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|--------------------------------------|--|----------------------------------|--------------------------------------|
| Report to: | Cabinet Council | Date of Meeting: | 14 February 2019 28 February 2019 |
| Subject: | Capital Strategy 2019/20 to 2023/24 | | |
| Report of: | Head of Corporate Resources | Wards Affected: | All Wards |
| Portfolio: | Cabinet Member - Regulatory, Compliance and Corporate Services | | |
| Is this a Key Decision: | Yes | Included in Forward Plan: | Yes |
| Exempt / Confidential Report: | No | | |

Summary:

The Capital Strategy sets out the long-term context in which capital expenditure and investment decisions are made and considers the impact of these decisions on the priorities within the Council's Core Purpose and Framework for Change Programme and the promises made in the 2030 Vision for Sefton.

At the heart of the Capital Strategy is the Council's core objective to continue deliver financial sustainability. As such a flexible capital investment programme is more important than ever as a method to stimulate and enable economic growth and strategic investment, ensuring best use of existing assets and of generating future income streams to pay for and deliver day to day services.

This is a statutory document that the Council is required to have in place and will be reviewed on an annual basis.

Recommendations:

Cabinet is asked to:

1. Recommend that Council approve the Capital Strategy as set out at Appendix 1

Council is recommended to

1. Approve the Capital Strategy as set out at Appendix 1

Reasons for the Recommendation(s):

The Capital Strategy is a key policy document for Sefton Council and follows guidance issued in the Prudential Code for Capital Finance in Local Authorities (2017 Edition).

Alternative Options Considered and Rejected: (including any Risk Implications)

None

What will it cost and how will it be financed?

(A) Revenue Costs

N/A

(B) Capital Costs

N/A

Implications of the Proposals:

The following implications of this proposal have been considered and where there are specific implications, these are set out as follows:

Resource Implications (Financial, IT, Staffing and Assets):

The Capital Strategy outlines the governance and framework for future capital investment decisions. Proposals may have an impact on physical assets and/or ongoing revenue income and expenditure and these will be assessed both at a programme and individual project level.

Legal Implications:

N/A

Equality Implications:

N/A

Contribution to the Council's Core Purpose:

Protect the most vulnerable:

The Capital Strategy will enable the Council to continue to seek to protect the most vulnerable within available resources.

Facilitate confident and resilient communities:

The Capital Strategy demonstrates a clear commitment to early intervention and prevention and working with partners, communities and local businesses to reduce the reliance on the public sector.

Commission, broker and provide core services:

The Capital Strategy recognises that where it is necessary to do so, the Council will continue to be a provider of those core services that the community expects to see delivered but will use new service delivery models and new forms of partnership.

Place – leadership and influencer:

The Capital Strategy will see the Council continue to demonstrate strong and effective leadership building on its proven track record of engagement, consultation, listening and considering feedback in the decision-making process.

Drivers of change and reform:

The Capital Strategy demonstrates the Council playing a key role in leading and driving change and reform to improve outcomes for Sefton residents and continuously improve the Borough.

Facilitate sustainable economic prosperity:

The Capital Strategy clearly articulates the Council's approach to investing in order to achieve financial sustainability and the ambitions of Sefton 2030.

Greater income for social investment:

The Capital Strategy recognises the Council's commitment to developing a commercial nature, looking at what it can do either by itself or with others to generate income and profit that can be reinvested into delivering social purpose.

Cleaner Greener: The Capital Strategy recognises the Council's commitment to work with others to maintain Sefton's natural beauty and ensure that its many assets provide a contribution to Sefton's economy, people's wellbeing and the achievement of the 2030 Vision.

What consultations have taken place on the proposals and when?

(A) Internal Consultations

The Head of Corporate Resources (FD 5533/19) is the author of the report and the Chief Legal and Democratic Officer (LD4657/19) has been consulted and any comments have been incorporated into the report.

(B) External Consultations

N/A

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Appendices:

1. Capital Strategy 2019/20 to 2023/24

Background Papers:

N/A

1. Introduction

- 1.1 The CIPFA Prudential Code for Capital Finance in Local Authorities (2017 Edition) has determined that all Local Authorities must develop a capital strategy. It is mandatory that all authorities have this approved and in place for the financial year 2019/20 and that this should be considered alongside the Councils other key budget reports eg, the Treasury Management Strategy
- 1.2 The Council has therefore sought to develop a capital strategy in conjunction with its Treasury Management advisors and to ensure compliance with the Code.

