



Environment: Science and Policy for Sustainable Development

ISSN: 0013-9157 (Print) 1939-9154 (Online) Journal homepage: <http://www.tandfonline.com/loi/venv20>

Systemic Risks: The New Kid on the Block

Ortwin Renn

To cite this article: Ortwin Renn (2016) Systemic Risks: The New Kid on the Block, Environment: Science and Policy for Sustainable Development, 58:2, 26-36, DOI: [10.1080/00139157.2016.1134019](https://doi.org/10.1080/00139157.2016.1134019)

To link to this article: <http://dx.doi.org/10.1080/00139157.2016.1134019>



Published online: 17 Feb 2016.



Submit your article to this journal [↗](#)



Article views: 8



View related articles [↗](#)



View Crossmark data [↗](#)

SYSTEMIC RISKS:

The New Kid **ON THE BLOCK**

by Ortwin Renn

Pesticide use has been very effectively regulated in OECD countries but still haunts many people in the developing world.

This is the fourth commentary in Environment Magazine's retrospective on "Our Hazardous Environment," following the first three commentaries published in the January/February issue of Environment. The original three articles discussed in the following and other commentaries are available at www.environmentmagazine.org.

Stock/Barfield

iStock/Andrew Parker



New York—September 21, 2014: Woman carries a placard depicting 'One Planet, One People, One Future' and protests against climate change at the People's Climate March along 6th Avenue in Manhattan.

Europe 6,000 years ago: Three representatives of the *Homo sapiens* species are sitting outside their cave, talking. "We have perfectly clean water," says the first. "Yes," agrees the second, "we eat purely natural food and don't have stressful jobs." "That's true," muses the third, "and this all sounds idyllic, but we won't live more than 30 years." Today, on the other hand, average life expectancy in the United States is 78 years and in most parts of Europe and Japan even higher than 80. This extremely positive trend can largely be attributed to four factors: a healthy and balanced diet, medical and technological advances, relatively good welfare provision, and high standards of hygiene. These factors alone account for

the fact that the risks to life and health have steadily declined for decades and continue to do so.¹

Much of this success can be attributed to risk pioneers who have alerted society to the common task of assessing, evaluating, and managing risks in society. While Harriss, Hohenemser, and Kates (1978) provide a taxonomy for dealing with technological and environmental risks, Fischhoff, Hohenemser, Kasperson, and Kates (1978) demonstrate the need for more effective risk management based on a comparative review of hazards in modern life.^{2,3} Bick and Kasperson (1978) draw our attention to natural hazards as well as environmental risks, which appeared to take the place of some of the major former health risks such as infections. All three

papers have something in common: (i) They are based on a thorough analysis of historical trends of risk emergence and risk management practices, (ii) they give advice on how to address, regulate, and manage these risks, and (iii) they demonstrate the need for continuous risk awareness and safety culture.⁴

Their voice has been heard throughout the Organization for Economic Cooperation and Development (OECD) countries, but less in threshold and developing countries where conventional risks, including natural hazards, are still rampant and often badly managed. The plea to address technological and environmental risks in the United States, Europe, and Japan has been resonating with society and its governance. Let's take just one example from my home

country, Germany.¹ The latest statistics show that 26,000 out of every 100,000 Germans die of cancer. Cancer is therefore the most common cause of death for people in Germany under the age of 70 years. The immediate cause of this disease for 11,000 out of the 26,000 people who die of it is highly likely to be smoking or an unhealthy diet (mostly obesity). By contrast, the general medical opinion is that only 26 cases of cancer (with a confidence interval of roughly 0 to 120) can be attributed to residual pesticides or chemical preservatives in food. Some environmental organizations believe these figures are too low and reckon there are up to 240 such cases for every 100,000 people. Even this is still a vanishingly small number. And even more dramatic is the decrease of deaths attributed to environmental factors in OECD countries. Hohenemser et al. (1983) calculated a roughly 30% of premature death to all environmental causes.⁵ Modern estimates range from 6 to 17% depending on assumptions and calculations modes.^{6,8}

