Summary: Intervention & Options

Department /Agency:	Title:	
DECC	**Impact Assessment of grandfathering support for dedicated biomass, Anerobic digestion and Energy from Waste under the RO**	
Stage: Consultation	**Version:** 1	**Date:** 24 March 2010
Related Publications: Consultation on the grandfathering policy of support for Dedicated Biomass, AD and EfW under the RO		

Available to view or download at:

http://www.

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What is the problem under consideration? Why is government intervention necessary?

Government intervention is necessary to address market failures that prevent the UK meeting low carbon and renewable energy targets. The Renewable Obligation (RO) supports a range of technologies. Support for most technologies is grandfathered so that once accredited, a generator should receive a set level of support over it's eligibility period. This is the not the case for dedicated biomass, AD, EfW and biomass CHP plant. The uncertain nature of support for these technologies, seems to lead to difficulty in raising finance, with the risk that planned investments may not now go ahead.

What are the policy objectives and the intended effects?

The objectives are to ensure support for Biomass, AD and EfW CHP plant to enable these investments to raise finance at a minimum cost to consumers. This will bring these technologies in line with other renewable technologies in terms of covering their non-fuel costs. For Biomass this is by grandfathering their non-fuel costs, for AD and EfW CHP this will be by grandfathering the full support. A decision on biomass CHP will be made following the RHI consultation. The intention is to give certainty to investors, to meet the RES target. We also propose not to grandfather bioliquids.

What policy options have been considered? Please justify any preferred option.

Four options have been considered: grandfather at current bands; grandfather at current bands with uplift; grandfather minimum level; do nothing. The preferred option is to grandfather support at a minimum level to cover non fuel costs. This presents the best balance between costs, value for money for the consumer and risk of not meeting renewable targets. We are seeking a call for evidence on the level and proportion of costs that are represented by fuel and non fuel costs, and the impact on investment of different options. We are also seeking evidence on advanced technologies.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

There will be ongoing evaluation of monitoring data as well as a full banding review of the RO for implementation in 2013.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

..... Date:

Summary: Analysis & Evidence

Policy Option: (ii)	Description: Grandfather at a level to cover non fuel costs of generation

COSTS

ANNUAL COSTS	
One-off (Transition) **Yrs**	
£	
Average Annual Cost (excluding one-off)	
£ 20 to 25m	

Description and scale of **key monetised costs** by 'main affected groups' There is considerable uncertainty about the impact of grandfathering on costs and deployment levels. Costs presented here show generation costs (including the cost of carbon allowances) of grandfathering compared to a do nothing option which assumes a hiatus in biomass build.

Total Cost (PV) **£ 450m**

Other **key non-monetised costs** by 'main affected groups' Costs considered are generation costs, and don't include the subsidy costs needed to bring forward generation, or costs of removing barriers to renewables deployment. Costs not included are implementation costs.

BENEFITS

ANNUAL BENEFITS	
One-off **Yrs**	
£	
Average Annual Benefit (excluding one-off)	
£	

Description and scale of **key monetised benefits** by 'main affected groups' no additional benefits

Total Benefit (PV) **£ n/a**

Other **key non-monetised benefits** by 'main affected groups' Non monetised benefits include the benefits from supporting innovation in new renewable technologies, and from encouraging diversity of generation. Security of supply benefits from increased biomass plant with high capacity credit.

Key Assumptions/Sensitivities/Risks The impact is very uncertain. Government is calling for evidence on costs and deployment levels. Technology costs and deployment levels are based on those used for the Renewable Energy Strategy. The section on risks/ sensitivities below considers the impact if biomass prices or deployment levels vary.

Price Base Year 2009	Time Period Years 20	**Net Benefit Range** (NPV) **£**	**NET BENEFIT** (NPV Best estimate) **£ -450m**

What is the geographic coverage of the policy/option?			UK	
On what date will the policy be implemented?			2010	
Which organisation(s) will enforce the policy?			DECC	
What is the total annual cost of enforcement for these organisations?			£ no change	
Does enforcement comply with Hampton principles?			Yes/No	
Will implementation go beyond minimum EU requirements?			Yes/No	
What is the value of the proposed offsetting measure per year?			£ n/a	
What is the value of changes in greenhouse gas emissions?			£ no change	
Will the proposal have a significant impact on competition?			Yes/No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	Yes	Yes/No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices) (Increase - Decrease)

Increase of £ Decrease of £ **Net Impact** **£** not significant

Key: **Annual costs and benefits: Constant Prices** **(Net) Present Value**

[Use this space (with a recommended maximum of 30 pages) to set out the evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Ensure that the information is organised in such a way as to explain clearly the summary information on the preceding pages of this form.]

