

Regulatory Impact Statement

Reducing the likelihood of offenders of serious violent or sexual offences from coming into contact with their victims

Agency disclosure statement

This Regulatory Impact Statement (RIS) was prepared by the Ministry of Justice.

It provides analysis of the options to address a legal gap that allows serious violent and sexual offenders to come into contact with their victim(s) where other legal protection mechanisms do not apply.

There are significant difficulties in obtaining the data relevant to estimating the number of victims who would want a legal remedy to address this situation.

Two of the options discussed require amendment to legislation.

The expected fiscal costs that may result from each option can only ever be approximate as there is no specific data that can be used to predict:

- the size of the gap the options might address.
- the likely number of breaches and therefore the cost implications of introducing a new order.
- the implications to the courts and collections.

Figures in this RIS are estimates only and are based on assumptions made from data on restraining and protection orders, as well as general assumptions on the potential impacts on the prison population. (see appendix 3 for more detail).



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Status quo and problem definition

Status quo

1. In response to an incident in late 2011, where an offender who had served a prison sentence for rape moved into a property next door to his victim, the Minister of Justice requested a review of the existing orders and options available to protect victims in similar situations.
2. There are a range of measures in the law to prevent offenders from coming into contact with those that they have offended against.
3. Release conditions, parole conditions, restraining orders, protection orders and bonds to keep the peace are all existing mechanisms that can be used to protect victims from offenders.
4. Both standard and special conditions can be imposed on released prisoners. Special conditions can include residential and workplace restrictions which place limits on where an offender can live or work as moving residence or place of employment must be approved by the probation officer supervising the offender. These conditions cannot last for more than six months beyond the statutory end of a sentence except for indeterminate sentences where conditions can apply indefinitely.
5. Restraining orders are designed to protect a person from harassment, and protection orders are designed to protect people from domestic violence.
6. A bond to keep the peace can be imposed to protect victims where they fear harm or provoking or insulting language or threats from another person. Bonds however, carry very low penalties compared to the other measures, and are rarely used (around 24 per year).
7. All of the existing orders are generally time-limited. Bonds can last up to one year, restraining orders for one year (unless otherwise specified by the judge), and release and parole conditions cannot extend more than 6 months after the sentence expiry date unless the offender has an indeterminate sentence, where conditions can apply for life. Protection orders can remain in place indefinitely.
8. Appendix 1 contains more information on the features of each of the existing mechanisms.

Problem definition

9. The impact and effect of serious violent and sexual offences can last for a significant period of time after an offence has been committed. For victims, the healing and recovery process can be hindered by ongoing fear and anxiety about the offender. This is exacerbated when offenders live or work in close proximity to their victims and the potential for contact between the two increases.¹
10. In situations where the release or parole conditions that apply to an offender have expired, and where there has not been a domestic relationship or evidence of deliberate harassment, there is no mechanism for the Police or the courts to reduce the likelihood of an offender from coming into contact with his or her victim.
11. It is very difficult to estimate the number of victims who find themselves in this situation and want a legal remedy. Most of these are likely to be children and/or female. Taking the number of offenders released from prison each year following

¹ Two victims representatives who were consulted on this proposal noted that fear/anxiety of victims toward their offenders can be heightened when the offender is living or working nearby to where the victim lives. This is consistent with research undertaken by the Ministry of Women's Affairs. See Ministry of Women's Affairs (2009) *Restoring Soul: effective interventions for adult victims/survivors of sexual violence*. Wellington: Ministry of Women's Affairs and Kingi, V., and Jordan, J. (with Moeke-Maxwell, T. and Fairbairn-Dunlop, P.) (2009) *Responding to Sexual Violence: pathways to recovery*. Wellington: Ministry of Women's Affairs.

conviction for a serious violent or sexual offence against children and/or females where there has not been a previous domestic relationship – estimated at 250– and assuming that around 20% of these want a form of legal protection, this would indicate about 50 cases each year.

Objective

12. To reduce the likelihood of unwanted contact between serious violent and sexual offenders and their victims where other legal remedies are not available.
13. There are no budget or time constraints applying to this analysis.