2. Content

- 2.1 The content of the Capital Strategy is defined, however it is recognised that each individual authorities final document will reflect its own individual circumstances. As such the document aims to provide information and guidance on how each authorities capital programme and future decisions will be made and what considerations will be taken into account in the management of the programme
- 2.2 The key areas that will be included in the capital strategy are therefore: -
 - governance and prioritisation;
 - capital expenditure and resources;
 - asset management Strategy;
 - Commercial Investment;
 - Debt, Borrowing and Treasury Management;
 - Risk Management; and
 - Knowledge and Skills.

A summary of the council's current capital programme is also included and this will be updated as future capital decisions are made.

- 2.3 As stated this document has been prepared in conjunction with the Councils Treasury Management Advisors and is presented for approval by Full Council.

APPENDIX 1

1.0 Introduction and Background

- 1.1 The Capital Strategy is a key policy document for Sefton and follows guidance issued in the Prudential Code for Capital Finance in Local Authorities (2017 Edition). It is an overarching document which sets the policy framework and governance for the development, management and monitoring of capital investment and the use of capital resources. The strategy reflects the Council's Vision for 2030, Core Purpose, and sets out how capital expenditure will play a significant role in its delivery through the Framework for Change and Growth Programme. The Capital Strategy is aligned to the Treasury Management Strategy, Medium Term Financial Plan (MTFP), Asset Management Strategy and the Disposal Policy and all other approved policy's and frameworks.
- 1.2 During 2016 Sefton Council led on developing a new and exciting vision for the future of the Borough. The Imagine Sefton 2030 consultation engaged with thousands of people, local businesses and potential investors to create a vision that collectively promotes shared prosperity, coordinated public investment and a healthy environment and population. On the back of this work the Vision 2030 was agreed in November 2016, together with the Vision Outcomes Framework and the Council's Core Purpose.
- 1.3 The Council's major change programme - the Framework for Change - is the way in which the Council will deliver the 2030 Vision whilst maintaining its commitment to financial sustainability.
- 1.4 There are four pillars that underpin the programme and which will help the Council deliver against its stated objectives. These are:
 - Economic Growth – physical regeneration and enabling infrastructure for our economic growth priorities;
 - Public Sector Reform – Service Transformation Projects
 - Service Delivery Options – making efficiencies and savings to ensure a financially sustainable Council in a time of continued financial austerity; and
 - Strategic Investment – supporting investment opportunities the Council may wish to directly sponsor or support in an enabling or commissioning role where there is a sound commercial and financial justification/reason to do so.
- 1.5 One of the fundamental requirements and drivers to maintain and continually update the Council's Capital Strategy is the change in the way local government is to be financed in future with a greater emphasis on locally generated income (e.g. Council Tax and Business Rates). The reliance on this income to support the delivery of frontline services means that it is important that the Council, working with its partners, optimises this opportunity.

- 1.6 As a result, development of economic growth will play an important role in ensuring that financial sustainability of the Council is achieved and the ambitions as set out in Vision 2030 are met. This means the manner in which the Council manages capital funding will change from the position taken historically and certainly from that taken prior to 2010 (the introduction of financial austerity measures).
- 1.7 The Strategy also recognises that regeneration is a priority and that where it is appropriate to do so the Council can acquire strategic property for regeneration purposes where business cases provide a satisfactory payback period/profile.
- 1.8 The Strategy is brought forward in the recognition that Cabinet has approved and published a number of Town Centre Investment Frameworks and other policies and that should the opportunity present itself the Council might be the investor, subject to consideration of a robust business case by Cabinet.
- 1.9 The Capital Strategy will be the framework from which capital expenditure and investment decisions in Sefton are made to enable the Framework for Change to have the desired impact. The decision-making process will consider stewardship, value for money, prudence, sustainability and (long-term) affordability. The Capital Strategy contains:
- An overview of the governance process for prioritisation, approval and monitoring of capital expenditure;
 - A longer-term view of capital expenditure plans;
 - An overview of asset management planning;
 - The authority's approach to commercial activities including due diligence and risk appetite;
 - Expectations around debt and use of borrowing to support capital expenditure;
 - The knowledge and skills in the authority in relation to capital investment activities.