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A. Strategic Overview

1. The UK has a stretching target to source 15% of energy from renewable sources by 2020. A large proportion of this will be met through technologies deployed in the large scale electricity sector. The key instrument to support these technologies is the renewable obligation (RO). An issue has been raised by investors in some bio-energy technologies, as there is a real danger these technologies could not go ahead as planned due to uncertainty over future support levels. This IA considers options for amendment of the current RO arrangements, and considers the costs and benefits of different options, and their impact on renewable deployment.

Rationale for Government Intervention

2. The overarching objective of this policy is to tackle climate change. Tackling the barriers that prevent the UK moving towards a low carbon economy requires addressing the market failures that prevent the optimal allocation of resources to maximise welfare to society over future generations. Technology support is part of the Stern review's three pronged approach to addressing climate change, without which the private sector is not expected to invest sufficiently, or in the timescales needed, in innovative low carbon technologies (such as anaerobic digestion) or in the deployment of renewable technologies that are currently more expensive than their fossil fuel counterparts. If these failures are not addressed, they could prevent the UK from meeting its legally binding renewables target.

B. Objectives

3. Following the consultation on banding and Grandfathering in 2008, the Government made a decision not to grandfather support for biomass technologies as, in contrast to other renewable technologies, a large proportion of generator's costs are fuel costs, which can vary over time. Grandfathering these technologies could lead to risk of rents for these technologies if fuel prices fall, and conversely too little support if prices rise. It could also lead to a market distortion in the ability of plant to compete for biomass feedstocks if support levels are fixed over time.

4. Evidence from investors in biomass industry suggests that the uncertainty due to lack of grandfathering ROC support for biomass technologies means that there will be little investment in these technologies. We are consulting on changes to our grandfathering policy that should provide sufficient certainty to investors to ensure that bio-energy projects in the large scale electricity sector go ahead, thus providing a key contribution to the UK 2020 renewable energy target.

5. The Renewable Energy Strategy published last year, suggested that renewable electricity would need to provide around 30% of all electricity by 2020 – a big leap from 5.5%

currently. A large part of this (around 20%) is expected to be met through bio-energy technologies. Biomass is one of the key technologies that is not intermittent, and therefore provides a valuable, dispatchable part of our energy mix. The objectives of these amendments are to balance the costs of grandfathering against obtaining value for money for the consumer. The options below set out this assessment.

Costs and Benefits

Introduction

6. The Renewable Energy Strategy (RES) and accompanying IAs, published last summer set out the measures needed, and the costs and benefits, to meet the 2020 renewable energy target. Since then, there have been further amendments to the RO, including changes to banding for certain offshore wind projects. The impact assessment for this work can be found at : http://www.decc.gov.uk/en/content/cms/consultations/elec_financial/elec_financial.aspx. Assumptions for costs of renewable technologies and deployment levels in this impact assessment are based on the assumptions underpinning this analysis for the RO and the RES. A full assessment of assumptions is set out in Redpoint (2010).

7. Under these assumptions by 2020 electricity generation from biomass (including biogas and wastes) will comprise around 20% of all renewable generation needed to meet the renewable energy target. This proportion is indicative, as it is not possible to predict with certainty the mix of renewable generation that will be incentivised over time, which will be determined by changing fuel prices, technology costs, and response to overcoming barriers. Build rates are assumed to increase over time, with a relatively small level of biomass generation assumed to be built by the time of the next banding review.

