From: (NE)

To: (ERG-BIO);

(NE);

**Subject:** RE: In confidence: Application to shoot buzzards to protect free-

range poultry

**Date:** 27 February 2012 17:25:00

Attachments: wlm-11-1801 - Buzzard - assessment - ver 4 - 27-02-12.doc

The update from the adviser came through much quicker than anticipated. The has been a modest drop-off in predation since the original report and the estimated actual loses are lower than predicted by this point in time. The loses remain, however, relatively high for a small holding of this size and we would expect losses to increase again once the buzzard pair have young to feed.

These new figures don't substantially alter my position on the case.

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Natural England - Wildlife Management and Licensing

Tel:

From: (NE)
Sent: 27 February 2012 16:55

To: (ERG-BIO); (ERG-BIO)

Cc: (NE)

**Subject:** In confidence: Application to shoot buzzards to protect free-range

poultry

Importance: High

Dear

We have had an application for a licence to shoot a small number of buzzards that are targeting a small scale free-range chicken enterprise.

The wildlife adviser's recommendation that a licence is issued to allow a small number of

buzzards (probably 2) to be shot. The aim will be to target the specific individual's predating on the chickens. This recommendation is endorsed by for this topic) .

Overall loses are modest in absolute terms (about for a six month period) but we estimate that this does equate to > 10% of the farmer's income.

I've reviewed the case am satisfied that – from a technical perspective – that reasonable steps have been taken to resolve the problem non-lethally and that the next logical step is to seek to remove the specific birds causing the problem (it does appear from the birds' behaviour that a specific pair are responsible for the problem). It is likely that this pair will be replaced by other birds, but the hope is that by removing birds that have developed a specific habit of predating on the chickens that the farmer's use of non-lethal methods will be more successful against newcomers and may possibly prevent a recurrence (at least in the short to medium term).

In this case there is no option to try nest destruction as a next step as this is a small-holding and the birds are not nesting on the applicant's land.

If we were not dealing with a bird of prey, then I think there would be no hesitation about issuing a licence for limited action of this type against a common predatory species. The fact the licence is for a bird of prey makes the situation more complicated, which is why I'm forwarding the report to you for comment.

While people will make comparisons between this and the game bird applications, I do think that farmed free-range poultry units are inherently different from game shooting. Here we are talking about protecting a fully domesticated animal that is entirely dependent on man and is – by its nature - vulnerable to predators in a managed farm environment. It is normal/accepted practice that people seek to eliminate (or at least minimise as far as possible) predation by wild animals on farmed animals (noting that he law allows farmers to shoot people's dogs that attack livestock).

This is different to game management – where you are, in essence, dealing with a wild bird living in the wider rural landscape alongside their natural predators and management is about how to ensure that – after predation / disease / starvation and other causes of natural mortality there remains a huntable surplus. This can, and often does, include predator management, but the aim here is not to eliminate it to the same degree as you expect to see in a farmed livestock situation.

My provisional view is that I am minded to endorse this licence recommendation. I have asked the adviser to get a further update on the situation before I make a final decision. I would expect the situation to be closely monitored so we can evaluate the benefits of the licence.

In view of stakeholder sensitivities and the ongoing discussions regarding control of birds of prey in relation to game management I wanted to give you the opportunity to

provide a policy input prior to the final decision on this application.

Ideally, we would aim to issue any licence (if that is the decision) in time to take action before the birds have dependent young.

Happy to discuss

Regards

Natural England - Wildlife Management and Licensing

Tel: +

- assessment - ver3 - 15-12-11-. doc >> << File: wlm-11-1801 - Buzzard - predation calculator.xls >>

# Wildlife and Countryside Act 1981 (as amended)

Licences to kill/take birds/mammals (non-piscivorous)



Note: This report may be disclosed in response to Freedom of Information requests.

