

**THE COUNCIL'S 2022/23 BUDGET AND MEDIUM TERM FINANCIAL PLAN
FOR 2022/23 TO 2024/25 - DRAFT**

Relevant Portfolio Holder	Councillor Mike Rouse
Portfolio Holder Consulted	Yes
Relevant Head of Service	Chris Forrester
Report Author	Name: Chris Forrester Job Title: Head of Service email: chris.forrester@bromsgroveandredditch.gov.uk
Wards Affected	N/A
Ward Councillor(s) consulted	N/A
Relevant Strategic Purpose(s)	All
Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

1.1 The Executive Committee RECOMMEND that Full Council approve: -

1) the overall net general fund revenue budgets (as set out in Section 4.9) of:

2022/23: £10.520m
2023/24: £10.289m
2024/25: £10.428m

2) the unavoidable costs as attached at Appendix 1:

2022/23: £0.427m
2023/24: £0.140m
2024/25: £0.134m

3) the Revenue Bids as attached at Appendix 2:

2022/23: £0.191m
2023/24: £0.150m
2024/25: £0.128m

4) the Identified Savings as attached at Appendix 3:

2022/23: £0.305m
2023/24: £0.327m
2024/25: £0.327m

- 5) an increase of the Council Tax per Band D equivalent of £5 for 2022/23.
- 6) the transfer from General Fund Balances of £0.282m for 2022/23.
- 7) the planned reallocation of £0.238m from Earmarked reserves to General Fund Balances as set out at Appendix 5.
- 8) the General Fund capital programme as at Appendix 4 of:

2022/23:	£4.257m
2023/24:	£2.407m
2024/25:	£1.930m
- 9) the Housing Revenue Account Budget at Appendix 6 of:

2022/23:	£25.390m
2023/24:	£25.074m
2024/25:	£25.545m
- 10) the Housing Revenue Account Capital Programme at Appendix 7 of:

2022/23:	£14.180m
2023/24:	£12.580m
2024/25:	£12.580m

1.2 And that the Executive Committee ask the Council to note

- 1) the 2020/21 Capital Outturn as reported at Appendix 9.
- 2) The Chief Financial Officer (CFO) Opinion on Estimates and Reserve Levels as reported in Appendix 8.

2. BACKGROUND

Purpose

- 2.1 The purpose of this report is to set the Council's (General Fund) Revenue and Capital Budget for 2022/23, as well as the Medium-Term Financial Plan (MTFP) for the period 2022/23 to 2024/25. Also, to set the Housing Revenue Account Budget (Capital and Revenue) for 2022/23.
- 2.2 The Council's Medium Term Financial Plan (MTFP) provides the framework within which the revenue and capital spending decisions can be made.
- 2.3 The Strategic Purposes that drive the financial considerations are:
- Run and grow successful business
 - Finding somewhere to live
 - Aspiration, work & financial independence
 - Living independent, active & healthy lives
 - Communities which are safe, well maintained & green
- 2.4 This report includes recommendations to Council to enable a balanced budget to be set for 2022/23 and the proposed Council Tax for 2022/23. The recommendations will then be presented to Council on 21st February 2022 together with the resolutions once we have received all the precepting bodies Council Tax calculations.

Financial Context

- 2.5 The Council faces a challenging financial context having:
- i) previously received a statutory recommendation from its external auditors under section 24 of the Local Audit and Accountability Act 2014 in relation to its financial position (noting that due to the positive steps taken by the Council this recommendation has not been re-issued by the external auditor in the past year);
 - ii) identified (but still needs to deliver) significant savings over the medium term;
 - iii) reserve balances (General and HRA) only marginally above minimum levels; and
 - iv) high levels of planning uncertainty with regards to the levels of available funding in coming years

- 2.6 The Council therefore needs to continue to carefully consider how it prioritises resources and balances budgets in a sustainable and affordable way, as part of this (and future) budget round(s).
- 2.7 Members and officers have therefore reviewed the services provided by the Council over the last 6 months to consider the levels of funding available to the Council and identified where potential savings can be made or additional income generated.
- 2.8 The Budget Scrutiny working group as established by the Overview and Scrutiny Committee has met on a regular basis to review budget related issues (including reports on underlying risks, pressures and uncertainties as well as income matters and fees and charges opportunities).

