

Media Bill - Overarching IA

Lead department	Department for Culture, Media & Sport
Summary of proposal	The Department is seeking to introduce a range of measures, through the Media Bill, to ensure that the British television and radio broadcasting landscape reflects current challenges and is better prepared for future ones.
Submission type	Impact assessment (IA)
Legislation type	Primary legislation
Implementation date	TBC
Policy stage	Final
RPC reference	RPC-DCMS-5202(3)
Opinion type	Formal
Date of issue	1 st November 2023

RPC opinion

Rating¹	RPC opinion
Fit for purpose	The Department has undertaken an appropriate consideration of the impacts arising from the range of measures included in the overarching IA, in line with RPC guidance ² on primary legislation IAs. The SaMBA is sufficient at this stage but could be strengthened through exploring the likely benefits to SMBs arising from the measures. The Department identifies the role that Public Service Broadcasters (PSBs) play in creating positive externalities, however, it should consider strengthening the rationale element for the Video-on-Demand (VoD) accessibility measure and provide more on the possible impact on smaller production companies. While the IA does well to include a comprehensive equalities assessment, it needs to include a stronger consideration of the impacts to trade, competition, investment and innovation. The Department discusses monitoring and evaluation (M&E) activities for some measures, however the IA must consider how to assess the aggregate impact of the measures upon PSBs.

¹ The RPC opinion rating is based only on the robustness of the EANDCB and quality of the SaMBA, as set out in the [Better Regulation Framework](#). RPC ratings are fit for purpose or not fit for purpose.

² <https://www.gov.uk/government/publications/rpc-case-histories-primary-legislation-ias-august-2019>

Business impact target assessment

	Department assessment	RPC validated
Classification	Qualifying regulatory provision	Qualifying regulatory provision
Equivalent annual net direct cost to business (EANDCB)	NQ	NQ Further IAs to be submitted at secondary legislation stages, for validation of EANDCB figures
Business impact target (BIT) score	NQ	NQ
Business net present value	NQ	
Overall net present value	NQ	

Category	Quality ³	RPC comments
EANDCB	Green	The IA discusses a range of impacts across the measures in the Bill and provides a suitable indication of the full impacts of all measures, in line with RPC primary legislation guidance. The Department should better indicate what measures are regulatory provisions and carry a direct impact to business.
Small and micro business assessment (SaMBA)	Green	The Department highlights that small and micro businesses (SMBs) are not expected to be impacted by the measures included in the Bill, and therefore do not, at this stage, face any direct costs. The IA would be improved by considering the potential benefits that SMBs may see from the measures introduced.
Rationale and options	Weak	The Department identifies the positive externalities associated with PSB content, to support the rationale for intervention. The IA presents a clear set of objectives and the options considered are appropriate for some measure. However, for the <i>VoD accessibility</i> , the Department has not made a clear case for why intervention is necessary, failing to consider the wider commercial factors which may drive VoD providers to make content accessible. The Department has not included discussion of the non-regulatory alternatives that have been considered.
Cost-benefit analysis	Satisfactory	The IA draws upon a range of sources to inform the analysis presented, including engagement with PSBs, Ofcom and industry.
Wider impacts	Weak	The IA includes a detailed assessment of the potential equality impacts, as well as briefly discussing the innovation, trade and competition impacts too. However, the Department needs to ensure its position on the potential impact to trade and investment is fully developed.
Monitoring and evaluation plan	Weak	The Department does not commit to undertaking a formal post-implementation review (PIR). Individual monitoring and evaluation (M&E) activities are discussed for some, but not all measures included in the Overarching IA. The Department needs to consider what M&E could be undertaken to understand the collective impact upon PSBs and their programming.

³ The RPC quality ratings are used to indicate the quality and robustness of the evidence used to support different analytical areas. The definitions of the RPC quality ratings can be accessed [here](#).

Summary of proposal

The Department is introducing a Bill which will include a number of measures to deliver key parts of the Government's vision for British television and radio broadcasting. The intention is a British broadcasting landscape which is fit for the future, continuing to drive the economic success of the sector and the creative economy, as well as supporting the provision of free and universal PSB content and, the delivery of high-quality content and choice for audiences across the UK. The measures discussed in the overarching Bill IA are:

- Modernising the UK's system of PSBs;
- Online (PSB) prominence;
- Channel 4 corporation (C4C) reform;
- S4C regulatory and governance reform;
- Video-on-Demand (VoD) regulation;
- VoD accessibility;
- Regulation of radio services across voice assistant platforms;
- Commercial radio de-regulation; and
- Repeal of s.40 of the Crime and Courts Act 2013.

