



Kildare County Council
Comhairle Contae Chill Dara

Corporate Procurement Plan

2022 - 2026

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1 Mission

Shaping a sustainable future while improving the quality of life of all citizens. Delivering enabling infrastructure and efficient accessible services and pursuing our vision through collaboration, innovation, inclusion and community engagement.

(Kildare County Council Corporate Plan 2019-2024)

2 Introduction

Public Procurement can be defined as the acquisition, whether under formal contract or not, of works, supplies, and services by public body. It ranges from the purchase of routine supplies or services to placing contracts for large infrastructural projects. Kildare County Council's procurements are governed by EU and national rules and objectives, including the principles of the Treaty on the Functioning of the European Union, namely transparency, mutual recognition, equal treatment of tenderers, non-discrimination, and proportionality.

2.1 Procurement Objectives

Kildare County Council's Corporate Procurement Plan 2022-2026 builds on the policy actions specified in the Corporate Procurement Plan 2018-2021 and outlines the objectives and goals over the next four years. It is also guided by the core values of Kildare County Council's Corporate Plan 2019-2024:

- Accessible
- Adaptable
- Inclusive
- Sustainable
- Accountable
- Courteous
- Innovative
- Transparent

These core values are incorporated into the 2022-2026 Corporate Procurement Plan. As Kildare County Council, as a contracting authority, is accountable for all the procurements it carries out, it is imperative that suitable mechanisms and systems are in place and improved on to ensure compliance, achieve value for money and to manage risks related to procurement, while supporting service delivery.

With the adverse effect to and uncertainty of the economic future as a result of Brexit and the coronavirus pandemic (COVID-19), along with the growing disruption to supply chains and growing uncertainties to international trade, means we must continue to focus on growing our competitiveness and managing our finances whilst minimizing risk.

This Corporate Procurement Plan establishes in conjunction with the 'Corporate Procurement Plan Information Note' (Office of Government Procurement, 2019) and the 'Guidance for Corporate Procurement Planning in the Local Government Sector' (Local Government Strategic Procurement Centre, 2015), along with Government Circulars and Departments Information Notes, specific procurement goals and targets for 2022-2026, whilst also meeting key procurement objectives, as outlined in the OGP's Information Note on Corporate Procurement Plan of:

- Support service delivery and fulfill strategic objectives in the organisation's Corporate Plan
- Embed transparency and accountability in procurement practices
- Ensure adherence to procurement policies and procedures
- Support the ongoing development of the organization's procurement function
- Facilitate economic, social or environmental objectives through procurement
- Ensure compliance with Procurement directives, legislation, circulars and other legal requirements
- Achieve greater value for money

The Corporate Procurement Plan 2022-2026 provides a platform for the Procurement Officer to communicate directly to staff the vision and direction of procurement within Kildare County Council and how others can contribute to its development.

The Chief Executive and Management Team will play leading roles in the developments of procurement by promoting a culture of compliance, transparency, best practice procurement, sound risk management and the achievement of value for money outcomes.

The Corporate Procurement Plan 2022-2026 will ensure that the procurement function within Kildare County Council is focused on compliance with all EU and National procurement legislation and policies whilst also obtaining value for money and managing risk.

The Plan has been prepared in consultation with the Procurement Steering Group and has been approved by the Chief Executive.

This Corporate Procurement Plan is divided into 3 sections:

1. Review: Firstly, a review of the Corporate Procurement Plan 2018-2021 and its deliverables
2. Goals: Secondly, a detailed look at the plans, goals and targets of the Corporate Procurement Plan 2022-2026
3. Implementation: Finally, the approach will be outlined on how the goals and targets will be implemented and achieved.

In the Corporate Procurement Plan 2022-2026 an annual review of the key deliverables will take place at the end of each year as part of the implementation plan, and this will be published on the external website.

3 Review

The Corporate Procurement Plan 2018-2021 focused on embedding and supporting the application of good procurement practices in Kildare County Council.

