
Robert Hoppe
Kari Lancaster, University of New South Wales
Allison Ritter, University of New South Wales
Caitlin Hughes, University of New South Wales

Available at: https://works.bepress.com/robert_hoppe1/34/
Research

A critical examination of the introduction of drug detection dogs for policing of illicit drugs in New South Wales, Australia using Kingdon’s ‘multiple streams’ heuristic

Kari Lancaster, University of New South Wales, kari.lancaster@unsw.edu.au; Alison Ritter, University of New South Wales, alison.ritter@unsw.edu.au; Caitlin Hughes, University of New South Wales, caitlin.hughes@unsw.edu.au; Robert Hoppe, University of Twente, r.hoppe@utwente.nl

This paper critically analyses the introduction of drug detection dogs as a tool for policing of illicit drugs in New South Wales, Australia. Using Kingdon’s ‘multiple streams’ heuristic as a lens for analysis, we identify how the issue of drugs policing became prominent on the policy agenda, and the conditions under which the alternative of drug detection dogs for illicit drugs policing came to be endorsed by decision makers. By applying Kingdon’s heuristic, we also consider how this approach may be used to illuminate the limitations of the evidence-based policy paradigm in the context of policing policy.

keywords: Kingdon • multiple streams • policing • drug detection dogs

Introduction

The Hon John Jobling:

… Quite frankly, most reasonable people in reasonable circumstances would say that that is common sense. The dogs are highly skilled and highly trained, and their purpose is simply to detect whether a person is carrying drugs.

The Hon Michael Costa:

And they are cute.

The Hon John Jobling:

They are much more handsome than the Minister for Police. They are also more efficient and more skilled. (NSW Government, 2001a, 20200)
In Australia and internationally, law enforcement and policing responses dominate illicit drugs policy both in terms of political rhetoric and budget resource allocation (Boyum and Reuter, 2005; European Monitoring Centre on Drugs and Drug Addiction, 2014; Executive Office of the President of the United States, 2014; Ritter et al, 2013). One more recent (and contentious) policy development in this domain has been the use of drug detection dogs as a high visibility strategy for street-level policing of illicit drugs (Marks, 2007; Meagher, 2009; Nabben, 2009). Police have long used general-purpose dogs to assist their operational duties, however it was not until 2001 that New South Wales (NSW) became the first Australian jurisdiction to use specially trained drug detection dogs in public spaces (to screen people for the presence of illicit drugs or residue) and provide a specific legislative basis for their deployment (the NSW Police Powers (Drug Detection Dogs) Act 2001) (Hughes et al, 2014; Meagher, 2009; NSW Ombudsman, 2006; NSW Police, 2015). While the introduction and subsequent legislative developments garnered bipartisan support in the NSW Parliament, the policy has attracted widespread criticism from some politicians, and from researchers, civil liberties advocates, and media. Questions have been raised about the effectiveness of this approach for policing illicit drug supply, the multiple effects on drug use behaviour, and whether or not this policing practice is an appropriate fit with harm minimisation approaches to drug policy (Dunn and Degenhardt, 2009; Hickey et al, 2012; Hughes et al, 2014; Marks, 2007; Meagher, 2009; Nabben, 2009; NSW Ombudsman, 2006; Race, 2014). The most significant and wide-ranging review of police use of drug detection dogs was undertaken by the NSW Ombudsman. This review, published in 2006, concluded

> There is little or no evidence to support claims that drug detection dog operations deter drug use, reduce drug-related crime, or increase perceptions of public safety. Further, criticisms of the cost-effectiveness of general drug detection operations appear to be well founded… [W]e have misgivings about whether the Drugs Dogs Act will ever equip police with a fair, efficacious and cost-effective law enforcement tool to target drug supply. (NSW Ombudsman, 2006, viii)

Despite this unequivocally scathing review, the use of drug detection dogs remains firmly embedded within the law enforcement agenda of NSW drug policy and strongly defended by NSW Police (Corderoy, 2014; NSW Police Force, 2011; Scipione, 2015). The use of drug detection dogs has also been integrated into the operations of all other Police Forces across Australia, in large part due to the proffered ‘success’ of the NSW example.

To date, there has been little critical examination of how drug detection dogs as a tool for street-level policing of illicit drugs came to be implemented in NSW, or indeed in any other jurisdiction internationally. Given the subsequent diffusion of this approach across all Australian states and territories, and the arguments which have more recently ensued regarding its effectiveness, it is important to take a critical view and trace in detail how the use of drug detection dogs for street-level policing was originally specified as a viable alternative and rose on the decision agenda. Such analysis would illuminate the conditions which foster such decisions and generate understandings about how an arguably ineffective policy can continue to garner support. The increased uptake of ‘evidence-based policy’ rhetoric in criminology and
policing (for instance, Sherman, 1998; Weisburd et al, 2005) has been accompanied by the assumption that new policing policies should be introduced based on the best available evidence of ‘what works’, and if evidence as to their ineffectiveness is brought to light, then this should provide sufficient rationale to terminate the policy. We suggest that the taken-for-granted assumptions about ‘evidence of effectiveness’, ‘rationality’ and ‘authoritative choice’ embedded within the evidence-based policy paradigm belies a far more conflicted and contested process, and that a highly politicised domain such as drugs policing policy provides fertile ground for such investigation. Thus, we position our research within a body of policy processes literature which, contrary to the premise of the evidence-based policy paradigm, sees policy processes as characterised by inherent conflict and ambiguity regarding ‘the problems to be addressed, which voices should be heard, and what activities may be appropriate’ (Colebatch, 2010, 33).

As has been argued elsewhere (Ritter and Lancaster, 2013), the problem of implementing effective drugs policing policy is less about the availability of ‘evidence’, and more to do with the very nature of the policy process: the policy context, influence of actors, contested knowledge(s), available alternatives, political imperatives, values, and the ways issues are framed and problematised. Thus, it is important to analyse drugs policing policy from a policy process point of view as it may provide valuable insight into the apparent ‘dissonance’ (Ritter and Lancaster, 2013, 457) between ‘evidence-based policy’ rhetoric and the actuality of policing policy. Kingdon’s (1995) multiple streams heuristic is one such policy process approach that ‘deals with policymaking under conditions of ambiguity’ and stresses the ‘dynamic, complex, and chaotic nature of political life’ which ‘other frameworks simply assume away’ (Zahariadis, 2014, 26–7, emphasis added). Despite the highly politicised nature of the policing policy domain, to our knowledge there has only been one published analysis of policing using Kingdon’s heuristic, in the European context. Terpstra and Fyfe (2014) examined macro-level police changes (structure, governance and accountability of police forces) across two nations (Scotland and the Netherlands). However, Kingdon’s approach has been used in the drug policy field more broadly to examine, for example, the emergence of methamphetamine as a policy issue in Australia (Lancaster et al, 2014), cannabis policy in Canada (Hyshka, 2009) and drug consumption rooms policy in Canada, England and Wales (Hayle, 2015). By applying Kingdon’s approach, these studies have illuminated the complexity of the drug policy process and the limitations of the ‘evidence-based policy’ paradigm in this contested policy domain. To date, Kingdon’s approach has not been applied to drugs policing policy specifically.