Unprecedented Levels of Uncertainty

- 2.9 It should be noted that the future of the system of local government finance remains uncertain. The government has committed to re-assess the baseline need for spend in each local authority (through its 'Fair Funding review'). This has been pushed back (again) to 2023/24 at the earliest - but is still expected to happen. This review will have a significant impact on the government's calculation of the Settlement Funding Assessment for (and therefore the amount of funding available to) this council - and remains therefore a significant risk.
- 2.10 It also remains uncertain as to what the Government's plans are with regards to the system of business rates - including the share of business rates retained locally.
- 2.11 A one-year provisional Local Government Finance Settlement was announced on 16th December 2021 and has been incorporated into this report. It remains unclear as to when Government will announce more funding certainty through a multi-year financial settlement for Local Government.
- 2.12 Furthermore, the short, medium and long term impact of the Covid- 19 pandemic and UK's exit from the European Union (on residents, the economy and the state of national and local government finance) remains uncertain.
- 2.13 Taken together therefore (the outcome of the fair funding review, the future of business rates and the local government financial settlement, COVID-19, Brexit and the state of the local and national economy) represents a challenging context within which to set the budget and MTFP - one characterised by an unprecedented level of uncertainty.

3. FINANCIAL IMPLICATIONS

3.1 In order to clearly explain the basis of the Budget proposals this report (which sets out all financial implications) will be structured as follows:

4) General Fund Revenue

i. The Prior Year MTFP 2021/22 – 2023/24

This section which will summarise the previous Council approved MTFP as a reminder of the previously approved starting point.

ii. Updated Forecast Outturn Position for 2021/22

This section will update the starting revenue position for 21/22 and therefore update the opening balances for 22/23.

iii. The 22/23 Budget and (updated) MTFP for the period 22/23 – 24/25

This section will set out the updated Budget and MTFP forecast for approval.

iv. The Updated MTFP and General Fund Forecasts

This section will summarise the impact of the updated 22/23 Budget and MTFP forecast on the Council's General Fund balance position over the medium term.

v. Reconciling the current updated MTFP to the Feb 2021 Approved MTFP

This section will analyse and explain the movements from the previous approved Budget and MTFP to the updated 22/23 Budget and MTFP.

vi. Council Tax increase

vii. Covid General Grant

This section summarises the position on general Covid grant funding received by the Council.

viii. Reallocation of Earmarked Reserves to General Fund

This section sets out those reserves previously earmarked for specific purposes that can be release back to the General Fund Reserve.

- 5) **Collection Fund and Precepts**
- 6) **Housing Revenue Account**
- 7) **Capital Programme**

4. GENERAL FUND REVENUE

The Prior Year MTFP 2021/22 – 2023/24 (approved February 2021)

- 4.1 The Council's MTFP is updated annually and was previously approved for the three year period 2021/22 to 2024/25 by full Council in February 2021.
- 4.2 The following table sets out what, at that point (Feb 2021) the MTFP forecast in terms of annual budget deficits and opening and closing general fund balances.

Table 1: The Prior Year MTFP and General Fund Balance Forecasts

General Fund	21/22	22/23	23/24
	£000's	£000's	£000's
Opening Balance	1,831	1,875	1,613
Annual (Deficit) / Surplus	44	-261	-761
Closing Balance	1,875	1,613	852

- 4.3 Table 1 shows that the previously (Feb 2021) approved MTFP predicted a surplus of £44k in 2021/22. The Council was expected to move to an in-year deficit position of £0.261 million in 2022/23 and £0.761 million in 2023/24.
- 4.4 Annual deficits require the Council to utilise its General Reserve balances. As at February 2021, the MTFP, based on the annual deficits forecast above, showed that the Council's General Fund Balances would reduce from £1.831 million a 1st April 2021 to £0.852 million at 31st March 2024.

Updated Forecast Outturn Position for 2021/22

- 4.5 Since the previous MTFP in February 2021, the final outturn position for 2020/21 allowed General Fund reserves of £2.2m to be carried forward as at 1 April 2021. This actual position represented a £0.374 million increase on the value assumed when the MTFP was approved in Feb 2021.
- 4.6 The outturn position for this current year (2021/22) is forecast to break even against budget (of a £0.044m surplus as approved by Council back in February 2021) after allocation of Covid Grant (but before any transfers from Earmarked Reserves).

