QUARTERLY REPORT

Quarter 2: 1 October to 31 December 2015



WorkSafe New Zealand's highlights for the quarter include:

- Release to staff of training material on key concepts and implementation of the Health and Safety at Work Act 2015 (HSWA), and internal rollout of HSWA eLearning modules.
- Finishing the National Construction Roadshow in November, completing 37 events with just under 4,000 builders and tradies attending.
- Work underway with ACC on injury prevention plan, intelligence gathering on Workforce Development nearing completion, progress on Health and Safety Representative training, and finalising terms and conditions for the preferred supplier in the ICT project.

Leadership and Engagement

- Board Chair Professor Gregor Coster took part on a panel discussion with Trans-Tasman Business Group, and Director Chris Ellis presented the safety contribution award at the Site Safe awards ceremony. The Board was pleased to have you visit and speak at the November Board meeting, which was also attended by Phillippa Gander (Fatigue Unit, Massey University) at the recommendation of the Occupational Health Advisory Group (OHAG). Various Board meetings were also attended by Richard Wagstaff (President, New Zealand Council of Trade Unions), George Adams (Chair, OHAG), and Gavin Taylor (Chair, Extractives Industry Advisory Group).
- Chief Executive Gordon MacDonald presented at conferences for the Master Electricians' Electrical Contractors Association, NZ Deer Industry, ACC Employer Forum, NZ Grain and Seed, and Rural Women's Organisation, and attended a meeting of Port CEOs. Deputy General Manager Assessments Jo Pugh also spoke at EMA's Occupational Health and Safety Conference.

2015-	16 to 31 Decem	ber Target Key N/A On track Below Not on track
×	Fatalities	WorkSafe has confirmed 23 fatalities (8 Agriculture; 2 Forestry, 1 Construction; 1 Manufacturing; 11 Other). This is a subset of all workplace fatalities ¹ . <i>Over the same 2014-15 period there were 22 confirmed fatalities</i> .
÷Ċ,	Serious Harm	1,619 Serious Harm notifications (50 more than 2014-15 period)
\otimes	Catastrophic events	Zero catastrophic events in high hazard sectors and major hazard facilities.
Ø	Assessments	8504 assessments undertaken and closed. (496 below forecast) ² 85% in primary focus areas (target 80%). 29% involved an Occupational Health focus.
*	Duty-Holder Reviews	47 reviews in progress. YTD 216 reviews received, 169 completed. (1 Jan-30 Jun 2015 258 reviews completed)
\Diamond	Investigations	Approximately 280 investigations currently underway. YTD 222 initiated and 266 completed.
Â	Prosecutions	70% of files (19/27) recommended for prosecution met quality criteria (<i>target 80%</i>). 94% of prosecutions (50/53) successful (<i>target 80%</i>) YTD 47 prosecutions initiated, 53 disposed, 69 active.
	Inspector Numbers	185 Health and Safety Inspectors, 14 High Hazard Unit Inspectors. (Target of 200 Health and Safety Inspectors by 30 Jun 2016)
\$	Budget	\$0.3m surplus against budgeted deficit of \$2.0m year to date. (see page 9).
đ	OIAs	97% of responses (221/227) completed on time (target 90%).

Performance Dashboard – Recent Results

¹ WorkSafe uses preliminary, ACC-blended data to provide an indicative fatality count. Statistics New Zealand publishes official and comprehensive workplace health and safety data annually.

² Forecast volumes are unevenly distributed across months to reflect phasing in service delivery.

KEY PRIORITIES UPDATE

The updates below relate to key Ministerial and WorkSafe Board priorities for 2015-16 as set out in our Statement of Performance Expectations 2015-16