Our aim is to use Kingdon’s multiple streams heuristic as an analytic framework to examine the introduction of the use of drug detection dogs for policing of illicit drugs in NSW, Australia. In Kingdon’s (1995, 3) terms, we seek to understand why the issue of illicit drugs policing became prominent on the policy agenda, and why the alternative of drug detection dogs as a major instrument for illicit drugs policing was seriously considered at this time. By applying Kingdon’s heuristic, in our discussion we also consider how this approach may be used to illuminate the limitations of the evidence-based policy paradigm in the context of policing policy.

We begin by providing an overview of Kingdon’s multiple streams heuristic, before describing the methods used in our analysis.
Kingdon’s multiple streams

Kingdon’s (1995, 2) seminal work, *Agendas, alternatives and public policies*, draws attention to the ‘predecision public policy processes’ that shape what issues arise onto the policy agenda and what proposals are likely to be taken up. The approach has been used for over 30 years, in over 200 academic publications, to examine policy issues across multiple levels of government in nations throughout the world (Weible and Schlager, 2016; Zahariadis, 2014).

Kingdon’s heuristic describes three ‘streams’ of policy activity which operate relatively independently: problems, policies and politics. In the problem stream, the attention of people in and around government can be captured through focusing events (such as a crisis or a shift in the nature, size or visibility of a ‘problem’), systematic indicators, or feedback on the operation of existing policies or programmes. Kingdon (1995, 116) describes the policy stream as a ‘policy primeval soup’: a constant flow of new, old and reframed policy proposals that are generated, floated and ‘tested’ amongst a community of specialists (including bureaucrats, academics, and think tanks). While many proposals will be floated, successful proposals will be technically feasible, anticipate budgetary and political constraints and fit with broader community values. The third stream is the political stream, which includes an array of factors such as public mood, changes of administration, electoral cycles, and interest group campaigns that shape what issues are likely to be deemed congruent with the political climate of the day.

According to Kingdon, there come critical episodes – policy windows – when the three streams are joined, enabling issues to rise onto the decision agenda and policy change to occur. However, policy windows are infrequent and may open either predictably or unpredictably (and close just as quickly). Hence, policy entrepreneurs (advocates for particular proposals who may be inside or outside government) are required to capitalise upon emerging opportunities and link the three streams: ‘they hook solutions to problems, proposals to political momentum, and political events to policy problems’ (Kingdon, 1995, 182). The likelihood of reform is inherently linked to events within the three streams, for example if there is not an available solution the window may close. The heuristic describes a policy process which is complex, non-linear, ambiguous and somewhat serendipitous.

Method

A detailed historical account of the introduction and development of the use of drug detection dogs as a tool for policing of illicit drugs in NSW is given elsewhere (Lancaster et al, 2016). To form this account, we drew on a corpus of documents including NSW Parliament Hansard, media, academic publications, government and institutional reports, books, and online sources (including social media). These texts were obtained through comprehensive searches of Parliamentary databases, Factiva, academic databases and Google, which were undertaken between October 2014 and March 2015. Search terms included ‘drug detection dog’, ‘sniffer dog’ and ‘NSW Police’. The searches of NSW Parliamentary databases produced 46 documents across Hansard, Committees and House Papers, as well as all relevant Bills and Acts. An initial search of the Factiva database identified 75 media articles in major Australian newspapers. Additional searches were also conducted across these databases using the
names of key figures involved in the development of the policy (for example, Minister for Police, Michael Costa).

All documents were retrieved, read and then collated to form a timeline of events. Further hand searches were conducted to enable more fulsome description (for example, documents cited within reports which had not been identified in initial database searches were located through hand searches and added to the data set). After documentary data collection, the first three authors reviewed a preliminary timeline of events which summarised the documents and organised all data in chronological order (with cross-referencing so as to triangulate data sources and identify any discrepancies). After review and analysis, a revised timeline was generated. A narrative was then formed, based on the timeline of events. The generation of this historical account followed a body of criminological and drug policy literature which has examined the history of crime policies in Australia, by aiming to reveal the complexities of policy development (Lancaster et al, 2016). This account formed the descriptive case study (Yin, 2009) upon which we based our analysis. We acknowledge that the use of publicly available sources potentially limits the scope of the narrative, and does not permit access to ‘behind closed doors’ processes. However, the substantial and broad-ranging corpus of texts identified, as well as extensive analysis of Hansard, Inquiries, media and traditionally non-academic sources such as political biographies (which all include the spoken voices of key actors) provides a robust basis for analysis of these processes.

Following the approach used by Lancaster et al (2014), firstly, the timeline and historical account were coded and classified against Kingdon’s three streams. Secondly, the historical timeline data was analysed seeking to identify policy entrepreneurs, windows of opportunity and moments of ‘coupling’ within the narrative (that is, analysing for congruence and incongruence with Kingdon’s heuristic). This preliminary analysis was then critically discussed amongst all four authors. These discussions focused on testing possible analytic conclusions, and confirmatory or contradictory data points. Through this iterative process, we drew a set of conclusions from the data analysis processes which were then subject to final review by all the authors.