The Emergence of Systemic Risks

The history of the last four decades has been a success story in terms of conventional risk management. Traditional risks have obvious negative physical impacts. But they are bounded.⁹ A fire, for example, may destroy a school, which could lead to the direct loss of the facility and to the interruption of the affected children's education. However, in an age when fires are prevented from consuming entire cities, the impact of almost any blaze is likely to be limited. When fire breaks out at a school, safety equipment, sprinklers, and routine fire drills (some of the basic tools of conventional risk management) are likely to be effective. With appropriate safeguards in place, the odds are minimal that lives will be lost, or even that anyone will suffer serious physical harm. What is more, the economic cost is almost certain to be

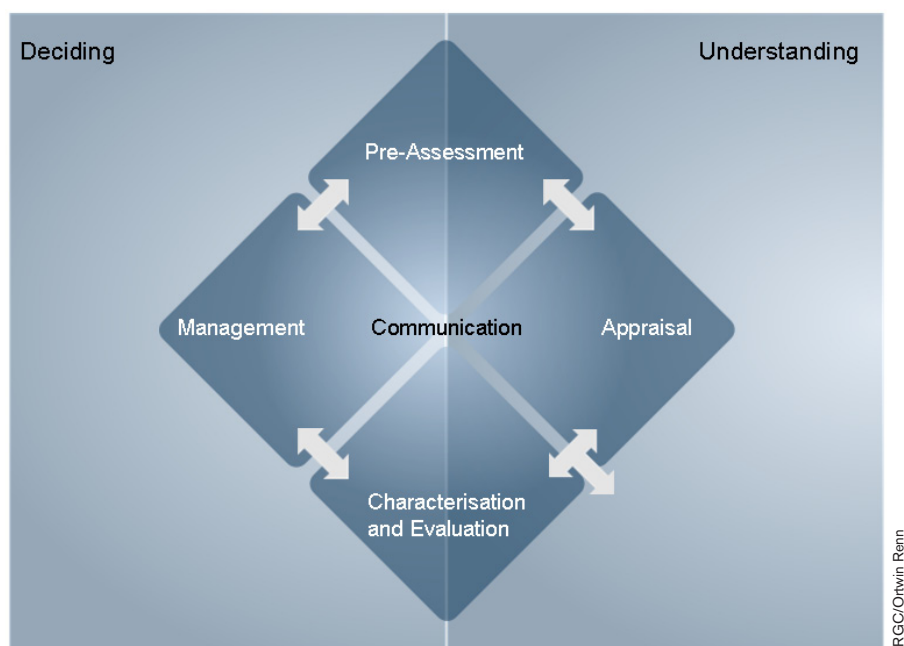
limited by insurance claims and contingency budgets, while disaster planning probably means that the lives of teachers and students are disrupted for no more than a few days.

This success of conventional risk management is documented in many statistical data. Referring again to my home country Germany,¹⁰ the number of fatal accidents at work decreased from almost 5,000 in 1960 to less than 500 in 2014; the number of traffic accidents decreased from 22,000 in 1972 to 3,700 in 2014; and the number of fatal heart attacks and strokes decreased from 109 cases per 100,000 to 62 in the time period between 1992 and 2002.^{11,12} In addition, the number of chronic illnesses as well as fatal diseases from environmental pollution or accidents has steadily declined over the past three decades, since the time when these three classic articles reminded society of the unfinished business in risk reduction.

However, the picture becomes less favorable if we look at globally interconnected, nonlinear risks such as those posed, for example, by climate change

or the global financial system and the closely related growing inequality between rich and poor. In order to take account of this situation, the OECD introduced the new category of "systemic risk."¹³ A widely cited definition of a systemic risk was provided by Kaufman and Scott (2003).¹⁴ While they defined systemic risks in the context of financial systems, their definition is robust enough to accommodate much broader systems, like the global climate: "Systemic risk refers to the risk or probability of breakdowns in an entire system, as opposed to breakdowns in individual parts or components, and is evidenced by co-movements (correlation) among most or all parts" (372). It is the totality of the threat, the probability that the entire system can collapse, that distinguishes systemic from other types of risk.

