Improving the Effectiveness of Antarctic Environmental Impact Assessment

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Summary

The paper presents a summary of the informal intersessional discussions on improving the effectiveness of the Antarctic Environmental Impact Assessment (EIA) system, and proposes next steps for taking this work forwarded.

It is recommended that the Committee:

* Continues to encourage Members to share, via Information Papers, templates, guidance and other documents associated with the operation of their EIA processes for the benefit of Members;
* Recommends that the ATCM adopts the attached Resolution on the requirement to include mitigation measures in preliminary and IEE stage assessments;
* Commissions the Antarctic Treaty Secretariat to prepare a comprehensive summary of previous CEP discussions on assessing cumulative impacts, as a first step for progressing work on improving the assessment of cumulative impacts; and
* Updates the CEP 5 Year Work Plan to appropriately take forward a programme of work for taking actions associated with improving the effectiveness of the Antarctic EIA system.

Background

At CEP XXIV the United Kingdom and the Netherlands presented WP 33 *Report on Effectiveness of Environmental Impact Assessment in Antarctica*, which summarised the findings of an independent assessment of the effectiveness of EIA in Antarctica. The paper highlighted five high priority improvement opportunities for improving the Antarctic EIA system, as outlined in the assessment. Following a discussion amongst Members, the Committee agreed to progress this issue through informal discussions during the intersessional period. The committee agreed that the intersessional discussions would address the following:

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Intersessional Discussions

The United Kingdom convened informal intersessional discussions using the CEP Forum, making an opening announcement on 28 October 2022 and sharing a Discussion Document with questions for Members. Nine Members and two Observers participated in the first round of discussions providing general comments, answering questions posed in the Discussion Document, and sharing documents and templates associated with their EIA and authorisation processes for the benefit of Members. A summary of those discussions is at Annex II.

Better defining the preliminary stage assessment in Antarctic settings

During the informal intersessional discussions Members shared information about their preliminary stage assessments, including the information requested from applicants. Some Members also shared templates and guidance documents for the benefit of Members. These documents are available on the CEP Forum.

It was noted that there is already guidance for preliminary stage assessments in Resolution 1(2016), although one Member commented that the guidance is not necessarily easy to interpret or implement. While some Members suggested that some additional guidance for preliminary stage assessments might improve the consistency of approach, others cautioned that the creation of any standard template, checklist or guide could be difficult, as each Member would need to consider and address the particular requirements of its relevant national legislation and procedures.

One Member commented that they are considering developing guidance to assist in determining the level of assessment required, and would be pleased to share their experience. There was some enthusiasm for creating a dedicated repository where Members could share EIAs and associated documents for the benefit of Members.

We recommend that Members continue to share, via Information Papers, their templates, guidance and other documents associated with the preliminary stage assessments for the benefit of other Members. Arrangements for improving the sharing of information could be discussed as part of ongoing work to be set out in the CEP 5 Year Work Plan.

Requirement for mitigation measures for Preliminary Assessment and IEE level assessments

During the intersessional discussions many Members noted that they already required mitigation measures to be included in preliminary and Initial Environmental Evaluation (IEE) level assessments. There was support from several Members for proposing a Resolution to encourage a consistent approach in requiring mitigation measures to be included as part or preliminary and IEE level assessments. It was noted that a resolution would strengthen the EIA Guidelines, which state that, ‘The EIA process should consider measures to decrease, avoid, or eliminate any of the components of an impact on the environment, or on the conduct of scientific research and on other existing uses and values. This can be considered a process of feedback, and should occur throughout the EIA process, not simply as a final step. Such measures include mitigation and remediation actions’.

A draft Resolution was included in the Discussion Document, and several members made comments. As a result, the text of the draft resolution has been amended, including to improve the clarity of the operative paragraph, to reference in the preamble the environmental principles in Article 3 of the Environmental Protocol, and to refer in the preamble to paragraph 2(g) of Article 3 of Annex I to the Environmental Protocol that requires mitigations to be included in Comprehensive Environmental Evaluation assessments.

We recommend that the Committee considers recommending that the ATCM adopts the draft Resolution at Annex I.