The 22/23 Budget and (updated) MTFP for the period 22/23 – 24/25

- 4.7 The MTFP has been updated for the period 2022/23 to 2024/25 to model the impact of changes in assumptions, budgetary pressures, reductions in funding and savings.
- 4.8 The 22/23 Budget and updated MTFP is summarised (in terms of its annual revenue and general fund forecasts) for the period 2022/23 to 2024/25 in the table below:
- 4.9 The proposed budget is summarised in the table below

REDDITCH BOROUGH COUNCIL

Executive Committee

25th January 2022

Table 2: The Updated MTFP and Annual Revenue Budgets

	2022-23 £000	2023-24 £000	2024-25 £000
Departmental base budget	10,064	10,051	10,132
Incremental Progression	144	275	361
Unavoidable Pressures	427	140	134
Revenue Bids/Revenue impact of capital bids	191	150	128
Savings and Additional income	-305	-327	-327
Changes in Specific Grant/Funding Movements	0	0	0
Net Revenue Budget Requirement	10,520	10,289	10,428
FINANCING			
Reserve release	-100	0	0
Lower Tier Services Grant	-100	0	0
Business Rates Net Position	-2,985	-2,985	-2,985
Council Tax	-6,747	-6,941	-7,031
Collection Fund Deficit (Council Tax)	-180	0	
New Homes Bonus	-330	0	
Investment Income	-673	-673	-673
MRP (Principal)	959	1,098	1,046
Interest payable	218	220	218
Discount on advanced pension payment	-301	-60	-170
Funding Total	-10,238	-9,341	-9,595
General Balances	2022-23 £000	2023-24 £000	2024-25 £000
Estimated opening balances 22/23 (projected)	2,292	2,010	1,061
Contribution (from) / to General Balances	-282	-949	-833
Closing Balances	2,010	1,061	228

Explanatory Notes re Table 2

- 1) All Service Teams / Departments have a base budget which includes staff budgets.
- 2) Staff budgets are subject to incremental progression as staff become more experienced within graded posts.
- 3) A number of budget pressures that have been deemed “unavoidable” and are further analysed in this report.
- 4) Budget setting includes a ‘bidding process’ for additional resources – set out below.
- 5) Budget setting includes the identification of savings and income – set out below.
- 6) Specific grant funding, where confirmed, is set against services as appropriate.
- 7) Financing includes an element of planned reserve usage.
- 8) The Council receives a ‘Lower Tier’ grant from Central Government.
- 9) The Council retains an element of its business rates receipts to fund services.
- 10) The Council retains its own element of council tax bills (it collects for all precepting authorities). The budget includes an increase of £5 (band D) - the maximum allowable without a referendum.
- 11) A element of Collection Fund surplus / deficit impacts on the Council General Fund.
- 12) New Homes Bonus has been confirmed by Central Government.
- 13) The Council earns interest on investment balances.
- 14) Minimum Revenue Provision costs reflect capital borrowing / repayment costs.
- 15) Borrowing costs based on forecast interest rates.

16) *The Council has benefitted financially from paying some of its Pension commitments calculated at the last Actuarial Review in one lump sum (to Worcestershire Local Government Pension Fund).*

- 4.10 The above table sets out how the Council's expenditure profile will be met by a combination of external funding and use of reserves over the period.
- 4.11 The table also shows that the General Reserve Balance is forecast to remain above minimum levels (currently set at £1.5m) until partway through the 23/24 financial year.

Analysis of key changes to the MTFP – Forecast General Fund Balances

- 4.12 The following table sets out how the draft MTFP (as summarised in Section 4.9) compares to the previous MTFP in terms of forecast closing general fund balances:
- 4.13 Table 3: The Updated (versus Previous) MTFP and General Fund Forecasts

General Fund Closing Balance	21/22 £000's	22/23 £000's	23/24 £000's	24/25 £000's
Previous	1,875	1,613	852	N/A
Updated	2,292	2,010	1,061	228

Note: It should be noted that the analysis in Table 3 excludes the £0.238 million or Earmarked Reserves provisionally identified for release back to the General Fund Reserve at the end of the current 21/22 year within Appendix 5.