8. This impact assessment considers the costs and benefits of 4 options related to grandfathering biomass technologies (Under grandfathering a technology once accredited, should receive a set level of support over the period of eligibility for the RO):

   i. Do nothing
   ii. Grandfather at a level to cover non fuel costs: (Biomass grandfathered at a minimum level, Grandfather AD and EFW CHP at current levels)
   iii. Grandfather at current banding levels
   iv. Grandfather at current banding levels with potential to upband

9. Presented in the summary sheet is the costs and benefits of option (ii) compared to option (i) the do nothing option. Options (iii) and (iv) do not have a separate sheet, since under central assumptions of deployment and biomass prices, the impact is the same as option (ii). The impact of different price and deployment assumptions on the relative cost of options is given in the risks/sensitivities section below.

10. The impact of grandfathering is very uncertain, and costs have been based on central deployment levels consistent with figures referenced in paragraph 4 above. This consultation calls for evidence on both the costs of dedicated biomass plant which will allow implementation of the preferred option - (ii) below, and information on possible impact on investment / deployment levels of different options, which will inform our understanding of the overall costs and benefits. We don't have evidence to consider

gasification and pyrolysis and are calling for further evidence. Information contained in this IA will be updated when these data have been received and assessed.

Options considered

(i) Do nothing

11. This option maintains current policy of not grandfathering biomass technologies. This would present the biggest level of uncertainty for investors as they would only be certain of the level of support for the period between reviews. Representation from stakeholders suggests that this could lead to a hiatus in investment in biomass projects, if the financing arrangements would discount the value of future, unknown, support levels.

12. Whether a hiatus will occur in practice is uncertain, and we have asked for evidence of this in the accompanying consultation. Nonetheless we asked Redpoint consultants to model a hiatus in biomass investment, compared to biomass growth that we assumed in the Renewable Energy Strategy. Using their model of the electricity generation market, they modelled the impact on the electricity sector under the assumption that no new biomass generation is deployed until 2015. This assessment is based on the assumption that RO banding is fixed at current levels for the period of the RO. This level of costs and deployment levels from the hiatus option is taken to be the baseline costs for the analysis of different options below. (This is different from the baseline used in the Renewable Energy Strategy referenced in para 4.)

13. These baseline costs represent lower resource cost and subsidy cost than under the RES assumptions. The mix of generation is also different, with 0.2 GW less dedicated biomass generation. This is replaced by a range of alternative technologies including co-firing, wind and wave and tidal stream. This result can only be indicative of the impact of a hiatus, as assumptions as to which technologies could fill the gap left by the reduction is uncertain, as it will depend on future cost, and response to overcoming barriers. Under this hiatus option renewable electricity represents 28.7% electricity generation.

14. This modelling does not assume a hiatus in AD/ EFW CHP. There is scope for AD to switch to support from FITs which offers grandfathered support, so the overall impact on deployment and levels of renewable subsidy overall is much less certain. However this impact will be small compared to the impact of the biomass hiatus, as the levels of growth assumed under the RES scenarios are much lower than those for biomass.

(ii) Grandfather at a level to cover non fuel costs: Biomass grandfathered at a minimum level, Grandfather AD and EFW CHP at current levels

Biomass

15. Under this option, a proportion of the ROC support level would be grandfathered to take into account the fact that some, but not all, of the costs of a biomass generator are non-fuel related. The free-floating level of support would be based on fuel costs and subject to change at future banding reviews. The grandfathered element would be based on all other cost elements. This would provide some level of certainty of future support levels to investors, whilst ensuring that variable fuel costs were based on more up to date information thus minimising rents should biomass prices fall and enabling investors to be protected should they rise.

16. The consultation document set out two ways the fixed/free-floating elements could be estimated: (1) to take the levelised non-fuel elements (capex, opex etc) and subtract

electricity revenues to determine ROC support required, or (2) to take the proportion of fuel to non-fuel levelised costs and apply this to the current ROC level. These different methodologies produce different levels of proposed support, which will be highly dependent on all the underlying cost and revenue assumptions.