Consideration of cumulative impacts

During the intersessional discussions many Members agreed that assessing cumulative impacts is one of the most important aspects of Environmental Impact Assessment, and yet, is very hard to do well. It was noted that effective assessment of cumulative impacts relies on knowledge of past, current and future planned activities in relevant locations, and this required the comprehensive sharing of information amongst Members.

There was broad agreement that collective progress on this topic would be helpful. Suggestions for how to take the work forward included:

* Continuing an open dialogue on the topic (one Member noted their ongoing work on assessing cumulative impacts, and that they would be pleased to share their findings);
* Producing a comprehensive summary of previous CEP discussions on assessing cumulative impacts (noting that the summary in the ‘*Environmental Impact Assessment in Antarctica – A Report on Effectiveness’* was a good start);
* Dedicating time during a CEP meeting for a presentation or discussion on the topic, or potentially arrangement of a CEP workshop ahead of a CEP meeting.
* Creating a clear outcome pathway in the CEP 5 Year Work Plan.

For further consideration, practical actions that were suggested included:

* Considering how to make information about activities more accessible (potentially through the EIES or by improving the EIA database to make it easier to find previous EIAs);
* Considering reviewing methodologies used in non-Antarctic contexts, as well as commissioning a report; and
* Considering undertaking an assessment of an exemplar study from Antarctica to assess strengths and weaknesses.

We recommend that the Committee commissions a comprehensive summary of previous CEP discussions on assessing cumulative impacts, as a first step, and updates the CEP 5 Year Work Plan to set out a programme of work for addressing the assessment of cumulative impacts (which could include consideration of the suggestions of practical actions from Members).

Next steps and actions for subsequent years

The intersessional discussions demonstrated enthusiasm for taking further action to improve the effectiveness of the Antarctic EIA system. There was general encouragement for Members to continue to share information relevant to EIAs with each other. Some Members agreed that there would be benefit in considering some of the other improvement opportunities identified in the Report. Other suggestions included:

* improving access to the EIA database to make it easier for Parties to identify past, present and future activities in each area (for improving consideration of cumulative impacts);
* considering whether a threshold could be established for whether an EIA could be amended or whether a new EIA should be produced when changes are made to the proposed (and already authorised) activities;
* improving guidance for assessing baseline environmental conditions; and
* improving (through additional guidance) the process for monitoring compliance with EIAs.

There was some support for considering a multi-year work plan for improving the EIA system, potentially by developing the existing EIA issue in the CEP 5 Year Work Plan. We therefore recommend that the Committee considers revising the ‘Implementing and improving the EIA provisions of Annex I’ Issue in the CEP 5 Year Work Plan to provide direction for taking forward these areas of work.

Recommendations

It is recommended that the Committee:

* Continues to encourage Members to share, via Information Papers, templates, guidance and other documents associated with the operation of their EIA processes for the benefit of Members;
* Recommends that the ATCM adopts the attached Resolution on the requirement to include mitigation measures in preliminary and IEE stage assessments;
* Commissions the Antarctic Treaty Secretariat to prepare a comprehensive summary of previous CEP discussions on assessing cumulative impacts, as a first step for progressing work on improving the assessment of cumulative impacts; and
* Updates the CEP 5 Year Work Plan to appropriately take forward a programme of work for taking actions associated with improving the effectiveness of the Antarctic EIA system.

**Annex I**

Resolution X (2023)

Consideration of Mitigation Measures in Environmental Impact Assessment

**The Representatives,**

*Recalling* the Environmental Principles under Article 3 of the Protocol on Environmental Protection to the Antarctic Treaty (“the Protocol”), and specifically Article 3(2)(c) which states that ‘activities in the Antarctic Treaty area shall be planned and conducted on the basis of information sufficient to allow prior assessments of, and informed judgments about, their possible impacts on the Antarctic environment and dependent and associated ecosystems and on the value of Antarctica for the conduct of scientific research’;

*Recalling* also the requirements under Article 8 of the Protocol and its Annex I regarding environmental impact assessment for proposed activities in the Antarctic Treaty area;

*Recalling* specifically paragraph 2(g) of Article 3 of Annex I to the Protocol, which requires a Comprehensive Environmental Evaluation to include ‘identification of measures, including monitoring programmes, that could be taken to minimise or mitigate impacts of the proposed activity and to detect unforeseen impacts and that could provide early warning of any adverse effects of the activity as well as to deal promptly and effectively with accidents’;