A number of goals and targets for 2018-2021 were identified under the following serving headings:

- Governance and Risk
- Procurement Planning
- Compliance
- Value for Money
- eProcurement
- Business Engagement Measures
- Sustainable and Green Procurement Measures

A review of the current organizational position for each of these areas was carried out for the preparation of this plan, as was an analysis of the activity carried out over the life of the Plan.

3.1 Governance and Risk

As a devolved function, the procurement officer supported and assisted budget holders with their tendering process from quotations to open and restrictive procedures to EU level negotiated procedures.

Kildare County Council procurement procedures governing how procurements are completed are summarized below¹:

¹ For the time period of 2020-2021 Sub-National Level Thresholds are <€25,000 for supplies and services and <€50,000 for works: Above-National Level Thresholds are €25,000 - €214,000 for supplies and services and €50,000 - €5,350,000 for works. EU Level Thresholds are >€214,000 for supplies and services and >€5,350,000 for works

<p>Sub-National Level Thresholds</p>	<ul style="list-style-type: none"> • Quotes and tenders are sought as per Procurement Procedure Guidelines • Use of standard templates and Supplygov where appropriate/ suitable • Drawdown from OGP, LGOPC or other frameworks available to KCC • Use of KCC's own framework agreements
<p>Above-National Level Thresholds</p>	<ul style="list-style-type: none"> • Advertise on eTenders • Optional to advertise in OJEU • Drawdown from OGP, LGOPC or other frameworks available to KCC • Use of KCC's own framework agreements
<p>EU Level Thresholds</p>	<ul style="list-style-type: none"> • Advertise on eTenders • Advertise in OJEU • Drawdown from OGP, LGOPC or other frameworks available to KCC • Use of KCC's own framework agreements

The procurement led increased use of standardised templates throughout all procedures and processes, along with widespread departmental use increased the knowledge and experience for Kildare County Council staff tendering.

An increase in volume of tenders published and tender users were also experienced over the lifetime of the plan.

3.2 Procurement Planning

2019 saw the Procurement Officer establish a Procurement Steering Group and here updates, new information on policies, procedures, frameworks and department experiences are discussed and reviewed.

The Procurement Steering Group established a central contracts register to give better visibility on contracts and frameworks in place, whilst also enabling better procurement planning within the relevant departments.

To enable better contract management and planning, Area Engineers now act as Category Controllers for the various requirements that are common to all Municipal Districts on the Supplygov tendering platform.

3.3 Compliance

Quarterly published Procurement Compliance Reports were initiated in 2019 and issued to all Director of Services. These reports look at the compliance of spend >25k within each Directorate. These reports required the Directors of Services to revert on compliance within their areas of responsibility.

Pre-publication checks were carried out by Procurement Officer for all departments where requested.

The Procurement Officer managed and maintained the internal Procurement Portal

Continued promotion of standardised templates by the Procurement Officer

Contract Award Notice (CAN) reports issued to relevant user to ensure completion of CANs and their correct and accurate publication.

In-house and external training carried out on introduction to procurement, tendering, CWMF, use of the eTenders Platform and various courses completed from the Office of Government Procurement's (OGP) Commercial Skills Academy.

3.4 Value for Money

Procurement Portal relaunched in 2019 with most up to date relevant information and templates for tendering at quotation, national and EU level.

A revised procurement procedure was published in 2018 with updated and relevant information.

Templates for quotation, national and EU level templates available on Procurement Portal along with CWMF Construction Procurement templates.

Template expenditure reports set up, communicated and issued at the Procurement Steering Group and Area Engineer Meetings.

3.5 eProcurement

Significant progress has and continues to accrue to Kildare County Council by continuing to engage positively in the move towards more electronic process around the purchase to pay pilot test which led to the implementation of eInvoicing as per the directive 2014/55/EU.