Systemic risks can be characterized by four major properties:¹⁵ They are (1) global in nature, (2) highly interconnected and intertwined leading to complex causal structures, (3) nonlinear in the cause-effect relationships, and (4)



The risk governance framework of the International Risk Governance Council (IRGC) includes separate sections for pre-assessment (framing) and evaluation. It also places communication in the center of the activities.

stochastic in their effect structure. The main features of systemic risks include ripple effects beyond the domain in which the risks originally appear and the threat of a multiple breakdown of important or critical services to society.¹⁶ The main problem is that it is often difficult to predict when a system will suffer a breakdown or collapse. Threats to the system, such as climate change, may be hidden in small incremental effects that provide no hint about when thresholds have been reached. Or a collapse may occur due to a domino effect where a small glitch is released that affects multiple elements within a system or even multiple systems in parallel, thereby amplifying the overall risk.¹⁷

Insidious systemic risks tend to be underestimated and do not attract the same amount of attention as catastrophic events that occur suddenly. There are three main sources of global hazards that we need to focus on: the growing extent of human intervention in nature (climate change, pollutant emissions, use of land and water); inadequate or ineffective control of central processes in the realms of business and politics (capital markets, corruption, capacity deficits); and adverse by-products of globalization and modernization (unequal living conditions, lack of security, loss of identity). Although most people are usually familiar with them, they do not get the same attention that the conventional hazards and risk have been given in the past. This can have disastrous consequences—and not only in financial markets.

Is there, for example, a link between the financial crisis of 2008 and the outbreak of the Ebola epidemic? What we can, at least, say is that this possibility cannot be ruled out.^{18,19} This is because the lack of attractive alternative investments during the crisis caused speculation in foodstuffs to rise sharply, which boosted the prices of rice and corn in world markets. This in turn meant that the poorest countries in particular had to get into further debt in order to feed their populations. Their desperate

financial plight forced many West African countries to suspend virtually all capital investment in health care and infrastructure projects—with devastating consequences, as we now know. This example clearly illustrates how today's systemic risks are totally impenetrable for any layperson who thinks in direct causal chains. Even experts have found

it challenging to model systemic risk with any degree of accuracy and to use such models to make reliable recommendations on issues such as how to manage risk.

Another key characteristic that sets systemic risks apart from conventional risks is that their negative physical impacts (sometimes immediate and

The loss of biodiversity as a result of excessive land use is one of the systemic risks that need more attention.



obvious, but often subtle and latent) have the potential to trigger severe ripple effects outside of the domain where the risk is located.^{13,20} When a systemic risk becomes a calamity, the resulting ripple effects can cause a dramatic sequence of secondary and tertiary spin-off impacts.²¹ They may be felt in a wide range of seemingly divergent social systems,

from the economy to the health system, inflicting harm and damage in domains far beyond their own. A commercial sector, for example, may suffer significant losses as a result of a systemic risk, as we witnessed in the financial crisis in the aftermath of the Lehman Brothers collapse. Even fairly healthy financial institutions were negatively affected,

and in the end, taxpayers had to pay the bill for the reckless behavior of a few.

Another example is the bovine spongiform encephalopathy (BSE) debacle in the United Kingdom, which affected not only the farming industry but also the animal feed industry, the national economy, public health procedures, and politics.²² People refused to eat British beef, regardless of the tangible evidence showing little danger to their health or safety.

Managing Systemic Risks

Systemic risks pose specific challenges for risk assessment and risk management because they are not amenable to the reductionism of the standard risk assessment model. They require a more holistic approach to hazard identification, to risk assessment, and to risk management, because systemic risks are complex, stochastic, and nonlinear. This means that it is difficult to trace the connections between causes and effects, to understand the direct impacts of human actions against a background of random changes, and to start learning from simulation rather than from trial and error. Risk analysis for systemic risks must focus on interdependencies, ripple and spillover effects, and other nonlinear dynamics that initiate impacts that cascade between otherwise unrelated risk domains.²³ Governing systemic risks presents specific and unique challenges, challenges magnified by the reality that systemic risks vary considerably across and within systems; no two are exactly alike. While each one has similarities common to the definition of systemic, the characteristics of individual risks within a domain vary dramatically. Since the risks are inherently different, they require fundamentally different governance approaches.^{13,24}