The RPC has previously seen, and issued separate opinions on, standalone IAs drafted to support the Draft Media Bill which went through pre-legislative scrutiny earlier this year, covering *Modernising the UK's system of PSBs*, *Online (PSB) prominence*, and *VoD regulation* measures. The RPC opinions on the Draft Bill and the individual IAs can be found on our website⁴. In addition, since then the Department has submitted, and the RPC reviewed, a further standalone IA covering the *Regulation of radio services across voice assistant platforms* measure.

Principally, the Department has undertaken a scenario 2 assessment (as set out in RPC primary legislation guidance⁵, as providing an indicative quantitative assessment of the impacts of the full impacts of the measure) however, as the *Commercial radio de-regulation* measure takes effect through the primary legislation itself, a scenario 1 assessment has been provided. The EANDCB that the Department has provided for the *Commercial radio de-regulation* measure is £0.9 million. The Department has not, at this time, included an indicative estimate of the EANDCB for the Bill as a whole and further IAs will be required for those measures requiring secondary legislation.

EANDCB

Identification and quantification of impacts

Since previously reviewed by the RPC, as a standalone final stage submission, the *Online (PSB) prominence* IA now considers an additional requirement relating to livestreamed content. To support this newly added requirement, the Department has

⁴ <https://www.gov.uk/government/publications/draft-media-bill-rpc-opinion-green-rated>

⁵ <https://www.gov.uk/government/publications/rpc-case-histories-primary-legislation-ias-august-2019>

included suitable discussion and evidence to support the position that this should not lead to substantial further costs to providers.

Presentation of EANDCB figures

At this stage, the Department has only included an EANDCB for validation for the *Commercial radio de-regulation* measure, as this is an enacting policy. For the rest of the policies covered in the Bill, a scenario 2 approach has been taken (as outlined in RPC Case Histories guidance), with further IAs to be produced, as necessary, for future secondary legislation.

While the RPC agrees with the Department's approach to what figures are to be validated, the IA should clearly present those EANDCBs that have been estimated at this stage and explain why these are not captured in the EANDCB for validation. For example, the measure relating to S4C includes an EANDCB, however as this is not a regulatory requirement being placed upon business (as defined in the Better Regulation Framework⁶) it should be clearly identified as such. However, as presented in the Overarching IA, it could be misunderstood by the reader that this EANDCB is being put forth for validation.

Establishment of baseline/counterfactual position

In the discussion of the S4C measure, the Department notes that S4C have already begun to implement some of the changes that have been recommended. It goes on to say that in the event of option 0 being taken, S4C would need to undo changes that have been made to date and revert to previous practices. However, the IA is unclear as to what changes have been made and what implications these have for costs to S4C (and business if applicable). Furthermore, it is unclear whether the costs of the preferred option are additional to or inclusive of those costs already incurred.

The IA should clearly establish the current baseline position, including costs incurred by S4C from changes already made, and the expected counterfactual, while making it clear in its assessment of the impacts of both options what the additional impact of these are, with respect to the baseline and counterfactual.

Missing impacts

Building upon the above point, if it is assumed that, in the event of the 'Do-nothing' option for S4C resulting in the reversal of changes that are already in progress, then it would appear that the 'Do-nothing' option would carry a cost. However, the individual IA produced to support the S4C measure does not discuss the impacts of the do-nothing option in any detail. The IA would be improved through a more thorough consideration of not only the sunk costs associated with the changes already made, but also those that would be necessary to revert to previous operating practices. Furthermore, the Department should consider the implications for the role of OFCOM, if the requirements upon them have increased and if this will lead to increased costs for them (and business given how OFCOM is funded), or whether this will mean a trade-off versus other responsibilities that OFCOM currently has.

