

FARNBOROUGH AERODROME CONSULTATIVE COMMITTEE

DRAFT

MINUTES OF MEETING HELD ON 29th October 2020 Held Online with MS Teams.

In Attendance:

Philip	Riley	Chairman
Whittacre	Hope	Secretary
Chris	Axam	Hart District Council
Brian	Edmunds	Farnham Town Council
Virginia	Barratt	Farnborough College of Technology
Ian	Dickson	NATS
Paul	Follows	Waverley Borough Council
Ben	Gleeson	Farnborough International
Simon	Geere	Farnborough Airport Ltd
Christina	Harris	Church Crookham Parish Council
Norman	Lambert	Crandall Parish Council
Geoff	Marks	FARA
James	Radley	Hart District Council
Jenny	Radley	Fleet & Church Crookham Society
Gareth	Saunders	Church Crookham Parish Council
Maurice	Sheehan	Rushmoor Borough Council
Ross	McNally	Hampshire Chamber of Commerce
Paul	Taylor	Rushmoor Borough Council
Miles	Thomas	Farnborough Airport Ltd
John	Tonks	Ash Parish Council
Roger	Walker	Farnborough Airport Ltd
Wally	Epton	WJE Associates

Introduction

The Chairman welcomed the Committee to the first online meeting of the FACC and made the following comments.

I am anticipating some comments about the way this meeting is being run. We have never held a meeting using MS Teams before, so we want to make sure that it works for everyone on the Committee.

In recent months we have all experienced difficulties with on-line meetings – Zoom etc. so please bear with us. At least one member does not have internet access!

Depending on how the meeting works, we will look at giving direct access to the public next time and giving them the opportunity to participate and ask questions.

Subject to the approval of those here today, the FACC plan to upload these meetings to the website in due course so Members and Public alike who cannot join us today have access to the proceedings and discussions.

The FACC received some lengthy questions regarding carbon emission. These will not be answered today. FAL is planning to issue a general statement in this regard. Any questions relating to this topic in the future will be referred to the document. The Chairman, Secretary, FAL and FACC will endeavour to provide answers to all questions submitted.

We have no intension of excluding questions genuinely relating to the operation of the airport at this or any meeting. For this meeting, we received a number of questions for which responses were obtained, only for the questions to be subsequently withdrawn. We also received questions which fall outside the remit of the FACC.

The FACC would like to thank Farnborough Airport for its assistance over the past three weeks in setting-up the video conferencing, educating the Chairman and the Secretary and running a number of rehearsals.

The Chairman proceeded to read out a list of instructions for the participants.

The Secretary then reminded all attendees that recording of the meeting was about to start. If members did not want to be filmed for the recording to be uploaded to the FACC website, they should make this known now.

Item 1 Apologies Received:

Josephine Hawkins	Surrey Heath Borough Council
Christina Main	Mytchett Deepcut & Frimley Green
Charlotte Morley	Surrey County Council

Item 2. Minutes of Meeting held on 27th February 2020 and Matters Arising

Three small corrections were requested; the Minutes were approved as amended.

Actions from last Meeting:

- The Secretary to liaise with the Chairman and Geoff Marks - FARA to establish Committee support for sending a letter to the CAA.
- The Secretary to liaise with RBC to establish the availability of the Farnborough Airport Community Environment Fund Report to the Committee
- GM took responsibility and an action to draft a letter to go to the CAA and circulate it through the Secretary to the Committee.

All actions were completed; a summary is attached.

Matters arising:

- Jenny Radley - Fleet & Church Crookham Society, asked if the Farnborough Airport Community Environmental Fund Report could be provided to and discussed by the Committee as an annual item by the Committee. The Secretary pointed out this is in the public domain and available on the RBC website.
- Jenny Radley thanked RBC for the additional details about the successful applicants in 2019, and the Secretary of circulating these.

- James Radley – Hart District Council, felt it fell within the remit of the FACC to scrutinise the report as it is an important factor when assessing the environmental impact of the airport.
- Paul Taylor – Rushmoor BC, agreed that he would ask that the regular report, already posted on the RBC website be sent to the FACC for entry on their website. Cllr Taylor made clear, however, that the allocation of the grant monies remains firmly in the gift of Rushmoor within the terms and scope of the original agreement.
- James Radley accepted this.
- The Chairman added it was not the role of the FACC to dictate policy or procedure to RBC but agreed it would be appropriate to review and understand the Report.

