan advertising such as Alberta.

As mentioned earlier, all government advertising in Ontario must be reviewed by the Office of the Auditor General. If the Auditor General deems any advertisements to be partisan in nature, they are not allowed to run. The Office also accounts for all money spent on advertising by government and reports annually on its advertising reviews. Private members’ bills have been introduced in Manitoba and British Columbia similar to Ontario’s legislation (Manitoba in 2008, and British Columbia in 2013), but they did not make it to second reading.

## Commonwealth jurisdictions

### *United Kingdom*

Our 1996 review noted several conventions for government advertising and publicity in the United Kingdom, including guidance for both paid and unpaid advertising. Since that time, the U.K. established the [2003 Communications Act](#) which addresses political advertising, and includes a propriety guidance manual for civil servants with a section on paid advertising. The manual states: “All paid publicity work must be objective, factual, appropriate and intended to communicate government policies. It should not be, or appear to be, used for party political purposes. This applies to all aspects of the work, including content, context, treatment, style, tone and quality of presentation.”

### Australia

In 2006, Australia adopted national guidelines, following a period where government used advertising for blatantly political purposes. These guidelines were further revised in 2008 to be made more robust. The national [Guidelines on Information and Advertising Campaigns](#) state: “Government campaigns must not be conducted for party political purposes.” They also outline specific subject matter and principles deemed appropriate for an advertising campaign. Principle three is “campaign materials should be objective and not directed at promoting party political interest.” Most states have also developed policy and guidelines similar to the national ones. New South Wales ([Government Advertising Act](#)) and the Australian Capital Territory ([Government Agencies Campaign Advertising Act](#)) have legislation that addresses the issue of partisan advertising.

On the national level, Australia has an Independent Communications Committee (ICC) that reviews all government advertising over \$250,000 to ensure it complies with the guidelines. Agency Chief Executives must receive and consider the ICC’s report on compliance before they can certify that a campaign complies with the guidelines. The Australian national government also reports bi-annually on its advertising expenditure.

### New Zealand

New Zealand has had advertising guidelines since 1989 that state government advertising should be impartial. Its cabinet manual states: “The [Guidelines for Government Advertising](#) assists Ministers and government departments in preparing advertising and publicity, and in the expenditure of public funds for this purpose. The State Services Commission is available to provide advice to departments on the guidelines, particularly if conduct and integrity issues arise. The Office of the Controller and Auditor General is also available to provide advice, particularly as to probity and financial management.” New Zealand’s Office of the Auditor General issued in 2005, [Government and parliamentary publicity and advertising](#), wherein it recommended strengthening the current procedures and adopting a principle-based framework.

## CONCLUDING COMMENTS

While the [BC Public Service Standards of Conduct](#) requires government employees to remain impartial, they also emphasize that employees must be loyal to the government of the day. This could place civil servants in an awkward position if their employers ask them to perform a duty that is partisan in nature as part of their jobs. However, with the recent implementation of the [Standards of Conduct for Political Staff](#), there is now an explicit expectation for political staff members to conduct themselves in a way to avoid potential conflicts in duties, and to funnel their communications through the Deputy Minister’s Office, where practical.

This also highlights the importance of establishing a frame of reference for appropriate government advertising. Having clear guidance, policy, or legislation would support public servants in balancing their need to be impartial with the duties of their jobs, and give them a clear boundary to point to if they are ever put in a position of potential conflict.

There are a wide variety of policies and legislation across the Commonwealth that could provide a basis for developing policy or legislation on partisan government advertising in BC. There are also several oversight models used in other Commonwealth jurisdictions for consideration.

## The impact of government advertising policy and legislation

Evidence suggests that implementing policy or legislation can make an impact. New South Wales provides an example of the difference both policy and legislation can make when it comes to government advertising.