- 4.14 Table 3 above shows that the 2021/22 General Fund closing position is now forecast to be improved (£2.292 million as opposed to £1.875 million) than that forecast when the budget was approved in Feb 2021. This is due to a more favourable outturn for 2020/21 than anticipated at February 2021 (when the budget was set). Reasons for this include lower than anticipated borrowing costs and some Covid related savings particularly on premises costs.
- 4.15 The table demonstrates that the updated MTFP forecasts a General Fund Balance of £2.01 million at the end of 2022/23 which remains above minimum set levels of £1.5 million.
- 4.16 Table 3 also shows that the General Fund is now forecast to total £1.061 million at the end of 2023/24 (compared to £0.852 million in the previous MTFP) falling below minimum adequate levels (which have been set at £1.5 million) during that year. Savings, increased income levels,

additional government resources or a favourable Fair Funding Review will therefore be necessary to ensure above minimum levels of reserves over the medium term. Further action is therefore needed as a matter of urgency.

Reconciling the current updated MTFP to the Feb 2021 Approved MTFP

- 4.17 Changes need to be made to the Council's budget and MTFP to keep them up to date and robust. In order to make these changes as transparent as possible these changes have been summarised in Table 4 below.
- 4.18 Table 4: Reconciliation of Previous and Updated MTFP - Adjustments made to the Annual Budget Forecasts

	22/23	23/24
	£000s	£000s
Previous Forecast Deficit	261	761
+ Corrections and Assumption changes	135	225
+ Pressures	427	140
+ Funding impact	-436	0
+ Resource Planning and Prioritisation (RPP)	-105	-177
= Updated Forecast Surplus / Deficit	282	949

- 4.19 The above summary shows that the annual budget deficits (before appropriation of General Fund Balances or General Covid Grant) are now forecast at £282k for 2022/23 (previously £0.261m), and £949k for 23/24 (previously £0.761m).
- 4.20 In order to better explain what is driving these changes in budget forecasts, this summary is further explained and analysed below:
- Corrections and Assumption changes (£135k in 22/23)
- 4.21 All budgets include estimates and assumptions. Eg. Inflation and interest rates, Government grants, council tax base and collection rates. These are updated annually.
- 4.22 One of the outcomes of budgetary control, closedown and setting procedures is also the identification of inaccuracies. There are a large number of such amendments which are individually usually small. The larger factors to the overall changes here include:

- Inflation. One of the pressures to the budget is general inflation on utility costs along with additional costs in relation to pay. The costs relating to pay inflation are above that initially anticipated. The original budget included a 1% pay award however the best estimate is now 2% which adds an additional pressure of circa £80k pa. Other pressures have been contained within budgets where possible.
- MRP, interest costs and investment income budgets lines have all been reviewed and reduced compared to prior year forecasts. These changes are due to a review of the capital programme to reflect more accurately planned spend. This reduces significantly MRP and borrowing costs – but also investment income (which has also been revised to take account of the short-term focus on delivering the Towns Fund rather than alternative strategic investments). The overall net impact is therefore minimal.

Pressures

4.23 Expenditure (and income) budgets required to deliver previously approved strategies and plans are subject to a multitude of market forces, sector issues, demographics and other matters.

- **Unavoidable Costs (£427k in 22/23).** When proposing the budget officers have also identified a number of budget pressures that have been deemed “unavoidable”. These unavoidable pressures include the ongoing effects of pressures identified during 2021/22 together with any issues that have been raised as fundamental to maintaining service provision as part of the budget process. In addition, income shortfalls that cannot be managed by improved marketing or price increases have been addressed during the budget planning.
- Unavoidable pressures include a £319k pressure specifically relating to Rubicon Leisure. This is the best and latest estimate (based on meetings with senior Rubicon management) of the impact of Covid-19 on footfall and therefore the financial position of Rubicon (and therefore our management fee). While this is considerably lower than annual additional cost estimated this time last year (of up to circa £1.2m additional), it remains a pressure that will only be covered by remaining Covid General Fund grant funding in the short term.

Resource Planning and Prioritisation (RPP):

4.24 RPP is the outcome of the steps taken to identify options to do things differently and more efficiently, to identify savings but also required areas of investment. It is the culmination of a ‘check and challenge’ process with regards to the Council’s budgets, led by the Corporate Management

Team and presented to Cabinet (and ultimately full Council). It is a critical element of the Council operating within available resources.