Today Kildare County Council also only receives tenders electronically through the use of the tender box on the eTenders portal, something that was introduced as a requirement in the Directive 2014/24/EU. The Procurement Officer worked with the OGP and LGMA to ensure a smooth transition enabled this function.

3.6 Business Engagement Measures

Business engagement measures continue to be a focus of Kildare County Council while also taking cognisance of Circular 10/14 initiatives to assist SME's in public procurement. This Circular provides for market analysis to be carried out before tendering for better understanding and selection of procurement strategy. Over the lifetime of the 2018-2021 Corporate Procurement Plan a number of business engagement actions were implemented.

These actions included the relaunch of Kildare County Council's external procurement website to provide an improved and more detailed information resource on procurement to suppliers and potential suppliers alike.

Under the Finance Section on the external website information on purchase orders with a value greater than €20,000 are published on a quarterly basis.

Kildare County Council continue to engage with LEO, the OGP and the LGMA to assist in identifying opportunities to support SMEs participation and engagement. The procurement officer has also partaken in procurement information sessions as part of Enterprise Week in conjunction with the LEO Department.

In 2019 a supplier engagement event in partnership with Intertrade Ireland, the Local Government Management Agency and other local authorities in the Dublin and surrounding counties region took place. The event gave suppliers an opportunity to meet directly with the

local authority staff who would be purchasing supplies, services and works. There were over 500 business attendees on the day and the event was very well received by both the business community and Council staff alike.

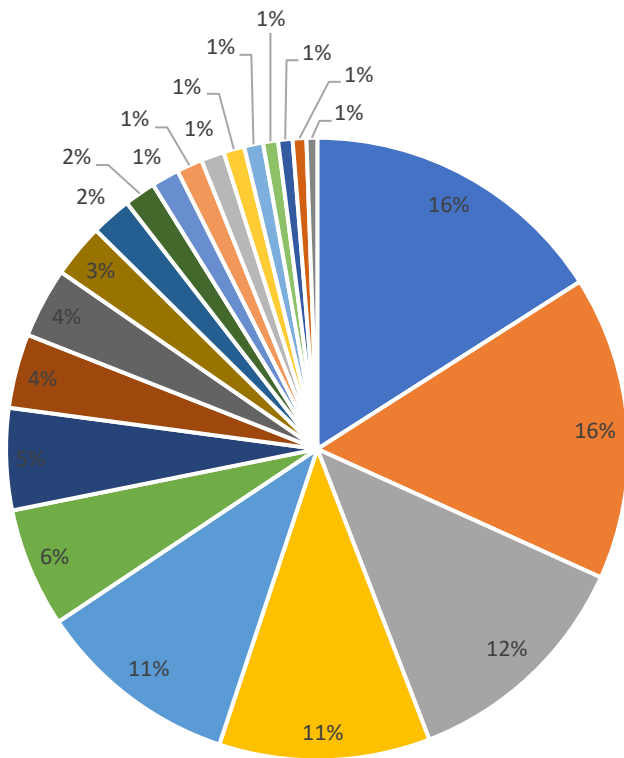
3.7 Sustainable and Green Procurement Measures

As Kildare County Council's focus was the continuance of their connection with social and green initiatives, a number of areas under the procurement remit were advanced or realized. These included the publication of the Environmental Protection Agency's Green Procurement Guidance for the Public Sector document on the Council's internal Procurement Portal thus allowing it to be available to all buyers and staff. A Sustainable Procurement Section was also added to the Council's internal and external procurement website. The opportunity to include green procurement and social consideration in tenders is actively and strongly promoted by the Procurement Officer and will continue to be so.