17. The level of biomass that could be supported through this option is uncertain, and will depend on the decision on the level of grandfathered support. It is possible that it could provide enough certainty to bring forward some investment in dedicated biomass before 2015, and that that the reduction in subsidy costs that would occur from a hiatus would not be realised. For example, if the level of deployment under this option is similar to that in the Renewable Energy Strategy referenced in paragraph 4, will be an increase in net costs of around £0.5bn, and increased subsidy costs of £0.5bn compared to option (i) do nothing. These are presented in Table 1 below:

Table 1: Impact of Option (ii), compared to option (i), do nothing

	Lifetime NPV
Change in Generation costs	+£450m
Change in subsidy costs	+£450m
% renewable generation	28.3%

18. The level of generation under this option is lower than that under the hiatus option (i). This is because, under this option there is assumed to be a higher proportion of biomass generation investment, which has a higher capacity credit compared to other renewable technologies. This results in slightly lower wholesale prices than under option (i), and hence slightly lower overall renewable generation. To note that the level of renewable generation under this option is lower than that assumed under the RES option described in paragraph 4. This is because for RES modelling we assumed future upbanding of the RO to achieve 29% renewable energy – this assumption has not been made for the purposes of this modelling work. Decisions on future banding levels will be taken at the time of future reviews.

AD/ EFW CHP

19. Options set out in paragraph 15 for determining the proportion of non fuel costs are not appropriate for AD and EfW technologies. Small on farm AD generators are less likely to rely on feedstocks with fluctuating prices, often using on farm waste. In cases where they source fuel, for example using food waste, they may be paid to take the fuel – i.e. the fuel is not a cost, it is an income stream. The same applies to EFW CHP plants where there is often a gate fee paid to the generator for taking waste. Therefore it is assumed that the appropriate approximation for non fuel costs for AD and EFW CHP is grandfathering at current levels.

20. Under RES build rate assumptions it is estimated that there will be a small increase in generation from AD and EFW under the RO, with 2 to 3TWh additional generation from AD and/ or wastes assumed to be incentivised under the RO by 2020. Additionally Feed in Tariffs will provide grandfathered support to small scale AD. We are therefore uncertain as to the overall impact, but expect that the impact of grandfathering ROC support on the

overall cost of renewable subsidies to be small. The consultation is seeking evidence on the impact of grandfathered RO support for these projects.

(iii) Grandfather at current band levels

Biomass

21. Under this option, biomass generators accredited by 31 March 2010 would be grandfathered at the current full ROC rate. This option would grandfather all cost elements, including fuel costs. This could have a distorting impact on the different biomass investors, with those grandfathered on higher rates (when biomass prices were high), having a clear advantage over plant that might receive lower levels of support if biomass prices fall. This could lead to excess rents and hence poor value for money for the consumer, for the former, and/or an inability to compete for biomass supply for the latter. If deployment levels are similar to those in the baseline scenario, under central assumptions for fuel prices, costs will be the same as option (ii) the preferred scenario. However, it is likely that the higher level of grandfathered support could increase biomass deployment due to increased certainty of support levels, and protection against revising bands as a result of falling fuel prices. This could increase costs over and above those in the baseline assessment if dedicated biomass displaces cheaper renewable electricity technologies supported under the RO.

22. The level of deployment brought forward by this option, and the cost of this option is extremely uncertain. The consultation is asking for evidence to support analysis of likely increase in deployment under different grandfathering options.

AD / EFW CHP

23. This option is the same for AD/EFW CHP as under option (ii), and the analysis is therefore the same.

24. **Grandfather at current band levels with potential to upband**

Biomass

25. Under this option, dedicated biomass plant could be banded up, but not down, at banding reviews. This aims to overcome the potential market distortion identified in (iii) above, whereby different investors could have varying buying power in the biomass market – however under this option market distortion is only addressed in periods of rising biomass prices . This option would over-compensate existing investors should biomass prices fall, exacerbating rents and consumer costs.

26. If deployment levels are similar to those in the baseline scenario, under central assumptions for fuel prices, costs will be the same as under the RES scenario referenced in paragraph 4 above. However, it is likely that the higher level of grandfathered support could increase biomass deployment due to increased certainty of support levels, and protection against revising bands as a result of falling fuel prices. This is likely to increase costs over and above those in the baseline assessment.

27. The level of deployment brought forward by this option is extremely uncertain. The consultation is asking for evidence to support analysis of likely increase in deployment under different grandfathering options.