- **Bids (£190k in 22/23).** In addition to the unavoidable pressure's revenue bids have been identified and included at Appendix 2. Bids relate to new funding requests made by officers to improve service delivery or to realise future efficiencies. Revenue 'bids' included in these budget proposals include developments relating to ICT (re maintaining core digital and cyber security related infrastructure) and supporting greater agile work. Work is also planned in relation to lower carbon emissions which requires investment. Additional capacity is also required for Business Improvement activity.
- **Identified Savings/additional income (£304k in 22/23).** A number of savings have been identified which are set out in Appendix 3. These relate to a variety of areas and relate to delivering efficiencies (eg cutting paper and print costs and reduced insurance costs), additional income (eg bulky waste and lifeline), and investigating and implementing alternative arrangements (eg cash payments alternatives).

Funding Impact (£436k in 22/23)

4.25 The main factors to the changes related to funding include:

- **Lower Tier Services Grant (£0.1m).** The finance settlement in December announced we are due to receive a Lower Tier Services Grant for £0.1million in 2022/23 not previously budgeted for. This grant is intended to compensate those local authorities whose core spending power did not increase in the finance settlement.
- **New Homes Bonus (NHB) (£0.121m).** The amount of NHB for 2022/23 has been confirmed as £0.3 million which is £121k more than anticipated in the MTFP. This is due to the Government funding an additional year of New Homes Bonus.
- The Councils share of the **Collection Fund surplus is £182k** which was not budgeted for previously.

Council Tax Increase

4.26 As part of the Financial Settlement the Council can increase Council Tax by up to 2% or £5 whichever is higher without the need for a referendum. These budget proposals include £5 increase for 2022/23 (Band D). The Council Tax relating to the Councils services will rise for Band D from

£249.15 to £254.15. This is unchanged from the previous approved MTFP.

Covid General Grant

- 4.29 In recognition of this negative impact on the Council's resources (and particularly for councils reduced income levels achievable for car parks and Leisure), the Council was awarded £1.952 million of General Covid-19 Grant across a number of tranches received in 2020/21 and the early part of 2021/22.
- 4.30 After allocating this funds against Covid related pressures in 20/21 some £1.077m of this grant was carried forward to the current financial year (ie 21/22). It is forecast that £292k of this General Covid Grant will be carried forward at 31/3/2022 (after funding the negative impact on 21/22 Budgets). This will be available (alongside General Fund balances) to mitigate pressures on budgets – at least in the short term.
- 4.31 It must however be emphasised that this funding is not expected to be a recurring income stream to the Council. Further work must therefore be done to reduce the gap between spend and income on a sustainable and ongoing basis.

Reallocation of Earmarked Reserves to General Fund

- 4.32 A review has been undertaken of reserves previously earmarked for specific purposes. This has identified £0.238 million that can provisionally be released back to the General Fund Reserve. See Appendix 5.

5. COLLECTION FUND AND PRECEPTS

- 5.1 The anticipated collection fund surplus of £1.455m (prior year £478k), will be distributed amongst the major preceptors using the prescribed formulae. The Councils share of the surplus as a one-off sum is £182k (prior year £63k).
- 5.2 The precepts from Worcestershire County Council, Hereford and Worcester Fire Authority and the West Mercia Police and Crime Commissioner are due to set their precepts in the week commencing 8th February. This will enable the Council to set the Council Tax on 21st February 2022. The precepting bodies Council Tax requirements will be included in the formal resolutions which will be presented to Executive and Council on 21st February.

6. HOUSING REVENUE ACCOUNT

- 6.1 The Housing Revenue Account is a ring-fenced account holding transactions relating to Council dwellings. It is a separate account within the General Fund but receives income from Council rents.
- 6.2 For the four financial years up to and including 2019/20 there has been a national requirement to reduce rents by 1% per annum and this has put severe pressure on the housing revenue account. From 2020/21 rents were able to increase by the consumer price index plus 1%. The rent increase for 2021/22 was approved by the Executive on 11th January 2022.
- 6.3 Appendix 6 provides a summary of the Housing Revenue Account including the latest forecast for 2021/22. It is estimated we will be in a surplus position for the next three years and therefore returning to earmarked reserves which will enable the HRA to fulfil its forecasted acquisitions and developments.
- 6.4 Appendix 7 provides the HRA Capital Programme.

