**Directorate of Natural Resources - Fisheries Department**

**Fisheries (Conservation and Management) Ordinance 2005**

**Guidance on ITQ B Action Plans**

**Introduction**

Under the Fisheries (Conservation & Management) Ordinance 2005, as amended in 2021, and the Regulations made under it, it is a condition of eligibility for ITQ B for a company to have an action plan in place, that is approved by the Director of Natural Resources.

This guidance, issued by the Director, covers:

* How the approval of an action plan relates to the process for the granting of an application for ITQ B eligibility
* How action plans are drawn up and approved
* What action plans will contain
* How progress against action plans is monitored and assessed
* How penalties may be applied if the targets and milestones in action plans are not met
* How companies may seek a review for certain decisions made by the Director in relation to action plans
* How it is intended that action plans will be reviewed and refreshed over time.

*This guidance seeks to explain and clarify the law, but it does not form part of the legislation. For the avoidance of doubt, if there is any inconsistency between this guidance and the legislation, then the legislation should be regarded as definitive.*

**How the approval of an action plan relates to the process for the granting of an application for ITQ B eligibility**

To hold ITQ B, a company will need to meet, and continue to meet, the ITQ B eligibility criteria set out in the Ordinance, chiefly that:

* they meet all the existing ITQ eligibility criteria that have been in place since 2005; and
* they hold at least 51% ownership of a qualifying company (or companies) that will undertake the fishing, *or* have the capability to fish in their own right; and
* all qualifying companies have a majority of directors who have Falkland Island status and are ordinarily resident in the Falkland Islands or meet the criteria for corporate directors of a qualifying company; and
* they are a member of FIFCA, thereby linking each company to the FIG-FIFCA Accord and Action Plan; and
* **they have an action plan in place, that is approved by the Director of Natural Resources.**

Applications for ITQ B eligibility must be supported by an approved action plan.

The Department of Natural Resources will operate a process by which action plans are approved. This process will be completed ahead of the deadline by which applications for ITQ B eligibility and ownership must be submitted.

An action plan must have been approved by the Director before the initial application for ITQ B eligibility is made, but it will not come into effect until ITQ B eligibility is granted.

Full details of the application process for ITQ B eligibility and ownership are contained in *‘Guidance on ITQ B applications’* issued by the Department for Natural Resources.

**How action plans are drawn up and approved**

The Director will ask all existing ITQ A eligible companies to indicate if this wish to agree an action plan. This will generally indicate an intention to apply for ITQ B eligibility, but that will not be binding at this stage.

The Director will then produce action plans for each company that has requested one using a standard template, which is included as an annex to this guidance. The template has been developed in consultation with the industry.

The Director will send the proposed action plan to the company, who will have opportunity to seek clarification, to comment and to suggest any changes they would like to be made.

The Director will consider any proposals made by companies to amend their action plan and will seek to reach agreement, but will have the final say (subject to the outcome of any ExCo appeal) over the content of all action plans.

The expected timetable for the initial round of action plans is as follows:

|  |  |
| --- | --- |
| 15 October 2021 | Director issues request for companies to indicate whether they wish to agree an action plan, in order to support an intended application for ITQ B eligibility. |
| 29 October 2021 | Companies asked to respond by this date if they wish to request an action plan  |
| 12 November 2021 | Draft company action plans produced by DNROpportunity for companies to comment and propose amendments |
| 31st March 2022 | Final company action plans produced by DNR |
| 14th April 2022 | Deadline for company to notify Director of request for ExCo to consider an appeal. |
| 14th May 2022 | Date by which companies will be notified of the outcome of any ExCo appeals. |
| 30th June 2022 | Deadline for ITQ B applications to be submitted |

**What action plans will contain; and how progress against action plans is monitored and assessed**

The *Fisheries (Action Plans) Regulations 2021* set out the scope of company action plans. The objectives in the action plans must relate to the goals set out in those Regulations, which are the five goals of the FIG-FIFCA Fisheries Accord. There is a legal duty on government in section 17E(2) of the revised Ordinance to consult the Fisheries Committee and FIFCA before making, or revising, these regulations.

The first set of company action plans will include four commitments:

1. ***Contribution to supporting the overall FIG-FIFCA Accord action plan***

Goal: Building a competitive and successful seafood sector by delivering sustainable, profitable and socially beneficial outcomes through economic leadership, strategic investment and fostering an innovative and sustainable sector of the Falklands economy.