Regulatory Impact Analysis

14. The proposal to address the legislative gap that allows serious violent and sexual offenders to come into contact with their victim is part of a wider package of reforms being undertaken to enhance the rights of victims.
15. Addressing this legislative gap will provide an additional element of protection to victims of serious violent or sexual offences. It will mean that victims of a serious violent or sexual crime, who have not been in a domestic relationship with their offender, but who are understandably apprehensive and experience fear and distress about coming into contact with an offender can take steps to address this situation.
16. All the options considered will apply only to victims of serious violent or sexual offending. In this context a 'serious violent or sexual offence' is a sexual or violent offence that resulted in the offender serving two years or more imprisonment. This definition also includes close family members of murder or manslaughter victims.

Option 1: retaining the status quo

17. As noted above, there are a number of orders and mechanisms to restrict an offender coming into contact with their victim under the status quo.
18. Although it will not cost anything to retain the status quo, when release or parole conditions have expired there is no way to make the existing range of mechanisms apply to victims who are not or have not been in a domestic relationship or who cannot provide evidence of deliberate harassment. Retaining the status quo cannot achieve the objective of this policy.

Option 2: enhanced status quo

19. Improvements to the status quo, such as better information for community service providers, could increase the number of people who apply for the existing orders.
20. As an example of how protection and restraining orders could be better utilised, both orders can contain conditions that can restrict an offender from visiting or attempting to make contact with the victim. In the case of Protection Orders, this condition can apply indefinitely. Conditions attached to both these orders can be varied or discharged on application to the court. A victim can therefore apply to have a new non-contact condition imposed if one doesn't already apply. However, some victims are not aware of this or may not feel they have the support or knowledge to apply for a variation. This undermines the effectiveness of these orders.
21. Enhancing the status quo depends on victims having the knowledge that these orders may be available, and can be varied as necessary. This requires clear information that is accessible to those without internet access and to those who do not speak English.

22. Ensuring accessibility would require: information to be distributed to key stakeholders engaging with victims (around \$10,000-\$15,000),² a review of the application forms and processes for restraining orders and protection orders to identify improvements to make them more user-friendly,³ and training of court staff, people who work in victim support and police officers to ensure they have the necessary knowledge to bring the availability of the existing orders to the attention of victims in appropriate cases.⁴ Information would need to be available in several languages.
23. These initiatives could be funded from within existing baselines at the Ministry of Justice and Police.
24. This option would not address the legislative gap directly; it would only ensure better use of the existing orders.

Option 3: a new order in the Harassment Act 1997 (preferred option)

25. A new order could be created in the Harassment Act 1997 to enforce the presumption that victims of serious violent and sexual offending are entitled to a certain level of protection. Unlike the existing restraining order there would not be a requirement for the victim to provide evidence of previous incidents of harassment by the offender.
26. Victims will be able to apply for the order at any time whether upon or after the offender's release.
27. Victims who have registered for the Victim Notification Register (VNR) receive updates on their offender's release from prison and again when parole and sentencing conditions expire. Victims not on the VNR by choice or because their offender has served their full sentence and is already living in the community may not be aware of when the offender is released or where the offender is living and working. This will not preclude the victim from applying for the order, but it could make it more difficult for the application to succeed if the offender cannot be located.

How many people would apply?

28. No data is available that would allow the number of people who may apply for this order to be accurately identified.⁵ Based on data available on protection orders and restraining orders however, a best-guess estimate is 10 orders granted per year.⁶ Because of the number of offenders of serious violent or sexual offences who have been released already and the impact of publicising the introduction of this order, it is likely more people will apply for the order in the year it is introduced than in subsequent years.

Implementation and administrative costs

29. As the new order is proposed to be inserted into the Harassment Act, it will need to be consistent with the format of the existing restraining order. This would require minor amendments to the Harassment Act, restraining order application forms and the creation a new form specific to the new order. The Ministry is not able to isolate these costs, but they are likely to be minimal and can be absorbed within existing baselines.

² See appendix 2 for further details.

³ The Ministry is unable to provide an estimate cost for this.

⁴ Training could either be carried out in-house by each organisation/entity or by Ministry representatives. Costs would vary by whichever method was chosen and the level of training needed.

⁵ See appendix 3 for further details.

⁶ Ibid.

30. The cost to court's of processing the existing restraining order cannot be specifically isolated from courts data so the Ministry is unable to estimate a cost for processing a new order. It is likely that more time would be required to process a new order than is currently required for restraining orders or protection orders because court registrars will be required to locate and verify the correct offender on the application and this could be difficult if the application does not provide much information about the offender's whereabouts.