For the purposes of this paper, our interest was in the introduction of drug detection dogs (that is, agenda setting and alternative specification processes) and not subsequent policy development. As such, we confine our analysis to a temporal frame from the 1990s to the time of adoption of the first specific legislation governing police use of drug detection dogs at the end of 2001. While this temporal frame necessarily excludes analysis of later debates regarding the dogs’ effectiveness (and particularly the Ombudsman’s damming report), the focus on alternative specification and agenda setting in this early period provides a different kind of analytic framework for tracing the introduction of this particular policing approach. In the following sections, we present the findings of this analysis, mapped against Kingdon’s multiple streams heuristic.
Problems, policy and politics: the introduction of drug detection dogs for policing of illicit drugs

Problems

In the 1990s, two significant factors drew attention to the issues of illicit drugs and policing in NSW, producing different problem framings. Firstly, the Wood Royal Commission into the NSW Police Force highlighted the ‘problem’ of police corruption and, secondly, researchers called attention to the ‘problem’ of increasing rates of heroin overdose and drug-related harms in NSW and particularly in Sydney.

In May 1994, the Hon Justice James Wood was appointed as Commissioner of the Royal Commission into the NSW Police Force. The three-year historic inquiry authorised investigation into the existence of systemic or entrenched corruption and within these broader terms of reference, ‘substance abuse’ by police officers, ‘protection of the drug trade’ and ‘drug trafficking’ (Australian Broadcasting Corporation, 2014; Wood, 1997, 67) featured as detailed areas of investigation. One of the most ‘disturbing’ findings was the ‘extent to which police admitted to being directly involved in the supply of cocaine, heroin and cannabis’ (Wood, 1997, 107). The inquiry attracted national media attention, with evidence of police involvement in crime, drug trafficking and bribery featured daily (Williams, 2002). Close to 500 police officers resigned, including the then Police Commissioner, Tony Lauer (Chan and Dixon, 2007; Williams, 2002).

As Chan and Dixon (2007, 444) observe, inquiries such as this are rarely appointed for the purpose of ‘considered reflection’ but rather as a response when issues have ‘reached a scale or achieved such prominence that governments feel obliged to seek external, considered advice’. In this sense, the Wood Royal Commission may be seen as a focusing event. The Wood Royal Commission triggered a wave of reform in the NSW Police Force, but for our purposes here it is important to note the way this institutional venue exposed and placed the issues of illicit drugs and policing front and centre in the media and public sphere. Arguably, the scale and range of endemic corruption identified in the final report (including the failure to control illicit drug supply) and the resignation of many high-ranking officers, produced a problem for government which was difficult to ignore. Indeed it was said that ‘these problems could not be explained in terms of “black sheep” or “bad apples”: such analogies were incisively discredited’ (Chan and Dixon, 2007, 446). The findings of the Wood Royal Commission highlighted the ways in which the Police Force, the very organisation charged with addressing the drug market and law and order issues, had become embroiled and implicated within the problem it purportedly sought to address. These findings arguably reshaped the way the problem of drugs could be talked about in NSW politics, and placed responsibility back on government to ensure appropriate oversight, as will be discussed in more detail below. In Kingdon’s (1995, 111) terms, a ‘re-categorisation’ took place which reframed the issue of ‘police corruption’ into a problem of ‘better policing of illicit drugs’. Importantly, the findings also pinpointed the ‘cause’ of a problem, here a ‘human’ cause, which immediately invokes accountability and blame issues.

At the same time that the Wood Royal Commission was revealing the extent of police involvement in Sydney’s drug market, researchers were beginning to detect and report increasing rates of heroin overdose and drug-related harm (Ali et al, 2000;
The introduction of drug detection dogs for policing of illicit drugs

Darke and Ross, 1999; Darke et al, 2000; Degenhardt et al, 2004; Zador et al, 1996). Analysis of all heroin-related deaths recorded in the coronial files showed a substantial increase in the number of fatalities in NSW from 1992 to 1996 (Darke et al, 2000). In the South Western Sydney region, heroin-related deaths had more than doubled in this period (Darke and Ross, 1999). Although researchers at the National Drug and Alcohol Research Centre 'tentatively reported evidence' of increasing heroin use in the mid-1990s, this information was 'not welcomed by Government and colleagues in the addiction field who were concerned about creating a media panic', but by 1997 the issue had nonetheless garnered media attention (Degenhardt et al, 2004, 4).

Indicator data across a range of routine monitoring systems reflected the increasing availability of heroin in the Sydney drug market. In addition to the increased rates of heroin overdose, indicator data also showed an increase in the number of clients entering methadone maintenance treatment, while sentinel surveys of people who inject drugs showed that heroin was easy to obtain, purity was high and, over time, the price of heroin had remained stable or decreased (Degenhardt et al, 2004). Sydney was regarded as 'Australia’s centre for heroin importation and trafficking' (Degenhardt et al, 2004).

The Sydney suburbs of Kings Cross, Redfern and Cabramatta were particular sites of concern throughout the 1990s (Degenhardt et al, 2004). Researchers undertaking ethnographic research in Cabramatta identified the way this market differed from the more familiar illicit drug markets of Sydney’s inner city districts (Maher and Dixon, 1999). Cabramatta was 'socially, geographically and symbolically' very different, and its illicit drug market (and heroin trade in particular) was dominated by ‘Indo-Chinese user-dealers’, many of whom were estimated to be less than 20 years of age, selling heroin of higher purity, all of which conjured public fear of ‘drug-related Asian criminality’ (Maher and Dixon, 1999, 489). The drug market in Redfern attracted public outcry when in January 1999 a Sydney tabloid newspaper published on its front page a photo of a teenage boy injecting in a lane-way (Swain, 1999). It was reported that the teenager was as young as 12 or 13 years of age (in fact he was 16 years old) and had obtained injecting equipment from Redfern’s publicly funded Needle and Syringe Program (a claim which was also false) (Swain, 1999). While indicator data and researchers’ analyses revealed a quantifiable and ‘demonstrable problem’ (Kingdon, 1995, 93), the image of a teenager injecting in a Redfern laneway and the xenophobic fear of Cabramatta’s drug market became ‘powerful symbols’ (Kingdon, 1995, 97) to focus the attention of the public and politicians alike.