# **Technical Assessment of Application**

# Summary of Application and Decision

Case reference	WLM/201	11/1801	Purpose	Preve	enting damage to livestock
		Species Buzza	ard		

### **Brief Description of Application**

Application to shoot individual Buzzards responsible for predating free-range chickens. This amended assessment report (ver.4) follows a deferral period (to monitor the situation and gathering additional evidence) and further discussion with the applicant on 02 Dec and 27 Feb. It also follows comments by received since 09 Dec 2011 and (Principle Adviser), since 27 Feb 2012. This version (ver.4) replaces my three previous assessment reports, dated 23 Oct, 02 & 15 Dec 2011.					
Recommendation Recommend Licence	Action Permitted: To kill birds (other than to aid scaring)  Reason for refusal: N/A  Date for reconsideration: N/A				
Adviser Name:	Date of Report: 27/02/2012				

# **Application Details**

1. App	licant					
Title		Forename/ Initials			Surname	
2. Site Address	Details					
				Descri	be precise loca	ation I
Grid Reference						

As 1.

#### **Technical Assessment**

#### 3. Assessment Details

Type of Assessment	Site Visit	Date of Assessment	19/10/2011
Risk Level	Low	Sensitivity Level	3

#### Risk Assessment

Bird of prey licensing is a sensitive issue and this application required a site visit. Case also assessed via telephone on 02 Dec 2011 and 27 Feb 2012.

Persons Interviewed (if other than applicant)

Name	Address	Role	Telephone Number
	(if not as 2 or on application)		
	As 2.	Business owners	

### 4. Background Information

Four years ago, started a small scale free range egg production business at small small scale free range egg production business at small small scale free range egg production business at small small small scale free range egg production business at small scale free range egg production egg production free free range egg production free free rang
have invested their savings into this small enterprise, profit margins are small and having spent heavily on a Fox-proof fence recently, they are experiencing lean times. During severely cold spells of weather in Nov/ Dec 2010 and again in Jan 2011, 8 and 4 chickens respectively were predated by Buzzards, an acceptable and not unexpected rate of loss given weather conditions at the time. However, from Jul to Oct 2011 lost >40 chickens to Buzzard predation. Since repeated attempts failed to scare Buzzards away, a licence application was submitted to shoot the individual Buzzards responsible for chicken predation.
On 02 Dec 2011, reported loosing at least another 10 chickens since I spoke to him 6 weeks earlier, and by 27 Feb 2012, had lost another 12, mostly during the cold spell in Feb. This is despite introducing new and improving existing non-lethal anti-predation measures. The applicants therefore still wish to pursue a licence and this report is amended (since my 19 Oct 2011 site visit) with new evidence to support their request.

#### 5. Evaluation

5. Evaluation
Extent of damage
Losses of hens to predation  On the application form, describes the predation of free range hens at the rate of 1 or 2 per day. They believe a number of local Buzzards may have been responsible for taking a few chickens last winter, but suspect the spate of predation since Jul 2011 is mostly the work of just one or two individual Buzzards.
During my site visit on 19 Oct 2011, I asked further questions about predation. It appears that one or more individual Buzzards predate one chicken per day, for periods of 2 or 3 days, then cease for a week or so. If predation accounted for >40 chickens during the past 3½ months (~110 days), this equates to losing one every 2.75 days. They lost a few more (estimate ~ 5) during the intervening 6-week period (to 02 Dec), so overall the loss of c. 45 hens in c.153 days is a predation rate of one hen every 3.4 days for 5 months.

Buzzards do not predate chickens all-year round and the farm suffered no, or very few losses throughout spring 2011 and in Jan 2012 - an exceptionally mild winter month. The 2011 calendar year loss total was 57 (avg. a predation rate of one hen every 6.4 days) and to date (27 Feb) has 12 lost in 2012 (a predation rate of one hen every 4.8 days).

Hen predation rates can therefore be expressed in different ways, ranging from one per 6.4 days (overall average per annum including non-predation periods) up to one per 3.4 days (during, sometimes long, periods of predation).

The farm expects natural mortality to account for only one hen every few weeks, and lost 26 in 2011. Therefore if Buzzard predation remains at similar rates (50 lost in 5 months or c.60 in 12 months), this multiplies re-stocking costs 2.3 to 4.6-times (replace 60 to 120 predated hen in addition to 26 hens).

Free range Silverlink organic laying hens cos each (the cheapest hens on market are ~£5). Kept for 2 years, 75-80% of these chickens are expected to lay an egg every day, reducing to c.50% eggs per day in the coldest of winter weather. estimated her chickens produce 280 to 300 eggs per year each. Eggs are sold per dozen (median = 0). Eggs are sold directly to B&Bs and markets, so no 'middleman' costs, just the main direct costs of packaging and distribution.