*Recognising* that Parties should already have in place national procedures for implementation of the Protocol in accordance with Article 1 of Annex I;

*Noting* that under Resolution 1 (1999) the Antarctic Treaty Consultative Meeting (“ATCM”) adopted Guidelines for Environmental Impact Assessment in Antarctica;

*Noting* also that under Resolution 1 (2016) the ATCM adopted revised Guidelines for Environmental Impact Assessment in Antarctica (“the Guidelines”); and

*Desiring* to ensure that, consistent with the Guidelines, all environmental impact assessments for proposed activities in Antarctica include mitigation measures, commensurate with the nature of the activity and the level of environmental impact assessment;

**Recommend** that their Governments ensure that Preliminary Stage and Initial Environmental Evaluation level environmental impact assessments include identification of measures, commensurate with the nature of activity and the level of environmental impact assessment, to minimise or mitigate the impacts of the proposed activity.

Annex II

Summary of Response to the Discussion Document: Improving the Effectiveness of the Antarctic Environmental Impact Assessment System

Background

At CEP XXIV WP 33 summarised the findings of an independent assessment of the effectiveness of Environmental Impact Assessment (EIA) in Antarctica (*Environmental Impact Assessment in Antarctica – A Report on Effectiveness*). The report found that, although the Antarctic EIA system had been effective overall, the system could be improved given the increasing pressures on the Antarctic environment. WP 33 highlighted five high priority opportunities for improving the Antarctic EIA system as outlined in the assessment. These included:

1. better defining the preliminary stage assessment;
2. development of more comprehensive guidance on cumulative impact assessments based on best practice approaches elsewhere;
3. requirement for mitigation measures for Preliminary Assessment and IEE level assessments;
4. development of guidelines and/or checklists to support national competent authorities in their assessment of EIAs; and
5. reminding Parties of their monitoring obligations as set out in the Environmental Protocol, and developing a reporting template and procedure to assist Parties in meeting these requirements.

The Committee agreed to progress this issue through informal discussion during the intersessional period, but agreed that opportunities for improving the Antarctic EIA system needed to be handled carefully so as not to cause additional challenges.

The Committee advised the ATCM that it had agreed to review and progress recommendations in WP 33 to improve the effectiveness of the Antarctic EIA system through informal intersessional discussions (Final Report of the Forty-fourth Antarctic Treaty Consultative Meeting, paragraph 73). The Committee further agreed that the intersessional discussions would address the following:

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Discussion Document

On 28 October 2022 a discussion document was circulated on the CEP forum to facilitate discussion and seek views from Members on the four subjects that the CEP agreed to address during the intersessional period.

Summary of Responses

Nine Members and two Observers participated in the informal discussions, providing comments generally on the Antarctic EIA system and in response to the specific questions asked. Members also shared documents and templates as well as described processes used in their own implementation of the EIA system for the benefit of other Members.

The discussion was helpful in sharing experiences in handling the development and assessment of EIAs as well as the authorisation process.

A summary of the responses and comments received is included below.

1. Report recommendation - Better defining the preliminary stage assessment in Antarctic settings, taking into account screening and scoping processes observed elsewhere

***For intersessional discussion:*** *To consider sharing examples of best practice or case studies which could facilitate consistency in approach to determining the appropriate level of EIA for an activity in Antarctic settings. Could also consider the need for any supporting guidance.*

The report noted that the preliminary stage assessment could be better defined, based on screening and scoping processes elsewhere. It was suggested that the process could be improved through the development of a standard format or template for preliminary assessment, as well as development of a checklist or guide for National Competent Authorities (NCAs) to use when assessing preliminary assessments.

Questions to Members

Members were invited to:

1. Summarise the type of information included in their preliminary stage assessments (which may include type and location of activity, duration of activity, identification of possible impacts, details of mitigation measures, etc.);

Some Members commented that their national regimes did not include a separate preliminary stage assessment step. One Member noted that while its system included a preliminary stage assessment, it was not defined in detail.

Several Members whose national regimes include a preliminary stage assessment shared the information that is requested from applicants as part of that assessment. There was a lot of common information requested as part of a preliminary stage assessment, with many Members asking for information on the type, location and duration of the activity, as well as information about plans to access protected or sensitive areas. Members also asked applicants to state predicted impacts on the Antarctic environment, with many also asking for proposed mitigation measures. While there was much commonality in the type of information required, there was some variation in the level of detail requested.