2.0 Capital Programme Governance and Prioritisation

- 2.1 All capital programme expenditure will be governed through the Capital Strategy framework. Individual programmes and projects will commonly fall into three main categories:
- Capital maintenance and improvement – to sustain the condition of existing assets and/or to avoid the short, medium and long-term revenue costs of “do nothing”.
 - Capital Investment for financial return – i.e. for commercial purposes to deliver an ongoing revenue return.
 - Capital Investment for non-financial return – investment in an asset of strategic importance linked to the 2030 Vision and Council's Core Purpose.

- 2.2 This categorisation will help to determine, for officers and members, the route that a project proposal must follow in order to gain approval into the capital programme. It will clarify the governance pathway and the degree of due diligence required before approval to spend is granted.
- 2.3 A robust planning and prioritisation process has been designed with clear approval stages at which risk, reward, value for money and alignment to the Council's priorities is tested.
- 2.4 The Capital Strategy proposes a governance structure that enables the effective management of whole capital programme. New capital schemes will typically take one of three routes to approval for inclusion in the capital programme.
- A. For recurrent capital schemes funded 100% from external resources the Finance Procedure Rules state:
- Schemes up to £100k can be approved by the Section 151 Officer and Chief Executive;
 - £100k - £250k the S151 Officer and Cabinet Member for Regulation and Compliance and Corporate Services;
 - £250k - £1m Cabinet;
 - £1m+ Cabinet and Council.
- B. Projects that require the use of council resources and meet strategic objectives will follow internal officer governance arrangements before submission to Cabinet and where appropriate Council for approval as set out in the Council's Financial Procedure Rules.
- 2.5 The Council will approve this strategy / policy framework and in accordance with the Council's constitution and legislation, Cabinet will make decisions to implement the strategy.
- 2.6 Financial management and performance of the Council's approved and published Capital Programme is reported to Cabinet and Overview and Scrutiny Committee with an Annual Report being produced at the end of each financial year.
- 2.7 The draft and indicative Capital Programme is summarised in Appendix 1 and this will be continually updated as part of each budget cycle and taking into account any decisions made in year.

3.0 Capital Expenditure and Resources

- 3.1 Capital Expenditure must be incurred in line with the Financial Procedure Rules. The Head of Corporate Resources (Section 151 Officer) is responsible for ensuring that a capital programme is prepared on an annual basis for consideration by Cabinet before submission to Council for approval alongside the annual revenue budget.

3.2 Capital resources are held corporately and are allocated according to the priorities outlined in section 2. The Council will seek to maximise the use of external grants and contributions; and to consider joint funding initiatives with partners if the benefits of doing so align with Council priorities.

3.3 Capital expenditure is typically funded from:

- Government Grants
- Section 106
- External Contributions
- Prudential Borrowing
- Capital Receipts

Prudential Borrowing

3.4 Local authorities are able to borrow to invest in capital works and assets provided that the cost of that borrowing is affordable/repayable and in line with principles set out in the Chartered Institute of Public Finance and Accountings (CIPFA) Prudential Code Guidelines.

<http://www.cipfa.org/policy-and-guidance/publications/t/the-prudential-code-for-capitalfinance-in-local-authorities-2011-edition-book>

3.5 Each year the Council approves a Treasury Management Strategy and a range of prudential indicators that reflect its compliance with the CIPFA guidance and the approach to capital expenditure and borrowing for the forthcoming year. As such, projects that are identified under the framework for change and which supports the Council's corporate objectives (including financial sustainability) as set out within robust business cases may utilise prudential borrowing. Within such cases a full financial appraisal will be required to ensure that all revenue implications of the cost of borrowing are taken into account.

3.6 Any capital expenditure funded from prudential borrowing will have a future impact on the revenue budget as the Council is required to set aside a minimum revenue provision (MRP) to repay the principal and interest, i.e. the debt, over the life of the asset.

3.7 Within the Liverpool City Region, the devolution arrangements have facilitated the devolution of resources from Government to the Liverpool City Region Combined Authority, along with certain powers and responsibilities.

3.8 All additional and directly devolved funding streams will be managed by the Combined Authority and the elected Mayor for the City Region.

3.9 Resources that will be available via the City region include those that will support Investment and Regeneration and Transport. The City Region will therefore be a major source of capital finance for the Authority going forward.