⁶ <https://www.gov.uk/government/publications/better-regulation-framework>

Future assessment

The Department stated (in paragraph 4) that further IAs will be produced, as appropriate, for any related secondary legislation. The RPC would expect to see much more detailed qualitative and quantitative cost-benefit analyses in the IAs accompanying the relevant secondary legislation enabled by the Bill. The RPC would welcome any discussion with the Department prior to the submission of IAs produced to accompany future secondary legislation.

SaMBA

Identification of impact upon SMBs

The IA highlights that while there is not a specific exemption for SMBs from the measures covered by the Overarching IA, the design of the policies in question are such that SMBs are not expected to be in scope. Therefore, there are no expected direct impacts to SMBs as a result of the measures covered in the Overarching IA.

While the Department states that no small and micro businesses (SMBs) will be directly impacted by most of the measures being introduced (with the *Commercial radio de-regulation* measure likely being beneficial to smaller radio stations), and therefore while no exemption or mitigation needs to be considered, it does not consider the potential wider indirect and positive impacts that may be accrued by such businesses. The IA would benefit from considering the full range of direct and indirect impacts, including positive impacts, that may affect SMBs.

Medium-sized business (MSB) exemption

In addition to considering whether SMBs can be exempt from the new requirements, the Department has also included discussion of the potential impact upon MSBs, as well as whether they can be exempt. The IA notes that the measures are designed to not capture MSBs, however also highlight that the future development of secondary legislation (and regulator guidance) may bring MSBs into scope. In such instances, the Department has indicated a commitment to reassessing the impact upon MSBs.

Rationale and options

Rationale

The Department clearly set out the rationales for intervention that have been identified for each measure. The Overarching IA highlights the positive externalities that PSBs, and their programming, provide and uses this to build the case for legislative change. The IA would be strengthened by providing more details on how the PSB externalities will be delivered through the proposal. In addition, the Department's rationale to support the introduction of *VoD regulation* needs to be strengthened, as was noted in the RPC's separate opinion on this measure.

Furthermore, while the arguments to support most of the measures are well developed, the Department does not provide a strong case for intervention for the *VoD accessibility* proposal. The IA does not sufficiently explain why businesses would not move towards providing the levels of accessibility being proposed, without the need for regulatory intervention. While the Department argues that the new

requirements will act as a safeguard, the IA should do more to identify evidence that will test whether the current trends in the increased rate of provision of accessibility would cease to apply in the absence of regulatory intervention.

Options

The Department present a limited range of options for consideration across the measures included in the Overarching IA. The Overarching IA needs to include a clear discussion of what non-regulatory options have been considered, and why non-regulatory intervention would not be sufficient in delivering the policy objectives.

Cost-benefit analysis

Evidence

The Department has engaged with a number of key stakeholders to inform its qualitative, and where possible quantitative, assessment of the likely impacts of the policy.

Assumptions, risks and uncertainty

Since previously scrutinised, the policies relating to VoD (both the regulation of and accessibility) have been further clarified. The Department has updated the respective IAs to reflect these, however the Department needs to explain in detail, whether VoD services would face additional costs if they were to be excluded from prominent positions, in favour of PSBs. In addition, they must also consider if VoD services are likely to face additional costs in competing with new standards and accessibility codes if they fall within tier one category.

In the IA's estimation of the Audit Arrangement costs as part of the S4C reforms, the Department use an assumption relating to profit margins of 25 per cent without explaining how this was chosen or whether it is appropriate. The Department should provide evidence to support this 25 per cent assumption, or identify an appropriate alternative proxy, for example drawing upon official government statistics on the financial figures (such as those reported in the Office for National Statistics Annual Business Survey, or that in the Interdepartmental Business Survey).

Wider impacts

Innovation

While the Department addresses the impact on innovation, as a result of most of the measures, it does not consider the potential impact on innovative programming produced by C4C due to the reforms. While the IA notes that "*There could be costs to other producers who may lose commissions when C4C are able to make some programmes in-house*", it does not discuss this further. The IA should consider discussing the current role of C4C in producing such content and the potential impact of a change in programming direction that may occur.

Competition

For the measures covered by the Bill, and in particular the *Regulation of radio services across voice assistant platforms* measure, the Department should seek to strengthen the assessment of the impacts upon competition. Specifically, the IA(s) should discuss in detail the risk of unintended impacts to new firms or platforms being able to enter the respective market(s) and how this ultimately may affect consumer choice.

