Improving the Statute Book: a Parliamentary Counsel's Viewpoint[1]

Dame Elizabeth Gardiner KC (Hon)[2]

Abstract

It is almost 50 years since the Renton Committee was appointed to consider how to achieve greater simplicity and clarity in statute law. What might the Committee say about the state of today's statute book? What recommendations might they make for reform? This article ventures to provide insight into these questions.

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[2] First Parliamentary Counsel, United Kingdom. The views and opinions expressed in this lecture are those of the author and do not necessarily reflect the views or positions of the UK Government or the Cabinet Office. This article is based on the Statute Law Society's Renton Lecture delivered on November 9, 2022.

Introduction

The title for my article has been shamelessly borrowed from an address given at the AGM of the Statute Law Society over 25 years ago, when Lady Mary Arden, a good friend to the Office of the Parliamentary Counsel and to the Statute Law Society, looked at the issue of improving the statute book from a Law Reformer's Viewpoint.[3]

Not everyone will be familiar with the work of the Office of the Parliamentary Counsel, so I will start there. Parliamentary Counsel, the title we give our legislative drafters, are civil servants, and the Office is part of the Cabinet Office. The "parliamentary" element of our title can be a source of confusion, but we are employed by the Government not Parliament. We currently have 54 parliamentary counsel, all barristers or solicitors. A very small team works at the Law Commission on law reform projects and consolidations. The rest work on Government programme Bills (and government-supported Private Member's Bills). In addition to drafting Bills, counsel advise on parliamentary procedure and practice and the handling of the legislative programme. The drafting of delegated legislation, by way of contrast, is undertaken by departmental lawyers, either in their departments or as members of the small central Statutory Instrument Hub (a group of seconded departmental lawyers who specialise in drafting delegated legislation).

I obviously do not need to say how influential Lord Renton was in the world of legislation. When I joined the Office of the Parliamentary Counsel in 1991, the 1975 review of the preparation of legislation by the Committee (the Renton Committee) he chaired was still frequently referenced.[4] Copies of the Committee's Report (the Renton Report) were treasured, and I still have my well-thumbed paper copy and remember how delighted I was when someone retiring from the office bequeathed it to me.

At any time, those in Parliament with a keen interest in, and understanding of, the production of legislation are a fairly select band. David Renton was obviously one of those experts, and, when he spoke on your Bill, it was always worth consulting Hansard to see what he had to say.

Re-reading the Renton Report in preparing this article, I was reminded how thorough and well-considered it was, and struck both by the continuing relevance of much it had to say, and, at the same time, by just how much the world has changed in the intervening 47 years.

Lord Renton noted with some frustration that, of the 81 recommendations put forward, only around 40 of them had been wholly or mainly implemented.[5] I think that number may have

[3] Lady Arden of Heswall DBE KC PC, retired Justice of the Supreme Court of the United Kingdom. *'Improving the Statute Book: A Law Reformer's Viewpoint*' [1997] Statute Law Review 169.

[4] *The Preparation of Legislation: Report of a Committee Appointed by the Lord President of the Council* (Cm 6053, 1975).

[5] Lord Renton, HL Deb 21 January 1998, vol 584, col 1584.

crept higher over the years as the evolution in drafting that has taken place over my career has largely aligned with the recommendations in the Report.

That said, no-one is suggesting there are not issues with the current state of the statute book, and I don't think the Renton Committee would be short of material for new recommendations. You'll be pleased that I am not detailing 81 recommendations this time around – neither are my suggestions intended to be comprehensive. Rather, they are the musings of a long-serving practitioner.

In many ways, the statute book has become more disorganised and inaccessible since 1975. So, if we are not to continue down this road, we need to explore new ways of addressing the issues. I doubt there is a silver bullet, and I hope the Renton Committee would recognise that we need to tackle the issues from a number of directions if we are to see meaningful change.

Renton Review

The Renton Committee was appointed in 1973 with representation from both Houses of Parliament and independent members. It was established

> [w]ith a view to achieving greater simplicity and clarity in statute law, to review the form in which public Bills are drafted … to consider any consequential implications for parliamentary procedure; and to make recommendations[6]

It was the first inquiry of its kind for 100 years.[7]

Even in 1973, concerns about the state of the statute book were nothing new. From Edward VI and Francis Bacon, to many who have previously spoken at Statute Law Society events, the failings of the statute book have been well-rehearsed over the centuries.

