



AGENDA

ORDINARY COUNCIL MEETING

TIME: 6.00 PM

4 JULY 2019

CITY OF STIRLING

*Constituent Members: Cities of Perth, Joondalup, Stirling, Vincent and Wanneroo
Towns of Cambridge and Victoria Park*



**MINDARIE REGIONAL COUNCIL
NOTICE OF MEETING**

21 JUNE 2019

Councillors of the Mindarie Regional Council are advised that an Ordinary Meeting of the Council will be held in the Council Chambers of the City of Stirling, 25 Cedric Street, Stirling at 6 pm on 4 July 2019.

The agenda pertaining to the meeting follows.

Your attendance is respectfully requested.



GÜNTHER HOPPE
CHIEF EXECUTIVE OFFICER

MINDARIE REGIONAL COUNCIL - MEMBERSHIP

Cr D Boothman JP (David) - Chair	City of Stirling
Cr M Norman (Mike) – Deputy Chair	City of Joondalup
Cr R Fishwick (Russ)	City of Joondalup
Cr E Lumsden (Eric)	City of Perth
Cr S Migdale (Suzanne)	City of Stirling
Cr K Sargent (Keith)	City of Stirling
Cr S Proud JP (Stephanie)	City of Stirling
Cr E Cole (Emma)	City of Vincent
Cr R Driver (Russell)	City of Wanneroo
Cr F Cvitan JP (Frank)	City of Wanneroo
Cr K Shannon (Keri)	Town of Cambridge
Cr K Vernon (Karen)	Town of Victoria Park

NB: Although some Councils have nominated alternate members, it is a requirement that a Council carries a specific resolution for each occasion that the alternate member is to act.

CONTENTS

1	DECLARATION OF OPENING / ANNOUNCEMENT OF VISITORS.....	4
2	ELECTION OF THE CHAIRPERSON	4
3	ELECTION OF THE DEPUTY CHAIRPERSON.....	4
4	ATTENDANCE / APOLOGIES / LEAVE OF ABSENCE	4
5	DECLARATION OF INTERESTS.....	4
6	PUBLIC QUESTION TIME	4
7	ANNOUNCEMENTS BY THE PRESIDING PERSON.....	4
8	APPLICATIONS FOR LEAVE OF ABSENCE	5
9	PETITIONS / DEPUTATIONS / PRESENTATIONS	5
10	CONFIRMATION OF MINUTES OF PREVIOUS MEETING	5
	10.1 ORDINARY COUNCIL MEETING – 11 April 2019	5
11	CHIEF EXECUTIVE OFFICER REPORTS	6
	11.1 FINANCIAL STATEMENTS FOR THE MONTHS ENDED 31 MARCH 2019 AND 30 APRIL 2019	6
	11.2 LIST OF PAYMENTS MADE FOR THE MONTHS ENDED 31 MARCH 2019 AND 30 APRIL 2019	8
	11.3 BUDGET APPROVAL - FINANCIAL YEAR 2019/20.....	9
12	MEMBERS INFORMATION BULLETIN – ISSUE NO. 48	17
13	MOTIONS OF WHICH PREVIOUS NOTICE HAS BEEN GIVEN	17
	13.1 NOTICE OF MOTION – CR RUSS FISHWICK CHANGE IN MEETING TIMES	17
	13.2 NOTICE OF MOTION – CR MIKE NORMAN HOUSEHOLD HAZARDOUS WASTE	17
14	URGENT BUSINESS.....	19
15	QUESTIONS BY MEMBERS OF WHICH DUE NOTICE HAS BEEN GIVEN.....	19
16	NEXT MEETING.....	19
17	CLOSURE	19

1 DECLARATION OF OPENING / ANNOUNCEMENT OF VISITORS

2 ELECTION OF THE CHAIRPERSON

Nominations for the office of Chairperson close at 6.00 pm on 4 July 2019.

The CEO will conduct the election of the Chairperson.

The Councillor elected will be required to make the declaration of office of the Chairperson of the MRC.

3 ELECTION OF THE DEPUTY CHAIRPERSON

Nominations for the office of Deputy Chairperson close at 6.00 pm on 4 July 2019.

The Chairperson will conduct the election of the Deputy Chairperson.

The Councillor elected will be required to make the declaration of office of the Deputy Chairperson of the MRC.