3.8 Review of the Key Figures over the Period 2018-2021

Acc Element	Detail	Amount 2018 €	Amount 2020 €	% Diff
70000	Materials	5,804,361	4,106,304	-29%
65500	Minor Contracts - Trade Services & other works	3,773,850	4,063,378	8%
69000	Hire (Ext) Plant/ Transport/Machinery & Equip	3,634,777	2,709,958	-25%
86000	Energy/Utilities	3,167,507	3,183,131	0.5%
69260	Repairs & Maint - Other Equip	1,371,720	2,818,600	105%
79900	Consultancy/ Professional Fees and Expenses	1,310,740	1,595,031	22%
79000	Legal Fees and Expenses	1,040,242	936,621	-10%
75000	Computer Software and Maintenance Fees	801,087	1,359,228	70%
68500	Non-Capital Equip Purchase -Other	705,957	542,288	-23%
76000	Communication Expenses	471,583	370,496	-21%
81000	Printing & Office Consumables	399,488	419,440	5%
69150	Repairs & Maint - Buildings (excl. LA Housing)	376,807	991,947	163%
68000	Non-Capital Equip Purch - Office Equip/Furn	320,205	192,365	-40%
85200	Cleaning	274,012	345,023	26%
80000	Advertising	243,604	310,267	27%
71550	Library Books and Purchases	230,780	253,018	10%
77200	Security - Property	206,511	182,963	-11%
66500	Non-Capital Equip Purchase - Fire Services	197,240	199,915	1%
69200	Repairs & Maint - Plant	184,696	38,870	-79%
67000	Non-Capital Equip Purch -Machinery Yard	183,180	278,966	52%
67500	Non-Capital Equip Purch -Computers	165,891	716,975	332%
85300	Canteen	138,114	143,952	4%
78100	Recruitment Expenses	127,617	22,587	-82%
69250	Repairs & Maint - Computer Equip	58,609	21,823	-63%
81050	Scanning	56,180	54,523	-3%
77250	Security - Cash Delivery	15,705	11,347	-28%
77100	Courier	10,790	2,832	-74%
66000	Non-Capital Equip Purchase - Civil Defence	742	1,741	135%
Total		25,271,995	25,873,589	2%

2020 Revenue Spend



- 70000 Materials
- 65500 Minor Contracts - Trade Services and other works
- 86000 Energy/Utilities
- 69260 Repairs & Maint - Other Equip
- 69000 Hire (Ext) Plant/Transport/Machinery & Equipment
- 79900 Consultancy/ Professional Fees and Expenses
- 75000 Computer Software and Maintenance Fees
- 69150 Repairs & Maint - Buildings (excl. LA Housing)
- 79000 Legal Fees and Expenses
- 67500 Non-Capital Equip Purchase - Computers
- 68500 Non-Capital Equip Purchase - Other
- 81000 Printing & Office Consumables
- 76000 Communication Expenses
- 85200 Cleaning
- 80000 Advertising
- 67000 Non-Capital Equip Purchase - Machinery Yard
- 71550 Library Books and Purchases
- 66500 Non-Capital Equip Purchase - Fire Services

Description	2018 Total	2019 Total	2020 Total	2021 Total
Expenditure	€25,271,995	€27,909,163	€25,873,589	
Suppliers	1,943	1,877	1,752	

Nr of Tenders published on eTenders				
Procedure	2018	2019	2020	2021
Open Non-OJEU	20	45	28	
Open OJEU	5	6	7	
Restricted Non-OJEU	1	3	2	
Restricted OJEU	3	1	2	
Mini Competition	2	38	81	
Negotiated Procedure	0	0	1	
PIN	1	0	1	
Quick Quote	4	12	44	
VEAT	0	1	0	
Total	36	106	166	

3.9 Need to Adapt to Change

Over the life of the Corporate Procurement Plan 2018-2021 we have seen change occur in the wider political, economic, and social environments that have affected and will continue to impact on the procurement of the supplies, services and works required by the Council to deliver services in the county.

The General Data Protection Regulation (GDPR) came into effect in May 2018. This required updating of legal agreements in place with contractors to meet the upgraded requirements. Data Processing Impact Assessments (DPIA) are now required for any new services or change in process that may impact on personal data.