Policy

While these indicator data, symbols and focusing events may have placed illicit drugs and policing on the agenda as an issue of concern in NSW, identifying a problem does not determine whether or not (and equally importantly how) governments should respond. The idea of drug detection dogs for street-level policing of illicit drugs was first raised as part of the Premier’s proposed anti-corruption crime package in 1995 (a response which pre-empted the findings of the Wood Royal Commission and its subsequent recommendations) (Humphries, 1995). At this time, it was suggested that a team of drug detection dogs could be stationed at Kings Cross and deployed as part of all-night foot patrols by police, but there was little pursuit of the idea more broadly. It was following the Wood Royal Commission, however, that two other institutional
fora became key settings for floating a range of possible responses to the problem of illicit drugs and policing. The first of these was the NSW Drug Summit held in May 1999. In announcing the Summit, the Premier said:

“It will be a no-holds barred, non-party examination of the drug problem….
It should be treated as a challenge above politics. We will push aside all other business. We have to look at fresh ideas.” (Swain, 1999, 2, emphasis added)

This Summit brought together drug experts, community leaders, families and interest groups along with 135 NSW Parliamentary delegates, NSW Police and public health representatives to create a better understanding by members of Parliament and the community of the causes, nature, and extent of the illicit drug problem, particularly in New South Wales; better inform members of Parliament through a forum bringing together a range of drug experts and community representatives who reflect the spectrum of views on drugs; hear and consider the views of young people; examine existing approaches to the illicit drug problem and consider new ideas and new options in a bipartisan forum; consider evidence regarding those strategies that work and those that do not, and in particular, to consider the effectiveness of existing New South Wales laws, policies, programs and services; and the effectiveness of current resource allocations in the drugs area; identify ways to improve existing strategies and services that work and identify gaps and needs in programs and services; build political and community consensus about future directions in drug policy; and recommend a future course of action for the Government to consider. (Swain, 1999, 7)

Overall, the Drug Summit’s final communique contained 172 recommendations with a focus on ‘a renewed financial and policy commitment to education, expanded rehabilitation and detoxification facilities, and police targeting of traffickers and suppliers’ (Swain, 1999, 48). Policy proposals floated were as diverse as prevention and early intervention services, arrangements for sharing data and research, regulatory standards for treatment service delivery, community education, the repeal of laws related to self-administration of drugs, the establishment of a trial for Australia’s first Medically Supervised Injecting Centre and expansion of police and court programmes to divert minor drug offenders away from the criminal justice system and into treatment. It was suggested that responses needed to be ‘multi-faceted, recognising the roles of demand reduction, supply reduction and treatment’ (Swain, 1999, 44). Notably, the use of drug detection dogs for street-level policing was not mentioned amongst the 172 broad-ranging recommendations, despite the Premier’s earlier proposal.

The second forum of note was the NSW Legislative Council Committee Inquiry into police resources in Cabramatta in 2000. The terms of reference stated that the committee would inquire into and report on the adequacy of police resources in Cabramatta, especially in relation to drug crime; the impact, if any, of the crime index on Cabramatta policing; and,
the effectiveness of the Police Service in addressing the needs and problems of Cabramatta residents and in particular people from non-English speaking backgrounds. (NSW Parliament Legislative Council General Purpose Standing Committee No. 3, 2000)

Conflicting views were expressed at the Inquiry as to how drug- and gang-related violence should be handled in Cabramatta, with some favouring New York-style zero tolerance approaches and others advocating harm minimisation (Williams, 2002). Following the release of the Inquiry’s ‘damning’ report (Williams, 2002, 298) the Premier announced a range of proposals. This suite of policy solutions became known as the ‘Cabramatta package’ and included reclassifying Cabramatta Police Station as a ‘Grade One command’ and giving police new powers in relation to drug premises and for ‘moving-on’ individuals reasonably suspected of being involved in illicit drug supply. The expanded use of drug detection dogs for street-level policing of illicit drugs was again raised as a proposed solution as part of the ‘Cabramatta package’. While the dogs were not permanently assigned to Cabramatta (that is, they were not attached to any one Local Area Command), it was intended that ‘[a] team of drug detection dogs will also be deployed to the area’ (NSW Parliament Legislative Council General Purpose Standing Committee No. 3, 2001, 103). The Premier noted that the team of drug detection dogs was already available having been ‘successfully trialled during the Olympic Games’ held in Sydney in September 2000 (NSW Parliament Legislative Council General Purpose Standing Committee No. 3, 2002, 12). While there had been little public discussion of the proposed solution at the time of the Premier’s anti-corruption announcement in 1995, the use of drug detection dogs as an ‘available’ solution began to be discussed more widely alongside the Cabramatta Inquiry. The newly appointed Police Minister, Michael Costa, suggested that more drug detection dogs (potentially specialising in heroin detection) could be trained, and could also be used to target drug users in the trucking industry (The Daily Telegraph, 2000).

The Summit and the Inquiry can be seen as two institutional venues for ‘floating’ policy alternatives in which politicians had more or less control over the outcome. While the Summit was expansive in its purview and inclusion of stakeholders, the terms of reference of the Cabramatta Inquiry heavily restricted its focus. The restricted focus of the Inquiry served to restructure and delimit the frame in which alternatives could be explored (which, as will be discussed below, resonated with political priorities).

Kingdon argues that a particular set of characteristics enhance the chances of an idea’s survival within the ‘policy primeval soup’. For an idea to survive in the policy stream, it must be technically feasible, a fit with dominant values and public mood, and anticipate budgetary and political constraints. Why did the idea of drug detection dogs for street-level policing survive? Most importantly, the use of drug detection dogs was an idea which was ‘ready to go’ insofar as a team of dogs had already been trained for the Sydney Olympics in 2000. Drug detection dogs were a ‘viable alternative available for adoption’ (Kingdon, 1995, 144, emphasis added). While other options were put forward for consideration during the 1999 Drug Summit, it was not until after the Olympic Games in 2000 that drug detection dogs were regarded as ‘available, worked through, and ready to go’ (Kingdon, 1995, 143). As one politician simply noted during parliamentary debate,
the New South Wales Police Service received 30 additional sniffer dogs to cope with the demands of the Sydney Olympic Games. Sniffer dogs are extremely well trained and I am told that they are worth about $100,000 each, and that they are worth it…. Anyone who has seen a sniffer dog in action will know that they have a formidable ability to discriminate between smells. (NSW Government, 2001a, 20202)

The technical feasibility of this solution was taken as given. Thus, a ‘tipping point’ was reached within the policy stream following the Cabramatta inquiry (Kingdon, 1995, 140). From that point onwards, the idea of drug detection dogs for street-level policing of illicit drugs became ‘commonplace’ (Kingdon, 1995, 140), openly discussed by senior politicians and in the media.

