

REVENUE AND FINANCING POLICY

The Revenue and Financing Policy outlines the council's policies on funding sources to be used to fund the operational and capital expenditure of council's activities and the rationale for their use.

The Policy is required by Section 102 and 103 of the Local Government Act 2002. The full policy must be included in the Long Term Plan.

Authorisation and Status

Policy Owner	Finance & Corporate Development Group	Version	Draft
Policy Contact	Finance & Corporate Development Group Manager	Last Reviewed By	Policy unit
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Notes			

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INTRODUCTION

This policy outlines the choices Council has made to determine the appropriate funding of operational and capital expenditure from the sources¹ of funds listed in the Local Government Act 2002 (LGA). The policy also shows how Council has complied with section 101(3)². The comprehensive section 101(3) analysis is separately documented in the Funding Needs Analysis.

Determining the appropriate way to fund Council activities is complex. It is a process that takes into account many variables including, but not limited to, the following matters:

- Legal
- Social
- Competition
- Affordability
- Impact of change
- Efficiency
- Equity
- Cost
- Intergenerational equity
- Transparency
- Accountability
- Business
- Strategic Alignment
- Benefit

In determining the appropriate Revenue and Financing Policy (RFP), Council plans to meet the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses.

Funding Principles

Council has determined the following basic principles to guide the appropriate use of funding sources:

- User charges are preferred when a private benefit can be identified and it is efficient to collect the revenue.
- Subsidies, grants and other income options are fully explored prior to rates being used.
- Each generation of ratepayers should pay for the services they receive and borrowing can assist to achieve this outcome.
- Capital expenditure to replace assets that reach their projected economic life is firstly funded from rates, which accumulate in asset renewal reserves until needed. Borrowing is then used if there is a shortfall in the total funding required.
- Capital expenditure to upgrade or build new assets is funded firstly from other sources (e.g. subsidies, grants, fundraising, financial contributions) and then borrowing.
- Growth related capital expenditure is funded by development contributions. Borrowing will be used if the expenditure is required in advance of the contributions being received.

Complying with these principles can at times be challenging. The Council must apply judgment in assessing many options to determine appropriateness in its development of budgets or acquisition of assets and the choice of funding sources to implement these.

¹ The sources of funds are listed in section 103(2).

² All legislative references are to the Local Government Act 2002 unless otherwise stated.

Related Policies

The Policy on Development Contributions and Financial Contributions provides further analysis, as required by section 106(2)(c). This explains why Council has chosen to use development and financial contributions to fund the capital expenditure needed to meet increased demand for community infrastructure.

The Liability Management and Investment Policy places restrictions on the use of borrowing as a funding source.