Target: Be a signatory of the FIG-FIFCA Accord Action Plan (providing a signed copy), and commit to supporting the delivery of its goals.

Annual milestone: Continue to support the delivery of the FIG-FIFCA Accord Action Plan.

For the annual review: The Director will request a short written narrative setting out how the company has supported the FIG-FIFCA Accord Action Plan. It is recognised that the contribution would be proportionate to the company’s share of the Falkland Islands fisheries sector.

1. ***Transhipment of product through a domestic container service***

Goal: Building a competitive and successful seafood sector by delivering sustainable, profitable and socially beneficial outcomes through economic leadership, strategic investment and fostering an innovative and sustainable sector of the Falklands economy.

Target: Carry out transhipment to a domestic containerisation service over the port in Stanley, Falkland Islands.

Annual milestone: Company action plans will include annual targets expressed as a percentage of their ‘available product’ for that season across all ITQ B licence classes for the duration of the action plan (initially, for six years).

The basis of the calculation is as follows, for each eligible company, for each year:

**Total Annual Product (not green weight)**: all product caught by all vessels licensed to fish Catch Entitlement owned by the eligible company within a calendar year = A.

**Exempt Total Annual Product**: the total annual product carried to a destination other than a port in Stanley in the hold of each fishing vessel licensed to fish the Catch Entitlement that is exempted by the Director for the purposes of calculating the company’s transhipment target = B.

**Available Product** = A – B.

**Target** is X% of Available Product being transhipped through a domestic container service.

The actual volume (in metric tonnes) carried in the hold of each vessel will be used to calculate the exempt product, *not* the hold capacity of the vessel, as this will not necessarily be filled due to vessel stability and safety requirements. Each vessel is entitled to **one hold** of exempted product per fishing season that it is licensed to fish (so for a vessel licensed to catch Loligo that would be two seasons in any year; for all other finfish licensed vessels, that would be one).

The target will be set as follows:

|  |  |
| --- | --- |
| **Year** | **Target (as % of Available Product)** |
| 2023 | 30 |
| 2024 | 30 |
| 2025 | 32\* |
| 2026 | 32\* |
| 2027 | 34\* |
| 2028 | 34\* |

If the new port in Stanley is not operational before the start of 2025, the target will remain at 30%. When the new port is operational the target will rise by 2% for the following year, and a further 2% two years later.

For the annual review: The Director will compare the actual transhipment data with the target for that year. As the target is expressed as a percentage of available product, the target amount in metric tonnes will only be known at the end of the year; but catch reports and other in year data will give a good earlier indication.

The Director will take account of mitigating circumstances, where events outside the company’s direct control are such that they could not reasonably meet the target in the action plan.

Such mitigating circumstances may include:

* **Port/port services not available** for *more* than seven days in succession. This includes:
	+ vessels not being able to berth safely;
	+ vessels not being able to get a berth due to congestion;
	+ non-availability of stevedores/plant; and
	+ the effective closure of the port (short term or long term) for weather, work, pandemic or other reasons.

Companies should notify the Director at an early stage if they believe this mitigation will apply, providing the relevant evidence. The Director will need to agree that the mitigation applies, in consultation as necessary with the Harbour Master and the Port Manager.

Where these circumstances occur for seven days or less it is considered that there will be opportunity within a year of operations to either trade or re-align transhipment obligations.

* **Transhipment containers not available.** This mitigation only applies when a suitable contract for container provision is in place with a domestic container provider, and can be evidenced as pre-planned.
* **Opportunistic transhipment in another port**, due to unexpected events such as a mechanical breakdown or medical emergency. This mitigation will only apply in extreme circumstances and will require pre-approval by the Director.
* **Fishing season is curtailed at short notice by FIG,** where the season is closed early with less than seven days’ notice, such that the company was unable to fulfil a reasonable plan to meet its transhipment obligations.

The Director may also take account of any other new and unforeseen circumstance that arise, that mean a company could not reasonably fulfil its plan to tranship through a domestic container service, but only where the company can demonstrate that they had taken reasonable steps to plan ahead and arrange for transhipment.

Given the approach taken to setting transhipment objectives, there is no need to have a mitigation measure for low catches. If catches are below the Exempt Total Annual Product, there is automatically no Available Product to tranship. In moderate years the obligation to tranship will be commensurate with catch levels given the approach is percentage based.

***Carry over***

Companies will be able to carry forward a shortfall on their annual transhipment target of up to 10% of the Available Product caught in any given year. This will be calculated at the end of each year and added to the following year’s obligation as a metric tonne amount.