Some Members also asked for additional information, including alternative options to the planned activity, details of any monitoring plans, information on use of Remotely Operated Aircraft Systems (RPAS), details of any emergency planning and information about waste management.

1. Share examples, case studies, process diagrams, templates, and internal or external guidance (to applicants, or for internal screening process), which could support Members to:
   * Help applicants to effectively undertake a preliminary stage assessment; and
   * Help NCAs to effectively assess preliminary stage assessments (and decide whether a higher level of EIA might be required); and

All those Members who responded to this question noted that some form of guidance is offered to those undertaking preliminary stage assessments, and Members shared examples of guidance offered.

Some members noted that brief instructions were included on the preliminary stage application form or template, others commented that applicants are provided with separate guidance documents and links to further guidance. Several Members noted that applicants are encouraged to discuss their applications with the National Competent Authority.

Members generally commented that they do not have internal guidance for assessing preliminary stage assessments. One Member noted that they are considering developing guidance to assist in determining the level of assessment required, and would be pleased to share their experiences.

1. Comment on whether any additional guidance may be useful to support Members to:
   * Set requirements for preliminary stage assessments (as identified in the report, this could include: a description of the activity, a description of the location(s) where it will be undertaken and the duration of the activity, an identification of the actual or potential environmental impacts that have been identified including on other uses and values, and the mitigation measures that will be employed); and
   * Effectively assess preliminary stage assessments.

While most Members that replied to this question were broadly content with the way that preliminary stage assessments are undertaken, several commented that some additional guidance might improve the consistency of approach. In particular, it was noted that additional guidance could be developed to improve the way that actual or potential impacts are identified and assessed.

While some Members noted that there was already some guidance for preliminary stage assessments in Resolution 1(2016), one Member commented that the guidance was not necessarily easy to interpret or implement.

Some Members cautioned, however, that the creation of any standard template, checklist, or guide could be difficult, since each Member would need to consider and address the particular requirements of its relevant national legislation and procedures.

The sharing of example EIAs through an appropriate repository was suggested.

1. Report recommendation – Requirement for mitigation measures for Preliminary Assessment and IEE level assessments.

***For intersessional discussion:*** *To review previous discussions on this topic, and consider how to share best practice or propose a Resolution to encourage inclusion of mitigation measures as part of Preliminary and IEE level assessments, including by considering best practice elsewhere. Consider ways in which NCAs could monitor the implementation of these measures as well as the consistency between the activity and the EIA.*

The report notes that mitigation measures are not required for activities assessed at preliminary assessment and IEE levels. Since the requirements for what to include in an IEE make no explicit mention of the need to identify measures to mitigate the identified impacts, the implication is that impacts that are judged to be no more than minor or transitory need not be further mitigated.

The report notes that previous intersessional discussions undertaken by CEP raised the issue of requiring a consideration of mitigation measures to be included at all levels of EIA. Noting that the recently revised EIA Guidelines emphasised that the application of mitigation and remediation measures is a fundamental part of the EIA document, it was agreed to wait and see if the revised guidelines had the desired effect in ensuring all EIAs cover mitigation measures or whether further action was required (ATCM XL / WP41). The report commented that a more deliberate means of addressing this concern is probably needed.

Questions to Members

Members are invited to:

1. Comment on a draft Resolution which could be proposed to encourage Members to require mitigation measures to be included in Preliminary and IEE level assessments:

***The Representatives****,*

*Recalling the requirements under Article 8 of the Protocol on Environmental Protection to the Antarctic Treaty (“the Protocol”) and its Annex I regarding environmental impact assessments for proposed activities in the Antarctic Treaty area;*

*Recognising that Parties should already have in place national procedures for implementation of the Protocol in accordance with Article 1 of Annex I thereof;*

*Noting that under Resolution 1 (1999) the Antarctic Treaty Consultative Meeting (“ATCM”) adopted Guidelines for Environmental Impact Assessment in Antarctica (“Guidelines”);*

*Noting also that under Resolution 1 (2016) the ATCM adopted revised Guidelines for Environmental Impact Assessment in Antarctica;*