Britain has exited from the European Union (Brexit) and the ongoing situation is being closely monitored to reduce, insofar as possible, the impact this may have on procurement and the delivery of services by the council. The Office of Government Procurement Guidance Notes on Brexit have been made available to all staff on the internal Procurement Portal and the potential impact is being assessed on a project-by-project basis.

The coronavirus pandemic (COVID-19) has also affected procurement, for example through supply chain disruptions. In some areas this resulted in local supply chains opening up for products that would ordinarily have been imported. Lockdowns and restrictions have resulted in difficulties and altered work programs. The coronavirus pandemic has also meant adapting how we carry out procurement processes and staff training videos have been prepared to reduce the need for on-site training while continuing upskilling staff in procurement procedures and processes.

An ability to adjust to changes will also be a part of the 2022-2026 Corporate Procurement Plan.

4 Plan, Goals and Targets of the Corporate Procurement Plan 2022-2026

4.1 Objectives

The 'Guidance for Corporate Procurement Planning in the Local Government Sector' (Local Government Strategic Procurement Centre, 2015) identifies four high level objectives for local authority procurement functions:

- To ensure the Local Authority complies with Procurement Directives, Legislation, Circulars and other legal requirements, and that staff engaged in procurement also adhere to the organisation's procurement policies and procedures.
- To support service delivery by the Local Authority and fulfill the strategic objectives in the Local Authorities corporate plan.
- To achieve greater Value for Money (VFM) by ensuring that purchasing is carried out in a coordinated and strategic manner; reviewing and, where possible, streamlining existing procurement processes; identifying opportunities for savings, for example by utilising national and regional aggregated contracts or other means.
- To facilitate economic, social or environmental objectives through procurement, for example by identifying opportunities for social or green procurement and engaging with businesses and suppliers.

The Corporate Procurement Plan 2022 to 2026 will continue to reflect the above objectives under the continued structure of the following headings:

1. Governance
2. Procurement Planning and Achieving Efficiencies
3. Compliance with Procurement Rules and Requirements
4. Value for Money
5. Business Engagement Measures
6. Sustainable and Green Procurement Measures
7. Innovation and Diversity Measures

4.2 Governance

- The Corporate Procurement Steering Group will continue to meet quarterly to oversee the implementation of the Corporate Procurement Plan.
- A revised Chief Executive Order outlining the procurement rules and procedures for the different expenditure thresholds will be put in place, reaffirming the Council's commitment to the application of good procurement practice. The Order will also approve the Corporate Procurement Plan 2022 - 2026.
- The dedicated Procurement Officer will be retained and continue to support purchasing staff in the application of good procurement practices in the Council.
- An annual report on the Measurement and Monitoring of the Implementation of the Corporate Procurement Plan will be prepared and published by the Procurement Officer.
- To continue to oversee best practice in procurement activity the following advertising methods will be promoted by the Procurement Officer:
 - All Kildare County Council run tender competitions above national and EU level thresholds will be advertised on www.etenders.gov.ie
 - Mini-competitions will be run through www.etenders.gov.ie, where feasible.
 - For competitions above the EU thresholds outcome letters will continue to be issued through www.etenders.gov.ie.
 - Quotations should be sought through QuickQuotes.
 - All mini-competitions from Local Government Operational Procurement Centre (LGOPC) frameworks and dynamic purchasing systems will be carried out by the relevant budgetholder through www.supplygov.ie platform.
- Procurement objectives from the Corporate Procurement Plan will continue to be incorporated into the Performance Management Development System, as actions in Team Development and Personal Development Plans.
- The Council will prepare and publish an annual Public Spending Code Quality Assurance Report in line with national circulars. The Council will provide training for relevant staff on the requirement of the Public Spending Code, to support compliance with the Code. Project managers will carry out appropriate project appraisals throughout the lifecycle of the project in keeping with the requirements of the Code.