7 CAPITAL PROGRAMME

- 7.1 The (Non HRA) Capital Programme has also been updated including proposed new bids required to deliver services to the community. These are included in the proposed Capital Programme at Appendix 4. The borrowing costs have been factored into the revenue budget for the financial plan. It should be noted that a housekeeping review of the Capital Programme has been recently undertaken in order to challenge the deliverability (and timing) of some schemes which has resulted in some rationalisation.

8. LEGAL IMPLICATIONS

- 8.1 As part of the budget and the Council Tax approval process, the Council is required by the Local Government Finance Act 1992 to make specific calculations and decisions in approving a balanced budget for the following financial year and setting the Council Tax Level. These will be included in the resolutions and presented to Executive and Council on 21st February 2022.
- 8.2 The Council has a legal obligation to set a balanced budget (s32 of the Local Government Finance Act 1992). The amount of the budget requirement must be sufficient to meet the Council's budget commitments and ensure a balanced budget. The 2022/23 budget requirement must leave the Council with adequate financial reserves.

8.3 A lawful Council Tax is required to be made on or before 11 March 2022.

8.4 Section 25 of the Local Government Act 2003 requires the Chief Financial Officer (CFO) to report to the Council the robustness of estimates included in the budget and the adequacy of the reserves when it is making the statutory calculations required to determine its Council Tax or precept.

9. STRATEGIC PURPOSES - IMPLICATIONS

Relevant Strategic Purpose

9.1 The Strategic purposes are included in the Council's corporate plan and guides the Council's approach to budget making ensuring we focus on the issues and what are most important for the borough and our communities. Delivering against all our Strategic Purposes is therefore integrated within our MTFP.

Climate Change Implications

9.2 No direct implications identified.

10. OTHER IMPLICATIONS

Equalities and Diversity Implications

10.1 No direct implications identified.

Operational Implications

10.2 The MTFP will enable services to be maintained.

11. RISK MANAGEMENT

11.1 The risks posed by the challenging financial context and the unprecedented levels of uncertainty (re the outcome of the fair funding review, the future of business rates and the local government financial settlement, COVID-19, Brexit and the state of the local and national economy) with regard to the budget have been set out within Section 2 as background to this report.

11.2 Risks prevalent in this area also include:

- Reductions in government funding leading to a reduction in the level of services delivered to the public

- Reductions in business rates income as a result of appeals or reduction in the rateable value leading to a lower level of income for the Council.
- Identification of sufficient and ongoing revenue savings to deliver a balanced budget.
- Allocation of sufficient resources to meet the needs of service delivery and the Councils priorities.
- Maintain adequate revenue and capital balances as identified in the MTFP to ensure financial stability.

11.3 This budget (and the processes underpinning it including the check and challenge of the Resource Planning and Prioritisation and 'bidding' processes, revisiting all budget assumptions and the identification of income and savings) provides a framework for managing and mitigating this risk.

11.4 In addition, Section 25 of the Local Government Act 2003 requires the Chief Financial Officer (CFO) to report to the Council the robustness of estimates included in the budget and the adequacy of the reserves when it is making the statutory calculations required to determine its Council Tax or precept. This is set out in full within Appendix 8.

12. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Unavoidable costs

Appendix 2 - Revenue Bids

Appendix 3 - Identified savings

Appendix 4 - Proposed Capital programme

Appendix 5 - Earmarked Reserves

Appendix 6 - Housing Revenue Account Budget 2021/22 and MTFP to 2023/24

Appendix 7 - Housing Revenue Account Capital Programme 2021/22 to 2023/24

Appendix 8 - Chief Financial Officer (CFO) Opinion on the Estimate Process and Reserve Levels.

Appendix 9 – Capital Outturn Position

Executive Committee

25th January 2022

13. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Mike Rouse	
Lead Director / Head of Service	James Howse, Exec Director of Resources (S151 Officer)	
Financial Services	Chris Forrester, Head of Finance and Customer Services	
Legal Services		
Policy Team (if equalities implications apply)		
Climate Change Officer (if climate change implications apply)		