*Desiring to ensure that all Environmental Impact Assessments include mitigation measures, reflecting current best practice in the revised environmental impact assessment of proposed activities in Antarctica;*

***Recommend that:***

*All Parties ensure that Preliminary Stage and Initial Environmental Evaluation level Environmental Impact Assessments include identification of measures, including monitoring programmes, to minimise or mitigate impacts of the proposed activity and to detect unforeseen impacts and that could provide early warning of any adverse affects of the activity as well as deal promptly and effectively with accidents.*

Several Members supported the proposal for a Resolution, commenting that it would be useful in encouraging Members to require the inclusion of mitigation measures in preliminary and IEE level assessments. However it was also noted that a Resolution would not fill a legislative gap, nor do much to address the challenge of ensuring that identified mitigations are implemented on the ground. Many members also noted that the inclusion of mitigation measures was already required as part of their own preliminary and IEE level assessment processes.

Some comments were received on the text of the draft Resolution to improve clarity, including to require mitigations for both seen and unforeseen impacts, and to suggest referencing the preamble in Article III to the Protocol.

Some Members commented that it would be helpful to understand other Members’ practice with regards to preliminary and IEE level assessments before discussing the requirement for a Resolution.

1. Describe how they determine appropriate mitigation measures (sharing any guidance or methodology which might be useful to other Members), and offer suggestions for the best way for ongoing sharing of best practice on appropriate mitigations for inclusion in preliminary and IEE level assessments; and

Most Members noted that they do not have any particular methodology for determining whether proposed mitigation measures are appropriate, and that they rely on the experience and expertise of those in their assessment teams. It was commented that it was primarily the activity proponent’s responsibility to identify appropriate mitigation measures, but that NCAs’ role may include requiring additional or modified measures as conditions of approval.

Some Members noted that they had domestic databases used for logging mitigation measures proposed in previous EIAs, and appropriate mitigation measures for recurring activities. There was some enthusiasm for sharing of information or best practice to help NCAs assess the appropriateness of proposed mitigations, possibly through the ATS website or forums, and it was commented that one of the recommendations in WP41 (2017) was to create a central repository for EIA guidance and resources. It was suggested that the CEP could again encourage Parties to upload copies of IEEs to the EIA Database.

Some Members also noted that additional guidance, advice, or feedback on effective assessment of preliminary level mitigation measures would be helpful.

1. Provide a description, preferably supported by case studies or examples, of how their National Competent Authorities (NCAs) monitor compliance with proposed mitigation measures, to support other NCAs in doing similar.

One Member noted that monitoring in-field compliance was one of the greatest challenges for the EIA system. Most Members who responded explained that they have requirements in place for activity proponents to submit post-season reports, which include a self-assessment of compliance with conditions of authorisation and the EIA.

Some Members noted that they also undertake monitoring activities, including using observers on tourist vessels to monitor compliance with authorised mitigation measures or by undertaking in-field audits of authorised activities.

1. Report recommendation - Development of more comprehensive guidance on cumulative impact assessments, taking into account the best practice approaches elsewhere.

***For intersessional discussion:*** *CEP to present general avenues to explore on cumulative impact assessments based on a benchmark study on best practices on this area.*

The report provides a summary of previous CEP discussions and work to address cumulative impacts (see section 3.2.2.1), concluding that current guidance with respect to assessing cumulative impacts is relatively modest, and that there are opportunities to develop more comprehensive guidance on methodological approaches based on best practice approaches elsewhere.

Questions to Members

Members are invited to:

1. Comment on their approach to assessing cumulative impacts (and share examples, case studies and guidance related to assessing cumulative impacts of activities); and

Members were in agreement that assessing cumulative impacts is one of the most important aspects of Environmental Impact Assessment, and yet, it is very hard to do well. Many Members that responded to this question commented that they did not use any formal methodology for monitoring cumulative impacts (relying instead on the expertise and experience of their NCAs), although some Members referenced the use of EIES, GIS, joint EIAs, and requesting activity proponents to highlight previous or contemporary activities.

Members noted that effective assessment of cumulative impacts relies on knowledge of past, current and future planned activities in relevant locations. While Members had good knowledge of their own authorised activities, it was noted that it was harder to have a good understanding of activities authorised by other Parties. In this respect it was commented that while the EIES and EIA database are useful tools, their usefulness relies on timely updates from all Parties.