Costs of enforcement and breaches

31. To avoid imposing a significant cost burden on the Police, enforcement of this order would have to be done reactively in response to breaches that have occurred. This problem arises with each of the options under consideration (including the existing orders) and highlights the limitations of orders designed to protect victims and assist them to feel safe from their offender as the victim would have to alert Police to a breach.
32. Police would be responsible for responding to call-outs regarding breaches, and deciding whether to lay charges. If breaches resulted in prosecution, there will be impacts to the courts in terms of a small increase in cases. If prosecutions result in imprisonment or community sentence, there will be costs incurred by the Department of Corrections but these are likely to be comparatively small.
33. No data is available that would allow the number of people who may breach this order to be accurately identified, but the breach and subsequent conviction and imprisonment rates for protection orders and restraining orders provide a base from which the rates for the new order can be estimated. Making assumptions based on these existing orders, the cost of breaches in terms of extra prison beds is minimal and should not exceed \$85,109.⁷ The cost of breaches in terms of community sentences should not exceed \$29,540.⁸
34. The costs of enforcing (by Police) and the costs of sentences for offenders convicted of breaching the orders will depend on the length of time orders are imposed for. The higher the number of people receiving indefinite orders, the higher likelihood of breaches, and the higher the enforcement and sentence costs.

Other issues

35. A problem with this proposal is that it relies on judicial discretion to determine what is necessary to reduce the likelihood of unwanted contact in each case. A risk is that this will vary depending on the circumstances in each case and some victims may not consider the order offers them adequate protection.
36. This risk could be mitigated by conditions applicable to their situation being imposed. For example, in a small town where the victim and offender have support networks and live near each other a judge may consider that making the offender move out of town is an unjustified limitation on their rights. In this situation the conditions imposed would be designed help the victim feel safer by preventing contact between the offender and victim wherever possible e.g. curfew, specific prohibition from visiting certain place(s) unaccompanied.
37. In addition, to comply with the condition the offender would have to be aware of the victim's location, which could increase the fear and anxiety a victim has in regards to the offender.
38. As the number of orders granted is estimated at around 10 per year, this option will only impact on the liberty of a small number of offenders in any given year. It is intended that any conditions imposed will not restrict an offender from living or

⁷ See appendix 3 for further discussion on how this figure was estimated.

⁸ Ibid.

working in a different location from the victim. This will ensure the order constitutes only a limited infringement on an offender's rights.

39. This option can achieve the objective of reducing the likelihood that offenders who have committed serious sexual or violent offences are prevented from coming into contact with their victim(s) wherever possible in the circumstances of each case.

Option 4: amending the Parole Act 2002 to allow for an indefinite non-contact/residential parole condition

40. A fourth option is to amend the Parole Act 2002 and allow the Parole Board to impose a special non-contact/residential parole condition that can last for any time they specify (including indefinitely). One of the criteria for special conditions is that they may be imposed where it is deemed necessary to protect the victim(s) from the offender.⁹ As with other special conditions, this could include a requirement that the offender has to seek approval from their probation officer to move residence or workplace.
41. This option has the benefit of operating within the existing parole process. It would require an amendment to section 29 of the Parole Act to allow a specific non-contact/residential parole condition to apply indefinitely.
42. This option also has the benefit of placing the onus of protecting victims on the state, not the victim's themselves. However, leaving the Parole Board to decide whether or not the condition is necessary limits the accessibility of this condition only to victims of offenders who will be released in the future.

Costs

43. Option four would be a significant extension of the parole system because it would require the Department of Corrections to monitor¹⁰ offenders who are no longer under the supervision of probation officers, well beyond six months after the statutory sentence end date (including indefinitely) when parole conditions currently expire. The pool of offenders subject to this condition would grow substantially over time, requiring additional ongoing Department of Corrections resources. The Ministry is unable to provide an estimate of these cost implications as the number of these conditions imposed cannot be estimated. However, this option is likely to result in significant cost increases to the Department of Corrections over time.
44. Community probation staff would be responsible for alerting police to breaches of the condition. Offenders and victims would therefore need to advise community probation (or another third party) of any changes to their circumstances for as long as the condition is in place. This raises practical and rights issues. As with option three, an offender would have to be aware of the victim's address at all times to ensure they can comply with the condition. This runs the risk of increasing rather than reducing any apprehension on the part of the victim.
45. This option can achieve the objective of reducing the likelihood that offenders who have committed serious sexual or violent offences are prevented from coming into contact with their victim(s) wherever possible if it is deemed necessary by the Parole Board.