A critical component for the effective management of systemic risks is the simple realization that the risk manager requires a different set of decision-making tools because of the inherent



problems of systemic risks being complex, stochastic, and nonlinear. In practice, conventional approaches are not sufficient. One approach for addressing systemic risks is the risk governance framework proposed by the International Risk Governance Council (IRGC) in Geneva.^{25,26} This framework provides guidance for the development of comprehensive assessment and management strategies to cope with systemic risk. The framework integrates scientific, economic, social, and cultural aspects and includes a disciplined scheme for the engagement of stakeholders. It introduces three decision-making strategies to fit with different types of risks. The strategies—probability-based, resilience-based, and discourse-based—correspond to the three problem characteristics of complexity, uncertainty, and political ambiguity. The framework incorporates different concepts to complement the classic decision-making steps such as selecting objectives, assessing and handling data, and finding the most appropriate procedure for balancing pros and cons.²⁷ A crucial element of the governance proposal is the integration into the regulatory framework of analytic-deliberative processes, a term introduced in the risk community by Stern and Fineberg of the U.S. National Research Council Committee and now widely adopted in the democratic governance of risks.^{28,29}

The robustness of the governance framework is consistently tested by an increasingly multicultural world. This adds yet an additional complexity to the governance of systemic risks, since significant cultural and political differences, as well as similarities, cloud the risk perception mechanisms and processes that prevail within cultures. The cloud thickens for cross-cultural, transboundary risks. These differences shape variations in risk perception. Individuals in divergent cultures may develop very different ideas about what is a risk, what is not, and what to do.³⁰ This culturally incubated shift in perceptions creates an important issue for the

governance of such systemic risks that have no more respect for multicultural boundaries than they do for political, social, or economic ones.