3.10 The financing of the capital programme will be led by the Head of Corporate Resources. Consideration will be given to the long-term impact of capital

expenditure and any ongoing revenue implications. The capital financing charges and any additional running costs arising from capital decisions are incorporated within the annual Budget and Medium Term Financial Plan. This enables members to consider the consequences of capital spend alongside other competing priorities for revenue funding.

- 3.11 Capital expenditure decision making is not only about ensuring that the initial allocation of capital funding meets corporate and service priorities but also that the asset is fully utilised, sustainable and affordable throughout its whole life. This overarching commitment to long term affordability is a key principle in all capital expenditure appraisal decisions.
- 3.12 The Prudential Code was introduced as part of the Local Government Act 2003. It details several measures/parameters known as prudential indicators that are set each year. When setting these indicators, the Prudential Code requires the Council to have regard to service objectives, affordability, prudence and sustainability. The Prudential Indicators Report is approved as part of the annual budget setting process and is also presented to Audit and Governance Committee.
- 3.13 The indicators are based upon capital programme expenditure and its funding requirements and ensure that the budgeted capital expenditure limit is monitored, along with the level of the Capital Financing Requirement which represents the Council's underlying need to borrow for the capital programme. Maximum borrowing limits are set for the Council, the affordability of which is assessed against total income from Government grants, Council Tax and Business Rate payers.

4.0 Asset Management Strategy

- 4.1 A core part of the Council's capital programme is informed by the Asset Management Strategy. The schedule of capital improvement works required to the Council's operational property portfolio is derived from this document. The Asset Management Strategy sits alongside the Asset Disposal Policy.
- 4.2 The main objectives of capital expenditure on operational assets is to ensure support service delivery, ensure that they meet health and safety standards, are fit for purpose in terms of statutory guidance and legislation, as well as helping the Council to reduce costs from unnecessary revenue expenditure on poorly maintained and/or redundant stock. A key objective of the capital strategy is that it links with the Asset Management Strategy to protect current buildings and long-term assets to avoid incurring significant future costs.
- 4.3 The asset management decision making process must consider the Council's Asset Disposal Policy. A review of all Council owned assets is underway and will be presented to Members in due course in order to inform decision making. This process will identify whether assets should be held for operational or heritage purposes, should form part of the Council's future investment and capital programme or should be disposed of.

- 4.4 The refreshed Asset Management Strategy and Asset Disposal Policy will be key documents to inform all long-term capital and revenue implications. A structured approach to any disposal and the likely capital receipt will mean that medium and long-term resourcing estimates can be made and aligned to future investment decisions.

5.0 Commercial Investment

- 5.1 As reliance on Government funding reduces, the importance of local income generation increases and this is a key stated central government objective for local government and one which reflects their future model for how local government will be funded. As a result, the Council is developing its commercial mindset in order to continue to support the achievement of a balanced budget, and at the same time, support the Framework for Change Programme. This commercial mindset is being developed across services as officers strive to achieve the best use of available resources to deliver improved outcomes for residents.
- 5.2 A commercial approach will lead to more commercial activities being developed, assessed and delivered and means that processes and financial controls, regarding material capital investment, need to be robust. Due diligence and ongoing budget management will be effective and proportional to the level of investment and risk.
- 5.3 The revised governance structure for all capital investment and expenditure decisions, explained in section 2, contains the gateway processes which allow further scrutiny, checks and levels of approval for commercial activity in recognition of the enhanced risk involved.
- 5.4 The Council already operates on a commercial basis in some areas of its core activity. The success of these functions provides assurance in terms of the Council's ability to manage commercial activity.

6.0 Non-Financial Investment Strategy

- 6.1 The Council's non-treasury investments consist of an Investment Property portfolio of over 200 properties. They deliver a return for the council after deducting for the cost of maintenance, net income of £2.060m in 2017/18, which contributes towards the provision of services.
- 6.2 The investment property portfolio is fully owned by the Council and no outstanding loans are held against it. No new investment properties have been added for several years. Any future purchases of such assets will follow the procedures set out in sections 2 and 3.
- 6.3 All properties classified as investment properties are revalued on an annual basis as part of the Statement of Account process and valuations are externally audited. The value at 31st March 2018 was £60.5m. All investment properties are valued at greater than original purchase price and have hence produced an unrealised capital return.