Politics

In our analysis, we identified three interrelated political and bureau-political factors of significance to the composition of the political stream: electoral cycles and the high political salience of law and order issues in NSW in the mid to late 1990s; the highly politicised and contested relationship between the NSW Government and the NSW Police Force; and what Kingdon (1995, 155) calls ‘questions of jurisdiction’. Battles occur in and around government over policy direction. Below, we describe one bureau-political battle being fought between the Police Minister’s office and the Police Commissioner, and a second battle over ownership of the law and order agenda between the major political parties.

The Australian Labor Party came to government in NSW in March 1995, under the leadership of Bob Carr. Law and order issues dominated the 1995 election, with some political commentators describing the campaign as a ‘law and order auction’ (Lee, 1996, 152). The outgoing Coalition government staged a theatrical launch of its law and order policy by inviting the victims and families of some of the most high-profile violent crimes in recent NSW history to be a part of the campaign event. The political symbolism was powerful: ‘the presence of these victims of crime at the coalition policy launch again helped to give crime a face’ (Lee, 1996, 154). The Carr Labor government were elected on the platform of ‘tough on crime, tough on the causes of crime’ (Lee, 1996, 154). The emphasis on law and order continued in the subsequent 1999 election campaign during which a Herald AC Nielson poll found that law and order was the issue that concerned the most voters (Bennett and Newman, 1999).

The Labor Party’s 1995 electoral victory followed less than a year after the Hon Justice James Wood was appointed as Commissioner of the Royal Commission into the NSW Police Force. The new Carr government inherited the Wood Royal Commission and the highly publicised turmoil surrounding a rapidly imploding Police Force as revelations of corruption unfolded. Kingdon suggests that turnover of key personnel also brings changes in policy agendas within the political stream. The appointment of a new Police Commissioner, Peter Ryan, even before the Royal Commission’s final report was published, was a significant change in personnel. Ryan came to NSW from England and his appointment was controversial and scrutinised by the media (Chan and Dixon, 2007; Williams, 2002).
The findings of the Wood Royal Commission and media scrutiny surrounding Ryan’s appointment had further implications for the relationship between Police Commissioner Ryan and the Police Minister’s office in particular. One of the key recommendations arising from the Wood Royal Commission was the need for increased independent oversight of the NSW Police Force. However the Commission had also expressed concern about the inadequate distinction between ‘operational’ and ‘policy’ matters (Wood, 1997, 237). It was suggested that the Police Commissioner ‘should retain independence’ to avoid the risk that ‘by reason of political and electoral considerations, decisions might be forced on a Commissioner by a Minister’ (Wood, 1997, 237). Overall, the recommended principle to be upheld was that ‘the Police Service not be subject to undue political direction, and that the ministerial role be confined to one of policy’ (Wood, 1997, 237). This recommendation was ‘explicitly rejected’ (Chan and Dixon, 2007, 460) by the Police Minister. In analysis of Ryan’s tenure as Police Commissioner, commentators have observed the wide range of operational matters into which the Police Minister’s office intervened (Chan and Dixon, 2007; Williams, 2002). The Minister set up an advisory committee which without consultation with the Police Commissioner had unilaterally, for example, reviewed police recruitment, established task forces, proposed new police uniforms, and among a myriad of other specific policing matters advised on ‘the use of drug-detection dogs’ (Williams, 2002, 319). The idea of drug detection dogs for street-level policing of illicit drugs was appealing to the Minister. On his first day as Police Minister, Michael Costa had ‘promised to make lawful the use of drug sniffer dogs in random street searches’ (Kennedy, 2001, 8). This announcement was made during a visit to Auburn and Cabramatta police stations, placing the issue of drug detection dogs squarely within the political discourse surrounding drug-related crime in South-West Sydney. This unprecedented intervention into policing operational matters coincided with the Cabramatta Inquiry, where the tensions between the government and the Police Force had also been aired. Two weeks before the Cabramatta Inquiry’s report was released, Premier Carr publicly admonished the NSW Police Force for ‘taking their eye off the ball’, essentially blaming Cabramatta’s then burgeoning drugs problem on police and not government (Williams, 2002, 298).3 In their analysis of this period in the history of the NSW Police Force, Chan and Dixon (2007, 460) concluded that

the politicisation of policing has become more serious with law and order being a key focus of election campaigns and the power of popular media in setting policing agendas…. The police, in effect, had become ‘captured’ by politics.

Kingdon (1995, 157) notes that politicians

compete with one another to claim credit for some initiative that they sense will be popular. In the rush to beat each other to the punch, a subject may become prominent much more quickly than it would in the absence of this competition.

Providing a specific legislative basis for the use of drug detection dogs for street-level policing of illicit drugs is one such example. In 2001, 14 specially trained drug detection dogs began operational duties in NSW, but at this time there was no
legislation governing where or how they could be used (NSW Ombudsman, 2006). Amidst increasing criticism from civil liberties organisations (for instance, Gerard, 2001a; 2001b; Redfern Legal Centre, 2001), the arrests of two individuals found in possession of small amounts of cannabis and methamphetamine following indications by drug detection dogs in public places generated controversy in 2001. The legal challenges posed in these two test cases⁴ (in which it was successfully argued that the drug detection dogs’ ‘sniffing’ and ‘nudging’ had constituted an illegal search in the absence of reasonable suspicion) precipitated significant discussion and activity within the NSW Parliament. In November 2001, the then leader of the opposition, Kerry Chikarovski, introduced a private member’s bill with the intention of clarifying the statutory basis for the use of drug detection dogs (the Drug Misuse and Trafficking Amendment (Sniffer Dogs) Bill). This bill was rejected by the government, and in December 2001 the new Police Minister introduced the Police Powers (Drug Detection Dogs) Bill. It was suggested by one member of the Legislative Assembly that the Opposition’s original bill was not given passage through the House ‘simply because the Government has been reluctant to give the Opposition the recognition it deserves for its initiative in relation to this legislation’ (NSW Government, 2001b, 19877).

Both sides of Parliament were eager to be seen to be leading on this issue for their own political purposes. Kingdon (1995, 158) argues that if participants in the policy process can see ‘some electoral or publicity mileage in it, competition will enhance the chances of the issue rising on the agenda’. Given the high political salience of law and order issues in NSW politics, legislation providing a statutory basis for the use of drug detection dogs was rapidly moved by the NSW Parliament (with members of both sides of politics voting in favour).