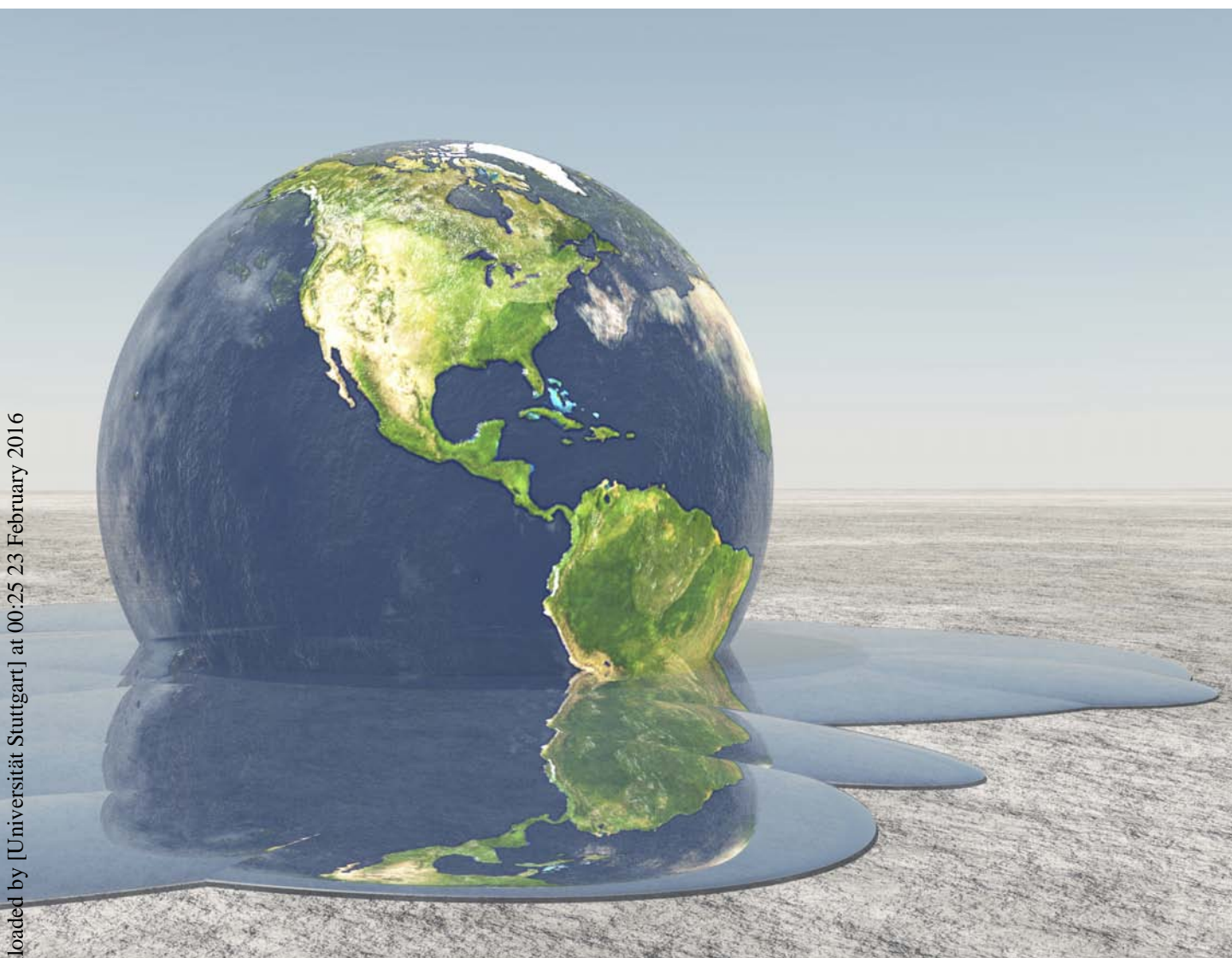
Conclusions for Risk Management

What does this imply for our approach to risk? First, the three classic articles remind us that given enough political will, resources, and commitment, risks can be effectively reduced. This lesson has been learned in most OECD countries but is still far from being implemented in most other countries. The World Health Organization (WHO) still estimates that almost 7 million people die each year prematurely due to air pollution, around 60% of them in China and India.⁷ Second, the challenge that the three articles raised with respect to risk management of conventional hazards need to be transferred to the new emerging systemic risks. These risks are global in nature, complex, stochastic, and nonlinear. They require cooperative management efforts of experts, the corporate sector, civil society, and regulators. Effective risk management must strike a balance between efficiency and resilience, and the solutions devised must be fair for the people affected. This means that we have to factor uncertainty more into the way we capture risk, and we must offer solutions that are effective even when unforeseen events occur. We need a form of risk management that demonstrably mitigates risk, is economical with the scarce resources available, helps to overcome unlikely but possible setbacks, and enables the resultant benefits and risks to be evenly shared.

Current societies are challenged by a number of pressing global systemic risks arising from global environmental change, in particular climate change. Responding adequately to global systemic risks is a challenge for our world society where national interests and different cultures conflict with efficient

responses. Governance of systemic risks requires strategies that address the complexity, scientific uncertainty, and sociopolitical ambiguity of its underlying relationships. However, national and international attempts to address systemic risks have decoupled risk anticipation from sustainable and resilient risk management processes and structures.³¹ Furthermore, the modernization process facilitates the emergence of plural knowledge and value claims that leads to the request of multiple stakeholders to be part of the risk management process.³² This often includes a power





Stock/bestdesigns

Systemic risks are global by nature. We cannot approach them by trial and error. We need to correct our policies before the major errors occur.

imbalance among stakeholders in decision making and communicative processes. Public participation has proven to be an important part and often key driver for successful and legitimate risk governance for advancing climate change policies.²⁹ The various actors of society and the public at large can be important in providing local knowledge and experiences, informing decision making, especially with regard to uncertainty and ambiguity, and securing legitimacy for managing risk. In the end, risk management and communication need to address the four characteristics

of systemic risks and develop the appropriate instruments to deal with global, interconnected, stochastic, and nonlinear risks.

Ortwin Renn is Director of the International Institute for Advanced Sustainability Studies in Potsdam/Berlin and a full professor of environmental sociology and technology assessment at the University of Stuttgart.

NOTES

1. O. Renn, "Are We Afraid of the Wrong Things? Statistics, Psychology and the Risk Paradox," in Union Investment, ed., *The Measurement of Risk* (Frankfurt/

Main, Germany: Union Investment International, 2015), 24–35.