Action: The Secretary will ask, if, once published, RBC would present the Report of the Farnborough Airport Community Environmental Fund to the FACC every year.

Matters arising:

- Geoff Marks - FARA, informed the Committee that in its response to our letter, the CAA noted that the FACC had raised an important issue which would be of interest to others. Consequently, an explanation of its policy would be posted on its website.
- Under the heading “Transitioning to the new airspace change process” this was duly set out in a website posting dated 29 August. This confirms that all future Post Implementation Reviews (PIRs) will be conducted in accordance with the CAP 1616 process requirements, but ‘actual’ environmental impacts will be assessed using the metrics that had been used earlier in the process to predict the benefits of the change.

Item 3. Welcome & Introduction – Simon Geere.

Simon said it was a great pleasure to have been appointed CEO of Farnborough Airport on 1 July and looked forward to working constructively with the Committee going forward.

Simon gave a short summary of his background:

- Before joining FAL, Simon was 18 years at Macquarie, the shareholder of FAL since the sale last September.
- He is familiar with the company as he had been involved in the acquisition process for Macquarie alongside John Bruen (previously introduced to the FACC) and was responsible for the operational and investment performance of FAL from a shareholder perspective
- By way of a reminder, Macquarie is a global financial services group and a leading investor in infrastructure companies across the world
- During his time at Macquarie Simon had the privilege of sitting on a number of European airport boards including Bristol, Birmingham, Newcastle, Copenhagen and Brussels Airports.
- Simon continues to represent Macquarie on the boards of Aberdeen, Glasgow and Southampton Airports where Macquarie is a joint controlling shareholder of the AGS Airports Group
- Prior to Macquarie Simon was at Luton Airport as the Business Development Director which included responsibility for the business aviation activities at the airport and also attending the LACC
- Before Luton Simon was at BAA plc based at Gatwick and then more latterly at Heathrow where he undertook a number of planning and property development roles
- Simon has a BSc Honours degree in Transport Studies from Plymouth University

Simon said that he hoped he could draw on his career experience to-date to assist his new role at FAL.

Item 4. Farnborough Airport Operational Update – Simon Geere.

Since the last FACC last there have been some significant developments at the airport, namely:

- Controlled airspace went 'live'
- Gulfstream MRO became fully operational
- Leadership team changes
- Operating performance/Covid-19

SG will ask Les Freer to talk about controlled airspace and the opening of Gulfstream. However, he did want to mention the changes made in the leadership team at the airport and talk about operating performance and the impact of Covid-19.

Leadership Changes:

The FACC will be aware that Roger Walker is due to retire at the end of this year and as such this will be his last FACC. Roger's successor Les Freer joined the airport on 1st Sept as Airport Operations Director and will introduce himself shortly. Other changes include:

- Rob Marsden joined on 1st May as Chief Financial Officer having come from Centrica PLC.
- Dominic Osborne joined on 1st July as FBO Director, a new role combining terminal and handling activities. Dominic was previously the General Manager for the Aviator and Swan.

On 1st July there were two internal promotions to the executive team:

- Miles Thomas to Head of Sustainability & Planning
- Stefania Vignano to Head of Safety & Compliance

SG emphasised the importance of these two areas in the business going forward.

Organisational Briefings:

At the end of September and beginning of October SG gave two CEO briefings in a socially distanced event staged in one of the hangars.

- It was exactly 1 year after the acquisition by Macquarie
- The entire workforce was invited; SG reflected on the year's trading performance and the future opportunity
- A newly commissioned video about the company was shown (this can be viewed on the FAL website)

Operational Update:

SG gave an operational update where the airport had clearly been impacted quite materially by Covid-19:

- ATMs in April fell by 87% as full UK lockdown took effect
- Activity gradually recovered however April, May and June were significantly down year-on-year
- The Aviator Hotel and Swan pub which also form part of the company have been quite severely impacted and continue to be so

- Recovery in July and August was quite encouraging however this was mainly focussed in the European markets
- Longer-haul including US and Middle East markets have been impacted more than other connections
- Year-to-date September ATMS were down approximately 40% compared to 2019
- October is trading softer and uncertainty surrounds performance for the rest of the year

SG highlighted that despite the impact of Covid-19 on the aviation industry and the job losses announced across the sector, FAL has remained relatively resilient.