The Renton Report considered the arrangements made for drafting, the legislative procedure for Bills, how legislation was published, and the criticisms frequently made of the language and structure of Bills. It recognised the different audiences for legislation (and their conflicting needs), the pressure on drafting resources, the challenges faced by the legislative drafters, the role that might be played by computers (then in their infancy), the tensions in the arrangements then in place for drafting Scottish provisions for Westminster Bills and the challenges around consolidation. Its recommendations were comprehensive and are worthy of re-reading.

The prevailing concern that statute law "lacked simplicity and clarity" was supported by, amongst others, the Statute Law Society in its evidence to the Committee. The language used was said to be "obscure and complex", such that its meaning was "elusive and its effect uncertain". One consequence of the search for certainty was said to be "over-elaboration",

[6] Above n. 4 at para. 1.1.

[7] HC Deb 6 May 1973, vol 656, col 95-6.

which often produced the opposite result to the one intended. The final Renton Report contained a list of detailed recommendations about drafting techniques and approaches.

In a pre-internet age, the difficulty of accessing physical up-to-date copies of statutes was highlighted. Although computers were still in their infancy, the Committee recognised their potential to run a statute law database, to assist with typesetting during the printing stages of Bills, to assist in the search for consequential changes and as a mechanical aid to drafting.

There were some Committee recommendations to promote greater consolidation. The need for more explanatory material relating to Bills was identified and a recommendation for a new Interpretation Act was made.

Generally, it was recognised that achieving change in many areas was inhibited by a lack of drafting resources and this ought to be addressed immediately. No-one could disagree with that.

What Would a Renton-style Committee Say Today?

In the intervening 47 years, the appetite for legislation has only grown. The Renton Committee anticipated the self-perpetuating growth in the statute book, commenting,

> Many might think that as a nation we groan under this overpowering burden of legislation and ardently desire to have fewer rather than more laws. Yet the pressure for ever more legislation on behalf of different interests increases as society becomes more complex and people more demanding of each other. With each change in society there comes a demand for further legislation to overcome the tensions which that change creates, even though the change may itself have been caused by legislation, which thus becomes self-proliferating.[8]

The role of parliamentary counsel as described in the Committee's Report is still a very recognisable one. As in 1975, the prime duty of parliamentary counsel is to make sure that "a Bill does what the Government wants and that, as far as possible, it can be seen to meet that aim without confirmation by cases decided by the courts."[9]

Drafting style

So, I will start with an area where I hope the Committee would acknowledge that significant improvements have been made, that of drafting style.

The Renton Review focused a lot on drafting techniques. Importantly, in the decades since the Report was published, there has been an increased focus on the need to achieve greater clarity in the legislation we produce (something which is an explicit aim of drafting offices

[8] Above n. 4 at para.7.3.

[9] Ibid para. 10.4.

the world over).[10] Parliamentary Counsel now adopt a modern plain-English style, very different from that generally employed in the 1970s. I think we are less inclined to accept that lack of clarity is an inevitable price to pay for legal certainty, and perhaps more inclined to rely on a provision being given a common-sense reading.

The Tax Law Rewrite Project (which rewrote the legislation for direct taxes) acted as a very effective catalyst when it came to updating drafting approaches and styles in the UK.[11] Sentences and sections now tend to be shorter, and we make greater use of overviews, signposts and other techniques to help the reader navigate what, in many cases, are complex ideas. Textual amendment (one of the Committee's key recommendations) is widely employed, such that consolidated texts can be created rather than leaving the reader to navigate overlapping freestanding Acts (as was more common in past eras).

Whilst precedents are not ignored, innovation and incremental improvement also have a vitally important part to play in improving the quality of legislation. In this area, as in many others, we rely on the experience and good judgement of our parliamentary counsel to balance the competing demands in the drafting process.

In their chapter for an upcoming book on legislative drafting, my colleagues, Diggory Bailey and Luke Norbury, discuss approaches and techniques that can help clarity in legislation, and factors that get in the way.[12] They recognise that the Office of the Parliamentary Counsel has made efforts to "improve the quality of legislation, including by sharing our experience of what works well and listening and learning from the experiences of others, both within OPC and the wider drafting community."[13] Like Diggory and Luke, I believe that these "efforts have resulted in many improvements but there will always be scope for further improvement."[14]

[10] Office of the Parliamentary Counsel, *Drafting* Guidance (2020).