***Trading of transhipment obligations***

Transhipment obligations can be traded to other ITQ B eligible companies. This must be notified to the Director by both companies, and must be a trade of specific amount of product in metric tonnes.

The company to whom the obligation has been traded will need to discharge the obligation, in addition to the obligations generated by the formula set out earlier in this guidance, within the current year, or within the maximum ‘carry over’ as described above.

There will be no requirement to notify or register a transfer of transhipment obligations, arising as a result of a trade in Catch Entitlement. The transhipment obligation will adjust automatically, as it will be calculated as a percentage of available product.

***Transhipment obligations – worked examples***

The table below illustrates how a company’s transhipment obligation and its performance against their annual milestone will be calculated from its available product, taking into account trading and carry over. Please note that the numbers used are for demonstration purposes only, and are not intended to represent realistic figures for metric tonnes of product.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Company A** | **Company B** | **Company C** | **Company D** | **Company E** |
| **A: Available product** | 10000 | 5000 | 2000 | 10000 | 5000 |
| **x 30%** | x 30% | x 30% | x 30% | x 30% | x 30% |
| **B: Company’s in-year obligation**  | 3000 | 1500 | 600 | 3000 | 1500 |
| **C: + Any carry over** | 0 | 0 | 0 | 1000 | 0 |
| **D: Adjusted obligation****(B + C)**  | 3000 | 1500 | 600 | 4000 | 1500 |
| **E: Actual transhipment** | 2500 | 2000 | 200 | 3500 | 200 |
| **F: +/- Trade(s)** | 0 | -400 | +400 | 0 | +500 |
| **G: Adjusted transhipment (E + F)** | 2500 | 1600 | 600 | 3500 | 700 |
| **H: Excess/(shortfall)****(G – D)**  | -500 | +100 | 0 | -500 | -800 |
| **I: % Excess/shortfall****(H / A)** | -5% | +2% | 0 | -5% | -16% |
| **Outcome** | <10% shortfallCarry over+500 to next year’s obligation | ExceedsNo impact on next year’s obligation | MeetsNo impact on next year’s obligation | <10% shortfallCarry over+500 to next year’s obligation | >10% shortfall+800 to next year’s obligation,warning letter for first instance, financial penalty for subsequent breaches |

1. ***Contribution to the FIFCA community fund or equivalent***

Goal: Caring for our community by creating business, employment and skills opportunities, coupled with our commitment to the Falkland Islands community, ensure the sector delivers a positive social contribution.

Target: Specified contribution to the FIFCA Community Fund or equivalent.

Annual milestone: A contribution to the FIFCA Community Fund or equivalent will be required for all ITQ B eligible companies. The minimum annual contribution required of all ITQ B eligible companies to the FIFCA Community Fund will amount to £50,000 in total across all companies, for each of the six years of the action plan. Individual contributions will be based on each company’s share of ITQ B fisheries, as measured by a formula developed by FIFCA in consultation with their members.

Alternatively, a company may make a financial contribution to a different community organisation or activity, of at least the same value as the amount they would have been required to contribute to the FIFCA Community Fund and this will count towards their contribution to the £50,000 annual requirement.

For the annual review: The company will need to set out how much they have contributed to the FIFCA Community Fund (confirmed by FIFCA) or provide short narrative setting out how they have made a financial contribution of at least the same value. Activities must be of benefit to the wider community, rather than to the company or its workforce.

1. ***Local content - Submission of an annual report summarising the value the company contributes to the local economy***

Goal: Caring for our Community by earning and retaining our social licence to operate through respect and support of our Falkland Islands communities. Where possible, we will create local business, employment and skills development opportunities.

Target: Build an accurate understanding of the extent that the company contributes to the local economy.

Annual milestone: The requirement is for each company to produce a short annual report summarising the value the company contributes to the local economy on an annual basis. A standard template has been produced, and is included in the template action plan in the annex to this guidance, to simplify the production of reports and to provide consistent data. It is recognised that in some cases, the value contributed in any single year may not be representative of the value contributed on a longer term basis. For example, the average contribution may be composed of regular annual expenditure and a larger ‘one off’ capital investment falling within a specific year. Companies may choose to add a short narrative to set out the context of their contribution over the longer term, but this is not a requirement.

For the annual review: The Director will note the contents of the reports, which will provide a useful evidence base for the contribution the fishing industry makes to the Falkland Islands economy. The level or types of contribution will not form a part of the assessment of a company’s progress against this target. Information provided as part of this report may analysed by FIG. Any publication of data obtained through these reports will only be made on an industry level basis, no individual company data will be published.