4 ATTENDANCE / APOLOGIES / LEAVE OF ABSENCE

5 DECLARATION OF INTERESTS

Declaration of Financial/Conflict of Interest to be recorded prior to dealing with each item.

Disclosure of Financial and Proximity Interests

- (a) *Members must disclose the nature of their interest in matters to be discussed at the meeting. (Section 5.65 of the Local Government Act 1995).*
- (b) *Employees must disclose the nature of their interest in reports or advice when giving the report or advice to the meeting. (Sections 5.70 and 5.71 of the Local Government Act 1995).*

Disclosure of Interest Affecting Impartiality

- (a) *Members and staff must disclose their interest in matters to be discussed at the meeting in respect of which the member or employee has given or will give advice.*
- (b)

6 PUBLIC QUESTION TIME

7 ANNOUNCEMENTS BY THE PRESIDING PERSON

8 APPLICATIONS FOR LEAVE OF ABSENCE

9 PETITIONS / DEPUTATIONS / PRESENTATIONS

10 CONFIRMATION OF MINUTES OF PREVIOUS MEETING

10.1 ORDINARY COUNCIL MEETING – 11 April 2019

The Minutes of the Ordinary Council Meeting held on 11 April 2019 have been printed and circulated to members of the Council.

RESPONSIBLE OFFICER RECOMMENDATION

That the Minutes of the Ordinary Council Meeting of Council held on 11 April 2019 be confirmed as a true record of the proceedings.

11 CHIEF EXECUTIVE OFFICER REPORTS

11.1	FINANCIAL STATEMENTS FOR THE MONTHS ENDED 31 MARCH 2019 AND 30 APRIL 2019
File No:	FIN/5-07
Appendix(s):	Appendix No. 1 Appendix No. 2
Date:	27 May 2019
Responsible Officer:	Director Corporate Services

SUMMARY

The purpose of this report is to provide financial reporting in line with statutory requirements which provides useful information to stakeholders of the Council.

BACKGROUND

Reporting requirements are defined by Financial Management Regulations 34 of the Local Government (Financial Management) Regulations 1996.

The financial statements presented for each month consist of:

- Operating Statement by Nature – Combined
- Operating Statement by Nature – RRF Only
- Operating Statement by Function
- Statement of Financial Activity
- Statement of Reserves
- Statement of Financial Position
- Statement of Investing Activities
- Information on Borrowings
- Tonnage Report

DETAIL

The Financial Statements are for the months ended 31 March 2019 and 30 April 2019 and are attached at **Appendix No. 1 and 2** to this Item. The Tonnage Report for the 10 months to 30 April 2019 is attached at **Appendix No. 3**.

The complete suite of Financial Statements which includes the Operating Statements, Statement of Financial Position, Statement of Financial Activity and other related information are reported on a monthly basis.

The estimates for Provisions for Amortisation of Cell Development, Capping and Post Closure expenditure are based on the estimated rates per tonne calculated with reference to estimated excavation cost of various stages of the landfill and the life of the landfill. An adjustment is made (if necessary) at the end of the year based on actual tonnages on a survey carried out to assess the “air space” remaining and other relevant information.

Summary of results for the year to date period ended 30 April 2019

	Actual	Budget	Variance
	t	t	t
Tonnes – Members	216,917	220,188	(3,271)
Tonnes – Others	11,526	12,826	(1,300)
TOTAL TONNES	228,443	233,014	(4,571)
	\$	\$	\$
Revenue – Members	44,219,043	44,980,305	(761,262)
Revenue – Other	4,008,845	4,399,961	(391,116)
TOTAL REVENUE	48,227,888	49,380,266	(1,152,378)
Expenses	45,749,630	46,009,716	260,087
Profit on sale of assets	7,394	7,394	-
Loss on sale of assets	8,870	-	(8,870)
NET SURPLUS	2,476,783	3,377,944	(901,161)

Commentary

Member tonnes for the year to date are 3,271 tonnes behind phased budget, which is mainly as City of Joondalup move to the three bin system.

The net result variance against budget of \$901,161 is mainly explained by budgeted tonnage related expenditure and RRF operating expenditures. The net surplus as at 30 April 2019 is \$2,476,735.

RRF

The Resource Recovery Facility residue tonnes are slightly below budget by 99 tonnes as they catch up after the scheduled maintenance closedown and FOGO trial.