Internal trade and investment

The Overarching IA states that the measures in the Bill are not expected to have a significant impact on trade or investment. However, given the C4C reform and S4C measures are, in part, driven by the current limitations on both broadcasters to fully utilise their commercial potential, the Department should better justify this position of there being no investment impact. Furthermore, the IA makes reference to the potential impact of the import and export of VoD services from the *VoD regulation* measure. The Department should therefore ensure that the impacts of trade, as well as investment for all of the measures in the Overarching IA are sufficiently considered.

Public sector

The Department have considered and identified the main areas of impact to public sector bodies, such as S4C and Ofcom, for the different measures covered by the Overarching IA. However, as noted in the above sections, the assessment of these impacts needs strengthened. For example, while the Department discusses costs for Ofcom, the extent of these are not fully explored and the Department simply notes that these will be appropriately and proportionately recovered through incremental fees levied on business. The IA needs to discuss in more detail the costs faced by Ofcom and how they will be met.

Monitoring and evaluation plan

The Department does not commit to undertake a formal PIR for the Bill, or the individual measures covered within. However, the Department does describe a range of M&E activities that they may undertake to assess the success and progress of individual policies that will be introduced by the Bill and resulting secondary legislation. The IA notes the key role that Ofcom will play in M&E, citing the current role that they play in assessing the performance of PSBs and the industry more widely, as the main justification for utilising them further for the purposes of M&E. The Department must consider whether an increase in the M&E requirements for Ofcom, across several of the proposals covered by the Bill, will impact on their ability to conduct both the evaluation of those policies, but also existing ones which Ofcom may be assessing alongside its other regulatory functions, if resources remain constant. While the IA does note that it is for Ofcom to decide how they will resource these M&E responsibilities, it does not consider the impact upon the quality or scope of said evaluations.

While the measures included in the Bill cover a range of aims and objectives, the Department has not explored the collective impact on PSBs and the service they provide, given the objective of the measures is to strengthen UK PSBs. The individual IAs produced to support the measures on PSB reform and PSB prominence, consider an overlapping set of M&E areas of interest, including key questions and metrics. However, the Department have not included similar M&E plans for the S4C reforms or C4C reform measures. The IA has not considered whether any M&E could be developed to assess the aggregate impact of the measures in the Bill, namely the collective impact upon PSBs and their programming.

Regulatory Policy Committee

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Annex A: Summary of impacts from measures included in the Bill

Measure	Description of measure	Main impacts identified by the Department	RPC opinion on quality of assessment and areas for improvement
Those in bold are measures identified as Regulatory provisions (RPs) by the Department			
Modernising the UK's system of public service broadcasting (PSB)	<p>This measure has a number of elements:</p> <ul style="list-style-type: none"> - An updated, singular remit for PSBs; - Allowing the delivery of certain quotas via a wider range of services; - Introducing a general requirement to produce distinctively British content; - Updating the Terms of Trade to reflect changes in technology and the way viewers are watching content from our PSBs; - Introducing a backstop power to enable SoS to set additional quotas for underserved content areas; - Making the Listed Events regime a PSB specific benefit in line with Ofcom's recommendations; and 	<p>Costs</p> <ul style="list-style-type: none"> - Familiarisation costs for PSBs; - Transitional costs to Ofcom; - Costs for PSBs of an updated singular remit; - On-going costs for Ofcom due resulting from an updated, singular remit; - <p>Benefits</p> <ul style="list-style-type: none"> - A simpler and more clearly articulated set of objectives; - Economic benefits to PSBs; and - Social benefits to audiences. 	<p>A separate IA was submitted for this measure prior to this Overarching IA. The RPC determined that IA to be fit-for-purpose and the relevant opinion has been published separately. However, since this opinion was issued, the Department has made amendments to the scope of the policy. The RPC is content with the Department's updated IA.</p>