[11] The Tax Law Rewrite Project (TLRP) of HM Revenue and Customs in the UK was established in 1996, with the aim of making the UK's direct tax legislation clearer and easier to use. The TLRP intended to make the language of tax law simpler, while preserving the effect of the existing law, subject to some minor changes. See also Ipsos MORI Social Research Institute, Review of Rewritten Income Tax Legislation, Research Report Number 104 (HM Revenue and Customs: 2011).

[12] D Bailey and L Norbury, Preprint "*Clarity in Legislation*" (SSRN, 2022) https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4260218 accessed 10 January 2023.

[13] Ibid at19.

[14] Ibid.

The structure of the statute book

Introduction

So, whilst we are by no means complacent and improving clarity remains a key focus for us, if I were appearing before the Committee I would be hoping that they would acknowledge the great strides that have been made in this area.

By contrast, in 2022 there is a rather less positive story to tell about the overall structure and organisation of the statute book. So, in this area, there remains great scope for improvement.

That said, Sir Granville Ram, former First Parliamentary Counsel, wrote in 1946,

> The chaotic condition of the statute book has been the subject of complaint for at least four hundred years, and it must be acknowledged that the history of the intermittent attempts to improve its form and arrangement is, in the main, a story of failure.

I am sure the Committee would not be defeatist.

Volume and unstructured nature

Many things contribute to the chaotic nature of the statute book. First and foremost, the statute book is vast and unstructured. We refer to "the statute book", but of course it is just a collection of many bespoke Acts, amended over hundreds of years, together with the various forms of subordinate legislation that have been made under those statutes, itself amended over the years. For the non-expert reader, the relationships between the different instruments that make up the statute book is not obvious. Furthermore, there is no consistent divide between the sort of material that appears in Acts and that which appears in secondary legislation.

Finding the law on a particular topic can be impossible without external aids. Acts are numbered chronologically. Driven by political and handling considerations, a single Act often contains material on a number of different topics (sometimes with little obvious connection). The law on a single topic may be spread across a number of Acts, pieces of retained EU law and subordinate instruments.

There is no free access to a completely up-to-date version of the statute book, and there is no subject index or official grouping of Acts by subject heading. To give a fairly mundane example, there are currently at least 5 pieces of primary legislation (and several secondary) governing when the Home Office can take fingerprints for immigration purposes, and only one of those actually uses the term "fingerprints".

The short title of an Act, particularly in a multi-topic Bill, may give few clues as to its contents (for example, who would know what an Enterprise Act was about, or that it

included provisions capping exit payments for civil servants).[15] Unlike statutory instruments, Acts have no standard subject classifications.

So complex is the picture that it is very difficult to estimate how much legislation is in force at any one time. Any parliamentary counsel operating on the statute book regularly stubs their toe on pieces of long-enacted legislation that have never been brought into force, or which have only been brought partially into force.

Devolution

The complexity which evolving constitutional arrangements within the UK has introduced into the statute book is a new development since 1975.

With three separate legal jurisdictions, we have a statute book which contains legislation which applies in all these jurisdictions and legislation which applies in one or two of them. Post-devolution, we have four separate legislatures, with the competence of each devolved legislature overlapping with that of the Westminster Parliament. So, legislation operating in devolved areas is not just legislation produced by the devolved legislatures. Old Westminster statutes in devolved areas still exist, and the Westminster Parliament will, from time to time, legislate in relation to devolved matters (usually with consent).

A number of different approaches have been taken to amending Westminster Acts which apply in devolved areas – some clearer than others.

Devolution is an example of where the statute book does not always mean what it says. For example, it is littered with references to the functions of the National Assembly for Wales which for many years have had to be read as references to the Welsh Ministers.

If an Interpretation Act is intended to shorten and simplify legislation, we are not short of assistance, with 4 separate Interpretation Acts, one for each nation (not to mention the continuing relevance of the instruments they superseded for older legislation). Much of the same material is covered in each but there are also differences. Working out which Act applies to a particular provision is not always straightforward.

Brexit

The Committee would no doubt also be interested to understand the impact of Brexit on the statute book.

Following the departure of the UK from the European Union, the statute book contains retained direct EU legislation brought into our law at the end of the transition period by the

[15] *Enterprise Act 2016*, s 41.