- FAL use of furlough arrangements for a small number of volunteer staff up until early August when everybody was brought back to work
- FAL did not take up its full entitlement to various other grants that were available especially in the hospitality sector
- Throughout the period FAL has not made any redundancies due to Covid-19 and is hopeful it can continue to maintain this position subject to limited further deterioration in the markets
- Conversely during the period, FAL has increased its employee base especially in the areas of safety and compliance

Covid-19 Specific Measures:

All government guidelines were followed. For the Committee's information, the following measures were implemented to maintain operational integrity during the period:

- Information and updates across the airport
- Social distancing of 2 metres where possible
- Where social distancing was not possible masks were mandated
- Hand sanitisers introduced throughout the airport complex
- Masks eventually became a mandatory requirement throughout the terminal
- Home working supported where practical

SG mentioned that it was through the dedication of FAL's employees that the airport was able to remain open and ensure the integrity of operations.

Item 5. Farnborough Airport Reports – Miles Thomas

The Reports provided to the Members 'were taken as read'.

MT commented there was no change in the format of the Reports. He pointed out the dominance of complaints from one source in Hindhead, representing 88% of all complaints received during this reporting period.

Jenny Radley – Congratulated Miles Thomas on his promotion.

JM asked MT to provide a key to the various responses to the complaints list. She pointed out that it is difficult to tell the difference between a number of the responses. If it was not clear to her, she suggested that other people might not understand either.

JR pointed out, that the level of flight movements has decreased but complaints have increased. It is still difficult to understand from the Reports where the complaints originate. To respond appropriately, it is important to identify location. JR requested clarity on the *Explanation* column on the Complaints Report.

MT agreed to try to provide a clear key to this complaints report in future.

MT also agreed that he would provide a 'brief explanation' about the various sections of the pie chart, to indicate the measures taken to dispose of waste and recycling materials from the airport. I for one had forgotten what some of the categories were about, and it was not clear to me what we were being told by this chart.

MT confirmed that a review of *Explanation* terms would take place and additional information on the subject would be provided for the next meeting.

Geoff Marks asked about the ten pages of complaints from Hindhead.

MT advised that one individual was raising the complaints from Hindehead, representing 88% of all complaints reported at the meeting. In compliance with Complaints Charter, the individual has been invited to the Airport to discuss the issues. While the offer has been accepted, it is agreed that a meeting could only be conducted once COVID related restrictions have been lifted.

MT stated that this level of complaint presents difficulty in terms of the time resources required to investigate and respond in depth to every question raised.

GM asked if Hindhead was newly overflowed?

MT confirmed the ACP routes concentrate arrivals from the south with the routing, passing over the Hindehead area, at the highest possible altitude. Generally, with the dramatic reduction of commercial aircraft in the sky, FAL traffic may also appear more prominent.

JR asked if the pie-chart on waste could provide more detail on waste management processes.

Action: MT took an action to provide a key to explain the various responses to the Complaints List and review the chart detailing waste management processes for the next meeting.

Item 6. **Airspace Change Process – Les Freer.**

Introduction

Before talking about the ACP/PIR, LF provided a short bio by way of introduction:

- His last 8 years have been spent working at London Heathrow (LHR). Namely:
 - 2 years as MD HEX (Air Rail service from PADD – LHR), plus navigating the complexities of managing and operating a business which needed to evolve in light of the 2 major rail infrastructure programmes coming, HS2 & Crossrail.
 - 6 years in airfield operations, safety, compliance, assurance and ground handling AFRS
- Prior to this various Operations Director roles in air, sea freight, road and rail
- And 9 years HM Royal Marines.

Gulfstream

In July a key milestone for one of the largest inward investment projects in Hampshire for several years was achieved with the opening of the Gulfstream site on the airport.

This investment by Gulfstream was actively supported by Hampshire County Council and Rushmoor Borough Council working in conjunction with the team here at Farnborough. This investment will further cement the airports position as an important contributor to the local economy and a business aviation gateway to London and the South East.

The new service centre is a 225,000-sq-ft/20,903-sq-m facility that can accommodate up to 13 ultra-long-range Gulfstream aircraft. The site is able to provide maintenance, repair, and overhaul services, as well as interior refurbishments and aftermarket modifications. The Farnborough facility has been designed with the environment in mind, including rainwater harvesting, hangar radiant heating, intelligent lighting controls, and heat recovery systems. It is a welcome and positive development for the airport and the borough.

