COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 15.6.2006
COM(2006) 305 final

2006/0102 (CNS)

Proposal for a

COUNCIL DECISION

on the First Instalment of the Third Community Contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund

(presented by the Commission)

EXPLANATORY MEMORANDUM

1. THE SHELTER IMPLEMENTATION PLAN (SIP)

The shelter enclosing the remains of Chernobyl Nuclear Power Plant (ChNPP) Unit 4 was constructed under exceedingly hazardous conditions shortly after the accident on 26 April 1986. It was not intended to be a permanent solution and, in fact, it is increasingly unstable, it has deteriorated and allows the ingress of rainwater. There is a risk of collapse due to seismic disturbance, extreme weather or further deterioration of the structure. The possibility of contamination of the surrounding zone and the Dnipro basin will persist until the highly radioactive material contained under the Shelter is adequately isolated from the environment.

In 1995, following up on an earlier Tacis funded project, the European Commission took the initiative to set up a group of experts from the EU and Ukraine to elaborate and assess a number of alternative solutions to convert the Chernobyl Unit 4 and its present shelter into an environmentally safe condition. The group was joined in 1996 by experts from the US and Japan. The study report, issued in November 1996, proposed a Recommended Course of Action, comprising stabilisation and other short term measures and preparation for long term conversion into an environmentally safe site.

At the beginning of 1997, the G-7 Nuclear Safety Working Group reached an agreement with representatives of the Government of Ukraine to further develop the above study. In May 1997 an outline plan was finalised, in close co-operation with the international expert group, which became known as the Shelter Implementation Plan (SIP).

The SIP includes a number of tasks to be executed over a period in the order of10 years to secure and stabilise the sarcophagus. The major tasks are as follows:

- short term stabilisation and shielding;
- increase nuclear safety to eliminate risk of criticality through water management;
- elaborate delayed Fuel Containing Masses (FCM) removal strategy
- build a new confinement shelter;
- remove upper unstable parts of the present shelter;

The initial cost estimate of the project for the period 1998-2005 amounted to $768 million, including a provision of $10 million for the licensing support.

2. THE CHERNOBYL SHELTER FUND (CSF)

At the G7 Denver Summit in June 1997, the G7 Heads of State and Government and the President of the European Commission endorsed the setting up of a multilateral funding mechanism to assist Ukraine in implementing the SIP. They agreed on a G7 financial contribution which should be complemented by other donors. It was also agreed that the EBRD should be asked to establish and manage a dedicated fund - the Chernobyl Shelter Fund (CSF). The CSF was officially set up by the EBRD Board on 6 November 1997.

A first pledging conference was held in New York on 20 November 1997. Twenty five countries and the European Commission pledged some 400 million USD. Ukraine pledged USD 50 million as an in-kind contribution. This sum was sufficient to start work on the first tasks of the SIP.

Taking into account the negative outcome of an initiative by the CSF Assembly to set up a Fund Raising campaign from private donors between 1998 and 1999, the EBRD as manager of the CSF, warned that a replenishment of the fund was needed by mid 2000 if the original schedule was to be maintained. A second pledging conference was therefore held on 5 July 2000 in Berlin. Some $320 million were pledged by twenty two countries and the European Commission, carrying the total amount pledged in the two conferences close to the estimated cost of $768 million (see Annex 1).

Under the rules of the Fund, the EBRD concluded a Framework Agreement with the government of Ukraine in November 1997 which paved the way for individual grant agreements to be concluded between the Bank and the Recipients. The Bank has developed a model agreement and Associated Standard Terms and Conditions which are used for all grants from the Fund. Commitments and disbursements of funds from the Fund money occurs on the basis of grant agreements. Up to now seven grant agreements have been signed.

The Assembly of Contributors governs the Fund. It is currently composed by 22 contributors including the European Commission and Ukraine. The Assembly authorises the grant agreements, supervises their implementation by the Bank, reviews the effectiveness of the activities financed and approves the annual budget and financial statements of the Fund. Its first meeting took place on 12 December 1997. The Assembly is currently chaired by Dr. Hans Blix (Sweden).