⁹ See section 15 of the Parole Act 2002

¹⁰ 'monitor' in this context would involve Corrections maintaining an active database of the offender and victim's whereabouts and providing resources to process applications from an offender to move place of residence or work.

Consultation

46. The Department of Corrections and the Police preferred an amendment to the Harassment Act 1997, and did not support amending the Parole Act 2002.
47. Three Community Law centres, two victims' representatives and the Ministry of Women's Affairs were contacted directly about the possibility of introducing a new order in the Harassment Act 1997, as well as how they perceived restraining orders to be used at present and how accessible they were. Four responses were received, and feedback demonstrated a mix of views, with two in support and two against.
48. Arguments against introducing a new order included that this order would breach a person's right to freedom of movement, and that any attempt to limit the location of an offender on the basis of 'potential' to commit an offence was akin to a breach of the double jeopardy rule.
49. Two responders indicated clear support for the introduction of a new order, stating that it would provide victims with an element of certainty, and may help to reduce the levels of anxiety victims experience when their offender is released.
50. All responders noted significant problems with the status quo. Information available to victims on the existing orders, user-friendliness of the application forms, and the levels of support available to victims were cited as particular issues.
51. In particular responders noted that restraining order application forms are difficult to understand. They noted that some victims do not have enough evidence of the incidents which forms the basis for an application, which can result in the application being refused. One responder also noted that people were often unaware or confused about the difference between a protection order and a restraining order.
52. All responders noted that many victims are unaware of the existing orders, that many mistrust the court system and don't feel the existing orders are accessible. This was noted as a particular problem for people without internet access, or with poor English skills. Legalistic explanations from court staff were noted as a deterrent to victims proceeding with an application.

Incorporating the feedback

53. These issues have been considered, and the implementation of the preferred option (option three) has been expanded to address them.
54. No other external consultation was undertaken due to the limited nature of this proposal.
55. As the purpose is likely to be addressed by legislative change the public will have an opportunity to comment when the proposal is considered by a Select Committee.

Conclusions and recommendations

56. Each option has its own costs and benefits. This proposal deals with an issue that is difficult to quantify, which makes it equally difficult to accurately determine the fiscal costs and benefits that might result from any one option. The table below provides a summary of the high level costs and benefits that may result from each option.

Table 1: High level overview of the costs and benefits of each option

Costs/ Benefits	Option 1 - Status Quo	Option 2 - Enhanced Status Quo	Option 3 – new order in the Harassment Act	Option 4 – amending the Parole Act
Implementation costs	None	Yes Information campaign.	Yes • Information campaign. • Development of new forms. • New operational procedures for Police, Justice and Corrections.¹¹ • Legislative amendment required. This is costly and lengthy.	Yes • New operational procedures for Police, Corrections and the Parole Board.¹² • Significant increases of costs to corrections for monitoring people subject to the new condition. • Legislative amendment required. This is costly and lengthy.
Enforcement Costs	N/A	N/A	Yes Breaches could result in imprisonment or fine	Yes Breaches could result in imprisonment or fine
Limitations on offender's rights	No more than at present	No more than at present	Yes More than at present. Potential conflict with freedom of movement and double jeopardy (sections 18 and 26(2) NZBORA)	Yes More than at present. Potential conflict with freedom of movement and double jeopardy (sections 18 and 26(2) NZBORA)
Presumption that victims of serious violent or sexual offences are entitled to extra level of protection	No	No	Yes	Yes
Victims will feel safer	No	No	Yes	Yes

57. Retaining the status quo, and enhancing the way the existing orders are used would avoid the cost of legislative change while ensuring the existing orders are being used to their full potential. The status quo/enhanced status quo does not require any extra limitations to offender's rights and it could ensure better use of the existing orders, but it cannot directly address the existing legislative gap that exists.
58. While options three and four will impose additional costs on the justice sector these are the only two options that will meet the stated objective and help victims to feel safer.
59. Option four will ultimately have greater cost implications than option three as the requirement for Corrections to provide monitoring of a parole condition will cost more than an order that is not monitored (i.e. option three). Over time these costs are likely to be very significant. The value of this option is also undermined by the fact it is a significant extension of a system that is not designed to restrict, or

¹¹ The cost of implementing this option cannot be quantified because data is not available on the cost of amending forms, the cost of implementing new operational policy could significantly vary between departments, and the cost of an education campaign is not able to be determined and could vary significantly depending on the approach taken.