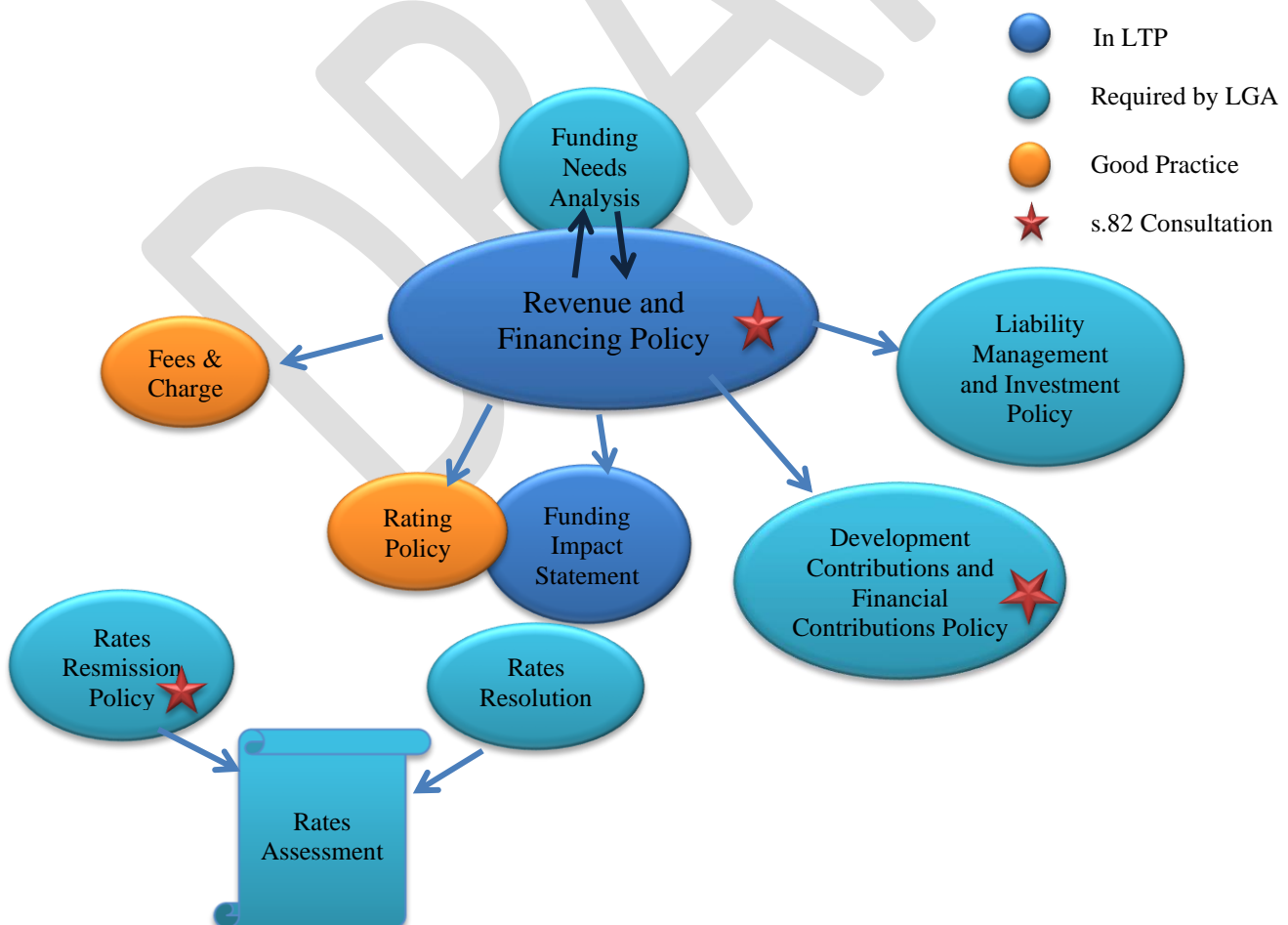
The Rating Policy further clarifies the funding requirements of Council by documenting matters not included in the Rating Funding Impact Statement, rates resolution or this policy.

It includes the allocation of activity rates requirements to different rate types, detailed definitions and maps for rating areas.

The Rating Funding Impact Statement is included in each Long-Term Plan and Annual Plan as required by clauses 15 or 20 of schedule 10 of the LGA. This statement shows the results of the detailed rates calculation for the coming year.

Together the following documents form the necessary components to lawfully charge under the LGA for the revenue requirements of Council. Council must also comply with other legislation in regards to the setting of some fees and charges and the Local Government (Rating) Act 2002 for the setting of rates.

Revenue and Financing Policy Relationships



1. The Funding Needs Analysis (s.101(3)) is informed by the high level policies of the RFP, but the RFP must demonstrate how council has complied with s.101(3).
2. The Investment Policy informs the RFP of investment income sources.
3. The Liability Management Policy, having been informed by the RFP of what borrowing will be needed for, determines how council manages its borrowings.
4. The Policy on Development Contributions and Financial Contributions is informed by the RFP as to when Council needs to use these as a funding source.
5. The Rating Policy contains matters not required to be in the RFP but which support the decisions needed for rate setting under the RFP and Rating Policy into numbers.
6. The Rate Remission Policy amends the Funding Impact Statement for some ratepayers' prior to the issue of the Rates Assessment.
7. The fees and charges schedule is handy to them all in one place.

Previous reviews

Council undertook a major first principles review of its Funding Policy in 2002/03. This review fundamentally altered the allocation of rates liabilities in the district. It saw a move to the current area of a benefit targeted rate system away from the traditional differentiated land value rating system previously in place.

In 2004 Council prepared its first Long Term Council Community Plan (later to be named the Long Term Plan). A requirement of the plan was to every three years include the RFP and thus review and consult on it. The Funding Needs Analysis was incorporated in its entirety in these previous RFPs.