**How it is intended that action plans will be reviewed and refreshed over time.**

Each action plan will set out the period it covers. After that period, a new action plan must be drawn up and approved.

This guidance applies to the initial set of action plans, which will have a duration of six years. Targets will be set in advance for the full duration of the action plan.

Within the action plan period, the annual targets may be adjusted by agreement between the Director and the company, but cannot be varied unilaterally by either party.

The current policy intention is after that initial period, company action plans will be renewed every four years, and this will tie into the same cycle of review for the overall FIG-FIFCA action plan.

**How penalties may be applied if the objectives in action plans are not met**

Progress against the action plans will be reviewed annually by the Director. This exercise will be conducted at the same time as the annual renewal of ITQ B eligibility.

Wherever possible, the Director will assess progress against action plans by using data and information already held by the Department of Natural Resources. For some action plan commitments, a short report will be required form the company, as detailed above. Companies must submit additional evidence, if requested, but the Director will keep such requests to the necessary minimum.

The Director may impose penalties if action plan objectives are not met, but must take into account any mitigating circumstances. Any penalties must be reasonable and proportionate, and this principle is written in to the Ordinance (section 17F(3)).

The maximum penalties are set out in section 17F of the revised Ordinance:

* a financial penalty of:
	+ for a breach related to transhipment, the shortfall of the target (in metric tonnes) multiped by the relevant freight rate (£ per metric tonne)
	+ for any other breach, the total gross value of the eligible company’s catch for the year (which would be based on the caught weight contained in catch reports); and
* withholding of a full season’s Catch Entitlement; and
* suspension or restriction of the right to buy and hold Catch Entitlement for the next season.

The Director has the power to impose a combination of the above penalties for a single breach of the action plan commitments. This would be a rare exception, for a serious and/or repeated breach.

The Director’s policy on penalties is:

* to issue a warning letter only, for a first breach of action plan commitments, unless it is a serious breach and/or the company has deliberately failed to fulfil its commitments
* to consider financial penalties as the appropriate penalty in most cases, increasing the amount in cases of repeated breaches
* to impose penalties involving the withdrawal of Catch Entitlement (and/or suspension or restriction of the right to buy and hold Catch Entitlement) only where there have been repeated breaches of significant severity indicating an ongoing lack of commitment to the action plan

For shortfalls against the transhipment obligations, penalties will depend on the scale of the shortfall, and whether there has been a shortfall in successive years (see table below).

Only a very significant shortfall (where a company had fallen short by more than 20% of the Available Product, meaning they had met less than one third of their obligation) would result in an immediate penalty.

The size of the shortfall in metric tonnes will be measured against the company’s target for the year. That target may have been revised upwards to include any carry over from previous years. In assessing the percentage shortfall, the denominator for the calculation will be assessed based on the company’s own Available Product figure for that year, which is not affected by any trade of transhipment obligations or carry over from previous years.

For the other targets, penalties will only be imposed in circumstances where:

* there is no or negligible engagement with the overall FIG-FIFCA Accord action plan
* there has been a significant or repeated shortfall in the company’s contribution to the FIFCA Community Fund or equivalent
* there has been no, or a negligible amount of, meaningful information provided about local content.

***Table of indicative penalties***

|  |  |  |  |
| --- | --- | --- | --- |
| **Breach** | **First breach** | **Second breach** | **Further breaches** |
| Minor shortfall on transhipment (<10% of available product) | No penalty – within carry over limit | No penalty – within carry over limit | No penalty – within carry over limit |
| Significant shortfall on transhipment (>10%) | Warning letter, revised target for subsequent year | Financial penalty – total shortfall x shipping rate x 50% | Financial penalty – total shortfall x shipping rate |
| Very significant shortfall on transhipment (>20%) | Financial penalty – total shortfall x shipping rate x 50% | Financial penalty – total shortfall x shipping rate | Financial penalty – total shortfall x shipping rate |
| Failure to submit adequate reports (local content, FIG-FIFCA action plan, community contribution) | Warning letter with deadline for late submission, followed by financial penalty of £3,000 if not submitted | Financial penalty – £5,000  | Financial penalty – £5,000-£10,000. Level to be determined with reference to degree of persistent and deliberate failure to comply. |
| Shortfall on multiple targets | Financial penalty – up to £5,000 or financial gain from non-compliance, whichever is greater | Financial penalty – up to £10,000 or financial gain from non-compliance, whichever is greater | Financial penalty – £10,000+ or financial gain from non-compliance, whichever is greater |
| Failure to meet all targets  | Financial penalty – £10,000 or financial gain from non-compliance, whichever is greater | Financial penalty – £10,000 or financial gain from non-compliance, whichever is greater and a warning letter advising that withholding of Catch Entitlement will be considered in relation to future breaches | Financial penalty – up to the total value of catch for the relevant year or Catch Entitlement penalty  |