European Union (Withdrawal) Act 2018.[16] So, a reader is faced with many different kinds of instrument, which take different forms and, in some cases, are drafted in different ways.

Ensuring a workable statute book on departure from the European Union was a key concern, but also a huge and complex challenge with significant impacts on the statute book. To give one example, section 29(1) of the *European Union (Future Relationship) Act 2020* provides that,

> (1) Existing domestic law has effect on and after the relevant day with such modifications as are required for the purposes of implementing in that law the Trade and Cooperation agreement….so far as the agreement is not otherwise implemented and so far as the implementation is necessary for the purposes of complying with the international obligations of the UK under the agreement.[17]

A short and expedient solution to a very knotty problem, but perhaps not the easiest provision to apply in practice in the future.

Pace of Drafting

Finally, the Committee might express concern about the ever-accelerating pace at which legislation is prepared.

In a speech in 1995, Lord Renton suggested that

> Governments should allow much more time for the preparation of major Bills, preferably two years, so that the draftsman is not rushed and so that there is enough time for thorough consultation with outside experts.[18]

An ability to draft at pace has always been an essential tool in the legislative drafter's toolbox. In recent years, Covid and other crises have demanded speedy response after speedy response, and this has raised expectations (inside and outside of Government) about how quickly things can and should be done.

One consequence of the pace is that everyone is likely to focus on making only essential changes and getting them right. Tidying up or improving the statute book is unlikely to be a priority in the available time (and unlikely to be welcome if it extends the length or scope of the Bill).

Another consequence of pace is that there are fewer opportunities for people to engage with and understand the legislation, and the complexity of the statute book does not assist those who wish to scrutinise new legislative proposals.

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[16] 2018, c. 16 (UK).

[17] 2020, c. 29, s. 29 (UK).

[18] Rt.Hon. Lord Renton, KBE, QC *The Evolution of Modern Statute Law and its Future,* Inaugural Statute Law Society Lecture, University College London, 1 November 1995, at 11.

New committee recommendations

So, faced with these challenges, what might a 2022 Renton Review recommend?

Codification or consolidation

As Lord Thring noted well over a hundred years ago,

> No-one can doubt that a code, or the reduction to a consistent and harmonious whole of the scattered fragments of the law of a country, is the ideal perfection of legislation.[19]

The Law Commission of England and Wales keeps the law under review with a view to

> its systematic development and reform, including in particular the codification of such law, the elimination of anomalies, the repeal of obsolete and unnecessary enactments, the reduction of the number of separate enactments and generally the simplification and modernisation of the law.[20]

As a result, one of its aims is "to codify the law, eliminate anomalies, repeal obsolete and unnecessary enactments and reduce the number of separate statutes," and to this end they are required to prepare "comprehensive programmes of consolidation and statute law revision."[21]

I doubt our new Committee would waste their time recommending complete codification of our statutes, common law and case law, as a practical solution to our current difficulties. The volume of law is so huge, and the landscape so complicated, that there can be no realistic prospect of it being codified as a whole.

Similarly, in 1975 the Renton Committee recognised that it would not be practicable to consolidate the whole statute book within a limited number of years.[22] In fact, with a few notable exceptions, consolidation work has, for a variety of reasons, taken something of a back-seat over the last decade or more.

Consolidations have tended to be large ambitious projects taking many years to complete, and some never being completed because they are overtaken by events. In a number of cases, the consolidation Act has been filleted very soon after it was enacted.

It seems to me that the Committee could usefully recommend that a more systematic and efficient approach to consolidation is adopted, with more emphasis on identifying the areas where consolidation would reap the most benefits, and on ensuring the volume and pace of consolidation brings about meaningful change.

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[19] Sir Henry Thring KCB, "*Simplification of the Law: Practical Suggestions"*, Sir Henry Thring KCB, (January 1874] *The Quarterly Review*.

[20] *Law Commissions Act 1965,* s 3 (UK).

[21] Ibid.

[22] Cm 6053, Ch 14.

I see the *Sentencing Act 2020* as a success in this regard.[23] This ambitious project had very clear goals and the prize of enacting the clean sweep was considerable.[24] Furthermore, a structure was established which it is hoped will stand the test of time and be amended to ensure a single *Sentencing Act* (constituting the *Sentencing Code* in Parts 2 to 13). But there are limited resources available to support consolidation work, and the project took many years to complete.