Trade & Casual

The Casual and Trade tonnages are 1,300 tonnes lower than forecast for the financial year as trade customers find alternative options for waste disposal

Overall for the period ended 30 April 2019, the tonnes received are 4,571 tonnes below phased budget.

VOTING REQUIREMENT

Simple Majority

RESPONSIBLE OFFICER RECOMMENDATION

That the Financial Statements set out in Appendix No. 1 and 2 for the months ended 31 March 2019 and 30 April 2019 are received.

11.2	LIST OF PAYMENTS MADE FOR THE MONTHS ENDED 31 MARCH 2019 AND 30 APRIL 2019
File No:	FIN/5-06
Appendix(s):	Appendix No. 4 Appendix No. 5
Date:	28 May 2019
Responsible Officer:	Director Corporate Services

SUMMARY

The purpose of this report is to provide details of payments made during the periods identified. This is in line with the requirement under the delegated authority to the Chief Executive Officer (CEO), that a list of payments made from the Municipal Fund since the last Ordinary Council meeting be presented to Council.

COMMENT

The lists of payments for the months ended 31 March 2019 and 30 April 2019 are at **Appendix 4 and 5** to this Item and are presented to Council for noting. Payments have been made in accordance with the delegated authority to the CEO which allows payments to be made between meetings. At the Ordinary Council Meeting held on 6 September 2018, the Council delegated to the CEO the exercise of its power to make payments from the Municipal Fund. In order to satisfy the requirements of Clause 13(2) of the Local Government (Financial Management) Regulations, a list of payments made must be submitted to the next Council meeting following such payments.

It should be noted that generally all payments are GST inclusive and the Mindarie Regional Council is able to claim this tax as an input credit when GST remittances are made each month to the Australian Tax Office.

Months Ended	Account	Vouchers	Amount
31 March 2019	General Municipal	Cheques	\$7,789.87
		EFT	\$4,243,292.76
		DP	\$136,855.80
		Inter account transfers	\$1,800,000.00
		Total	\$6,187,938.43
30 April 2019	General Municipal	Cheques	\$7,652.74
		EFT	\$6,191,269.44
		DP	\$138,812.52
		Inter account transfers	\$4,200,000.00
		Total	\$10,537,734.70

VOTING REQUIREMENT

Simple Majority

RESPONSIBLE OFFICER RECOMMENDATION

That the list of payments made under delegated authority to the Chief Executive Officer, for the months ended 31 March 2019 and 30 April 2019, be noted.

11.3	BUDGET APPROVAL - FINANCIAL YEAR 2019/20
File No:	FIN/146
Appendix(s):	Appendix No. 6
Date:	14 April 2019
Responsible Officer:	Director Corporate Services

SUMMARY

The purpose of this item is to present the Budget for 2019/20 to the Council for approval and adoption.

BACKGROUND

The 2019/20 budget process commenced in March 2019 and included one workshop held with Councillors and Officers on 11 April 2019.

The underlying operating budget has been developed from a 'zero base' in discussion with the managers across the business and has been reviewed in detail to ensure that the Mindarie Regional Council (MRC) continues to deliver its current service offering in an efficient, cost effective manner and in line with the Waste Strategy 2030.

The budget has been premised largely on a 'business-as-usual' basis. In addition to the MRC's normal operations however, \$340k for new leachate processing infrastructure has been included.

Some of the key points with regard to the 2019/20 budget include:

- No increase to the Members gate fee or the non-members gate fee for 2019/20 budget.
 - A decrease in expected Member tonnes from 267,924 to 260,584 tonnes (2.5%) based on information provided by the member councils.
 - No increase to the non-member tonnes remaining at 15,800 tonnes.
 - The inclusion of \$350k of ongoing project costs for the Face Your Waste campaign.
 - No increase to the landfill levy remaining at \$70 per tonne landfilled.
-

DETAIL

Budget 2019/20

The Budget for 2019/20 has been set to achieve a \$1.85 million surplus. The proposed surplus has been set intentionally to assist with the funding of long-term site post closure liabilities.

Significant changes in year-on-year operating costs are outlined in more detail below:

Employee costs

Employee costs have increased by \$479k which is driven by an assumed 2% salary increase, face your waste funded staff, new operations admin position and cover for the reuse shop longer opening hours.