	<ul style="list-style-type: none"> - Addressing outdated references to the public teletext provider. 		
Online (PSB) Prominence	<p>The measure will introduce a principle-based framework to be enforced by Ofcom. Ofcom will be given powers to designate PSB on-demand and live streaming services which are to be made available and appropriately prominent on prescribed TV platforms.</p> <p>Those TV platforms, who will be in-scope of this new prominence regime, will be designated as such by the Secretary of State in regulations, following recommendations from Ofcom, where they have relevant control of a user interface (UI); where distribution of TV is a core feature of the service; and where it is used by a significant number of UK viewers as a main way of watching TV online.</p>	<p>Costs</p> <ul style="list-style-type: none"> - Ofcom familiarisation costs; - Set-up costs of the framework and then the on-going enforcement; - PSBs familiarisation costs; - TV platforms familiarisation costs; and - TV platforms opportunity costs from the provision of prominence for PSBs. <p>Benefits</p> <ul style="list-style-type: none"> - Retained PSB viewership; and - Societal benefits of PSB programming. 	<p>A separate IA was submitted for this measure prior to this Overarching IA. The RPC determined that IA to be fit-for-purpose and the relevant opinion has been published separately. However, since this opinion was issued, the Department has made amendments to the scope of activities/businesses covered by the policy. The RPC is content with the Department's updated IA.</p>
C4C reform	<p>The measure will see the introduction of interventions to support C4C's long term sustainability. This will primarily be through the introduction of a duty on the Board, in conjunction</p>	<p>The Department has not undertaken a formal IA for this measure. However, the Department does discuss potential areas of impacts, such as:</p>	<p>The Department provides a sufficient assessment of the full impacts of the policy.</p> <p>However, the IA should be strengthened in the following area:</p>

	with the removal of C4C's publisher-broadcaster restrictions.	<ul style="list-style-type: none"> - Familiarisation and other transitional costs for C4C; - costs to C4C through providing increased financial reporting on performance; and - costs to other content producers, if C4C are able to make content in-house. 	<p>Innovation</p> <p>While the Department does note that there may be an impact to other content producers, the IA should discuss this further, including the potential impact on the programming produced.</p>
S4C regulatory and governance reform	<p>This measure has a number of elements:</p> <ul style="list-style-type: none"> - Update S4C's public service remit to include digital and online services and remove the current geographical broadcasting restrictions; - Amend current approval requirements to give S4C greater clarity in their ability to invest and generate commercial revenue; - Enable S4C and the BBC to come to an alternative arrangement to deliver BBC support for S4C rather than the current fixed requirement of 10 hours of programming per week; 	<p>Costs</p> <ul style="list-style-type: none"> - S4C familiarisation costs; and - Audit arrangement costs. <p>Benefits</p> <ul style="list-style-type: none"> - Indirect benefits from new investment; - Direct benefits from cost savings; - NAO will benefit from new audit arrangements; and - Increased viewership for S4C. 	<p>The Department provides a sufficient assessment of the full impacts of the policy and has made an attempt to quantify the direct impacts. However, the IA should be strengthened in the following areas:</p> <p>Counterfactual/baseline</p> <p>As noted, in the main body of the opinion, the IA lacks clarity over the actions to be taken by S4C under the counterfactual position. This uncertainty limits the assessment of the additionality of the impacts of the policy. The IA should further clarify the baseline and counterfactual positions.</p> <p>Missing impacts</p> <p>As a result of the uncertainty in the counterfactual, the Department's may be missing impacts from it's consideration of option 0 (do-nothing).</p> <p>Assumptions, sensitivity and risk</p>

	<ul style="list-style-type: none"> - Replace the S4C Authority with a new unitary board comprising executive and non-executive directors, to reflect what has already been implemented administratively; and - Appoint the Comptroller and Auditor General as S4C's external auditor, again to reflect what has already been implemented. 		<p>The Department should provide evidence to support this 25 per cent assumption, or identify an appropriate alternative proxy, for example drawing upon official government statistics on the financial figures.</p>
VoD regulation	<p>The measure will introduce a new light-touch regulatory regime and bring TV-like VoD services under a new video-on-demand Code to strengthen content rules, but do not mandate audience protection requirements. Specifically this will seek to;</p> <ul style="list-style-type: none"> - Bring larger, TV-like and potentially harmful, VoD services outside the UK which target UK audiences under UK jurisdiction; - Implement a two-tiered system and bring in enhanced regulation for 'top tier' (larger and potentially harmful) services (both UK and 	<p>Costs</p> <ul style="list-style-type: none"> - Ofcom familiarisation costs; - New regulatory enforcement regime set-up costs; - On-going costs to Ofcom of new enforcement; - VoD provider familiarisation costs; and - Costs to VoD of ensuring content meets required standards. <p>Benefits</p> <ul style="list-style-type: none"> - Viewer protection from harmful content; and 	<p>A separate IA was submitted for this measure prior to this Overarching IA. The RPC determined that IA to be fit-for-purpose and the relevant opinion has been published separately. Since this opinion was issued, the Department has made amendments to the scope of activities covered by the policy. The RPC is broadly content with the Department's updated IA, however as outlined in the main body of the opinion, needs to consider the additional costs faced by VoD services.</p>