The SIP represents a comprehensive set of measures, therefore it is essential that it is managed under a single implementation scheme. This is provided for in the Shelter Fund rules. These rules contain provisions for the procurement of services and of supplies. They provide in particular that "EBRD procurement policies and rules will apply to grants made from the resources of the Fund, except that in principle procurement shall be limited to goods and services produced in or supplied from the countries of the contributors or to the countries of EBRD operation". It is therefore necessary that the Commission's contribution agreement with EBRD be based on a common understanding that there will be no discrimination amongst individual Member States of the European Union. The participation of third countries in procurement may be authorized on a case by case basis.

3. THE COMMUNITY CONTRIBUTIONS TO THE CSF

The first pledge to the Chernobyl Shelter Fund made by the European Commission in 1997 (US$ 100 million) was formally followed up by the "Council Decision 98/381/EC of 5 June 1998 concerning the Community contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund"[1]. This contribution was effectively funded from the 1998 and 1999 Community budgets. The second Commission contribution (€100 million) was formalized by the Council Decision 2001/824/EC.

[1] OJ L 171, 17.6.1998, p.31.

The Commission presented a first progress report on the implementation of the CSF in October 1999[2], as foreseen in Article 3(2) Decision 98/381/EC. A second progress report was presented in 2001[3] and a third in 2004[4].

The Chernobyl Shelter Fund provides a very important tool to assist Ukraine in resolving the problems resulting from the Chernobyl accident. Taking into account that the Community is by far the largest donor to the CSF, its continued participation is essential to the success of the project. This is recognized in the Tacis Regulation covering the period 2000-2006, which mentions explicitly the "relevant EU supported international initiatives such as the G7/EU initiative on the closure of Chernobyl" as a priority action[5].

On the basis of the financial overview presented here below the EBRD indicated that a replenishment of the fund, i.e. new commitments by the Contributors, were required before they would be able to conclude a contract for the New Safe Confinement (due to take place in 2006). In order that the Chernobyl projects might continue and brought to a successful completion, the major donors pledged some €173 million at an event in London in May 2005. This figure includes €49.1 million pledged by the Commission (corresponding to the historical burden sharing amongst the ex G7 members plus the EC), subject to the required authorizations. The Commission's pledge is intended to be paid over the period 2006-2009.

The objective of the present proposal is to solicit a Council decision for the first instalment of the third Community contribution amounting to €14.4 million. The proposed new contribution will be subjected to the same conditions stated in Articles 1 and 3 of Council Decision 98/381/EC of 5 June 1998, as applicable. The balance of the pledge (€34.7 million), to be paid over the period 2007-2009, will be subjected to a new decision.

The contribution will be made according to Article II, Section 2.02 of the Rules of the Fund and will be the subject of a formal Contribution Agreement between the European Commission and the European Bank for Reconstruction and Development.

4. CURRENT FINANCIAL SITUATION OF THE CSF

As of 31 October 2005, the financial situation of the fund was as follows:

- total contributions to the CSF amount to some €658.6 million including Ukraine's in-kind contributions of $50 million;
- grant agreements concluded between the donors and the EBRD amounted to about €446.5 million;
- amounts contracted represented € 323.4 million;
- disbursements amounted to € 248.5 million.

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2 COM(1999)470 of 12.10.1999
3 COM(2001)251 of 29.05.2001
4 COM(2004)481 of 14.07.2004
5 Council Regulation 99/2000, 29.12.1999, article 2,§5(c)

In the financial overview provided in the Third Progress Report it was explained that, following cost estimates based on actual design work, the cost of the project had to be revised. The estimate presented by the EBRD in mid 2004 was $1,091 million[6] (instead of $768 million foreseen originally); the completion date was foreseen for end of 2008 (instead of 2007). There were two fundamental differences between the 1997 and the 2004 estimates. First, the scope of the initial estimate did not include tasks that have been subsequently found necessary, like removal of the Vent Stack, Interim Radwaste Storage, the Owner Engineer and Deconstruction Building and Equipment, which raised the cost to $876.82 million. In addition, the initial estimate did not include provisions for escalation and risk and contingency for the New Safety Confinement, which represent an additional $214.2 million.

At the CSF Assembly of Contributors on 22 November 2005 the EBRD indicated that the bids for the New Safe Confinement, just received, had exceeded considerably the estimated price, therefore additional funds might be required beyond those already pledged at the three events. However the extent of the shortfall, if any, would not be known until the evaluation of the bid was completed.