Airspace Change Process (ACP)/ Post Implementation Review (PIR)

FAL puts safety at the heart of everything it does, is committed to operating in accordance with our regulatory obligations and for managing our impact on the surrounding community and wider environment.

For residents who may not be as familiar with the background to the ACP and PIR, the key headlines are:

1. Permission to operate 50,000 movements was granted in March 2011 following the release of the 2009 Master Plan.
2. Following approval; in line with any proposed changes to airspace which could affect the flight paths of aircraft flying at low and intermediate altitudes the airport had an obligation to consult with stakeholders which would include members of the public in areas which may be affected. For information, the CAA regulates all airspace in the UK and is required to consider a framework of legislation, standards and government guidance which then sets out the CAA's obligations and the factors that it must take into account in assessing the merits of the airspace change proposal.
3. The subsequent FAL ACP launched in 2012 and following the initial design process, was publicly consulted on between February and May 2014.
4. The ACP was designed to address a public call for certainty in flight routings of aircraft arriving and departing from FAL and sought to, where possible, concentrate flights paths over less populated areas. Where concentrated, it would seek to retain the highest possible aircraft altitudes when positioning for final approach and achieve a greater altitude during initial climb, thus reducing the number of people significantly effected by aircraft noise.
5. The ACP is regulated by the CAA and FAL has complied with all of the mandatory steps throughout the process, and the ACP was implemented on the 27th Feb 2020.
6. The final stage, PIR, was to look to review the success of the ACP against its original aims.

Whilst it had been expected that commencement of the Stage 7 PIR of the Farnborough Airport airspace change would be in the latter part of 2020, the significant impact of the COVID-19 related crisis has reduced the activity levels of Commercial Air Transport and General Aviation.

It has therefore been agreed by the CAA, sponsor and the GA stakeholders that the start of the FAL airspace change PIR period will be put back to 2021. As a consequence, the group will meet again in January 2021 to determine the confirmed start date of the PIR, the scope of the required analysis and corresponding data requirements in order to determine the overall impact on all airspace users.

Jenny Radley pointed out that FAL had agreed to hold Community Engagement Events for ACP. Would LF confirm he will meet this commitment?

LF confirmed this was very much his intention.

Geoff Marks light-heartedly apologised for giving Roger Walker a hard time over the years when he represented TAG and now Farnborough Airport Ltd.

GM said he would appreciate time with LF in January to understand the metrics of PIR.

LF said he would be happy to engage with GM in 2021.

Item 7. FACC Constitution & Membership Review – The Chairman.

The Chairman told the Committee that Woking Borough Council had requested a seat on the Committee. The effect of ACP was to route more flights over Woking to approach Runway 06. So, he felt the request was legitimate.

The Chairman indicated that he felt the Committee was well balanced with 8 Members from the Operator Community, 8 from the Council Community and 8 from Local associations. He does not want to upset this balance so suggested that one of the two councils who had two members could be persuaded to return one of their seats and asked the Committee for their views.

James Radley said he did not think the Committee was too big and did not agree someone should leave. He went on to say the operations had expanded at FAL so should the Committee not expand?

Brian Edmunds – Farnham Town Council, Committee membership should be defined by noise footprints and Geoff Marks suggested this should be defined by the 51dbL contour footprint.

Action: The Chairman took an action to draft and circulate a note on the subject of the FACC Committee Membership.

Item 8 - Members Questions, Questions from Members of the Public.

The Chairman mentioned he and the Secretary had received a number of aggressive emails arguing that not allowing the public to attend the meeting was unconstitutional. He pointed out the Constitution did not contemplate the exceptional circumstances the world now faces and was drafted before the business applications of the internet we now benefit from. Indeed, the Constitution does not prescribe the use of online conferencing.

The Chairman felt the Constitution is broadly fit for purpose but could see good reason to ask the Committee for their comments and suggestions as to how it could be updated.

Action: The Secretary took an action to ask the FACC Committee for comments regarding the FACC Constitution which will be reviewed and put forward for consideration.

Question from Cllr Brian Edmonds - Farnham Town Council:

With so much reduced traffic do we know why it is necessary to fly low directly over Farnham?