### Timeline: Evolution of New South Wales Government Advertising Legislation and Guidelines

- 1995** The New South Wales Auditor General (AG) concludes that guidance to agencies is insufficient to prevent the misuse of public funds for party political purposes.
- 2007** The AG revisits the issue and finds government’s guidelines are still insufficient.
- 2008** The NSW Government published revised *Government Advertising Guidelines (the Guidelines)* in August.
- 2008/09** The Australia National Audit Office’s Campaign Advertising Review finds the NSW guidelines useful; however, they could be further refined or supplemented by additional guidance.
- 2009** The NSW AG reports the guidelines are “a positive step towards reducing the risk that publicly funded advertising could be used inappropriately.”
- 2011** The NSW government passes the *Government Advertising Act*, and revises its Government Advertising Regulations, the *NSW Government Advertising Guidelines*, and the *NSW Government Advertising Handbook*. Section 6 of the new Act prohibits political advertising. The Act also requires the Auditor General to conduct an annual performance audit of advertising campaigns.
- 2013** The NSW AG performance audit examines two campaigns: the Cancer Institute NSW’s “Break the Chain” campaign and Rail Corporation NSW’s “Fixing the Trains” recruitment campaign. The audit found that both organizations carried out their campaigns effectively, economically and efficiently, and government spending on advertising for 2012/13 was the lowest in 14 years.

## Legislation, policy, or guidelines?

Are guidelines and policies as effective as legislation? Some critics have expressed concerns that the Canadian government’s advertising is partisan despite the existence of policy. A recent example is the Economic Action Plan campaign, which critics said is partisan advertising and contravenes the government’s “common look and feel” policy regarding its websites.

As an article by Australia’s Centre for Policy Development points out, “the problem is that there will always be a temptation for incumbent governments to turn explanations of their policy decisions into good news broadcasts. Until they are made into law, advertising guidelines will always remain vulnerable to reinterpretation or revision; following a change of Government, they could be ignored altogether.”

Also, as stated in a 2009 report by the New South Wales Office of the Auditor General (which was published before the *Government Advertising Act* came into effect in 2011), “government guidelines set out standards of performance and processes to be followed. Guidelines are generally not binding and therefore would not appear to attract penalties for breaches, unlike many laws and regulations.” In Australia, there are still concerns raised about whether ads are partisan, even after the robust federal guidelines were put in place.

## RECOMMENDATIONS

As in our 1996 review, we recommend that government:

1. establish a general policy that explicitly prohibits the use of partisan political information in public government communications, and provide specific guidelines which set out criteria as to information that should or should not be included in public government communications.

In addition, we also recommend that government:

2. ensure that the policy and guidance to be established is adhered to.



## CANADA

Federal policy: [Communications Policy of the Government of Canada, Section 23: Advertising](#)

Alberta policy: [Government of Alberta Communications Policy](#)

Ontario legislation: [The Government Advertising Act, 2004](#)

Ontario guidelines: [Government Advertising Act Guidelines](#)

## UNITED KINGDOM

Federal legislation: [Communications Act 2003](#)

Federal guidelines: [Propriety Guidance](#)

## AUSTRALIA

Federal guidelines: [Guidelines on Information and Advertising Campaigns by Australian Government Departments and Agencies \(March 2010\)](#)

New South Wales legislation: [New South Wales Government Advertising Act 2011](#)

New South Wales guidelines: [NSW Government Advertising Handbook](#)

Australian Capital Territory legislation: [Government Agencies \(Campaign Advertising\) Act 2009](#)

Victoria guidelines: [Advertising and Communications Guidelines](#)

Tasmania policy: [Tasmanian Government Communications Policy](#)

South Australia policy: [Advertising Policy and Guidelines](#)

Queensland guidelines: [Queensland Government Advertising Code of Conduct](#)

Western Australia guidelines: [Guidelines for Government of Western Australia Advertising and Communications](#)

## NEW ZEALAND

Federal guidelines: [Guidelines for Government Advertising](#)



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