No penalty may be imposed if the company can demonstrate that mitigating circumstances apply such that they could not reasonably comply with the action plan. Partial mitigating circumstances may also result in a partial reduction in the penalty. Severe or persistent breaches may incur a higher than indicated penalty.

Failure to comply with their action plan will not result in the company ceasing to be eligible to hold ITQ B.

**How companies may seek a review of certain decisions made by the Director in relation to action plans**

If there is disagreement on the content of the first action plan to form part of the company’s application to be named on an ITQ B eligibility register, the company may make an appeal to ExCo, who will have the power to:

* affirm the decision
* vary the decision
* to ask the Director to re-consider their decision
* set aside the Director’s decision and substitute a new decision.

If there is a disagreement on the contents of a later action plan (following the expiry of the original or any subsequent plan), the company may apply to the Disputes Commission to review the decision. This may include, but is not limited to, a situation where the company believes that the objectives and/or targets set by the Director are not a reasonable and proportionate way of advancing the goals in the Regulations. If a company no longer has an approved action plan, they are no longer eligible to hold ITQ B. Removal of ITQ B eligibility as a result of failure to accept an approved action plan will only take place after all available review processes have concluded or the company confirms that it will not be taking forward any further reviews or appeals.

A company may also ask the Disputes Commission to review a decision made by the Director in relation to any penalty imposed. This may include, but is not limited to, the grounds that it disagrees with the Director’s assessment of whether it has met its action plan objectives; it disagrees with the Director’s assessment of whether mitigating circumstances apply; or it disagrees that the level of penalty is reasonable and proportionate.

The Disputes Commission has the powers to:

* affirm the decision
* vary the decision
* set aside the Director’s decision and substitute a new decision.

There will be no right to apply to the Disputes Commission to review the Director’s decision to issue a warning letter.

None of the above affects the ability of any company to seek a judicial review.

**Annex – Template Eligible Company Action Plan**

**Falkland Islands Fisheries Department**

**Fisheries (Conservation and Management) Ordinance 2005**

**ITQ B Eligible Company Action Plan**

Company Name:

Contact:

Date of validity of action plan: 1st January 2023 – 31st December 2028

This is the approved action plan for [company name] for the purposes of the Fisheries (Conservation and Management) Ordinance 2005.

[Company name] agrees to the following obligations:

1. Goal: Building a competitive and successful seafood sector by delivering sustainable, profitable and socially beneficial outcomes through economic leadership, strategic investment and fostering an innovative and sustainable sector of the Falklands economy.

Target: Be a signatory of the FIG-FIFCA Accord Action Plan and commit to supporting the delivery of its goals.

Annual milestone: Continue to support the delivery of the FIG-FIFCA Accord Action Plan.

Annual review: Each year, the company must provide a written statement of how it has supported the FIG-FIFCA Accord Action Plan.

1. Goal: Building a competitive and successful seafood sector by delivering sustainable, profitable and socially beneficial outcomes through economic leadership, strategic investment and fostering an innovative and sustainable sector of the Falklands economy.

Target: Carry out transhipment to a domestic containerisation service over the port in Stanley, Falkland Islands.

Annual milestone: Each year the company must tranship the following percentage of its available product:

|  |  |
| --- | --- |
| **Year** | **Percent of Available Product** |
| 2023 | 30 |
| 2024 | 30 |
| 2025 | 32\* |
| 2026 | 32\* |
| 2027 | 34\* |
| 2028 | 34\* |

\*If the new port is not operational the % will remain at 30, when the new port is available the percent changes will start in the following year, rising by 2% every 2 years.

Annual review: Company will provide an annual return with the following data: MT of product landed; MT of transhipped product; MT of traded product; this will be cross checked against FIFD data.

1. Goal: Caring for our community by creating business, employment and skills opportunities, coupled with our commitment to the Falkland Islands community, ensure the sector delivers a positive social contribution.

Target: Specified contribution to the FIFCA Community Fund or equivalent.