The following tables estimate annual profit (without Buzzard predation) and the financial cost suffered so far from losing **52** laying hens to Buzzard predation from **Jul 2011 to Feb 2012** (244 days).

Table 1. annual net profit

Table 1. allilu	ai net pront								
Egg producti	ion gross profit	t							
No of laying hens	No eggs produ per annum		Eggs sold per dozen	Income from sold bienr		calcula	tion	Su	ıb-total
600 hens	290 (280 - 300 eggs	))	)	(guess sold, som	; some	(600 x	290 x		
Production a	nd overhead co	osts							
Feed cost per month	Transport and business overloper month		Price per laying hen	Restockin (replaced			calculation	Su	ıb-total
				(600 hens	/ 2 yrs) x				
Annual net profit									
Gross egg profit Anr		Annua	al overhead costs calc		calculati	calculation		TC	TAL

**Table 2**. financial losses to Buzzard predation (<u>Jul - Feb ~ 244 days</u>)

Estimate of replac	ing layin	g hens	,	,		
Price of laying hen	<del>`</del>			Calculation	Sub-total	
		52		x 52		
Estimate of lost eg	g produc	ction				
Average price of an egg	Average egg production per day		Daily rate of hen loss to predation	calculation	Sub-total	
	(290/ 365) = 0.7945 eggs		1 hen/ 4.115 days = 0.243 hens	cumulative of y = x for 244 days		
Savings from lost	hens					
		d other business	calculation	Sub-total		
(365/12) days) / Guess no add 600 hens = have to buy in		ditional saving (they nextra eggs)	Cumulative of y = x for 244 days			
Actual financial loss estimate						
Cost of replacing hens Cost of replacing eggs		Savings from not feeding lost hens	calculation	TOTAL		

In Dec 2011, the introduction of enhanced scaring measures (since Oct) appeared to have reduced the rate of predation, and particularly mild weather through Jan saw almost a complete cessation of predation, but the

ineffectiveness of scaring was offset by cold conditions in Feb 2012, when most of the 12 lost this calendar year were taken, at a rate of one every other day. left his previous job to concentrate on their free-range chicken farm. With an estimated annual profit to support them both and with no other obvious source of income, this business could be described as running on a shoestring. A seemingly obvious solution to reducing losses of egg production is to purchase new laying hens, not eggs from other businesses. However, laying hens cannot be immediately replaced, in a sense like buying them off a shelf. They need to be ordered, poults then need be over 16 weeks old, screened, vaccinated and introduced to the flock as the same age class. Different aged chickens need separate salmonella testing, so the need to perform just one £15 test one the whole flock makes economic sense. order their poults from the same place and do not expect to replace hens lost since Jul 2011 until mid-Mar 2012. Therefore, the business is expected to continue losing money to Buzzard predation until hens can be replaced. A new shed and 200 hens will arrive in mid-Mar. Part of this total is to replace lost hens, the remainder are an attempt to slightly expand the business. Expressing damage and consideration for relative significance can be expressed as financial loss and as percentage losses, both as losses suffered to date and as predicated losses if the problem is allowed to continue. The following table summarises damage to the business in a range of ways. Table 3. Financial and percentage losses to Buzzard predation during 8 months (Jul 2011 to Feb 2012) Financial and percentage losses to-date (Jul 2011 to Feb 2012) Financial loss (£) Annual profit (£) Financial loss as proportion of annual profit % loss (Table 1) (Table 2) calculation 7.25 % Numbers and percentage losses of laying hens to-date (Jul 2011 to Feb 2012) No hens on farm No lost to date Proportion of hens predated to date calculation % loss (Table 2) 600 52/600 8.67 % 52 Egg production dropped suddenly in mid-Oct and the business has had to buy in additional eggs for re-sale to support their own diminished production. Consequently, the business ran at a loss for a while. believe stress is the main cause of this additional loss of egg production. They have evidence to support the view, but believe stress is induced by the presence of Buzzards. I agree this could be the source, but other factors could also influence egg production, including crèching the chicken sheds. The sheds will be moved again in Mar 2012. The predation losses are minimum figures, ■ said she does not always remember to make a note. Collectively taking into account the estimates of direct and indirect costs and marginal profits, losses experienced by this business to Buzzard predation are just within the definition of what I would regard as significant damage. Other potential causes of losses Other factors that have the potential to influence hen numbers include predators (other than Buzzard), escapees, disease and husbandry practices/ welfare. Predators: The farm used to lose a few hens to Fox predation and eggs to crow predation. Losses to these predators are now negligible since the introduction of preventative measure (see below). A single sighting of a Fox in the field did not manage to predate any hens. It managed to scale the fence, panicked at being chased off, but needed a few attempts to escape. Escapees: The hens are enclosed inside part of an open field by non-electrified fencing, then a Fox-proof fence and then a hedgebank. No reported losses of escapees. Disease: Salmonella testing is always 'good', as described it, meaning negative, and no reported significant losses to disease. in fact, are so fond of their hens, the sick or injured are tended to. rehabilitated and returned to the flock. Losses to natural mortality are relatively low (26/600) ~ 4.3 %, a good preindustrialisation rate<sup>1</sup>. http://hamandeggonomics.blogspot.com/2009/09/understanding-mortality-rates-of-laying.html Husbandry practices/ welfare: Poultry farms are inspected. Defra apparently has no welfare concerns. I had the