At each review Council has considered particular activities that may need re-analysis. Council does not reconsider all of the options for funding each activity at each review; this would be impractical and inefficient.

Although the policy has been redrafted a number of times to more clearly articulate its purpose there have been only minor amendments to some of the allocations since the policy was first adopted in 2003.

FUNDING SOURCES FOR OPERATING COSTS

Operating costs are the day to day spending that maintains the services delivered by Council. This includes contributions to the wear and tear on assets used (depreciation), interest charged on borrowing and corporate overheads.

Council must consider the funding of each activity in a way that relates exclusively to that activity. Some activities may be best funded by user charges, such as swimming pool admission fees, others with targeted rates such as a water rate, and others from a general rate such as the cost of Council including all of its planning and decision making processes. Distinct funding enables ratepayers or payers of other charges to assess more readily whether or not the cost of the service provided to them, either directly or indirectly, represents good value. They can also more

easily determine how much money is being raised for the service and spent on the service, which promotes transparency and accountability.

The funding sources for operating costs include:

User charges

User charges are used for services where there is a benefit to an individual or group. User charges is a broad group of revenue charged directly to an individual or entity. It includes:

- Entry fees
- Service charges
- Hire
- Rent, lease, licenses for land and buildings
- Permits
- Regulatory charges
- Fines and penalties
- Connection fees
- Disposal fees
- Deposits
- Private works
- Memberships
- Planning and consent fees
- Statutory charges
- Retail sales

The price of the service is based on a number of factors, including:

- The cost of providing the service.
- The estimate of the users' private benefit from using the service.
- The impact of cost to encourage/discourage behaviours.
- The impact of cost on demand for the service.
- Market pricing, including comparability with other councils.
- The impact of rates subsidies if competing with local businesses.
- Cost and efficiency of collection mechanisms.
- The impact of affordability on users.
- Statutory limits.
- Other matters as determined by Council.

Council's ability to impose user charges is limited by the powers conferred to it by many statutes and regulations. As a general rule, fees for statutory functions should be set at no more than the cost of providing the service. In some cases legislation sets the fees at a level that is below cost. In other cases, where provided by legislation (e.g. Waste Minimisation Act 2008) Council may set fees at greater than the cost of providing the service. Council considers it appropriate to incorporate overhead charges in the determination of the cost of providing a service.

Where Council is charging for the sale of goods or services not required by statute, Council's preference is to charge a market price, having regard to the powers conferred by section 12 and the policy on competing with local businesses. This includes leases, rents and licenses for land and buildings.

Actual fees and charges may be set by Council at any time and are reviewed by Council annually. A list of regular fees and charges is maintained on Council's website.

User charges revenue is allocated to the activity which generates the revenue.

Policy of competing with local business

Certain activities earn revenue from retail sales that compete with other businesses in the local community. Where Council is in competition with local

business for discretionary retail activities, the policy is that for Council retail operations rates should not be used to subsidise unfair competition and considers that it is appropriate for Council activities to sell goods and services associated with their operations at market value.

Grants, sponsorship, subsidies and other income

Grants, sponsorship and subsidies are used where they are available. Many of these items are regular and predictable and therefore can be budgeted for. Some items of other income are unexpected or unpredictable and may not be able to be prudently budgeted (e.g. reparation payments, Civil defence and other reimbursements, legal settlements and insurance payouts)

Council expects to continue receiving substantial subsidies for road maintenance from government or its agencies.

Investment income

Council Investment Policy is documented in its Liability Management and Investment Policy. These investments generate income such as dividends, interest, forestry returns and rents.

Each source of income is receipted to the activity that owns the asset.

Council maintains reserve funds and much of the income received by Council is allocated to reserve balances and is not used to reduce rates requirements for operating costs.

Financial contributions

Council collects financial contributions under the Resource Management Act 2001. The purpose of these contributions is outlined in the Waitaki District Plan. Most contributions are made by vesting assets in Council. Some contributions are paid in cash and the Waitaki District Plan allows for some of these contributions to be used for operating expenses.

Council's approach is to deposit receipts into a reserve fund and to withdraw from that fund for specific projects. These projects are in addition to the normal operating budgets but may not meet the accounting definition of capital expenditure (e.g. the establishment of a garden).