4.3 Procurement Planning and Achieving Efficiencies

- The Procurement Officer will assist the relevant department in planning and coordinating the procurements required to deliver the Council's Annual Service Delivery Plan.
- All procurement arrangements such as contracts/ frameworks/ dynamic purchasing systems/ panels valued over €25,000 will be recorded promptly on award in the central contracts database by the budgetholder/ relevant steering group member.
- The Procurement Officer will regularly monitor the procurement contracts database and will prepare reports for the Procurement Steering Group to consider on such items such as opportunities for efficiencies identified.
- The Procurement Officer will support service delivery and business continuity by monitoring and reporting on contracts due for renewal and/or are nearing expiry to the Procurement Steering Group.
- When carrying out a procurement, purchasers are encouraged to consider procurement approaches that look at requirements on an annual/ multi-annual basis, and where applicable to consider additional requirements that may arise over the term of a project. Suitable measures should then be included in the tender documents; for example, including options, establishing framework agreements and so on.
- Relevant staff will engage with the Office of Government Procurement (OGP), the Local Government Strategic Procurement Centre (LGSPC), Local Government Operational Procurement Centre (LGOPC), and other national networks to maximise opportunities and efficiencies from shared procurements.
- Relevant issues and potential risks to service delivery associated with contracts will be considered and suitable mitigating measures put in place as part of the Council's risk management processes.
- The Council will use Low Value Purchase cards (LVP) for low value expenditure on supplies where appropriate, such as those required on a one-off or emergency basis, to minimize the processing costs for these transactions. The use of LVPs will be

governed by appropriate control measures, and the expansion of LVPs across the Council will be subject to audit assurance that existing control measures are enforced and are appropriate.

- The steps in the process in carrying out a procurement will be assessed by the Budget Holder, Procurement Steering Group/ Procurement Officer to identify areas where transactional savings can be realised. This may include combining shared requirements into a single tender/ quotations process and considering a low value payments strategy for the Council.

4.4 Compliance with Procurement Rules and Requirements

- The Procurement Officer will continue to communicate procurement requirements including regulations, policies, procedures and so on, in the organisation through the Procurement Steering Group, intranet site, procedures manual, and training programmes.
- The Procurement Officer will provide procurement advice and assistance on request to staff preparing tender documents.
- Standard template documents will be used for seeking tenders.
- The Procurement Officer will carry out pre-publication checks on a portion of tenders to give assurance of compliance in the Council with procurement rules.
- Procurement functionality in the Financial Management System (“Milestone 7”) will be implemented in the next planned upgrade of the system, to improve on contract spend and compliance with procurement rules.
- Independent assessment of compliance with procurement rules will be carried out by the internal and external audit functions.
- Where personal data is received as part of a competition or processed in the administration of a contract, suitable measures will be put in place by the contract manager to safeguard the data in line with the requirements of the General Data Protection Regulation (GDPR).

- The Data Retention Policy for Procurement Related Records will be implemented by the Procurement Officer and Purchasing departments. The Council will try not to hold records beyond the necessary timeframes.

4.5 Value for Money

- The Council will continue to prioritise the use of national and regional arrangements, where appropriate, over stand-alone local procurements to ensure that opportunities for efficiencies are maximised.
- Ongoing expenditure analysis will be conducted both at organisation and department levels to monitor items such as suppliers approaching procurement thresholds; measure contract/ framework expenditure; identify further areas for corporate contracts and monitoring instances of off-contract spend.
- For contracts which encompass the activities of a number of sections in the Council one department will take the role of lead purchaser and co-ordinate the preparation of the procurement and will act as contract manager once the contract is in place. This will generally be a function devolved to budgetholders or staff within the relevant department.
- The competitive nature of procurement processes, that is, seeking quotes or tenders, will continue to be prioritised as a method of attaining value for money. Award criteria including quality criteria will be used where considered most appropriate acknowledging that the cheapest item does not necessarily equate to the best value.
- Should it appear that value for money would not be achieved by use of a collaborative arrangement, the provisions of Circular 16/13 will apply. Any such value for money justifications will take into account the full costs of running a public procurement competition as well as the costs of the supplies/ services/ works to be delivered and will be fully documented.
- Contracts will be monitored by budget holders and contract managers to ensure agreed services and performance levels are delivered and the correct rates are being applied by the supplier.