Pledges to the CSF

Contributor	**Contribution Before July 2000**			**Berlin 2000 Pledging Conference**
	Ccy	**Contribution**	Ccy	**Contribution** (1 € = 0.95 $)
Austria	€	2.500.000	€	2.500.000
Belgium	€	2.500.000	€	600.000
Canada	US $	20.000.000	US $	13.000.000
Denmark	€	2.500.000	€	2.500.000
EC	US $	100.000.000	€	100.000.000
Finland	€	2.500.000	€	1.000.000
France	€	18.520.000	€	23.250.000
Germany	US $	23.610.000	US $	25.610.000
Greece	€	2.500.000	€	2.500.000
Iceland	US $	10.000	US $	15.000
Ireland	€	2.515.790	€	3.085.000
Italy	US $	16.820.000	€	17.820.000
Kuwait	US $	4.000.000	US $	2.000.000
Luxemburg	€	2.500.000		0
Japan	US $	22.500.000	US $	22.500.000
Netherlands	NLG	6.000.000	€	3.000.000
Norway	US $	5.000.000	NKR	20.000.000
Poland	€	2.500.000		additional bilateral pledge of €3.000.000 announced
Portugal	US $	200.000	US $	200.000

[6] Figure presented at the CSF Assembly of Contributors on 22 June 2004. The EBRD indicated that at the exchange rate at the time (€1=$1.23) the shortfall was equivalent to €245 million.

Slovak Rep.	€	2.000.000		0
Slovenia	-	-	US $	300.000
Spain	US $	3.000.000	US $	2.000.000
Sweden	€	2.500.000	SEK	24.000.000
Switzerland	€	4.000.000	SFR	7.000.000
Ukraine	US $	50.000.000		0
UK	US $	16.820.000	US $	18.320.000
USA	US $	78.000.000	US $	80.000.000
Subtotal 1€=0.95$	US $ EUR	~ 395.000.000 ~ 415.789.000		~ 321.767.250 ~ 338.702.368
Total	US $ EUR			~ 716.767.250 ~ 754.491.368

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THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty establishing the European Community, and in particular Article 308 thereof,

Having regard to the Treaty establishing the European Atomic Energy Community, and in particular Article 203 thereof,

Having regard to the proposal from the Commission,[7]

Having regard to the opinion of the European Parliament,[8]

Whereas:

(1) The Community, in pursuance of a clear policy of supporting Ukraine in its efforts to eliminate the consequences of the nuclear accident which occurred on 26 April1986 at the Chernobyl Nuclear Power Plant, has already contributed to the Chernobyl Shelter Fund (CSF), established at the European Bank for Reconstruction and Development (EBRD) 90.5 million euro over the years 1999-2000, in accordance with Council Decision 98/381/EC, Euratom.[9] and a further 100 million euro over the years 2001-2005, in accordance with the Council Decision 2001/824/EC, Euratom[10]

(2) The EBRD, as administrator of the Chernobyl Shelter Fund, confirmed to the CSF Assembly of Contributors that there was roughly a shortfall of €250 million and that there were not sufficient unallocated funds to allow contract award for the New Safe Confinement. New commitments were required from the Contributors in 2005 to avoid further delays to the project.

(3) The ex G7 Members and the EC, which have provided most of the contributions to the CSF, agreed on the principle of further contributions into the Fund according to the historical burden sharing amongst the contributors.

(4) Council Regulation (EC, Euratom) No 99/2000 of 29 December 1999 concerning the provision of assistance to partner States in Eastern Europe and Central Asia[11], in

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7 OJ C
8 OJ C
9 OJ L 171 of 17.6.1998, p. 31
10 OJ L308 of 27.11.2001, p. 25
11 OJ L 12 of 18.1.2000, p. 1

Article 2(5)(c), includes as a priority in the area of nuclear safety the contribution "to relevant EU supported international initiatives such as the G7/EU initiative on the closure of Chernobyl".

(5) In the Communication of 6 September 2000 from the Commission to the Council and the European Parliament, the Commission proposed that from 2001 Community financial support for nuclear safety in the Newly Independent States and the countries of Central and Eastern Europe[12] should be taken from a single budget line for financial assistance to nuclear safety for the NIS.