impression that were particularly considerate to their hens and outside foraging conditions appeared to be good. One chicken shed I peered into was covered in droppings and could do with a clean; otherwise no concerns.
Buzzard numbers and activity
<u>Buzzard presence</u> : Buzzards are resident breeders in small numbers, but do not nest on the farm. Up to nine Buzzards reportedly seen at a time from the farm, presumably circling around on thermals. Only one Buzzard has been observed at a time within the hen field, but two individuals are suspected involved in chicken predation.
<u>Buzzard behaviour</u> : has identified particular fence-posts around the field and telegraph poles within the field that are seemingly favoured by these particular individual birds, and has noticed patterns in their habits and directions of flight.
Occasionally a Buzzard is flushed off a recently killed and partly plucked chicken out in the field away from the sheds. Sick hens that die of (other) natural causes are invariably found inside or adjacent the sheds. It is therefore believed that Buzzards actually kill chickens, rather than just scavenge carcases. Last winter, chicken carcases were entirely stripped to the bone, but since then, only the neck was stripped and sometimes the belly ripped out to consume developing eggs. The injuries sustained by the chickens and locations of the kill suggest to me Buzzard predation, rather than any other form of predation. Having asked a few of times about this, they are convinced that virtually all hen predation is now by Buzzards, and not by other predators.
When hens had full use of the field to roam around, those nearest the fence were taken. Sick hens remain in and around the sheds, so the assumption is that predated hens were healthy and productive.
Preventative measures
Human presence: live on site, spending most of their time there, spending only a few hours away e.g. at market. One of them visits the chicken field three times a day and during Nov/ Dec 2011, made more frequent visits throughout the day. Other people also visit to field and spend time nearby every day, checking the sheep and horses. Human presence scaring is therefore frequent to very frequent. explained that the Buzzard now recognise the sound of and quickly disperse, but simply wait in a neighbouring field then returned soon after during the worst periods of predation.
Occasionally, has spent longer periods waiting for the Buzzard with his shotgun and has shot-to-scare quite a few times. Since my site visit, he habitually takes his shotgun with him to the chicken field.
<u>Audible scarers</u> : Gas-cannons and other loud audible devices cannot be used regularly in the field since these would distress the chickens too much and could therefore potentially reduce egg production.
<u>Guard companions</u> : A few geese put in with the chickens formed their own separate huddle and failed to keep Buzzards away. Not aware of any other companion species that could be safely left in the field, that instinctively chases birds of prey and not hens.
<u>Visual scarers</u> : A scarecrow with a florescent jacket was ineffective. Not sure this was particularly life-like or was moved around.
Moving the chicken sheds: The 4 or 5 chicken sheds used to be widely spaced around the field to allow the hens to make full use of the field. Since it was discovered that Buzzards were predating hens near the perimeter fence, clustered the sheds within a 20-metre zone and has kept the hens within a non-electrified fence, now allowing access only to a small portion of the field, but the perceived advantages are that hens are kept close to the sheds for cover and away from most of the perimeter fence. Unfortunately, as a consequence, Buzzards are predating chickens much nearer the sheds and the chickens are coincidentally failing to lay, possibly a result of stress induced from the presence of the Buzzard or perhaps also from their sheds being moved.
Aerial cover: Created a suspended fan nattern of non-electrified tane near the chicken sheds within the

Aerial cover: created a suspended fan pattern of non-electrified tape near the chicken sheds within the restricted foraging area, stretching from an old trailer (left for cover) and a row of fence-posts. This created a one metre high 'covered' area under which chickens can scratch around. However, signs are that a Buzzard glided under the tapes, took a chicken and the trail of scattered hen feathers leads under the taped area.