A colleague helpfully reminded me this week that 25 years ago we had relatively junior parliamentary counsel taking on significant consolidation Bills. Given other pressures, resources are always going to be a limiting factor. I think the Committee might usefully repeat its 1975 recommendation that

> The possibility should continue to be explored of recruiting and training for consolidation work lawyers with the necessary aptitudes even though they have not had the full training of Parliamentary draftsmen.[25]

Mapping the statute book to make it more accessible

The Committee might also usefully make recommendations aimed at mapping the existing statute book to make it more accessible, and identify opportunities for reform.

DefraLex illustrates what is possible, and is a model that could be reproduced in other areas.[26] DefraLex is an online system established by the Department for the Environment, Food and Rural Affairs (DEFRA) which lists and provides access to all the legislation for which that department are responsible (primary and secondary) and arranges that legislation by subject matter.

If UK Government departments each operated the same model, major strides could be made in imposing some meaningful structure on the statute book and making it more accessible. It would also be possible to enhance such a system over time to include other instruments such as directions under Acts, or to provide easy access to statutory or non-statutory guidance. Organising the statute book in this way would also help departments identify what legislation they have, what could usefully be reformed or consolidated and what could be repealed.

In Wales, they have set out even more ambitious plans to map, consolidate and arrange their devolved statute book. Importantly, their approach is underpinned by Part 1 of the

[23] 2020, c. 17 (UK).

[24] The clean sweep allowed the *Sentencing Code* to set out the applicable law without requiring courts to refer to separate commencement and transitional provisions and, in some cases, old sentencing law when dealing with offenders for convictions on or after 1 December 2020.

[25] Cm 6053, 1975, para. 14.18.

[26] Department for the Environment, Food and Rural Affairs, Defralex (legislation.gov.uk, 2023) https://www.legislation.gov.uk/defralex accessed 10 January 2023.

Legislation (Wales) Act 2019 under which the Counsel General and Welsh Ministers are to keep the accessibility of Welsh law under review and promote activities which make it more accessible.[27] Implementation of the Welsh plan will be resource intensive and limited progress has been made to date – but every journey begins with a single step and it will be interesting to see if this is a model that would work for us.

User-testing

As Renton recognised in 1975, the statute book has multiple audiences and, as parliamentary counsel, we are trying to keep each in mind. The Committee might reasonably suggest that we need to better understand what the various audiences for legislation want from the statute book, to inform any attempts to make improvements. Do we know what Parliamentarians think? What helps lawyers and non-lawyers who want to find out what the law is? How would judges like material presented? A better understanding of how these groups use legislation, and their preferences, would help ensure efforts are not misdirected.

Computers

Just as the Committee was quick to see the potential for computers, I am sure they would want to ensure full advantage is being taken of modern technology.

I imagine the Committee would be disappointed that there is still no free completely up to date version of UK primary and secondary legislation for the public to view on legislation.gov.uk. As Sir Cecil Carr put it "if English law will not allow us to plead ignorance of its contents, the State owes us the duty to supply us with the means of knowledge."[28] The Committee would, I am sure, recognise that substantial progress has been made and the significant headwinds faced by those running the legislation.gov.uk platform. Hopefully, they would recommend that all necessary support is now provided to create and maintain an up-to-date statute book.

Whilst style and techniques have changed over the decades, we still essentially draft to produce a hard copy product. We approach it much like a book, intended to be read from cover to cover. Given the way legislation is now accessed online, the Committee might usefully recommend that more research is done into the best formats and approaches for documents which are primarily read online. Accessing legislation online, the public may land on an individual section via a Google search, and not read the whole Act. Online publication may also bring new opportunities to assist the reader to navigate and understand the statute book. In an electronic age, could we provide up-to-date information about extent and commencement section by section? Would longer sections with internal headings be

[27] 2019 anaw 4.

[28] Sir Cecil Carr, 67 LQR 482.

better for the online reader than a run of shorter sections? Should hyperlinks be provided for defined terms? Should we aim for more signposts to help the reader navigate the document?

Devolution

Devolution is, of course, intended to permit differences to arise within the United Kingdom. But I think, particularly when it comes to amendments to older Acts, the Committee could rightly challenge whether we have done enough, as parliamentary counsel, to minimise unnecessary differences of approach and prioritise clarity. There are strong relationships between the four UK drafting offices, and we could explore whether there is more scope to agree approaches to common issues.