(6) EBRD procurement rules apply to grants made from the resources of the Chernobyl Shelter Fund, on the understanding that procurement shall in principle be limited to goods and services produced in or supplied from the countries of the contributors or the countries of EBRD operations. Those rules are not identical to those applied to operations directly financed through the Tacis programme, which cannot consequently cover the contribution which is the subject of this Decision.

(7) It is, however, appropriate to ensure that, with regard to procurement arrangements made pursuant to the EBRD's Rules of the Chernobyl Shelter Fund, there is no discrimination between individual Member States of the European Community, irrespective of whether they have concluded individual Contribution Agreements with the EBRD or not.

(8) It is also appropriate that procurement arrangements with countries not belonging to the European Union or that are not TACIS partner countries be authorized, on a case by case basis, in the interest of the projects concerning the Chernobyl Shelter Implementation Plan.

(9) The Treaties do not provide, for the adoption of this Decision, powers other than those of Article 308 of the EC Treaty and Article 203 of the Euratom Treaty,

HAS DECIDED AS FOLLOWS:

Article 1

The Community shall make a contribution of €14.4 million euro to the European Bank for Reconstruction and Development ("EBRD") for the Chernobyl Shelter Fund in 2006.

The appropriations shall be authorised by the budgetary authority within the limits of the financial perspective.

Article 2

1. The Commission shall administer the contribution to the Chernobyl Shelter Fund in accordance with the Financial Regulation applicable to the general budget of the European Communities, having particular regard to the principles of sound and efficient management.

[12] COM(2000) 493 final

The Commission shall forward all relevant information to the Court of Auditors and shall request from the EBRD any supplementary information that the Court of Auditors may wish to receive, as regards the aspects of the operation of the Chernobyl Shelter Fund that relate to the Community's contribution.

2. The Commission shall ensure that, with respect to procurement arrangements relating to grants made from the resources of the Fund, there is no discrimination between Member States.

Article 3

In accordance with Article II, Section 2.02 of the Rules of the Chernobyl Shelter Fund, the Community contribution shall be the subject of a formal Contribution Agreement between the Commission and the European Bank for Reconstruction and Development.

Article 4

The Commission shall present to the European Parliament and to the Council, on a yearly basis, a progress report on the implementation of the Chernobyl Shelter Fund.

Done at Brussels,

For the Council
The President

LEGISLATIVE FINANCIAL STATEMENT

1. NAME OF THE PROPOSAL :

Proposal for a Council Decision on the First Instalment of the Third Community Contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund

2. ABM / ABB FRAMEWORK

Policy Area(s) concerned and associated Activity/Activities:

Relations with Eastern Europe, the Caucasus and central Asian Republics (Chapter 19.06).

Community contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund.

3. BUDGET LINES

3.1. Budget lines including headings:

The action will be financed from the existing budget line 19 06 06 — Community Contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund

3.2. Duration of the action and of the financial impact:

Allocations will be made in 2006. Their renewal is not foreseen.

The balance of the pledge (€34.7 million), to be paid during 2007-2009, will be subjected to a new decision.

3.3. Budgetary characteristics:

Budget line	**Type of expenditure**		**New**	**EFTA contribution**	**Contributions from applicant countries**	**Heading in financial perspective**
19.06.06	Non-comp	Diff[13] /	NO	NO	NO	**No**

[13] Differentiated appropriations

4. SUMMARY OF RESOURCES

4.1. Financial Resources

4.1.1. Summary of commitment appropriations (CA) and payment appropriations (PA)

EUR million (to 3 decimal places)

Expenditure type	Section no.		2006	2007	2008	2009	2010	2011	Total
Operational expenditure[14]									
Commitment Appropriations (CA)	8.1	a	14.400						14.400
Payment Appropriations (PA)		b	14.400						14.400
Administrative expenditure within reference amount[15]									
Technical & administrative assistance (NDA)	8.2.4	c							
TOTAL REFERENCE AMOUNT									
Commitment Appropriations		**a+c**	**14.400**						**14.400**
Payment Appropriations		**b+c**	**14.400**						**14.400**
Administrative expenditure not included in reference amount[16]									
Human resources and associated expenditure (NDA)	8.2.5	d	*PM*						
Administrative costs, other than human resources and associated costs, not included in reference amount (NDA)	8.2.6	e	0.002						0.002

Total indicative financial cost of intervention

TOTAL CA including cost of Human Resources		a+c +d+ e	**14.402**						**14.402**
TOTAL PA including cost of Human Resources		b+c +d+ e	**14.402**						**14.402**

14 Expenditure that does not fall under Chapter 19 01 of the Title 19 concerned.
15 Expenditure within article 19 01 04 of Title 19.
16 Expenditure within chapter 19 01 other than articles 19 01 04 or 19 01 05.