<u>Egg protection</u>: hens laying their eggs in the sheds are safe by rolling away into troughs designed to prevent crow from taking them. This is successful.

Fencing: a 6-foot partly electrified fence has largely curtailed Fox predation. The electrified strand is suspended angled out, leaving the fence-post tops exposed, or so I recall. There are now many fence-posts and telegraph poles for Buzzards to perch on. Proofing them all might be considered impractical, although banging a 6" nail into the top of every post and contacting the electricity company to allow its poles to be proofed, has been suggested. The field has a perimeter of 864 metres. Assuming a standard spacing of 3 metres, this gives a total of 288 fence-posts that need proofing, an undertaking which would be of little additional benefit unless the telegraph poles, which run across the field, were proofed too.
Diversionary feeding: described how Buzzards appear to prefer a fresh kill, ignoring their own kills from the night before. Although Rabbits are locally numerous, it is believed that two individual Buzzards are frequently targeting chickens, perhaps due to being easier prey to catch than Rabbits. This method has the disadvantage of likely attracting more predators into the area, rather than distracting particular individual birds.
The chickens do not readily run for cover, and although huddle and sometimes crowd around the sheds, they instinctively crouch when alarmed, making them vulnerable to predation in an open area. This is a free-range farm so permanently housing the chickens to prevent predation is not an option for the owners.
Summary of preventative measures  Despite having their foraging range dramatically reduced to keep the hens close to the sheds, and having a trailer and tape covered zone, the hens are still being predated. Human presence scaring was further increased following my visit and was borderline impractical to sustain during Nov/ Dec, but unfortunately only a slight decrease in predation levels has been noted. The amount of additional aerial or brash pile cover needed and proofing of fence-posts and telegraph poles needed, and other visual aids to scaring also needed to further reduce the rate of predation again to an acceptable level may be considered impractical.
Proposal  The application form stated a proposal to shoot Buzzards during the period Nov 2011 to Jan 2012. I explained to (in Feb 2011) that due to the long deferral period, the licensed period will reflect the need to reduce predation, but may take into account other factors, such as when Buzzards may have dependant young.  and are named as authorised persons.  Buzzards himself as a last resort. Use of a hide and a shotgun was muted as the preferred method. If a licence was issued, I agreed with this approach, though suggested this may need to be in conjunction with additional preventative measures, in case more than one Buzzard is responsible.
Consequences of not taking action  The business is currently losing money and at best runs on tight margins. If predation continues at a similar rate, believe they will not be able to support the business.
5. Consultations
Is the proposed site on or near a designated site (NNR, SSSI, SPA, SAC etc)? No

Is the proposed site on or near a designated site (NNR, SSSI, SPA, SAC etc)? No					
Where the proposal might impact on a designated site, have you consulted Natural England colleagues? N/A					
For SPAs and SACs, is an Appropriate Assessment necessary? N/A					
Reason for Consultation and Summary of Response					
Colleague/body Consulted Date of Consultation Date Response Received					

# 7. Consideration of Conservation Factors

The Common Buzzard <i>Buteo buteo</i> has experienced a significant range expansion and population increase in recent decades. The BTO's CBC/ BBS Index 1966 – 2008 shows a 606% increase (395 – 1525% confidence limits). "The increase has been associated with rapidly improving nesting success, perhaps through reduced persecution, the recovery of rabbit populations from the effects of myxomatosis and release from the deleterious effects of organochlorine pesticides (Elliott & Avery 1991, Clements 2002)"; see link: - <a href="http://www.bto.org/birdtrends2010/wcrbuzza.shtml">http://www.bto.org/birdtrends2010/wcrbuzza.shtml</a>								
The dust cover of the last published national breeding bird atlas shows rather well the status of Buzzard 20 years ago.								
<sup>2</sup> Gibbons, Reid & Chapman. 1993. <i>The New Atlas of Breeding Birds in Britain and Ireland: 1988 – 1991</i> . Poyser.								
3								

# 8. Disease Considerations

ls t	the ¡	oropos	ed ac	ction	likely to	presei	nt a d	lisease	risk to v	wildlife	e, dom	estic a	nimal	s or p	peop	le?	No
If "	'yes	", a Di	sease	Risk	k Asses	sment	(DRA	l) is red	quired fo	r this	case.	Consul	It the	SOP	for g	guida	ance.