	<p>non-UK based) including a new Video-on-demand Code, similar to the Broadcasting Code, with practical implementation led by Ofcom;</p> <ul style="list-style-type: none"> - To ensure proportionality, smaller, lower risk on-demand services in the UK will continue under existing rules, ensuring services that have a smaller audience size and pose lower-risk to viewers, are not unfairly or unnecessarily penalised; and - Do not mandate specific protection measures (like compulsory age ratings), but give Ofcom an enhanced obligation to assess VoD providers' protections for audiences. 	<ul style="list-style-type: none"> - Levelling of playing field for UK based broadcasters. 	
VoD accessibility	<p>The measure will introduce a range of minimum levels of provision, with regards to the accessibility of VoD content.</p>	<p>Costs</p> <ul style="list-style-type: none"> - Familiarisation costs to VoD providers; - Set-up costs for Ofcom, as well as on-going costs to Ofcom of monitoring and enforcement; - Development costs for VoD providers; 	<p>A separate IA was submitted for this measure alongside the Overarching IA. The RPC determined that IA to be fit-for-purpose and the relevant opinion has been published separately. However, since this opinion was issued, the Department has made amendments to the IA to reflect newly available data. The RPC is content with the Department's updated IA.</p>

		<ul style="list-style-type: none"> - Costs to VoD providers of ensuring both current and then new content is accessible; and - Costs to VoD providers due to annual reporting. <p>Benefits</p> <ul style="list-style-type: none"> - Benefit to consumers of improved rates of accessible VoD content, as well as the associated reduction in social isolation; and - Increased business for VoD providers who are able to attract new customers due to increased accessibility. 	
Regulation of radio services across voice assistant platforms	The measure will introduce requirements on providers of voice assistant platforms, including relating to availability, cost access and integrity of service, to ensure that listener access to radio across these devices is protected.	<p>Costs</p> <ul style="list-style-type: none"> - Initial familiarisation costs for radio stations and smart speaker platforms, - Transitional set-up costs for voice assistant platforms; - The reversal of the value exchange between radio 	A separate IA was submitted for this measure alongside the Overarching IA. The RPC determined that IA to be fit-for-purpose and the relevant opinion will be published separately.

		<p>stations and voice assistant.</p> <p>Benefits</p> <ul style="list-style-type: none"> - The benefits to consumers from improved access to radio services through voice assistants. 	
Commercial radio de-regulation	<p>The measure will remove unnecessary regulation from the commercial radio sector, to enable it to be more agile.</p>	<p>Costs</p> <ul style="list-style-type: none"> - Familiarisation costs for the radio sector and Ofcom; and - Costs to Ofcom of updating guidance. <p>Benefits</p> <ul style="list-style-type: none"> - Benefit to radio sector from de-regulation and reduced admin requirements for format changes. 	<p>The Department provides a sufficient assessment of the full impacts of the policy and has made an attempt to quantify the direct impacts. However, the IA should be strengthened in the following areas:</p> <p>Assumptions, sensitivity and risk</p> <p>While the Department states that their analysis and assumptions have been tested with key stakeholders, the IA would be improved through including a clearer explanation of the appropriateness of some assumptions on the back of this engagement. For example, the IA notes, on page 10 when discussing the previous consultation and asking stakeholders views of the results, that the "...finding of which broadly still hold true..." which while indicating that stakeholders did not disagree with the results, may suggest that they do not remain wholly accurate.</p>

Repeal of s.40 of the Crime	The measure will repeal s.40 of the Crime and Courts Act 2013.	The Department assesses there to be no impact from this measure, as it removes the risk of legal action (which has not previously been brought), from happening.	The Department provides a sufficient assessment of the impacts of the policy.
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