Co-financing details

Not applicable

4.1.2. Compatibility with Financial Programming

☑ Proposal is compatible with existing financial programming.

☐ Proposal will entail reprogramming of the relevant heading in the financial perspective.

☐ Proposal may require application of the provisions of the Interinstitutional Agreement[17] (i.e. flexibility instrument or revision of the financial perspective).

4.1.3. Financial impact on Revenue

☑ Proposal has no financial implications on revenue

☐ Proposal has financial impact – the effect on revenue is as follows:

4.2. Human Resources FTE (including officials, temporary and external staff) – see detail under point 8.2.1.

Annual requirements	2006	2007	2008
Total number of human resources	0.6		

5. CHARACTERISTICS AND OBJECTIVES

5.1. Needs to be met in the short or long term

In 1996 an international group of experts, including experts from the EU, US and Ukraine, elaborated a study of alternative solutions to convert the Chernobyl Unit 4 and its present shelter into an environmentally safe condition. The study report proposed a Recommended Course of Action, comprising stabilisation and other short term measures and preparation for conversion into an environmentally safe site.

The G-7 Nuclear Safety Working Group reached an agreement at the beginning of 1997 with representatives of the Government of Ukraine to proceed with the further development of the Recommended Approach. As a result, a multidisciplinary construction management program was finalized, designated as the Shelter Implementation Plan (SIP), developed in close co-operation with EU, US and Ukrainian experts. The SIP foresaw to carry out remedial work on the Shelter directed towards making it physically safe and environmentally stable. Under the management of the European Bank for Reconstruction and Development (EBRD), the Chernobyl Shelter Fund (CSF) was constituted, to finance the SIP.

[17] See points 19 and 24 of the Interinstitutional agreement.

The total cost of the Chernobyl Shelter Fund project was initially evaluated by the group of experts that developed the project, it amounted to approximately US $768 million for the period 1998-2005, including the licensing support. Further to new cost estimates based on actual design and engineering work, the EBRD indicated a revised cost of $1,091 million. The proposed new Community contribution of €14.4 million represents the first instalment of the Commission pledge of €49.1 million to cover the roughly €250 million shortfall to complete the project[18].

The SIP has been financed under the budget line 19 06 06 (Community contribution to the European Bank for Reconstruction and Development for the Chernobyl Shelter Fund). The present contribution represents a complement to finance additional costs to complete the project, which were justified by the EBRD to the Donors Assembly.

5.2. Value-added of Community involvement and coherence of the proposal with other financial instruments and possible synergy

The Chernobyl Shelter Fund provides an important tool to assist Ukraine in resolving a major safety hazard for itself and for Europe. The corner stone of this work being to transform the damaged Chernobyl Nuclear Power Plant in an ecologically safe environment. Being the Community by far the largest donor, its continued participation is decisive to the success of the project

5.3. Objectives, expected results and related indicators of the proposal in the context of the ABM framework

The Shelter Implementation Plan includes the following major technical steps to be implemented over the period up to 2010/2011

- The stabilisation of the present shelter to the extent required for the subsequent steps;
- shielding for radiation protection purposes;
- increase nuclear safety to eliminate risk of criticality through water management;
- building of a new confinement;
- removal of upper unstable parts of present shelter;
- analysis of Fuel Containing Masses (FCM) and elaboration of FCM removal strategy.

The total cost of the operation is estimated to be $1,091 million USD including licensing work. The content of the SIP was explained in detail to the Phare/Tacis Nuclear Safety Expert Group on 27 May 1997 with a follow up on 20 December 2000. An update on the revised cost and schedule was provided to the Phare/Tacis Nuclear Safety Expert Group (PTEG) on 28 April, 2004. Details of the revised cost and schedule were also presented to the COEST Group of the Council on 20 September 2004.