Consultants and contract labour

Consultants and contract labour has decreased by \$497k mainly due to future MRC modelling costs and FOGO trial not being needed for the 19/20 budget year as they were all funded in the 18/19 budget year.

Landfill expenses

Landfill expenses have increased by \$412k due to the increased focus on environmental management of Ground water, Gas, Leachate and Odour.

RRF costs

The RRF costs have increased by \$1.3m directly attributed to the increase in budgeted tonnage from 100,000 tonnes to 105,000 tonnes and contractual indexed increase in the contractor's fees.

Depreciation

Depreciation has decreased by \$439k due to being rebased following the 18/19 external valuations.

DWER Landfill Levy

The Department of Water and Environmental Regulation (DWER) landfill levy expense has decreased by \$687k which primarily reflects the decrease of tonnes being landfilled for the year.

Tonnages

Approximately 260,584 tonnes (Mid-Year Budget 2018/19: 267,924 tonnes) of waste are expected to be delivered to the MRC by Member Councils during the course of the year.

Of this, 105,000 tonnes (Budget 2018/19: 100,000 tonnes) is expected to be diverted to the RRF, which will in turn generate 51,135 tonnes (Budget 2018/19: 48,700 tonnes) of residue which will be sent back to Tamala Park. The RRF waste diversion target is set at 51.3%, However, this may change as Council's amend their bin systems.

Non-members are expected to deliver 15,800 tonnes (Budget 2018/19: 15,800 tonnes) to Tamala Park.

Capital Expenditure

The following capital expenditures have been included in the Budget for 2019/20:

New capital expenditures

		\$
• Computer equipment		90,000
- Repl. Core switch	12,000	
- Network Rack for UPS	8,000	
- Navision system upgrade	70,000	
• Furniture and Fittings		67,600
- Repl. Air conditioning units	67,600	
• Plant and equipment		381,476
- Repl. Fire Ute	85,000	
- Repl. Kia Grand Carnival	47,000	
- Repl. ADC Tarps	36,000	
- Repl. Hooklift bins	45,000	
- Vehicle litter vacuum	32,000	
- Dinosaur water canon	10,000	
- 3 x Hooklift bin modifications	60,000	
- Odour irrigation – Landfill	16,476	
- Hooklift tines for Loader	50,000	
• Buildings		70,000
- Upgrade Admin toilets	20,000	
- Upgrade recycling security	50,000	
• Infrastructure (incl. Landfill)		1,149,816
- Repl. Trash pump	5,000	
- Upgrades MRC Infrastructure	150,000	
- Landfill access ramp	50,000	
- CDS Footprint infrastructure	70,000	
- Repl. Western boundary fence	110,000	
- Irrigation upgrade	10,000	
- Gas monitoring bores	150,000	
- Vapour Pods	5,600	
- Solar hot water (leachate)	340,000	
- Repl. Gas monitor	17,000	
- Pumps	22,000	
- Cell Development	200,216	
- Visual Barrier North Stage 2	20,000	

1,758,892

Carried forward capital expenditures

• Repl. Toyota forklift	35,000
• Cardboard compactor project	102,000
• Transfer station extension	200,000
• Recycling centre alignment	160,000
• Leachate treatment project	347,000

Total Capital expenditure

2,602,892

Reserves

The revised Cash Backed Reserves with the projected balances at 30 June 2019 are expected to be as follows:

Site rehabilitation Reserve

Estimated balance at 30 June 2020: \$14,788,715

Purpose: *To be used to fund post closure site rehabilitation costs associated with the Tamala Park landfill site.*

A transfer of \$1,705,771 to this reserve is anticipated during the course of the 2019/20 financial year with no anticipated drawdowns on the reserve.

This will result in a funded reserve of approximately \$14.7 million to cover an estimated post closure liability of approximately \$16.7 million. Any unfunded portion of the post closure liabilities will need to be funded over the remaining life of the landfill or from the audited surplus of the financial year 18/19.

Reserve for Capital Expenditure

Estimated balance at 30 June 2020: \$1,780,082

Purpose: *To be used to fund the ongoing capital expenditure requirements.*

A transfer of \$2,602,892 to this reserve is anticipated during the course of the year with drawdowns to fund capital expenditures.