Development contributions and proceeds from the sale of assets

Council does not collect revenue from these funding sources to fund operating costs.

Reserve funds

Council maintains reserve funds. These cash reserves have generally come about from unspent rates, investment income or other revenue source in a previous year. Many of these reserve funds are for capital expenditure however, some of these reserve funds are available to meet operating costs.

Council generally uses these funds for the purposes that the reserve was created and usually for new projects additional to normal operating expenditure. Council at times may use these funds to minimise or smooth changes in rates.

Borrowing

Council does not borrow to fund operating costs. This is not allowed under Council's policies on borrowing, documented in the Liability Management and Investment Policy.

Rates

Council funds its remaining operating expenses from rates by being prudent and appropriately exhausting all other funding sources. For many activities this is the main funding source.

Council must determine whether the portion of an activity to be funded from rates is to be funded from the general rate or a targeted rate.

In doing this, while considering all matters of section 101(3), Council placed emphasis on "the area of benefit". By this, Council means that it reviewed each activity and determined where the benefits from the provision of the service is, then chose a rating option that most closely charges that group. Matters which Council has considered are:

Table 1: Council's rating preferences

Type of Benefit	Preferred rating solution
To an area of the district (e.g. town or ward)	Establish targeted rates based on areas defined by map.
To the value of the land	General rate – land value
To the property improvements	Targeted rate – capital value
To people	Uniform annual general charge (where everyone in the district receives a similar level of benefit). Targeted rate – uniform basis

Council has, when considering the requirements of section 101(3)(a), allocated the rate portion of an activity based on whether the activity contributes more to the value of the land, rather than the value of improvements or for the benefit people.

Summary of sources of funding for operating expenditure by activity

Council has applied the above preferences for the use of the funding sources to each activity in its Funding Needs Analysis. The table describes the extent to which each funding source is used, which is expressed in ranges. These ranges are expressed as a percentage of the cost of the activity. A key to interpret the graphics follows the table.

Table 2: Summary of funding sources by activity

Activity	User charges	Grants, subsidies & other	Invest. Income	Fin. Cont.	Dev. Cont.	Reserve Funds	Borrowing	General Rates	Targeted rates
Animal Control	✓	x	x	x	x	x	x	x	x
Parking Enforcement	✓	x	x	x	x	x	x	x	x
Oamaru Harbour - Port Operations	✓	x	x	x	x	✓	x	✓	✓
Community Housing	✓	x	x	x	x	x	x	x	✓
Building Control	✓	x	x	x	x	x	x	✓	x
Residual Waste disposal, closed landfills and waste minimisation	✓		x	x	x	✓	x	✓	x
Waitaki Aquatic Centre	✓	x	x	x	x	x	x	x	✓
Cemeteries	✓	✓	x	x	x	✓	x	✓	x
Waitaki Lakes Camping Grounds	✓	x	x	x	x	x	x	x	✓
Environmental Health	✓	x	x	x	x	x	x	✓	x
Liquor Licensing	✓	x	x	x	x	x	x	✓	x
Oamaru Opera House	✓	✓	x	x	x	x	x	x	✓
Resource Consent Processing and District Planning	✓	x	x	x	x	x	x	✓	x
Roads and Bridges	✓	✓	x	x	x	x	x	x	✓
Commercial Property	x	x	✓	x	x	x	x	x	✓
Forestry	x	x	✓	x	x	x	x	✓	x
Operational Property	x	x	✓	x	x	x	x	x	x
Treasury	✓	✓	✓	x	x	✓	x	x	x
Oamaru Airport	✓	x	✓	x	x	✓	x	x	x
Otago Museum Grant	x	x	x	x	x	x	x	✓	x
Sports Grounds	✓	x	x	x	x	✓	x	✓	x
Noxious Plants	x	✓	x	x	x	x	x	✓	x
Environmental Monitoring and Enforcement	✓	x	x	x	x	x	x	✓	x
Public Toilets	x	✓	x	x	x	x	x	✓	x
Community Safety, Development and Grants	✓	✓	x	x	x	✓	x	✓	x
Tourism Development and Visitor Services	x	x	x	x	x	✓	x	✓	✓
Council	✓	✓	x	x	x	✓	x	✓	✓
Economic Development	✓	✓	x	x	x	✓	x	x	✓
Civil Defence	x	x	x	x	x	x	x	✓	x
Community Planning and Accountability	x	x	x	x	x	x	x	✓	✓
Waitaki Community Recreation Centre	✓	x	x	x	x	x	x	✓	✓
Community Boards	x	x	x	x	x	x	x	✓	✓
Oamaru Harbour - Coastal Protection	x	x	x	x	x	x	x	x	✓
Stormwater	x	x	x	x	x	x	x	x	✓
Town Centre Services - Township Works	x	x	x	x	x	x	x	x	✓