¹² The cost of implementing new operational policy could significantly vary between departments.

monitor, an offender's movements past six months after their statutory sentence expiry date.

60. The Ministry notes that if a new legislative tool is required, developing a new order in the Harassment Act provides an opportunity to directly address the legislative gap that allows offenders to come into contact with their victims when other orders or conditions do not apply. This option also has the benefit of being supported by both Police and Corrections and the other people who were consulted with.

Implementation

61. If Cabinet agrees to this proposal, legislation amending the Harassment Act will be introduced to Parliament in early 2013.
62. Following enactment, the Ministry of Justice would provide information about the new order to community law centres, citizens' advice bureaus and victim's support workers. Pamphlets, information guides (whether paper or electronic copies) and the internet (via the courts website, and community service provider websites) are an example of methods that would be used to facilitate information flow.
63. As with existing restraining orders, Police must be alerted when a breach is occurring, or has occurred. To ensure that this order achieves its public policy objectives, breaches should be strictly enforced through charges being laid although this will ultimately be a matter of police discretion.

Monitoring, evaluation and review

64. To ensure there is adequate funding for the processing and enforcement of these orders, the Ministry's Courts data will be reviewed at six months, and then one year after implementation to evaluate how often the order is being sought, and how often it is granted.
65. It is also important to determine whether or not the preferred option is effectively achieving its objective. Community service providers and users will be surveyed one year after the order is introduced on the accessibility of the order with regard to the application forms and the information available to victims.

Appendix 1: Analysis of the existing legal mechanisms available to protect victims

	Civil or Criminal Order	Apply to:	Specific residential restrictions?	Length of time conditions/order applies	Penalty for Breach
Release conditions	Criminal	Offenders sentenced to <12 months imprisonment, as determined by court (optional). Offenders sentenced to >12 months imprisonment (mandatory).	Y- as a special condition for reasons such as 'reasonable concerns of victim'.	No more than six months after sentence expiry date.	Up to 1 year imprisonment.
Parole conditions	Criminal	Offenders sentenced to >2 years.	Y- as a special condition for reasons such as 'reasonable concerns of victim'.	Determinate sentences: up to 6 months after statutory end date. Indeterminate sentences: any time specified by parole board, can apply for life.	Up to 1 year imprisonment and/or recall during period of original sentence.
Protection order	Criminal and Civil	Respondent in a 'domestic relationship' where evidence of domestic violence and order needed to protect applicant and/or applicant's children.	Y – court may impose special conditions that are reasonably necessary to protect the protected person from further domestic violent which could include residential restrictions.	Indefinitely- until it is discharged by the court.	Up to 2 years imprisonment.
Restraining order	Civil	Respondent who has committed specified acts of harassment against an applicant on at least two separate occasions within a period of 12 months and order is needed to protect applicant.	Y- court may impose special conditions that are reasonably necessary to protect the applicant from further harassment, which could include residential restrictions.	For duration of restraining order: 1 year if not specified, for any other period of time specified by the judge until discharged by the court.	For first breach - up to 6 months imprisonment or a fine not exceeding \$5000. For second and subsequent (within three years of the first offence) - up to 2 years imprisonment.

Bond to Keep the Peace	Civil	Either: any person, on application by a member of the public with 'just cause' to fear harm by the respondent, or the respondent has used provoking or insulting language or has threatened to commit a specified offence under the Crimes Act 1961. Or: imposed by judiciary on a person charged with an offence Requires offender to enter a bond- with or without surety to the court as the court directs.	Each bond includes a condition that the defendant keeps the peace towards the complainant and refrains from doing the act feared or from repeating the conduct complained of or from doing the act threatened. If the conduct/act involved stalking, or visiting the complainants house the bond would prevent this behaviour.	Up to one year.	Failure to enter bond – up to 2 months imprisonment. Breach of conditions - forfeiture of 'bond' paid to court.
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Appendix 2: Costs of providing information

Information packages, potentially in the form of pamphlets and posters, or electronic documents, could be provided or sent to key stakeholders such as libraries, citizen's advice bureau's, community law centres, local police stations, churches, rape crisis centres etc. Collaborating with victims' advisors in the district courts would also assist the distribution of information to those who need it most.