2. R. C. Harriss, C. Hohenemser, and R. W. Kates; R.W. (1978): "Our Hazardous Environment," *Environment: Science and Policy for Sustainable Development* 20 (7): 6–41. doi:10.1080/00139157.1978.9928699.


3. B. Fischhoff, C. Hohenemser, R. E. Kaspersen, and R. W. Kates, "Handling Hazards," *Environment: Science and Policy for Sustainable Development* 20, no. 7 (1978): 16–37, doi:10.1080/00139157.1978.9928700.

4. T. Bick and R. E. Kaspersen, "Pitfalls of Hazard Management," *Environment: Science and Policy for Sustainable Development* 20, no. 8 (1978): 30–42, doi:10.1080/00139157.1978.9933084.

5. C. Hohenemser; R.W. Kates and P. Slovic, "The Nature of Technological Hazard," *Science* 220 (1983): 378–384.

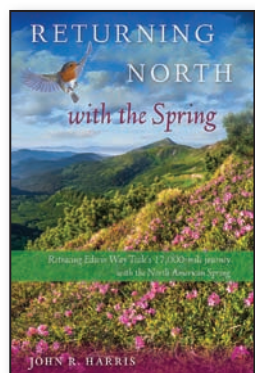
6. World Health Organization, *Review of Evidence on Health Aspects of Air Pollution — REVIHAAP Project Technical Report* (Copenhagen, Denmark: World Health Organization, Regional Office for Europe, 2013).

7. World Health Organization, *Health Impacts of Air Pollution*, <http://www.who.int/mediacentre/news/releases/2014/air-pollution/en> (2014).
8. O. Renn, *Das Risikoparadox. Warum wir uns vor dem Falschen fürchten* (Frankfurt/Main, Germany: Taschenbuch, 2014).
9. E. A. Rosa, O. Renn, and A. M. McCright, *The Risk Society Revisited. Social Theory and Governance* (Philadelphia, PA: Temple University Press, 2014).
10. O. Renn, *Das Risikoparadox. Warum wir uns vor dem Falschen fürchten* (Frankfurt/Main, Germany: Fischer Taschenbuch, 2014), 128ff.
11. <http://dggk.org/pressemitteilungen/herzbericht-2014/aktueller-deutscher-herzbericht-2014-erfolgreiche-herzmedizin-herzinfarktsterblichkeit-stark-gesunken-kardiologische-versorgung-auf-hohem-niveau>
12. O. Renn, *Das Risikoparadox. Warum wir uns vor dem Falschen fürchten* (Frankfurt/Main, Germany: Fischer Taschenbuch, 2014), 102.
13. Organization for Economic Cooperation and Development, *Emerging Systemic Risks: Final Report to the OECD Futures Project* (Paris, France: OECD, 2003).
14. G. Kaufman and K. E. Scott, "What Is Systemic Risk, and Do Bank Regulators Retard or Contribute to It?," *The Independent Review* 7, no. 3 (2003): 371–91.
15. O. Renn, "New Challenges for Risk Analysis: Systemic Risks," *Japanese Journal of Risk Analysis* 24, no. 3 (2014): 157–60.
16. O. De Bandt and P. Hartmann, *Systemic Risk: A Survey*, Working Paper Series/European Central Bank number 35 (Frankfurt/Main, Germany: European Central Bank), 10.
17. O. Renn, M. Dreyer, A. Klinke, and C. Losert, *Systemic Risks: A New Challenge for Risk Management*, Contribution to the OECD International Futures Project on Emerging Systemic Risks (Paris, France: OECD, 2002).
18. A. Wilkinson and M. Leach, "Briefing: Ebola—Myths, Realities, and Structural Violence," *African Affairs* adu080 (2014), doi:<http://dx.doi.org/10.1093/eurpub/cku236>.
19. R. Peckham, "Economies of Contagion: Financial Crisis and Pandemic," *Economy and Society* 42, no. 2 (2013): 226–48.
20. O. Renn, *Das Risikoparadox. Warum wir uns vor dem Falschen fürchten* (Frankfurt/Main, Germany: Fischer Taschenbuch, 2014), 137ff.