AD / EFW CHP

28. This option would provide increased certainty for AD/EFW CHP plant than under option (ii)above, and we would therefore expect it to bring forward more deployment than under

the RES scenario, at higher cost. If there were an increase in the cost of waste disposal (an increase in gate fees) there is a risk of higher rents for these technologies than under option (ii). However, any impact on deployment is uncertain, in particular given that support for AD is grandfathered under Feed in Tariffs. We are asking for evidence on the impact on investment in AD of different grandfathering options.

Bioliquids

29. Although some bio-liquids have been co-fired in the RO since its inception, there is now a small but growing pool of electricity and/or CHP plants in planning or consented that are looking to use bio-liquids (approximately 200MW). There are also 1185MW currently installed capacity of oil-fired plant which could convert to bioliquid.

30. Initial analysis carried out for DECC indicates that, in the majority of cases, electricity production is unlikely to be the best way of using this resource. Because liquid feedstocks are a finite resource we should therefore consider whether we need to prioritise achieving our transport target and allow liquids to be used to decarbonising domestic heating oil. In addition, support levels under the RO are based on solid biomass. This needs to be revisited to ensure it is at the right level for bio-liquids technologies.

31. While there are sustainability concerns for bioliquids which use virgin oils such as palm oil, it will be important to see how companies respond to the RED sustainability criteria, in which key sustainability features such as land use change must be taken into account. If these criteria provide an effective barrier to unsustainable liquid feedstocks, it will provide a clear framework for companies to demonstrate their sustainability. The changes to the RO will form part of the consultation in summer. In the meantime, by not changing its policy towards grandfathering of bioliquids allows Government the flexibility to change its approach to bioliquids as further evidence comes to light.

Cost and Benefit Sensitivities /risks

32. Under central assumptions of deployment and biomass prices, all the grandfathering options above have similar costs and benefits as presented in Table 1 above. However, if biomass prices were to change significantly by the time of the banding review, the different repsonse of subsidy levels to changes in costs under different options could result in a potential difference in cost of different options.

    a. If ROC prices were to fall to a level that could justify a reduction in the ROC level by, say, half a ROC, then options (iii) and (iv) which grandfather the ROC at current levels would limit the ability to reduce ROC levels at a review period for renewables already accredited. Under central deployment assumptions, if biomass prices fell, grandfathering ROC levels could result in a foregone reduction in subsidy levels of around £0.3bn (NPV to 2030). Option (i) retains the option to reduce subsidy levels, and would not risk forgoing the reduction in subsidy costs – this is also true to some extent for option (ii), depending on the level of the grandfathered ROC.

    b. Conversely, if ROC prices were to rise to a level that could justify an increase in the ROC level by, say, half a ROC at the time of review, then option (iii), grandfather with no uplift would limit the ability to increase ROC levels at a review period. Under central deployment assumptions, if biomass prices rose, grandfathering ROC levels could result in a saving in subsidy levels of around £0.3bn (NPV to 2030).

    c. There is a risk of rents to AD and EfW CHP plant from grandfathering support if fuel costs fall / gate fees rise over time. We are calling for evidence to support analysis of this impact.

33. It is likely that options (iii) and (iv) which offer more certainty as to subsidy levels, will bring forward increased biomass deployment, which is likely to increase the overall cost of the Renewables Obligation. We haven't modelled these increased costs, due to lack of information on potential increase in deployment.

Administration costs

34. This measure is not expected to have a significant impact on administration costs, as it is not expected to change significantly levels of deployment under the RO.

Specific Impacts

Carbon

35. Under the do nothing option, in 2020 the renewables obligation is estimated to save in the region of 130MtCO2 pa from all renewable generation. The impact of option (ii), assuming that build rates are similar to those assumed in the RES is to slightly reduce overall generation, which reduces the overall level of carbon saved, and the value of carbon saved. Carbon savings from renewable energy are assumed to be within the ETS cap, and are not counted as additional carbon savings to meet carbon budgets.

Security of Supply

36. Dedicated biomass has a higher capacity credit than other renewable technologies, therefore option (ii) which increases the proportion of biomass generation compared to the do nothing option results in a slightly higher overall capacity margin within the electricity market. Levels of unserved energy are similar across all options, assuming central build rates.