- 6.4 The liquidity of the portfolio will depend upon the prevailing market conditions. However, access to funds is not considered an issue as the portfolio does not provide security against loans and is providing an adequate return.
- 6.5 Any loans made by the Council that will support projects aligned to the Framework for Change programme, will require a full business case including robust due diligence and will be approved in accordance with the Council's governance processes. Any loan granted will be within the Council's approved prudential indicators.

7.0 Debt, Borrowing and Treasury Management

- 7.1 Any loans made by the Council that will support projects aligned to the Framework for Change programme will require a full business case including robust due diligence and will be approved in accordance with the Council's governance processes. Any loan granted will be within the Council's approved prudential indicators.
- 7.2 The Council has adopted CIPFA's revised 2017 Code of Practice on Treasury Management in public services which recommends the production of an annual Treasury Management Policy and Strategy documents. These documents are approved as part of the annual budget setting process and are presented to the Audit and Governance Committee. The strategy document sets out in detail how the treasury management activities are to be undertaken in a particular year to comply with the Council's Treasury Management policy.
- 7.3 The Treasury Management Strategy details how the Council will manage its borrowing, investments and cash flow and therefore forms an important part of the overall Capital Strategy. The Capital Programme and the mix of funding sources determines the borrowing requirement of the Council, which will require management of the Council's cash flow to ensure that the Council can meet both its future revenue and capital obligations.
- 7.4 If the Council is required to borrow funds, it can seek to support the capital programme through prudential borrowing from the Public Works Loan Board (PWLB). This borrowing is not supported by government grant. It means that there will be a future charge to the revenue budget to pay back the principal amount borrowed plus accrued interest. As a result, robust financial appraisals are used to determine a future financial benefit from the initial investment, which will be able to fund the future charge to the revenue budget and potentially achieve further cashable savings or income generation, for instance an invest to save (or earn) scheme, strategic investment or major regeneration schemes.

7.5 The Council's borrowing limit is contained within the Prudential Indicators Report:

| | 2018/19 £m | 2019/20 £m | 2020/21 £m |
|------------------|---------------|---------------|---------------|
| Authorised limit | 177,000 | 172,500 | 170,000 |

7.6 In recent years, the Council has followed a policy of internal borrowing, whereby borrowing for the capital programme is deferred whilst the Council holds healthy cash balances. This is advantageous as it avoids cost of carry and reduces the overall borrowing costs. This position requires careful management of interest rate risk in conjunction with our treasury consultants.

7.7 The Council has regard to the Ministry of Housing, Communities and Local Government's (MHCLG) guidance on the application of minimum revenue provision (MRP). The recommended MRP policy is summarised below:

| <u>Category</u> | <u>Basis of MRP Calculation</u> |
|------------------------------------|--|
| Supported Borrowing | Annuity Basis over 50 years (commencing from 1 April 2015) |
| Unsupported (prudential) borrowing | Annuity Basis – Calculated using the estimated life method |

Standard asset lives applied to calculate MRP charge vary from 3 years for intangible assets to 50 years for land.

8.0 Risk Management

8.1 Risk management across the Council has been reviewed over the last year in a process led by the Chief Internal Auditor. A corporate risk register is in place, as are service area risk registers. The final stage has seen operational, project and transformation risk registers developed.

8.2 Section 2 in the strategy describes the consistent approach to project management. Each project has a risk section/focus which means that consideration of risk and its mitigation is at the forefront throughout the project design and feasibility stage.

8.3 Risk management is embedded in project and programme boards. Live projects are subject to challenge in project board meetings from the Project Sponsor and Senior Responsible Officer. Significant risks will move on to Service and Corporate risk registers and be reported through capital scheme updates in the monthly budget monitoring report to Cabinet.

8.4 Treasury management risk is managed in line with MHCLG investment guidance principles of security, liquidity and yield. The Council's risk appetite for financial investments is detailed in the Treasury Management Strategy. The

risk appetite is low, security and liquidity being the key principles underlying the investment strategy. The Treasury Team balance the risks associated with cash management, mitigating risks as much as possible to seek maximum financial return.

- 8.5 Treasury management activity will be reported to Audit and Governance via quarterly reports and an outturn report. Cabinet and Council receive a half yearly report and the annual outturn report.