Answered by Ian Dickson – NATS.

Farnborough IFR aircraft operating in the Wrecclesham/Rowledge area will generally be inbound descending to 5,000ft on the STAR to shortly receive vectors for the ILS Runway24.

Recently we have more Runway 06 operations, which mean the aircraft are taken off the STAR for vectors earlier and descend earlier (this may be down to 3,000ft).

During weekend gliding activity at RAF Odiham, limitations on airspace availability causes Farnborough inbound flights to utilise ILS procedures (which stops the gliding) or a visual approach. This visual approach may see aircraft position in closer to the field and at a lower altitude than would be experienced during weekday operations (with no gliding to affect). There is also scope for General Aviation aircraft that overfly Farnborough Controlled Airspace to utilise Farnham Castle as a visual reporting point (this is notified in the AIP) and also a visual hold if needed to wait for a gap in the traffic to facilitate the airspace crossing.

More generally aircraft may be removed from the SID/STAR route for reasons of safety (unknown traffic in conflict or weather avoiding) or when deemed necessary for tactical air traffic management reasons. Both Farnborough and London Terminal Control endeavour to keep aircraft on the pre-defined routes for as much of the time as is possible, with each occurrence resulting in an investigation to understand the reasons why.

Brian Edmunds asked why when taking off do aircraft fly so low over the countryside?

Ian Dickson responded, departures are pre-assigned, if the airspace above is busy aircraft will not be able to climb until the correct levels of separation can be achieved.

The Chairman suggested Brian Edmunds visit the Operations Team at FAL.

Question from Keith Oborn.

You will recall from the minutes of the February meeting that I asked the following (shortened):

“--Each journey to or from Farnborough results, on average, in the emission of 3 tonnes of CO2 per passenger — How is this waste of resources and pollution justified by all concerned--?”

Note that this was, by definition, a question for the entire Committee.

Mr. O'Reilly answered for Farnborough Airport Ltd that this was "A matter for the aircraft owners"

Due to a public disturbance no time was allowed for a response from the committee as a whole or as individuals.

I have a further question:

"The most recent accounts filed by Farnborough Airport Ltd show revenue of £30m from the sale of aviation fuel. This is 40% of the total revenue of £74m."

At the typical current price for Jet A1, that equates to emissions of over 11000 tonnes of CO2 per annum from which the Airport directly profits by sale of the fuel.

Without the sale of fuel, no aircraft would use the airport. Even if the sale of fuel was by an independent company, the Airport would still benefit from rent or lease income from the operator as well as the other fees related to aircraft movement and storage.

How can the Airport and the Committee explain the fact that the Airport directly profits from the sale of fuel that results in these emissions, and that because this sale is fundamental to the Airport's entire business model the Airport cannot claim that this is "not their problem"?

It must be remembered that these emissions benefit a vanishingly small number of people: in the region of 50,000 departing passenger per annum.

In other transport industries all players accept their responsibility for damaging emissions: car manufacturers submit to pressure and legislation to reduce emissions, drivers respond to better fuel economy, roads are designed with fuel efficiency as a metric, and oil companies acknowledge their responsibility for emissions.

Aviation has long benefitted from supremely generous tax benefits in respect of fuel costs, and as a result is culturally out of step with general trends?

Answered by Simon Geere - FAL

SG stated that FAL recognised the important role that the aviation sector had in the global response to climate change. For the avoidance of doubt, the Committee was reminded that over the years the airport had focussed on reducing its own carbon emissions where it had direct control. This had led to a reduction in emissions by over 70% since 2008 and subsequently FAL became the first business aviation airport to achieve carbon neutrality in 2018.

SG however re-emphasised his predecessor's comments, that when it came to carbon emissions from aircraft, it was a matter for the aircraft owners, as it was they that had the direct control over fuel uptake and use. That said, SG believed it was without question that the broader aviation industry had a role to play, especially when it came to the availability and use of alternative fuel technologies. For example, airports could accelerate progress through the financing and provision of infrastructure to support technological change. SG commented that FAL was actively working with fuel suppliers to hasten the availability of Sustainable Aviation Fuel (SAF).

Going forward, it was FAL's view that aircraft refuelling in whatever form it takes, would continue to be an operational requirement for every airport. As such, revenues associated with its provision and supply would continue to exist. SG stated that at Farnborough Airport, revenue was generated from a number sources and that there was no fixed revenue model or dependency on any one activity.