Participants' Surplus Reserve Account

Estimated balance at 30 June 2020: \$2,000,000

Purpose: *To be used to fund any deficit or part of a deficit as shown in the annual financial report of the MRC.*

No allocations are proposed to this reserve in the 2019/20 financial year.

Carbon Abatement Reserve

Estimated balance at 30 June 2020: \$491,076

Purpose: *To be used to fund carbon abatement projects.*

MRC plan to investigate the suitability of solar being installed to the new recycling shop upon completion of the renovations.

Surplus

The budget shows a forecast surplus of \$1.85 million. It is proposed that the surplus will be allocated in part to the Site Rehabilitation Reserve and in part to the re-establishment of the participants' surplus reserve.

Funding Plan

- Operational expenditures will be funded from the proceeds of the Members' and Non-members' gate fees.
- Capital Expenditure will be funded from the Capital Expenditure Reserve.

SUMMARY OF APPENDICES

Attachment to this Item is as follows:

- Appendix No. 6 – Statutory Budget and Supplementary Information

CONSULTATION

One workshop for Councillors and Officers was conducted in April 2019 to discuss the 2019/20 Budget. The participants indicated that they did not feel a second budget workshop was required. Feedback from the workshop has been taken into account in compiling this final draft of the budget.

STATUTORY ENVIRONMENT

Budget approval is required by end of August 2019 in accordance with section 6.2 of the Local Government Act 1995 (as amended).

Modifications of existing reserves and creation of new reserves is done in compliance with section 6.11 of the Local Government Act 1995 (as amended).

POLICY IMPLICATIONS

The 2019/20 budget process is consistent with existing MRC policy.

FINANCIAL IMPLICATIONS

The Members' gate fee will be set at \$205 per tonne (excluding GST) for the 2019/20 financial year.

The Non-members' gate fee will be set at \$192.72 per tonne (excluding GST) for the 2019/20 financial year.

An estimated surplus of \$1.85 million is budgeted for the 2019/20 financial year.

Capital expenditure of \$2,602,892 is budgeted for the 2019/20 financial year, of which \$844,000 is carry forward expenditure.

STRATEGIC IMPLICATIONS

The Budget for 2019/20 has been derived from the MRC's Strategic Community Plan, the Corporate Business Plan, the Asset Management Plan, the Workforce Plan and the 20 year Financial Plan and is consistent with these documents, in compliance with section 6.2(2) of the Local Government Act 1995 (as amended).

In developing the 2019/20 budget, the funding required for the activities outlined in the Corporate Business Plan have been taken into account.

VOTING REQUIREMENT

Absolute Majority

ADDITIONAL COMMENTS

Subsequent to the budget workshop held on 11 April, 2019 the following adjustments have been made to the budget:

- Capital Expenditure: \$297,000 bought forward from 2018/19 for ongoing projects.
- Profit/Loss on sales of assets: \$113,445 quoted estimates added.
- Operational Expenses: \$43,200 minor changes across the budget.

The Members' gate fee has not been adjusted for the impacts of any of these changes.

RESPONSIBLE OFFICER RECOMMENDATION

That Council:

- (i) adopt the Budget for the Mindarie Regional Council for 2019/20 financial year
- (ii) endorse the on-going strategy of deferred payment of operational surpluses, as approved by Council at its August 2005 meeting, for the 2005/06 financial year and future years to meet its on-going capital requirements
- (iii) Approve the Capital Budget Program of \$2,602,892 for 2019/20 as follows:

New capital expenditures

	\$
• Buildings	70,000
• Office furniture and equipment	67,600
• Computer equipment	90,000
• Plant and equipment and vehicles	381,476
• Infrastructure	<u>1,149,816</u>
	1,758,892

Carried forward capital expenditures

• Repl. Toyota Forklift	35,000
• Cardboard compactor project	102,000
• Transfer station extension	200,000
• Recycling centre alignment	160,000
• Leachate treatment project	<u>347,000</u>
	844,000

Total Capital expenditure **2,602,892**

- (v) approve that \$405,771 will be transferred from the Operating Surplus to the Site Rehabilitation Reserve.
- (vi) Approve that \$1,300,000 will be transferred from Retained Earnings to the Site Rehabilitation Reserve
- (vii) approve that \$2,60,2892 be transferred from the Reserve for Capital Expenditure to Operating Surplus to fund capital expenditures.
- (viii) Approve that \$250,000 will be transferred Operating surplus to the RRF Maintenance reserve
- (ix) approve that any funds required for carbon abatement projects be transferred from the Carbon Abatement Reserve to the Operating Surplus.
- (x) approve that all interest earned on cash funds associated with cash-backed reserves will not be credited to the respective reserves.