**Policy windows and ‘coupling’**

From the analysis above, we can begin to see the way that the three streams coalesced in 2000–2001. Our analysis suggests that a specific policy window opened in conjunction with the Cabramatta Inquiry, allowing for the broader discussion and widespread introduction of drug detection dogs. The problems of illicit drugs and policing had already been established through the investigation of the Wood Royal Commission and through the work of researchers in analysing indicator data. While these processes in the problem stream shaped how the problems of illicit drugs and policing could be thought about, the analysis reveals that it was not until the Cabramatta Inquiry that the specific problem of *better drugs policing per se* was placed on the decision agenda by government. The institutional venue of the Inquiry produced a more restricted problem frame in which a narrower set of alternatives could be discussed, which accorded with the law and order political agenda of the day. In this venue, the government could admonish the Police Force for their failures, thus distancing the government from the problem of police corruption while being seen to actively lead on the issue of policing in one of Sydney’s drug ‘hot-spots’.

The ‘Cabramatta package’ was reliant on both political will to acknowledge that this was a problem that government should address, and also the availability of feasible policy alternatives. That drug detection dogs were a solution that was available, worked through and ready to go was crucial to this particular policy solution being moved on the decision agenda at this moment in time. Despite the early legal challenges,
The introduction of drug detection dogs for policing of illicit drugs

in accordance with Kingdon’s criteria for survival, the constraints to embedding drug detection dogs within NSW drugs policing policy were not great. Given the bi-partisan competition for the leadership of the law and order agenda, the enabling legislation embedding the use of drug detection dogs was able to be passed rapidly.

There are a number of other specific factors worth noting about the particular solution (drug detection dogs) that rose to the surface in the policy stream and aligned with the politics stream (law and order agenda) and problem stream (heroin overdose, drug-related crime and police corruption). Firstly, in the context of the highly publicised corruption revelations throughout the 1990s, the notion that drug detection dogs were a technology ‘independent’ from the judgement and discretion of individual police officers was arguably significant. Police discretion had largely been discredited through both the Wood Royal Commission and the Cabramatta Inquiry, and as such, the idea that ‘a dog’s nose does not lie’ was potentially an intuitively appealing idea (whether or not this perception of independence was founded in evidence is another matter; later research by Lit et al (2011) has demonstrated the influence of handler behaviour on dogs’ detection outcomes). This speaks to value acceptability within Kingdon’s criteria for survival.

Secondly, despite the three streams successfully coming together, it is apparent that there was nonetheless an awkward fit between the specified alternative of drug detection dogs and the problem this solution was purportedly implemented to address. In this case (and in other drug policy analyses which have applied Kingdon’s heuristic, see Lancaster et al (2014)) policy entrepreneurs arguably played a role in manipulating the shape of the solution to fit a particular interpretation of the problem. While the focus of concern was on the burgeoning problem of heroin in Sydney’s drug market from the mid-late 1990s, by the time the legislative basis for drug detection dogs was enacted in late 2001, NSW was experiencing a sudden and unprecedented heroin shortage (Degenhardt et al, 2004). Even if this dramatic change in the market had not occurred, drug detection dogs were more useful for detecting cannabis than heroin (NSW Ombudsman, 2006). Similarly, while political rhetoric focused on the deployment of drug detection dogs for the purposes of ‘smashing the back of drug lords’ (Wainwright and Gibbs, 2001), most people targeted by this intervention were low-level users (NSW Ombudsman, 2006). Thus, while concern about the problem of heroin overdose may more logically lead to the introduction of solutions such as overdose prevention and management interventions including the administration of naloxone by peers (a solution unsuccessfully floated by researchers at the time: Darke and Hall (1997), Hargreaves and Lenton (2000), and Lenton et al (1997)), such solutions did not fit as readily with the prevailing law and order focus, which despite the efforts of the Drug Summit to refocus on harm minimisation, remained the dominant ideological position in the wake of the Wood Royal Commission. Another example of conflict is that the Police Powers (Drug Detection Dogs) Act gave police the powers to use drug detection dogs in authorised places (including licensed venues, sporting events or outdoor festivals), but these spaces were not contested ‘problem sites’ at the time of adoption. It was political rhetoric (and arguably policy entrepreneurs within government) which allowed for the shape of both the proposed solution and interpretation of problems to be manipulated to better fit each other for political purposes.

The third factor of note is the ‘evidence’ upon which the assessment of drug detection dogs’ feasibility was based. For a solution to rise to the top of the ‘policy primeval
soup’ it must be technically feasible, which means that policymakers must believe that it will ‘actually’ work (Kingdon, 1995, 132). According to Kingdon (1995, 132), a serious proposal will receive ‘detailed attention’; while he notes that such attention ‘does not necessarily result in enacted programs that work’, policymakers must believe in its technical feasibility on some level at the time the idea is being discussed. In this case study, at the time of the Premier’s announcement of the Cabramatta package (the time, we argue, when the three streams came together), he noted that the team of drug detection dogs was already available having been ‘successfully trialled during the Olympic Games’ (NSW Parliament Legislative Council General Purpose Standing Committee No. 3, 2002, 12). From the available data, we do not know what this ‘trial’ constituted (there is no information to suggest that a formal evaluation took place). This assessment of ‘technical feasibility’ was essential within the dynamics of the policy stream, but most importantly without it the solution would not have fit the criteria of an ‘available alternative’ necessary for coupling. While we can see the ways in which the three streams came together and were coupled at a particular point in the policy process, we also suggest that this coupling process relies on a range of political, rhetorical and strategic turns to take place. Therefore contrary to the purely serendipitous manner in which the ‘coupling’ process in Kingdon’s heuristic may be understood, we suggest that this case demonstrates that coalescing of the streams is not simply fortuitous; it is as a result of dynamics internal to each stream and the intentional working of actors within the process to bring the streams together.

Conforming to Kingdon’s (1995) empirical observation and conceptual distinction, the ‘policy entrepreneurs’ in this case study were sometimes most visible, and sometimes somewhat obscured behind the veil of government. We cannot know with any specificity who the individual advocates were who were pushing the drug detection dogs proposal, but we can make assessments based on some identifiable factors in the case. For example, we know that ‘well connected and persistent policy entrepreneurs are more likely to be successful at coupling’, and being a member of Parliament, minister, or ministerial advisor ‘increases the political clout’ of ideas (Zahariadis, 2003, 69). Moreover, we can also identify two strategic moves often employed by successful entrepreneurs: the manipulation of problem dimensions (downplaying dimensions for which policymakers have no or very uncertain solutions, like police corruption; and highlighting problem dimensions for which readymade, satisfactory and politically acceptable solutions are available) and crisis framing (which symbolically shorten the timespan of the opportunity for coupling) (see Zahariadis, 2003, 69–71). Given that the newly appointed Police Minister championed this policy idea during a media briefing very early in his tenure, staking his ‘reputation’ upon it (Kingdon, 1995, 179), and that the idea of drug detection dogs had been raised by the newly appointed Premier as part of the anti-corruption plan in 1995 (Humphries, 1995), our analysis suggests that Costa and Carr themselves were entrepreneurs, or that policy entrepreneurs existed within the Ministerial office, or the office of Premier and Cabinet (that is, within the political sphere). This finding highlights, firstly, that policy entrepreneurs are not necessarily obvious, and secondly, they need not be confined to the policy stream.