Christmas Decorations	x	✓	x	x	x	x	x	x	✓
Waihemo Service Centre	x	x	x	x	x	x	x	x	✓
Waitaki District Libraries (including Archives)	✓	✓	x	x	x	✓	x	x	✓
Water Supplies	✓	x	✓	x	x	x	x	x	✓
Oamaru Public Gardens	✓	x	x	x	x	✓	x	x	✓
Reserves, and Open Spaces	✓	x	x	x	x	✓	x	x	✓
Forrester Gallery and North Otago Museum	✓	✓	x	x	x	x	x	x	✓
Public Halls and Community Centres	✓	x	✓	x	x	✓	x	x	✓
Waste Water	✓	✓	✓	x	x	x	x	x	✓

Key

Range Name	Range	Key
Unlikely	0	x
Minimal	0% -20%	✓
Low	20% -40%	✓
Moderate	40% - 60%	✓
High	60% - 80%	✓
Most	80% - 100%	✓
All	100%	✓

Council budgets will normally be set within these ranges. As these ranges are expressed as a percentage of the cost of the activity, they may change over time because of changes in expenditure rather than changes in revenue. If budgets were marginally outside these ranges, it is unlikely that Council will consider that matter to have a high degree of significance and therefore warrant a consultation to change the RFP. It is also likely that actual funding sources will be different from the budgeted funding sources.

FUNDING SOURCES FOR CAPITAL COSTS

Capital costs are those costs associated with the purchase and improvement of assets and for the repayment of debt. The funding sources for capital costs include:

User charges

User charges are generally not available for funding capital costs as individual user contributions are generally too large to be affordable. Borrowing and charging users annually for financing costs (interest and principal) via rates is often a more affordable method of charging user contributions.

Council does charge for capital works that are solely for private benefit (e.g. a network extension to a single dwelling) or where capital works are done outside of asset management plans at the request of individuals (e.g. a rural seal extension for dust suppression).

Grants, subsidies, and other income

Council relies on a significant subsidy for capital works for its roads and bridges activity. Other activities are able to access grants and subsidies from time to time. Other income can be from many and varied sources and is unlikely to be predictable enough to budget for in advance. Other income used to fund capital expenditure

could include bequests, insurance payouts, and legal settlements. Grants, subsidies and other income are used wherever they are available.

Development contributions

Council collects development contributions to fund capital expenditure, necessary to service growth over the long-term.

Council has a Policy on Development Contributions and Financial Contributions, where most contributions receipted are transferred to reserve accounts or loan accounts³. The funds collected under this policy will be applied to the projects identified by the policy. Projects identified in the policy may be either completed projects (with debt yet to be repaid from future development contributions), or future projects planned to be undertaken.

Note that, in addition to the requirements of sections 101(3) and 103 the Policy on Development Contributions and Financial Contributions additionally describes funding matters further as stipulated by section 106(2)(c).

Financial contributions

Council collects financial contributions under the Resource Management Act 2001. The purpose of these contributions is outlined in the Waitaki District Plan. Most contributions are received as revenue by the vesting of assets in Council; some contributions (reserve contributions) are paid to Council.

Council's approach is to deposit receipts into a reserve fund and to draw funds from that account for specific projects that meet the purpose for which the funds were collected.

Proceeds from the sale of assets

From time to time Council disposes of assets. Many of these are low value items and the revenue is received by the activity that owns the assets.

Council's property activity holds some higher value assets that are intended for sale. Unrestricted proceeds from the sale of these assets will be used to repay debt held by the property activity, unless resolved otherwise by Council. Restricted revenues will be placed in a reserve fund and used for the purpose required by the document that imposes the restriction (e.g. endowments).