(Absolute Majority Required)

12 MEMBERS INFORMATION BULLETIN – ISSUE NO. 48

RESPONSIBLE OFFICER RECOMMENDATION

That the Members Information Bulletin Issue No. 48 be received.

13 MOTIONS OF WHICH PREVIOUS NOTICE HAS BEEN GIVEN

13.1 NOTICE OF MOTION – CR RUSS FISHWICK – CHANGE IN MEETING TIMES

In accordance with *clause 3.13(2) of the Mindarie Regional Council Standing Orders Local Law 2010*, Cr Fishwick has given notice of his intention to move the following Motion:

That future Ordinary Council Meetings of the Mindarie Regional Council commence at 6.30 pm to provide Council Members with an additional 30 minutes to travel to meetings.

REASON FOR MOTION:

The current commencement time of 6.00pm for Ordinary Meetings of the Mindarie Regional Council can be problematic for some Council Members who are employed and required to travel some distance across the metropolitan area at peak hour to attend meetings at Member Council Administration Buildings. By delaying the commencement of future meetings by 30 minutes would ensure that Council Members and for that matter relevant staff have sufficient time in which to attend the commencement of meetings.

13.2 NOTICE OF MOTION – CR MIKE NORMAN – HOUSEHOLD HAZARDOUS WASTE

In accordance with *clause 3.13(2) of the Mindarie Regional Council Standing Orders Local Law 2010*, Cr Norman has given notice of his intention to move the following Motion:

That the CEO prepare a report to council for their consideration, outlining the cost and logistics involved in the MRC undertaking a limited trial of a “HHW Toxic Taxi Service” for the on-demand collection of Household Hazardous Waste (HHW) from the residents of the MRC’s member councils.

The report should cover:

1. The area and population base to be covered as part of a limited trial of 12 months;
 2. Which HHW items could be included in the trial service, noting that the list will be as comprehensive as possible;
 3. The cost of the limited trial and the impact that it would have on the members’ gate fee;
 4. How the service would be marketed;
 5. How the improvement in intercepting HHW, that would otherwise go to landfill, will be measured; and
 6. How the scheme would function.
-

REASON FOR MOTION:

There are many authorities around the world that operate such a service and have done so for a decade or more.

It is intended to intercept HHW from those residents who are unlikely to properly dispose of HHW unless it is easy and convenient for them.

This would complement any HHW services that already operate (eg community collection stations, school battery collection program, HHW drop-off days, self-haul to Tamala Park and Balcatta), noting that some of those do not deal with the full range of HHW.

It could involve a window of pick-up from a pre-determined safe pick-up location at each dwelling (that is out of public view,). The pick-up window would allow a vehicle to do multiple pick-ups in a single trip more efficiently. Commercial quantities would not be collected for free, but could be for a fee.

It completes the home based waste sorting approach of the 2 or 3 bin systems, as HHW cannot be disposed of in either system. It will help keep HHW out of the landfill, compost and recyclables waste streams.

The cost of such a service would be reflected in the MRC gate fee, which of course, may cause some objection from member councils unless the impact was minor.

The concept would be best tested with a limited trial of not more than 12 months in duration and no more than 1 or 2 LGAs. It is envisaged that the end of the trial, the CEO will report on the outcomes of the trial and the cost of rolling out the service to all member LGAs.

If the trial proves successful, it may be a good initiative to attract Waste Authority grant funding to cover set-up/ licensing/ educational development costs, given it would be the first such service in WA, if not Australia.

Based on the MRC's recent waste audits, approximately 1% of the waste stream currently going to landfill is comprised of hazardous waste and this service would assist in reducing the contamination of our various waste streams.

14 URGENT BUSINESS

15 QUESTIONS BY MEMBERS OF WHICH DUE NOTICE HAS BEEN GIVEN

16 NEXT MEETING

Next meeting to be held on Thursday 19 September 2019 in the Council Chambers at the City of Vincent commencing at 6.00 pm.

17 CLOSURE