[18] This figure may need to be revised again if the there is a substantial difference between the estimated cost and bid price for the New safe Confinement that is not covered by the contingency.

Although Ukraine is the target beneficiary, the benefits of nuclear safety are global and provide added environmental security for the European Union Member States.

5.4. Method of Implementation (indicative)

☑ Joint management with international organisations

Relevant comments:

The SIP is financed by the Chernobyl Shelter Fund which is managed by the EBRD. The Bank reports to the Donors Assembly, where the Commission is represented. The Assembly approves the grants for the financing of specific projects.

6. MONITORING AND EVALUATION

The Assembly of Contributors monitors and oversees the actions undertaken in the SIP. A periodic report (at least twice a year) is provided to the donors by the EBRD as administrator of the Fund.

According to Art. 3(2) of the Council Decision 98/381/EC, the Commission presented a first progress report on the implementation of the Chernobyl Shelter Fund in October 1999[19],a second report was presented in September 2001[20] and a third report in July 2004[21].

Article 4 of the present decision foresees that the Commission shall present to the European Parliament and to the Council, on a yearly basis, a progress report on the implementation of the Chernobyl Shelter Fund.

7. ANTI-FRAUD MEASURES

Periodic reporting on the project progress and finances is made by the EBRD to the Donors Assembly, of which the European Commission is a member. Audit by the Court of Auditors is possible as provided by the exchange of letters with the EBRD.

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19 COM(1999)470 of 12.10.1999
20 COM(2001)251 of 29.05.2001
21 COM(2004) 481 final of 14.7.2004

8. DETAILS OF RESOURCES

8.1. Objectives of the proposal in terms of their financial cost

Commitment appropriations in EUR million (to 3 decimal places)

(Headings of Objectives, actions and outputs should be provided)	**2006**		**2007**		**2008**		**TOTAL**	
	No. outputs	Total cost	No. outputs	Total cost	No. outputs	Total cost	No. outputs	Total cost
3rd Community Contribution to EBRD for Chernobyl Shelter Fund (first instalment)		14.400						14.400
TOTAL COST		14.400						14.400

8.2. Administrative Expenditure

8.2.1. Number and type of human resources

Types of post		Staff to be assigned to management of the action using existing and/or additional resources (**number of posts/FTEs**)		
		2006	2007	2008
Officials or temporary staff[22] (19 01 01)	A*/AD	0.25		
	B*, C*/AST	0.25 0.10		
TOTAL		0.60		

Actual mobilization of the necessary administrative resources will depend on the Commission's annual decision on the allocation of resources, taking into account the number of staff and additional amounts authorized by the budgetary authority.

8.2.2. Description of tasks deriving from the action

– Administrative follow up.

– Attendance of meetings.

– Preparation of reports.

[22] Cost of which is NOT covered by the reference amount

8.2.3. Sources of human resources (statutory)

☑ Posts currently allocated to the management of the programme to be replaced or extended

8.2.4. Other Administrative expenditure included in reference amount (19 01 04/05 – Expenditure on administrative management)

Not applicable

8.2.5. Financial cost of human resources and associated costs not included in the reference amount

EUR million (to 3 decimal places)

Type of human resources	2006	2007	2008
Officials and temporary staff (19 01 01)	*PM*		
Staff financed by Art 19 01 02 (auxiliary, END, contract staff, etc.)	*0*		
Total cost of Human Resources and associated costs (NOT in reference amount)	*PM*		

The needs for human resources shall be covered within the allocation granted to the managing DG in the framework of the annual allocation procedure (see 8.2.1)

8.2.6. Other administrative expenditure not included in reference amount

EUR million (to 3 decimal places)

	2006	2007	2008	TOTAL
19 01 02 11 01 – Missions	0.002			0.002
19 01 02 11 02 – Meetings & Conferences				
19 01 02 11 03 – Committees				
19 01 02 11 04 – Studies & consultations				
19 01 02 11 05 - Information systems				
2 Total Other Management Expenditure (19 01 02 11)	0.002			0.002
3 Other expenditure of an administrative nature				
Total Administrative expenditure, other than human resources and associated costs (NOT included in reference amount)	0.002			0.002