Bills and Distributional Impact

37. Impact on consumer bills is small, and the direction is uncertain, resulting from a combination of changes in wholesale prices and renewables subsidy levels.

38. Under an assumption of lower biomass prices, there is scope for subsidy costs to be lower than the baseline scenario under options (i) and (ii) which would reduce the impact on electricity bills.

Competition Assessment

39. The RO is a market-based instrument that operates in a competitive market for electricity. It is open to all participants in renewable generation. The way in which the RO recycles money from the buy-out fund should act as a positive incentive to competition between suppliers, and reduce barriers to entry for renewable electricity generators.

40. The aim of the preferred option is to ensure that there can be competition within the biomass market – to ensure that biomass technologies are not advantaged or disadvantaged through lock in of biomass prices into support rates. By grandfathering non fuel costs biomass technologies are placed on a similar footing to other technologies under the RO, by underpinning support for non fuel costs.

Small firms impact test

41. The major impact of the RO on the large majority of small business is likely to come from increased costs of electricity which, while affecting all electricity consumers are likely to represent a larger proportion of income for smaller companies, as they are less likely to have their own generation compared to – particularly - larger industrial users with heavy electricity requirements.

Sustainable Development

42. The RO is aimed at increasing the deployment of renewable electricity generation in order to move the UK away from fossil fuel dependency towards a low carbon economy in preparation for a future when supplies of gas and oil will become tighter and more expensive.

43. The RO includes sustainability reporting requirements for the use of biomass in electricity generation. This will be reported annually and will help inform Government policy on sustainable use of biomass for electricity generation.

Environmental Impacts

44. The RO provides the Government's support scheme for renewables electricity generation. It incentivises investment in renewables projects which help to move the UK away from fossil fuel dependency towards a low carbon economy with consequential carbon savings from displaced fossil fuel generation.

45. Individual projects supported under the RO that are deemed to have the potential to cause significant adverse impacts are required to undertake an Environmental Impact Assessment (Directive 85/337/EEC) as part of the planning process.

Rural Proofing

46. A large proportion of renewable energy is produced in rural areas and affects businesses involved in the generation of renewable energy and rural communities living in the vicinity of new developments. Increasing the proportion of energy from renewable sources will mean more renewable energy developments in rural areas.

47. Certain forms of renewable development impact disproportionately on rural areas and there can be resistance to new developments. However, any resistance needs to be viewed in the light of Government's commitment to increasing renewable energy to meet its longer term goals and in order to tackle climate change. In addition, a high proportion of the new renewable generation needed between now and 2020 will take the form of offshore wind generation, some of which will be built some distance from shore.

48. Although there has been no separate or explicit assessment of the needs of rural areas, the proposals are set within this wider policy context and aim to ensure that the impacts on consumers and their bills are reasonable.

49. Separate legislation exists with a focus on ensuring that the environmental and social impacts of development are fully taken into account, outside the scope of the RO.

50. Development of RO policy has been subject to extensive consultation. This has previously included business interests within the renewables sector and consumer interests. It has also included relevant rural business groups (including NFU and CLA as well as wind sector) but has not sought to engage rural community groups in particular.

51. RO policy has also been informed by advisory boards including the Renewables Advisory Board and Biomass Implementation Advisory Group (BIAG). These are primarily industry groups and include rural business interests as appropriate (e.g. the NFU and CLA are represented on BIAG).

Implementation and Monitoring and Evaluation

52. The RO is administered and enforced by Ofgem, who report annually on their administration of the RO and conduct regular audits in relation to compliance with the RO.

53. DECC is responsible for monitoring the impact of the RO on the development of renewable energy and collects detailed information on growth in renewable energy generation and projects under development.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	***Results in Evidence Base?***	***Results annexed?***
Competition Assessment	Yes	Yes/No
Small Firms Impact Test	Yes	Yes/No
Legal Aid	No	Yes/No
Sustainable Development	Yes	Yes/No
Carbon Assessment	Yes	Yes/No
Other Environment	Yes	Yes/No
Health Impact Assessment	No	Yes/No
Race Equality	No	Yes/No
Disability Equality	No	Yes/No
Gender Equality	No	Yes/No
Human Rights	No	Yes/No
Rural Proofing	Yes	Yes/No

Annexes

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