Global warming is one of the systemic risks that are likely to be underestimated in public debate and policy making.

21. J. X. Kasperson, R. E. Kasperson, N. Pidgeon, and P. Slovic, "The Social Amplification of Risk: Assessing Fifteen Years of Research and Theory," in N. Pidgeon, R. E. Kasperson and P. Slovic, eds., *The Social Amplification of Risk* (Cambridge, UK: Cambridge University Press, 2003), 13–46.
22. B. Wynne and K. Dressel, "Cultures of Uncertainty—Transboundary Risks and BSE in Europe," in J. Linnerooth-Bayer, R. E. Löfstedt, and G. Sjöstedt, eds., *Transboundary Risk Management* (London, UK: Earthscan, 2001), 121–54.
23. T. Horlick-Jones and J. Sime, J. (2004): "Living on the Border: Knowledge, Risk and Transdisciplinarity," *Futures* 36 (2004): 441–56.
24. M. B. A. van Asselt and O. Renn, "Risk Governance. *Risk Research*, 1, no. 4 (2011): 431–49.
25. International Risk Governance Council, *Risk Governance: Towards an Integrative Approach* (Geneva, Switzerland: IRGC, 2005).
26. International Risk Governance Council, *An Introduction to the IRGC Risk Governance Framework*, Policy Brief (Geneva, Switzerland: IRGC, 2007).
27. O. Renn, *Risk Governance. Coping With Uncertainty in a Complex World* (London, UK: Earthscan, 2008).
28. U.S. National Research Council of the National Academies, *Understanding Risk: Informing Decisions in a Democratic Society*, National Research Council, Committee on Risk Characterization (Washington, DC: National Academy Press, 1996).
29. U.S. National Research Council of the National Academies, *Public Participation in Environmental Assessment and Decision Making* (Washington, DC: National Academies Press, 2008).
30. A. Boholm, "Comparative Studies of Risk Perception: A Review of Twenty Years of Research," *Journal of Risk Research* 1, no. 2 (1990): 135–63.
31. J. Bloesch, et al., "Sustainable Development Integrated in the Concept of Resilience," *Problems of Sustainable Development* 10, no. 1 (2015): 7–14.
32. K. D. Grieger, I. Linkov, S. F. Hansen, and A. Baun, "Environmental Risk Analysis for Nanomaterials: Review and Evaluation of Frameworks," *Nanotoxicology* 6, no 2 (2012): 196–212.



HARDCOVER \$24.95

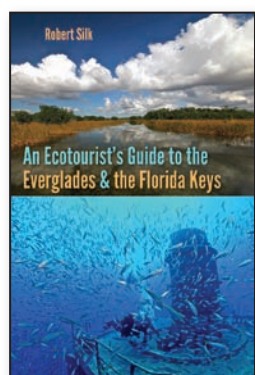
"HARRIS'S THRILLING REVISIT
IS A POWERFUL ADDITION TO
NATURE-WRITING."

—**JANISSE RAY**,
author of *Drifting into Darien*

"DESCRIBES NOT ONLY WHAT HAS
BEEN LOST BUT ALSO WHAT
REMAINS, AND MERITS OUR
PROTECTION, TODAY."

—**JOHN ELDER**,
author of *Pilgrimage to Vallombrosa*

UNIVERSITY PRESS OF FLORIDA
www.upf.com | 800.226.3822



PAPER \$16.95

"AS ESSENTIAL AS SUNSCREEN
AND A MUST-HAVE FOR
ANYONE VISITING OR LIVING IN
SOUTH FLORIDA."

—**MAC STONE**,
author of *Everglades*

"A WARM, INVITING EXPLORATION
OF SOUTH FLORIDA'S NATURAL
BEAUTY AND HISTORY."