Reserve funds

Council maintains various reserve funds for capital projects and will approve the use of the funds when a project meets the specific criteria of the reserve. These reserve funds may include bequests, depreciation or asset renewal reserves, financial contribution reserves, and development contribution reserves.

Borrowing

For larger capital projects that provide a long-term benefit to the community, Council may determine that borrowing the funds is an appropriate method of allocating the costs of a project over time to users.

³ Many growth developments are undertaken in anticipation of growth. The growth portion of the project is funded from borrowing. When this occurs development contribution receipts are used to repay the debt.

Borrowing, both the capital (principal) and interest components, is generally repaid by future rates. Council may resolve to capitalise interest repayments on some debt, where it considers it most likely (prudent) that another funding source (e.g. property sales or development contributions) will be able to repay the accumulating debt.

Where it is not practical to obtain third party revenue and where reserve funds haven't previously been set aside, Council prefers borrowing as a funding source. Borrowing spreads the cost of the project over a longer period, smoothing changes in rates and contributing to help achieve intergenerational equity.

Rates

Rates are used firstly to fund day to day expenses, including depreciation and borrowing interest costs. A portion of rates funds the capital (principal) repayments of debt, generally using table loan calculations. Rates will be used to fund some small items of capital expenditure. Rates are not a practicable method to fund large projects in the year of expenditure.

Council will fund in advance some capital projects that will maintain service levels by collecting rates for depreciation (an operating expense). These funds are placed in depreciation or asset renewal reserve funds until they are required.

Analysis for capital expenditure by activity

Council has applied the above preferences for the use of the funding sources for capital to each activity in its Funding Needs Analysis. Council will fund capital costs on the same basis as determined for operating costs, unless Council resolves otherwise. It is not practicable to determine a funding policy for an unknown future project at this time.

Council uses the following guidelines when considering the funding of capital projects:

- All projects are first funded from grants, subsidy or other income.
- Renewal projects that maintain service levels are then funded from reserves set aside for this purpose.
- Growth projects for network infrastructure that are required to meet increased demand are funded from development contributions.
- Other reserve funds (e.g. financial contributions) are considered.
- Lump sum rating options are considered.
- Capital projects that have exhausted previous funding sources or are for new or increased service levels or for growth in non-network infrastructure are then funded from borrowing.

A single project may have a mix of each of these funding options.

Generally, it is not practical to create separate funding policies for each and every capital project. Council will only do this when a project is particularly large, affects a particular group or does not fit with an existing funding policy or activity. Whenever Council resolves to consider a separate funding policy it will consider the sources of funds above, the RFP and complete a section 101(3) assessment to determine an appropriate funding policy for the project. Generally Council will resolve the funding policy at the time the project is proposed in an Annual Plan or Long-Term Plan.

RATES

General rates

The general rate is allocated to properties based on the value of that property. Council has chosen to use land value as the basis by which to calculate the amount of rates to allocate to each property. Subsequently, Council has chosen to have an undifferentiated general rate (i.e. every fully rateable property pays the same rate in the dollar). In considering the area of benefit approach, Council has allocated the cost of activities to the general rate where Council has determined there is a primary benefit to the use or value of the land.

Council has determined in its Funding Needs Analysis that all or part of the following activities should be funded from the General Rate:

- Council
- Community Boards
- Community planning and accountability
- Noxious plants
- Resource consent processing and district planning
- Forestry
- Sports grounds
- Oamaru harbour - port operations
- Waitaki community recreation centre

The uniform annual general charge is allocated to each separately used or uninhabited part of a rating unit⁴. The uniform annual general charge is used to fund activities where Council has determined that the primary benefit is to people and that all people in the district receive a similar benefit.

Council has determined in its Funding Needs Analysis that all or part of the following activities should be funded from the uniform annual general rate:

- Building control
- Environmental health
- Liquor licensing
- Otago museum grant
- Tourism development and visitor services
- Cemeteries
- Environmental monitoring and enforcement
- Residual waste disposal, closed landfills, and waste minimisation
- Sports grounds
- Public toilets
- Civil defence
- Community safety, development and grants

Targeted rates

Owing to the widespread nature of the district, distance from services and variability of services, Council has developed a rating system with a strong emphasis on the use of targeted rates.