There was broad agreement that collective progress on this topic would be helpful, potentially resulting in additional guidance (drawing on international examples). One Member noted that they are undertaking some work on assessing cumulative impacts, both from the perspective as an activity proponent as well as an authorising NCA, and would be pleased to share their findings. Members remain keen to share experiences in assessing cumulative impacts.

1. Offer views on what the next steps might be for improving the assessment of cumulative impacts as part of environmental impact assessments, including whether a comprehensive summary of CEP discussions to date on assessment of cumulative impacts would be helpful, and if more comprehensive guidance might be useful.

Members agreed that the topic of improving assessment of cumulative impacts is important, but difficult. Challenges include having sufficient access to up-to-date information about past, present and foreseeable future activities to be able to make an assessment on potential cumulative impacts. There was some agreement that additional guidance or development of a tool to assist with assessing cumulative impacts would be helpful.

Other suggestions included considering how to make information about activities more accessible (potentially through the EIES or by improving the EIA database to make it easier to find previous EIAs).

In terms of taking the work forward, there was also some agreement that a comprehensive summary of previous CEP discussions on assessing cumulative impacts would be a good place to start (noting that the topic had been discussed by CEP for some time). Consideration could also be given to reviewing methodologies used in non-Antarctic contexts, as well commissioning a report. It was also suggested that there may be benefit in undertaking an assessment of an exemplar study from Antarctica to assess strengths and weaknesses.

Given the importance of the topic and the need for working together, it was suggested that time could be given during a CEP meeting for a presentation or discussion, or perhaps a workshop prior to a CEP. While an ICG discussion was suggested as another option, it was noted that such an approach may be less effective in encouraging broad participation. It was also noted that having a clear outcome pathway in the CEP 5 Year Work Plan would be important.

1. Consider next steps and actions for subsequent years.

***For intersessional discussion:*** *Further discussions on how to take forward other actions for improving effectiveness of the Antarctic EIA system.*

WP33 (ATCM XLIV) presented a number of high priority improvement opportunities that are likely to have the greatest impact on improving the Antarctic EIA system. But the *Report on Effectiveness of Environmental Impact Assessment in Antarctica* highlighted a number of other opportunities that could also improve the Antarctic EIA system.

Questions to Members

Members are invited to:

1. Comment on any other opportunities that should be considered for improving the Antarctic EIA system; and

Many Members agreed that we should continue to encourage and support Parties to implement the Environmental Protocol through domestic legislation. While there was a suggestion that improved standardisation of the approach to EIAs might be useful, particularly to avoid the issue of ‘permit shopping’ by operators, other views were that it would be hard to try to standardise the system too much given the difference in Parties’ domestic requirements.

There was some agreement that there could be benefit in further consideration of the CEE process, including collating the existing procedures into a single, easily-accessible document.

There was some agreement that there would be benefit in considering some of the other improvement opportunities noted in the report, including, for example, the potential application for Antarctica of ‘screening and scoping’ processes commonly applied as part of the EIA process for large projects in other parts of the world.

Other noted areas of improvement included:

* improving access to the EIA database to make it easier for Parties to identify past, present and future activities in each area (for improving consideration of cumulative impacts);
* considering whether a threshold could be established for whether an EIA could be amended or whether a new EIA should be produced when changes are made to the proposed (and already authorised) activities;
* improved guidance for assessing baseline environmental conditions; and
* improving (through additional guidance) the process for monitoring compliance with EIAs.

1. Offer any other views on how the work to improve the Antarctic EIA system could be best taken forward (such as whether we could consider any changes to the EIA Database, or whether it would be useful to propose a multi-year EIA system improvement plan).

It was noted that implementation of the EIA system relies on open communication and information sharing amongst Parties, and commented that better and more active use of the NCA forum page would allow for sharing of experience and improving consistency.

We were also reminded that we should take account of the difference in means and expertise within Members’ NCAs, and consider that while some Members may be confident in processes, others may consider some succinct guidance to be of great help.

Members agreed that there were several topics that would benefit from further consideration, and it was suggested that it would be helpful to consider relative priorities.

There was some support for considering a multi-year work plan for improving the EIA system, potentially by including it in the CEP 5 Year Work Plan or developing the existing EIA Issue in the 5 Year Work Plan.