New powers to simplify the landscape

I am sure that, as in 1975, the Committee will be able to identify a raft of other things which might help improve the state of the statute book. They might like to consider the role that new delegated powers could play.

The *Deregulation Act 2015* conferred two powers which make small but useful contributions to simplifying the overall state of the statute book. Section 104 enables references to the commencement of an Act, or another event, to be replaced with the actual date (a useful tool – but one the Committee might recommend departments make better use of). Section 105 has simplified the landscape of secondary legislation by enabling legislative drafters to use regulations, by default, regardless of the type of instrument originally specified in the enabling power.

There are other similar sorts of changes that the Committee might like to consider, such as powers –

- to renumber Acts or parts of Acts where they have been heavily amended;
- to repeal legislation which hasn't been commenced after 5 years;
- to make a single instrument even if the underlying powers provide for different parliamentary procedures to apply (thus reducing the total number of instruments needed and the fragmentation of the law).

Whilst a handy back-stop for parliamentary counsel, one that may not find favour is a power to make minor corrections to Acts. Such a power exists in some other jurisdictions, but when it was proposed in the UK a *Times* newspaper leader apparently said:

> If Parliament, by reason of its legislative incontinence and hugger mugger proceedings is no longer capable of ensuring that it legislates with care and precision, the remedy for that sad degeneration is not to lighten the procedural penalties for carelessness but to increase them.

Other possible areas for recommendations

A more consistent approach to the labelling of Acts – to draw out the connections between them – might be a helpful development. Statutory instruments, by contrast, are allocated a subject category as well as a title.

Perhaps we can also learn from the past. Originally every railway had its own Act of Parliament, but eventually most of the common clauses were extracted into general railways Acts, leaving each company's individual Act to deal with exceptions and additions to the general rules. There are a number of areas where there might be scope for employing a similar technique to avoid repetition and improve the clarity of legislation.

Current parliamentary procedure is one driver for large multi-topic Bills. Multiple Bills are likely to take longer to pass through Parliament than a single combined Bill of the same length. If splitting out topics into individual Bills is better for the coherence of the statute book, then thought could be given to how parliamentary procedure might facilitate that. Similarly, we have discussed internally trying to "tidy as we go", by consolidating or restating a wider set of provisions where we are operating in an already heavily amended area. Time is always going to be a factor here, but current rules on scope also deter Government Bills from taking this approach, as it would open up for debate and amendment areas where the law is remaining unchanged (but being restated).

Conclusion

It is not difficult to identify many things which would have a beneficial impact on the accessibility of the statute book. The question is how can meaningful steps be taken?

Understandably, for politicians, new laws are generally more attractive than laborious attempts to consolidate or improve the statute book. So, whilst I do not imagine anyone is hostile to making improvements to the statute book, it is unlikely to be a political priority.

Wales is in a different place, given the desire to present Welsh law in a particular way, and as such has secured that political buy-in through the *Legislation (Wales) Act 2019*.

The Law Commission and parliamentary counsel are two players with a keen interest in the overall condition of the statute book. But we need a wider coalition of "the interested" to recognise that change is important, and that meaningful change will take time and needs consistent and sustained effort. For change to happen, I do not think it needs to be a high political priority, but it needs to be recognised that it should always be happening, in the background. The rule of law requires a statute book that is fit for purpose.

On a lighter note, I finish with some thoughts from Lord Thring on the subject of Simplification of the Law. He said:

> Everybody is a reformer. Every woman can say, and every man can write, how a scheme could easily be framed by which one small volume, or at most a few small

> volumes, should comprise, in a form intelligible to all, the wrongs of man, the rights of women, the mode in which those wrongs should be redressed, and those rights enforced. Opinions differ as to the reasons why the world is deprived of so great, so easily attained a boon. The House of Lords blames the House of Commons; the House of Commons makes an onslaught on the obstructiveness of the Lords; the Judges, with characteristic impartiality, denounce both Houses equally. On one point alone Lords, Commons and Judges alike agree, namely on the incompetency of the officials entrusted with the task of drawing Acts of Parliament.[29]

As you will have gathered, I have tried to share out the responsibility.

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[29] Thring, above n.19.