Council views the use of targeted rates as creating a much more transparent and equitable allocation of the cost of services.

Council has determined in its Funding Needs Analysis that all or part of the following activities should be funded from the targeted rates:

⁴ Separately used or inhabited part of a rating unit – is a factor listed in the Local Government (Rating) Act 2002 - Schedule 2, which Council may use for the charging of rates. Each council is required to define this term in the Funding Impact Statement in each Long-term Plan and Annual Plan.

- Council
- Community Boards
- Roads and bridges
- Town centre services - township works
- Town centre services – Christmas decorations
- Economic development
- Oamaru harbour - coastal protection
- Oamaru harbour - port operations
- Public halls and community centres
- Water supplies
- Waste water
- Stormwater
- North Otago museum
- Forrester gallery
- Waitaki district libraries
- Oamaru public gardens
- Community housing
- Waitaki lakes camping
- Reserves and open spaces
- Waitaki aquatic centre
- Waitaki community recreation centre
- Oamaru opera house
- Community planning and accountability
- Waihemo service centre
- Tourism development and visitor services
- Commercial property
- Parking enforcement

In funding the above activities, Council uses the following types of targeted rates. More information on the calculation of each rate, including the percentage of the rate requirement of an activity to be collected for each rate, and the rating area maps can be found in the Rating Policy.

Table 1: Targeted rate types

Name	Activities funded	Basis for Rate
District services rate	Activities that Council considers to benefit every property in the district.	Capital value across whole district.
Ward services rate	Activities that Council considers to benefit a ward.	Capital value across each ward.
Ward services charge	Activities that Council considers to benefit a ward.	Uniform charge across each ward to every separately used or inhabited part of a rating unit.
Community Board rate	Activities that Council considers are directed by the community within a ward's choice to have a community board.	Land value across each ward with a community board.
Oamaru business area rate	Activities that Council considers to benefit the business area.	Capital value set differentially based on use and location of the rating unit.
Oamaru urban area rate	Activities that Council considers to benefit the Oamaru urban area.	Uniform charge across the Oamaru urban area to every separately used or inhabited part of a rating unit.
Loan rates	For reasons of public safety or due to private benefit Council may agree to fund the private benefit of works by specific local rates on targeted properties.	Uniform charge to each identified rating unit.

Roading Rate	To fund roads, bridges and related activities.	Capital value rate across the district set differentially. There are 4 differentials based on use; hydroelectric power generation, mining and mineral extraction, forestry and other uses.
Local amenity rate	To fund those activities that provide local amenity to townships.	Land value rate across each property within a town area.
Public hall rates	To fund public halls and community centres.	Uniform charge to each separately used or inhabited part of a rating unit within a hall area.
Sewerage rates	To fund sewerage treatment and disposal.	Uniform charge to each water closet set differentially to connected water closets and serviceable rating units.
Water rates	To fund water supply.	Uniform charge for each connected property based on location, the nature of connections, volume of water supplied, the number of connections, or serviceability.
Construction loan rates	To fund significant capital upgrades to sewerage and water schemes per serviced rating unit within a defined boundary.	Uniform charge for each connected or serviceable property.

OVERALL FUNDING CONSIDERATION

Council is required by section 101(3)(b) to consider the overall impact of the allocation of liability for revenue needs on the community. It allows Council, as a final measure, to modify the overall mix of funding in response to these considerations.

1. Council is required to adjust the total amount collected from the 'uniform annual general charge' portion of the general rate to be within the 30% rule.⁵ If the sum of the activities to be funded from the uniform annual general charge is more than the 30% cap, Council will adjust the rate down to the cap and the balance will be funded from the general rate.
2. Council may use accounting provisions and reserve funds to spread the costs of activities over multiple years for the purpose of smoothing the cost to users and ratepayers.
3. Council may waive or discount fees and charges where it considers it appropriate to do so. Some matters Council may consider when deciding whether it is appropriate to waive fees are:
 - a. for social reasons,
 - b. for the promotion of events and facilities
 - c. for commercial reasons

⁵ Local Government Rating Act 2002 - s.21

- d. due to poor or interrupted service provision
- e. to minimise risk.

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