Several different types of media will be required to ensure the information is accessible to all the audiences who will receive it (including victims, victims' advisors, victim support and legal practitioners). Information will need to separately convey information about the orders, and how to apply for them. Testing of the information package on the target audience will also be needed to ensure the information is presented effectively and in a user-friendly way. The cost of designing and producing media in house at the Ministry of Justice is likely to be \$10,000-\$15,000.

In conjunction with advertising, the Ministry would also need to ensure that both the Courts website and the Justice website contained up to date information and links to people who can assist victims. Updating of the Ministry websites can be completed in-house and absorbed within existing baselines.

Appendix 3: Assumptions used to estimated figures used in the Regulatory Impact Analysis

Number of applications made per annum/number of victims eligible to apply

- An average of 1150 offenders of serious violent or sexual offences are released from prison every year but the Ministry of Justice cannot identify how many of these offenders are subject to one of the existing orders.
- The Ministry of Justice was also unable to match the total number of protection orders and restraining orders issued each year with the number of breaches of these orders. The result is that it is not possible to give an estimate of how many victims might be eligible for this proposed new order.

Number of orders granted per annum

- Over the period 2008-2010, the average number of protection orders and restraining orders issued each year is 280 and 78 respectively. These figures do not provide a direct comparison given the specific nature and intent of each order. This makes it difficult to use these figures to give a practical estimate of how many of the new orders will be issued in any given years.
- It is likely that a significantly smaller number (less than a quarter of the average number of restraining orders issued each year) of the new orders will be issued on average, to a total of around 10 per year. This estimate is based on the similarity of the new order to the existing restraining order, and recognition that the pool of people who unable to access the existing orders is likely to be very small.

Costs resulting from breach of option three

- As a consequence of not being able to calculate rates of breach of restraining orders and protection orders, it is similarly impossible to calculate a rate of breach for the proposed new order. We can, however, provide some data on the likely cost based on a numerical range of possible breaches each year and what the corresponding impacts to the sector in terms of convictions and prison beds are.
- The average breaches/convictions/custodial sentences and extra custodial days for restraining orders and protection orders are as follows:

Average number of cases for breaches and resulting convictions and imprisonment per annum: 2008-2010

Breaches			
Protection Orders	Convictions	Custodial sentences	Average custodial sentence imposed (years)
2662	1800 (67.6%)	494 (27.4%)	0.36
Restraining Orders			
9	6.3 (70.4%)	1.2 (17.1%)	0.64

- Using an average based on the combination of current rates for restraining orders and protection orders, the following calculations for determining the number of breaches of proposed new order were established:
 - Estimated conviction rate: 69.0%
 - Estimated custodial sentence rate: 22.3%
 - Estimated average custodial sentence imposed (years): 0.5

- Estimated proportion of custodial sentence served: 0.5 (based on previous proportions served for offences against justice), so $0.5 \times 0.5 = 0.25$ years or 91 days.

- The estimated impact is as follows:

Estimated cost impacts of breaches per annum (imprisonment)

Breaches	Convictions	Custodial sentences	Total custodial sentences imposed (days)	Prison beds	Imprisonment cost (\$)
2	1.4	0.3	56	0.1	3,404
5	3.5	0.8	141	0.2	8,511
10	6.9	1.5	281	0.4	17,022
20	13.8	3.1	562	0.8	34,044
50	34.5	7.7	1405	1.9	85,109

Using data for breaches of protection orders from 2008-2010, it is estimated that 3.4% of convictions for breaches of the new order would result in home detention sentences and 42.7% in community sentences.

Estimated cost impacts of breaches per annum (community sentences)

Breaches	Convictions	Home detention sentences	Other community sentences	Community sentences cost (\$)
2	1.4	0.0	0.6	1,182
5	3.5	0.1	1.5	2,954
10	6.9	0.2	2.9	5,908
20	13.8	0.5	5.9	11,816
50	34.5	1.2	14.7	29,540