9.0 Knowledge and Skills

- 9.1 The Council has a wide range of expertise to call upon, including professionally qualified legal, finance and property officers, to support the delivery of the Capital Strategy and Framework for Change.
- 9.2 There is commercial expertise across the Executive Leadership Team and Senior Leadership Board and a commercial approach is being embedded across the organisation.
- 9.3 Recent changes to the senior management structure have been made to better meet the resource requirements to support Framework for Change going forward.
- 9.4 Support services, including Finance, Legal, Property and Business Intelligence and Commissioning, are being reviewed with a focus on providing the right support and officers with the necessary skills, to work with the frontline service and project managers. Where gaps in knowledge are identified the relevant training is co-ordinated for individuals or teams.
- 9.5 The Capital Programme and Treasury Management Strategy is managed by a team of qualified accountants who follow a programme of continual professional development, attending tailored courses offered by the Council's retained treasury consultancy.
- 9.6 As part of the Treasury Management Strategy it is a requirement that all members involved in treasury management understand this complex area. Annual training is open to all members and is delivered by external treasury consultants. A record is maintained of member attendance.

Capital Programme 2018/19 to 2020/21

| | 2018/19 (For reference) | 2019/20 | 2020/21 |
|--|------------------------------------|----------------|----------------|
| | £'000s | £'000s | £'000s |
| CURRENT GRANT ALLOCATIONS AND EXPENDITURE | | | |
| | | | |
| CORPORATE RESOURCES | 5,184 | | |
| Southport Town Hall Boiler | 160 | 3 | |
| TOTAL | 5,344 | 3 | |
| | | | |
| LOCALITY SERVICES COMMISSIONED | 6,312 | | |
| CERMS 2016-21 | 1,104 | 492 | 534 |
| Crosby Marine Lake to Formby Point | 344 | 233 | 306 |
| Tree Planting | 162 | 70 | 70 |
| M58 Junction 1 | 4,609 | 772 | |
| A565 Northern Key Corridor | 721 | 117 | |
| TOTAL | 13,252 | 1,684 | 910 |
| | | | |
| LOCALITY SERVICES PROVISION | 2,530 | | |
| | | | |
| REGENERATION & HOUSING | 452 | | |
| | | | |
| REAGULATION & COMPLIANCE | 9 | | |
| | | | |
| HEALTH & WELL BEING | 65 | | |
| | | | |
| OLDER PEOPLE | 3,944 | | |
| ASC IT Infrastructure | 50 | 70 | |
| TOTAL | 3,994 | 70 | |
| | | | |
| CHILDREN'S SERVICES | 5,709 | | |
| | | | |
| COMMUNITIES | 1,050 | | |
| | | | |
| INARD INVESTMENT & EMPLOYMENT | | | |
| Southport Pier | 1,367 | 50 | 23 |
| | | | |
| DFG | 2,200 | | |
| | | | |
| TOTAL ALL SERVICES | 35,972 | 1,807 | 933 |
| | | | |
| | 2018/19 (For reference) | 2019/20 | 2020/21 |

| | £'000s | £'000s | £'000s |
|---|---------------|---------------|---------------|
| FUTURE YEARS GRANT ALLOCATIONS | | | |
| | | | |
| CHILDREN'S SERVICES | | | |
| DFC | | 365 | 365 |
| Capital Maintenance | | 1,714 | 1,714 |
| Basic Need | | 2,872 | 1,847 |
| High Needs SEND | | 206 | 205 |
| TOTAL | | 5,157 | 4,131 |
| | | | |
| LOCALITY SERVICES COMMISSIONED | | | |
| LTP – Highways Maintenance | | 2,298 | 2,298 |
| LTP – Integrated Transport Block | | 990 | 990 |
| LTP – Additional Key Route Network | | 300 | 300 |
| Additional Highways Maintenance Fund | 1,283 | | |
| SIF Local Growth Fund Key route Network A59 | | 2,356 | |
| TOTAL | | 5,944 | 3,588 |
| | | | |
| BETTER CAR FUND | | 3,939 | 3,939 |
| | | | |
| TOTAL ALL SERVICES | 1,283 | 15,040 | 11,658 |
| | | | |
| TOTAL – CURRENT AND FUTURE ALLOCATIONS | 37,255 | 16,847 | 12,591 |