In respect to the numbers stated in the company's annual accounts which refer to the airport's fuelling activities, SG informed the Committee that these related to 'turnover' from fuel sales, which was inclusive of the wholesale cost of fuel and should not be interpreted as either revenue or profit.

With reference to taxes on aviation fuel costs, SG stated that this was a matter for UK and foreign governments.

Item 9. Matters Raised by the Committee not on the Agenda

James Radley said he was unhappy that the public had been excluded from the Meeting and it is the responsibility of the FACC to answer their questions.

The chairman reiterated his own desire that the FACC meetings remain open to the public, this has always been the case and will be so again, at the next meeting in 2021.

As previously mentioned, it was felt prudent to limit the attendance of the first online meeting to avoid technical issues and the procedures descending into chaos.

Referring to a question received after the deadline, relating to emissions and sustainability, the Chairman advised the Committee that FAL will publish its own policy which will be available in Spring 2021.

Jenny Radley suggested for the next meeting the FACC could consider using the FI Exhibition Centre.

Ben Gleeson – Farnborough International, said he would look into this.

Wally Epton - WJE Associates, proposed a vote of thanks to Roger Walker, his proposal was seconded by Geoff Marks and supported by the whole committee

The Meeting was closed.

Item 10 Date of Committee Meetings in 2021

Thursday 18th February, Thursday 17th June and Thursday 21st October.

Date of the next Meeting: Thursday 18th February 2021.

ACTIONS FROM MEETING HELD ON 27th February 2020

1. Action: The Secretary to liaise with the Chairman and Geoff Marks.

GM took an action to summarise and circulate his thoughts on the CAA PIR Methodology. Once this was achieved, the Secretary would organise a vote of Members on whether a letter detailing these concerns should be sent to the CAA. A summary was circulated, the Members voted as follows.

	Voted	Send Letter	Don't Send Letter
Totals	22 of 24 Members Responded	14	8

2. Action: The Secretary will liaise with RBC to establish the availability of the Report to the Committee.

The Secretary contacted RBC.

The current report covers the period January – December 2019. RBC confirmed this could be circulated to the Committee and posted on the FACC website. RBC went on to explain, there are lists of grants awarded on the RBC website by financial year, these are updated regularly: <https://www.rushmoor.gov.uk/airportfund>

3. Action: Geoff Marks took responsibility and an action to draft a letter to go to the CAA and circulate it through the Secretary to the Committee.

GM drafted a letter, it was sent to the CAA on 19 May, a response was received on 2 June and circulated to Members.

Geoff Marks reaction to the CAA's response.

In his response to the FACC's letter Mr Lindsey refers to the Secretary of State's agreement to the projected benefits of the Farnborough airspace change being confirmed through a PIR using the noise metrics applied in the CAP 725 process, rather than those invoked in the updated process CAP 1616. He confirms the Farnborough airspace change decision was based on noise above the 54dBA Leq 16h contour, not the 51 dba Led contours, and therefore it must be applied as the PIR is a comparison exercise.

The Section 106 agreement currently requires the modelling of 55, 60 and 65 dBA lea contours every six months in order to confirm limiting contours have not been breached. The Aviation National Policy Statement (NPS) recommends that such noise contours are reviewed on a regular basis, and the Air Navigation Order (ANO) 2017 calls for the modelling of the 51 dBA led contour.

As the PIR requires the modelling of the 54dBA contour, the FACC may consider it would be sensible to support the PIR, meet the NPS recommendation, and also comply with the ANO 2017 by replacing the current Section 106 contours with 51, 54, and 59 dBA Leq16h contours.

GM June 2020.

A response to the above, from Farnborough Airport Ltd (FAL).

FAL regard the response from the CAA as a clear explanation of their understanding and position on PIR methodology and now consider this matter closed.

The FAL position on further action in the regard is, if any member of the Committee wishes to continue this line of discussion it is clearly open to do so. The submission of further correspondence, using the name of the FACC, must first be presented to, and fully discussed at a meeting and approved/voted upon, if necessary.

If any member of the Committee wishes to raise questions arising from the position taken by FAL in this matter they are, of course, free to do so in line with established procedures and with the provisions of the FACC Constitution.

FAL June 2020.