Another key finding is the ways in which inquiries and summits created the space for clusters of action in all three streams. Inquiries and summits can be seen in this case as institutional ‘venues’ for producing problem frames and solution ideas. The basic difference between the two venues is that ‘summits’ allow a much wider participation
from different actors and actor types in the policy subsystem, and therefore a wider (arguably, uncontrollable) plurality in problem frames and solution suggestions, whereas an ‘inquiry’ gives an incumbent government much more control over both the problem frames and the solution suggestions because participation can be controlled through politically-inspired inclusion / exclusion habits and/or strategies. We suggest that Kingdon does not sufficiently problematise the relationship between the politics stream and the policy and problem streams. In this case study, institutional ‘venues’ created a forum for debate and agenda setting in the problem stream, for airing solutions in the policy stream, and also functioned as arenas for political contestation. The contrast between the expansive purview of the Drug Summit and the restricted focus of the Cabramatta Inquiry was important in this case, and played a role in filtering ideas in the policy primeval soup and delimiting the frame to accord with political priorities.

Discussion and conclusions

In this paper, we have critically analysed the introduction of drug detection dogs as a tool for policing of illicit drugs in NSW, Australia. Using Kingdon’s ‘multiple streams’ heuristic as a lens for analysis, we have identified how the issue of drugs policing became prominent on the policy agenda, and the conditions under which the instrument choice of drug detection dogs came to be endorsed by decision makers. In this final section, we broaden the scope of our discussion and consider how the application of Kingdon’s heuristic in this case has highlighted the ways in which this approach may be used not only to understand agenda-setting and decision-making processes, but also to illuminate the limitations of the ‘evidence-based policy’ paradigm in the context of policing policy.

Kingdon’s approach reminds us that policy problems are not self-evident. While indicator data, research and focusing events may point towards ‘conditions of concern’, whether or not a government chooses to respond and take on a ‘policy problem’ is determined by a myriad of other factors. This proposition is contrary to the taken-for-granted assumptions underpinning the ‘evidence-based policy’ paradigm, which assumes that policy problems exist ‘out there’ waiting to be solved through the authoritative actions of government. In this case study, ‘recategorising’ illicit drug and policing issues as a new kind of composite problem (better drugs policing per se) through institutional venues appeared to be crucial for policy action. This ‘recategorisation’ of the problem (or manipulation of problem dimensions) also importantly corresponded with the high political salience of law and order issues and the willingness of the major political parties to vie for leadership in this space. For Kingdon (1995, 113), ‘when issues are recategorised new definitions of problems and conceptualisations of solutions come into play’. Perhaps due to the identified systemic failure of the NSW Police Force and the willingness of the government to exploit this for political gain, novel solutions could be pursued which fell outside the realm of ‘usual’ approaches. The idea of drug detection dogs was championed from within the Police Minister’s and Premier’s offices and not from the NSW Police Force themselves. Indeed, we found that this period was characterised by increased political interference in police operational matters. Thus drug detection dogs represent the politicisation of the selection of a policy instrument, not an ‘authoritative choice’ in response to a pre-identified problem.
In the analysis presented, alternate specification of policy solutions occurred in two possible venues: the NSW Drug Summit with its broad remit, which failed to identify drug detection dogs as a policy option; and the narrower Cabramatta Inquiry, with its more specific focus facilitating drug detection dogs as a viable policy solution. It is our contention that the delimited frame of the Cabramatta Inquiry precipitated particular policy action in relation to the expansion of drug detection dogs and the establishment of their legislative basis. This specific policing policy was only able to rise on the decision agenda at this point because the problem of drugs policing per se had been taken up by government, during a politically fertile time for law and order issues. Thus, the distinction we draw in our analysis here aligns with Kingdon’s (1995, 166) distinction between the broader governmental agenda’ and the more specific ‘decision agenda’. For Kingdon (1995, 178, emphasis original), while problems or politics by themselves can structure the governmental agenda… the probability of an item rising on this decision agenda is dramatically increased if all three streams – problems, policies, and politics – are joined.

Thus, the availability of drug detection dogs as a feasible alternative was crucial and ‘seized upon by politicians’ (Kingdon, 1995, 178) in this case study. Assuming that the policy entrepreneurs in this case were inside the Minister’s and Premier’s offices, it is notable that this process of coupling an available solution to a particular problem within the political environment occurred quite apart from the other drug policy processes which had occurred (for example, the bringing together of clinicians, drug policy experts and police at the Drug Summit). Given the continued emphasis in the evidence-based policy literature on ‘research translation’ and effective collaboration between experts and policymakers (for discussion in the context of criminology and policing policy see Ritter and Lancaster, 2013), this is a significant finding and highlights the limitations of these pursuits in real-world political settings.

The findings of this case study also demonstrate the importance of the ‘available alternative’. As calls for ‘evidence-based policing’ continue to be voiced within the criminological literature (for instance, Sherman, 1998; Weisburd et al, 2005), it is important to note that Kingdon’s notion of ‘feasibility’ does not equate with ‘evidence of effectiveness’, in the way we might imagine within the evidence-based policy paradigm. The idea must simply be ‘available, worked through, and ready to go’ (Kingdon, 1995, 143). Kingdon eschews a narrow scientific notion ‘evidence’ and recognises other knowledge(s) which bear upon politics and policy. As we try to better understand and resolve the ‘dissonance’ between ‘evidence-based policy’ rhetoric and the actuality of policing policy (Ritter and Lancaster, 2013, 457), perhaps we need to humbly accept Kingdon’s argument that ‘attention to the details of implementation does not necessarily result in enacted programs that work’ (Kingdon, 1995, 132).