4.6 Business Engagement Measures

- Requirements in tendering will be proportional and reasonable ensuring that there are no unnecessary barriers for suppliers, particularly SMEs. Open procedures for tendering for contracts below the threshold of €134,000 and the division of contracts/frameworks into lots as recommended in government guidelines (Circular 10/14) will both continue to be used, where practicable.
- The Procurement Officer will engage with business support organisations, such as the Local Enterprise Office, Kildare Chamber and InterTrade Ireland, on the Council's tender opportunities and will promote upskilling programmes for businesses interested in tendering for public sector contracts.
- The Council will see quotations electronically using either www.etenders.gov.ie or www.supplygov.ie, where feasible.
- The Procurement Officer will maintain the dedicated procurement page on the Council's external website, which includes details on how the Council procures and how to register for tender opportunities. Copies of the Corporate Procurement Plan and Procurement Procedures will also remain available here.
- An analysis of the Council's supplier base will be carried out, to assess the levels of business carried out by the Council with SMEs and within the Kildare County Council area.
- Pre-market engagement measures will be used where appropriate, for example by way of a Prior Information Notice/ Request for Information Notice on www.etenders.gov.ie. This will allow us consider innovations available on the market prior to tendering.
- Procurement processes that allow for discussion during the tender process will be used where appropriate, (for example Competitive Procedure with Negotiation, Competitive Dialogue, Innovation Partnerships). This will facilitate engagement with interested businesses during the procurement process and should assist the Council obtain the best solution for very complex requirements.

4.7 Sustainable and Green Procurement Measures

- The commitments contained within the **Local Authority Climate Action Charter**, which was signed by the Chief Executive and Cathaoirleach in October 2019, include a requirement that Kildare County Council *will implement green public procurement strategy and procedures across all business areas*.

In order to respond to this strategic requirement, Kildare County Council commits to the following actions:

- In line with the requirements of Circular 20/2019 the Council will consider including green criteria in public procurement processes where clearly defined, quantifiable, verifiable and measurable criteria have been developed by the Department Environment, Climate and Communications and are relevant to the specific procurement process; and the cost can be met within a department's existing budget without impacting on service delivery.
- The Council will also look to include green procurement criteria/ criteria that reduce the environmental impact where there is a clear link to the output/ outcome delivered in a works/ works related contract(s). Depending on the nature of the project these may relate to minimum requirements in the specification, award criteria, contract clauses or other suitable approaches.
- The Procurement Officer along with the Procurement Steering Group will look at ensuring social considerations are included in tenders, where practicable.

4.8 Innovation and Diversity Measures

- The Council will continue to look for better ways to deliver services and improve life in the County by developing and procuring innovative solutions to common problems. The Council will also continue its works in the implementation of the Kildare County Council Climate Change Action Plan.
- In keeping with the Human Rights and Equality Framework our procurements will include products and services that are underpinned by universal design and equality.

4.9 Measurement and Monitoring of Implementation

The procurement officer will publish a Measurement and Monitoring of Implementation Report annually. At a minimum this report will include:

- Number of meetings of procurement steering group and summary of issues considered
- Number and percentage of tenders conducted using the different procurement procedures
- Number of procurement training sessions held for staff and summary of items covered
- Number of revenue suppliers in the different expenditure threshold
- Revenue spend per Account Element
- Number of quotations sought through quick quotes (www.etenders.gov.ie) and request for quotations (www.supplygov.ie)
- Update on business engagement measures
- Update on sustainable procurement measures

Note

This Corporate Procurement Plan will be reviewed by the Procurement Steering Group on an annual basis and should something new or unforeseen procurement related arise over the life of this plan, this new element may be included as an addendum to Appendix 1 and will be included in the annual reporting hereafter.