Annual milestone: A contribution to the FIFCA Community Fund or equivalent will be required for all ITQB Eligible Companies. The minimum annual contributions of all ITQB holding companies to the FIFCA Community Fund will amount to a total of £50,000. Each company’s individual contribution will be calculated by FIFCA.

Annual review: Please provide evidence of your contribution in your annual declaration

Companies that have their own arrangements for contributions towards community projects must demonstrate the contribution they made over the course of the year as part of the annual review.

1. Goal: Caring for our Community by earning and retaining our social licence to operate through respect and support of our Falkland Islands communities. Where possible, we will create local business, employment and skills development opportunities.

Target: Build an accurate understanding of the extent that the company contributes to the local economy.

Annual milestone: Submission of a report summarising the value that the company contributes to the local economy, on an annual basis.

Annual review: Companies should complete and submit the following table:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|   | Locally sourced goods, products & services | Notes (e.g. major supplier, etc.) |  |  Other Notes  |
|  |  |  |  |  |
| **Employment costs** |   |   |  |   |
| Wage and salaries (including directors' remuneration) |   |   |  |   |
| Recruitment costs |   |   |  |   |
| Staff travel & accommodation |   |   |  |   |
| Other staff & crew costs |   |   |  |   |
|  |  |  |  |  |
| **Production costs** |   |   |  |   |
| Charter expenses |   |   |  |   |
| Equipment & machinery (hire) |   |   |  |   |
| Equipment & machinery (purchase) |   |   |  |   |
| Consumables |   |   |  |   |
| Inspections and testing |   |   |  |   |
| Packaging |   |   |  |   |
| Port costs |   |   |  |   |
| Other production costs |   |   |  |   |
|  |  |  |  |  |
| **Commissions & fees** |   |   |  |   |
| Management fees |   |   |  |   |
| Sale commissions |   |   |  |   |
|  |  |  |  |  |
| **Food & beverages** |   |   |  |   |
| Fruits and vegetables |   |   |  |   |
| Meat |   |   |  |   |
| Other food & beverages |   |   |  |   |
|  |  |  |  |  |
| **Fuel** |   |   |  |   |
| Bunker fuel (with 12 miles) |   |   |  |   |
| Other fuel |   |   |  |   |
|  |  |  |  |  |
| **Transport & warehousing** |   |   |  |   |
| Freight (sea transport) |   |   |  |   |
| Freight (land transport) |   |   |  |   |
| Stevedoring charges |   |   |  |   |
| Warehousing & cold storage charges |   |   |  |   |
| Other transport costs |   |   |  |   |
|  |  |  |  |  |
| **Repairs & maintenance** |   |   |  |   |
| Ship expenses & repair services |   |   |  |   |
| Other repairs and maintenance |   |   |  |   |
|  |  |  |  |  |
| **Utilities** |   |   |  |   |
| Electricity |   |   |  |   |
| Water |   |   |  |   |
| Heating (including heating gas) |   |   |  |   |
| Service charges |   |   |  |   |
|  |  |  |  |  |
| **Legal, financial, and professional services** |   |   |  |   |
| Bank charges |   |   |  |   |
| Legal expenses |   |   |  |   |
| Insurance |   |   |  |   |
| Audit and accountancy fees |   |   |  |   |
| IT costs |   |   |  |   |
| Communication (post, telephone, internet) |   |   |  |   |
| Advertising and marketing |   |   |  |   |
| Education & training |   |   |  |   |
| Cleaning |   |   |  |   |
| Other professional services |   |   |  |   |
|  |  |  |  |  |
| **Research and development** |   |   |  |   |
| R&D expenses |  |  |  |  |
|  |  |  |  |  |
| **Real estate** |   |   |  |   |
| Leasing & renting of dwellings |   |   |  |   |
|  |  |  |  |  |
| **Other expenses** |   |   |  |   |
| Miscellaneous office expenses |   |   |  |   |
| Transport equipment (excluding vessels) |   |   |  |   |
| Vehicle running costs |   |   |  |   |
| Donations |   |   |  |   |
| Subscriptions |   |   |  |   |
| Entertaining |   |   |  |   |
| Fairs & shows |   |   |  |   |
|  |  |  |  |  |
| **Fixed assets investment** |   |   |  |   |
| Building material |   |   |  |   |
| Construction services |   |   |  |   |
| Vessels |   |   |  |   |
|  |  |  |  |  |
| **Other expenses** |   |   |  |   |
| Other expenses not included above |   |   |  |   |