In the case of drug detection dogs, this has been demonstrated by the subsequent review of drug detection dogs in NSW which unequivocally found clear evidence of ineffectiveness (NSW Ombudsman, 2006). This begs the question: how can policies, once implemented, cease after conclusive evidence comes to the fore?

The ways in which Kingdon’s heuristic can be used to understand and advocate for policy termination has been taken up by Geva-May (2004). The application of Kingdon’s constructs to the notion of termination potentially offers valuable renewal for the policy termination literature (for instance, Bardach, 1976; deLeon, 1978; 1983;
The introduction of drug detection dogs for policing of illicit drugs

1997), which has generally observed that it is more difficult to undo policy than it is to create new policy given the preference for stasis and equilibrium. Geva-May (2004, 310) argues that the constructs within Kingdon’s approach can ‘provide strategies for facilitating the termination phase’ insofar as the termination phase of policy entails a window of opportunity opening, and the alignment of three streams. Hypothetically, we could imagine the ways in which feedback on the existing drug detection dogs programme, indicator data or a focusing event (for example, a high-profile arrest) might come together with a proposal for policy cessation (perhaps in favour of an alternative, viable and feasible policing strategy), and a shift in the political climate (for example, increasing public support for drug law reform or a change in administration with a more progressive government). However, what we know from Kingdon’s heuristic is that even under these conditions, a policy entrepreneur would need to emerge to marshal these forces and seize an opportunity. Such an analysis would demonstrate why the Ombudman’s (2006) scathing report was insufficient to bring about policy termination. This once again highlights the limitations of evidence-based policy rhetoric: evidence and critical evaluation are insufficient to bring about policy change. In the case of drug detection dogs, it suggests that recent efforts by the NSW Greens Party and law reform advocates (NSW Greens, 2015; Unharm, 2014) to use data to highlight the deficiencies of this policy are likely to be futile in the absence of the other necessary elements (namely, a viable alternative policy proposal and the mobilisation of all three streams by a clever and tenacious policy entrepreneur).

But perhaps more pointedly, in the context of not only the stasis of this policy in NSW but also its diffusion across other jurisdictions, it is interesting to reflect on how Kingdon’s multiple streams heuristic might be used differently to understand the forces against termination. Could something in the specific coalescing of the three streams, or the particular roles of policy entrepreneurs, consolidate and ground the alignment of the three streams in such a way that makes it more difficult for policy to be undone? For example, could it be that if policy entrepreneurs occupy political roles in government and have staked their reputation upon an idea (as the newly-appointed Police Minister did in this case) when feedback emerges it is not taken into account? Or if, as Kingdon argues, changes of administration are important, is it significant that the Labor party held government in NSW for 16 years until 2011? These are questions which could be explored in future research.

This demonstration of Kingdon’s heuristic in a new policy domain (policing) speaks to its enduring resonance. We contend that the further application of policy processes theories in a politicised domain like drugs policing policy may help to develop more nuanced understanding of the relationship between evidence and policy, recognising the contingent, ambiguous and necessarily political nature of policy processes.

Acknowledgements

This project was funded by an Australian Research Council Discovery Project grant (DP140100219). The Drug Policy Modelling Program is funded by the Colonial Foundation Trust, and is located at the National Drug and Alcohol Research Centre, a research centre funded by the Australian Government. Alison Ritter is a recipient of a National Health and Medical Research Council Fellowship (APP1021988).
Notes
1 As will be seen in the analysis below, by taking the introduction of legislation as the end point for our analysis, we include a brief period of troubled implementation before formal regulation was established. In doing so, we note that the differentiation between policy formulation and implementation is not always clear-cut (contrary to the ways in which other ‘stages models’ represent the policy process).

2 Our analysis here focuses on technical feasibility. Issues of dominant values and political constraints relevant to the idea’s survival are discussed in more detail below.

3 This reflects the process highlighted in the problem stream in the context of the Wood Royal Commission, whereby problem analysis and definition frequently become ‘blame games’.

4 Police v Darby (Jerram DCM, Unreported, Downing Centre Local Court, 21 November 2001); DPP v Harris Unreported, Lismore Local Court, 23 June 2004.

References


Bardach, E, 1976, Policy termination as a political process, Policy Sciences 7, 2, 123–31


Colebatch, HK, 2010, Giving accounts of policy work, in Colebatch, HK, Hoppe, R, Noordegraaf, M (eds), Working for policy, Amsterdam: Amsterdam University Press

Corderoy, A, 2014, Police in the doghouse over strip searches, Sydney Morning Herald, Sydney: Fairfax

Darke, S, Hall, W, 1997, The distribution of naloxone to heroin users, Addiction 92, 9, 1195–1200


The introduction of drug detection dogs for policing of illicit drugs

Geva-May, I, 2004, Riding the wave of opportunity: Termination in public policy, Public Administration Research and Theory 14, 3, 309–33
Hargreaves, K, Lenton, S, 2000, A trial of naloxone for peer administration has merit, but will the lawyers let it happen?, Drug and Alcohol Review 19, 4, 365–9
Hayle, S, 2015, Comparing drug policy windows internationally: Drug consumption room policy making in Canada and England and Wales, Contemporary Drug Problems 42, 1, 20–37
Humphries, D, 1995, Carr: How I’ll beat corruption, Sydney Morning Herald, Sydney: Fairfax
Hyshka, E, 2009, Turning failure into success: What does the case of Western Australia tell us about Canadian cannabis policy-making?, Policy Studies 30, 5, 513–31
Kennedy, L, 2001, Costa committed to police use of drug sniffer dogs, Sydney Morning Herald, Sydney: Fairfax
Lancaster, K, Hughes, C, Ritter, A, 2016, Drug dogs unleashed: An historical and political account of drug detection dogs for street-level policing of illicit drugs in New South Wales, Australia, Australian and New Zealand Journal of Criminology, http://anj.sagepub.com/content/early/2016/04/05/004865816642826.abstract
Lee, M, 1996, Governance and criminality: The 1995 New South Wales election campaign and law and order, Current Issues in Criminal Justice 8, 152
Race, K, 2014, Complex events: Drug effects and emergent causality, *Contemporary Drug Problems* 41, 3, 301–34
Scipione, A, 2015, Police Commissioners Panel, 7th Australasian Drug and Alcohol Strategy Conference, Brisbane
Unharm, 2014, Ditch the dogs, www.unharm.org/ditch_the_dogs