Consideration of Disease Risk:

# 9. Licensing Criteria

Is there clear evidence that the species in question is causing or is likely to cause serious damage?	Yes
Are there other evident causes of the serious damage?	No
<ul> <li>Where appropriate</li> <li>have non-lethal methods been used?</li> <li>have they been found to be ineffective or impractical and not just difficult to implement?</li> </ul>	Yes Yes
Is there any other satisfactory solution?	No
Will the proposed action contribute to preventing the damage?	Yes
For birds on Sch 2, Part 1 of the Wildlife and Countryside Act 1981 (the quarry list) only, are there good reasons why action could not have been taken in the open season?	N/A

# Conclusion

# 10. Conclusions and Justification for Recommendation

Application emailed to Advisers: 04/10/2011 Application received by Adviser : 19/10/2011 Visit report and clock-stop email to WLU: Contacted ; consulted with the contacted assessment report to Emailed assessment report to Emailed assessment report to For peer review: 05/12/2011 Comments received: Emailed assessment report to For peer review: 15/12/2011	03/10/2011 10/10/2011 24/10/2011 02/12/2011 09/12/2011 27/02/2012						
Conclusion  run a free-range organic laying hen business at a smallholding in predation has accounted for the loss of c.52 hens since Jul 2011, and previously another 12 hens were hard weather last winter (Nov 2010 to Jan 2011).	Buzzard re lost during						
A range of calculations were performed to estimate the level of financial damage. Taking into account costs for replacing predated hens, revenue lost from egg production and indirect savings made by, e.g. not having to feed hens lost to predation, I estimate the business has lost as a direct result of Buzzard predation during the period Jul 2011 to Feb 2012.							
This is a small enterprise comprising of 600 - 700 laying hens making an annual profit of approximately Financial losses to date (Feb 2012), expressed as a proportion of the estimate net annual profit, is <b>7.25</b> %. The total number of hens lost to predation (total = 52) to date (Feb 2012), as a proportion of the current flock size (600), is <b>8.67</b> %.							
When considering thresholds for relative damage, I regard a loss within the double-digit percentage real loss expressed as being in the region of a significant. At present, I consider this case to be threshold of significant damage in terms of percentage losses, but with an annual financial loss of man evidence suggests <b>significant damage</b> . This particular case involves a small private enterprise with margins.	nearly at the ny £100s, the						
Despite enhancing scaring measures, altering the chicken shed configuration, providing more cover a losses to other predation, the business continues to lose its laying hens to Buzzard predation. Non-le preventative measures have not been effective at reducing predation enough to an acceptable level. rate of predation appears to be lower since introduced enhanced preventative measures, continues and rose sharply during the cold spell in early Feb 2012.	ethal Although the						
Additional preventative measures were suggested. Proofing every one of the hundreds of fence-posts around the field and the telegraph posts might help, but will not prevent Buzzards from being able to enter and land on the field amongst the hens. Diversionary feeding could be counterproductive here by attracting more predators. Better use of life-like scare-crows was encouraged during my site visit, instead the applicant visited the field more frequently throughout the day, but with only modest success at reducing the predation rate. Other factors, such as weather, seem more influential on Buzzard presence than scaring effort.							
Despite being locally numerous, hen predation appears to be the work of just one, probably two individual buzzards. The problem could be resolved by targeting and dispatching these particular birds. The lowill not be adversely affected by the loss of two Buzzards. Regular lethal control at this site is not anti-	cal population						
Recommendation I suggest this application and assessment report are forwarded for peer review and considered as a considered permitting lethal control of a bird of prey (Buzzard). Licensing could potentially be justified under s.16 the purposes of preventing serious damage to livestock" Although targeting and despatching particularly individuals, the scaring regime should remain and be maintained.	(1) (k) "for						

# 11. Attachments

N/A