—**LAURA ALBRITTON**,
author of *Miami For Families*

STATEMENT OF OWNERSHIP, MANAGEMENT, AND CIRCULATION REQUIRED BY SECTION No. 3685, TITLE 39 (PS Form 3526, July 2014, PSN: 7530-01-000-9931), UNITED STATES CODE for *Environment: Science and Policy for Sustainable Development*; ISSN 0013-9157. *Environment: Science and Policy for Sustainable Development* is published bimonthly for a total of 6 issues per year. The annual subscription rate for U.S. nonmembers is \$61. The publication office address is Taylor & Francis, LLC, 530 Walnut Street, Suite 850, Philadelphia, PA 19106. Contact person: Natacha Carter (tel: 215-606-4233). The address of the headquarters and general business office of the publisher is Taylor & Francis, 4 Park Square, Milton Park, Abingdon, Oxfordshire, OX14 RN, United Kingdom. The names and addresses of the publisher, editor, and managing editor are: publisher: Natacha Carter, Taylor & Francis, LLC, 530 Walnut Street, Suite 850, Philadelphia, PA 19106; editor: Margaret Benner Smidt, 211 Mary Alice Drive, Los Gatos, CA 95032; managing editor: Edward Cilurso, Taylor & Francis, LLC, 530 Walnut Street, Suite 850, Philadelphia, PA 19106. Stockholders owning 1 percent or more of total amount of stock: Taylor & Francis, LLC, 530 Walnut Street, Suite 850, Philadelphia, PA 19106. Known bondholders, mortgagees, and other security holders owning or holding 1 percent or more of total amount of bonds, mortgages, or other securities: Taylor & Francis, LLC, 4 Park Square, Milton Park, Abingdon, Oxfordshire, OX14 RN, United Kingdom. The purpose, function, and nonprofit status of this organization and the exempt status for federal income tax purposes have not changed during the preceding 12 months.

The issue date for circulation data (issue nearest to filing date) is July 2015. The average number of copies each issue during the preceding 12 months is: (a) Total number of copies (net press run): 1960. (b) Paid circulation: (1) mailed outside-county paid subscriptions stated on PS Form 3541: 1141; (2) mailed in-county paid subscriptions stated on PS Form 3541: none; (3) paid distribution outside the mails including sales through dealers and carriers, street vendors, counter sales, and other paid distribution outside USPS®: 176; (4) paid distribution by other classes of mail through the USPS (e.g., First-Class Mail®): none. (c) Total paid distribution: 1317. (d) Free or nominal rate distribution: (1) free or nominal rate outside-county copies included on PS Form 3541: 385; (2) free or nominal rate in-county copies included on PS Form 3541: none; (3) free or nominal rate copies mailed at other classes through the USPS (e.g., First-Class Mail): none; (4) free or nominal rate distribution outside the mail: none. (e) Total free or nominal rate distribution: 385. (f) Total distribution: 1702. (g) Copies not distributed: 258. (h) Total: 1960. (i) Percent paid: 77.

The number of copies of single issue published nearest to filing date is: (a) Total number of copies (net press run): 1960. (b) Paid circulation: (1) mailed outside county paid subscriptions stated on PS Form 3541: 1141; (2) mailed in-county paid subscriptions stated on PS Form 3541: none; (3) paid distribution outside the mails including sales through dealers and carriers, street vendors, counter sales, and other paid distribution outside USPS: 176; (4) paid distribution by other classes of mail through the USPS (e.g., First-Class Mail): none. (c) Total paid distribution: 1317. (d) Free or nominal rate distribution: (1) free or nominal rate outside-county copies included on PS Form 3541: 385; (2) free or nominal rate in-county copies included on PS Form 3541: none; (3) free or nominal rate copies mailed at other classes through the USPS (e.g., First-Class Mail): none; (4) free or nominal rate distribution outside the mail: none. (e) Total free or nominal rate distribution: 385. (f) Total distribution: 1702. (g) Copies not distributed: 258. (h) Total: 1960. (i) Percent paid: 77.

I certify that 50% of all my distributed copies (electronic and print) are paid above a nominal price. I certify that all information furnished on this form is true and complete. I understand that anyone who furnishes false or misleading information on this form or who omits material or information requested on the form may be subject to criminal sanctions (including fines and imprisonment) and/or civil sanctions (including civil penalties). (signed) Edward A. Cilurso, September 19, 2015