Taracting Dick	
Targeting Risk	
Occupational Health Implement the occupational health strategy (including progressing action plans on airborne respiratory hazards and noise, and more effective asbestos coordination by agencies	 On track. Draft OH Strategic Plan and operating model developed, cross-organisational engagement has begun to refine for 2016-17 implementation. First meeting of new cross-agency Health Group on worker health and wellbeing held, representatives included Chief Medical Office and Group Manager Public Health. Ministry of Health and Statistics NZ dataset adaption underway to provide more insight into environmental factors that shape OH outcomes. Phase 1 Clear Air programme completed. End of phase review has shown increased clean air related assessment activity: 29% of workplace inspections had a secondary Clean Air assessment.
Injury Prevention	 On track for delivery to both WorkSafe and ACC Boards in July 2016.
Target high-risk sectors including via injury prevention programmes with ACC	 Joint Working Group has been established and high-level planning has been agreed to ensure delivery timeframe is met. Sector Business Cases are on track. Work underway with ACC using data to identify high-risk businesses and cross-cutting health and safety issues which impact areas beyond our key risk sectors. Injury prevention plan progressing – will identify the right combination of interventions at the right level (system, sector, regional, company).
Targeted work	Agriculture
Targeted campaigns, presentations, roadshows to support health and safety understanding and	 Mostly on track with the delivery of milestones for quarter 2.
	 The pilot Activity Workbook programme was delivered into schools, feedback was positive. ACC funding is being sought to roll out the programme nationally. The Farming Myths Busted article was published, outlines top myths
workplaces' ability to	surrounding Agriculture health and safety and provides answers.
comply Assessments in areas more likely to cause harm	 The third Agriculture CEO's forum held in Nov 2015 with CEs of WorkSafe, Federated Farmers, Beef + Lamb, and DairyNZ.
Codes, guidance, standards developed, and access to health and safety professionals for those we	 A paper has been circulated proposing next steps for the Quad Bike Safety Action Group. Following the Dec 2015 session with Minister Woodhouse, a renewed focus on lowering the toll caused by quad bike incidents is to be taken. Outcomes and deadlines will be set at a Feb 2016 workshop.
regulate	Forestry
Providing training and	 On track for delivery of the forestry implementation plan for 2015-16.
raising awareness	• Established the FISC Operational Advisory Group and Technical Action Group.
Enforcement action Establishing a business case	• The new forestry assessment tool for inspectors was implemented in Nov 2015.
process for National Programmes funding,	 A joint safety campaign between WorkSafe and ACC has led to 900 forestry workers receiving safety key messages and information on the new Act, and promoting Safe Tree and WorkSafe Forestry websites.
including monitoring and evaluation frameworks	 The annual Safe Start Breakfasts kicked off in Jan 2016 with 23 workshops scheduled and over 1800 attendees expected.
	Construction
Evaluation updates are included under Research	 On track with Joint Intervention Plan and Business Case development with ACC. Drafting of the Business Case is expected to be completed early 2016.
and Evaluation (page 4)	 National Roadshow finished in Nov 2015. It was very successful, with 37 events and just under 4,000 builders and tradies attending.
	 In Nov 2015 WorkSafe and ACC partnered with the Master Plumbers, Gasfitters and Drainlayers association for its Health and Safety Seminar series, with presentations in Wellington, Hamilton, and Christchurch.

	 Good Practice Guide for Scaffolding is out for consultation.
	Manufacturing
	 On track with the development of the Joint Intervention Plan and Business Case with ACC. The Business Case was presented to SLT in Nov 2015, will go before the Injury Prevention Design and Delivery Committee and the ACC Investment Committee for final approval. This will seek ACC agreement to ring fence funding to design/deliver a suite of interventions over 3-5 years.
	 The Absolutely Essential Toolkit for Manufacturing is progressing through the Guidance and Standards process.
	Canterbury
	 Canterbury Rebuild Safety Charter has over 275 signatories and endorsees, is on track to receive \$100k of funding from members this year.
	 Since 2013 we have had over 5,500 attendees of WorkSafe/Charter events. We will hold at least four more events in the first half of 2016.
	 Canterbury assessment numbers are significantly higher than the minimum planned, in part due to visiting Australian inspectors. SafeWork NSW has extended the contract for inspectors' secondments until March 2016.
	 As part of the Beat Fatigue campaign we have given 15 toolbox talks, visited 45 sites, and presented to 1,000 workers, with more planned early 2016.
High Hazards	 Overall on track. Additional stakeholder engagement not related to HSWA introduction has been delayed to allow staff to focus on introduction/ integration of the new inspectorate case management system (Awhina).
	 Energy Safety performance indicators on track. Fewer than expected notified events reported, which is good.
	 Extractives on track for key deliverables and projects.
	 Petroleum and Geothermal on track, see comments about Awhina above. Continued enforcement action including a successful prosecution and sentencing; complex offshore process safety investigations; issuing and closing a raft of onshore improvement notices.
	 Major Hazard Facilities on track, but see comments on Awhina above.
Investigations Cases of particular interest or significance	 Bulk storage tank explosion fatality: Joint investigation; Police are considering a manslaughter charge, WorkSafe is investigating potential breaches under HSE and HSNO. Very resource intensive, one Inspector working full time.
	 Oropi Quarries (Tauranga) fatality: charges against director and company. National interest in quarries at present, director was very hands-on. Also charged for failing to ensure the Manager was notified to WorkSafe.
	 Hamilton City Council Zoo tiger attack: international media interest due to nature of the death, appears human factors a major contributory factor.
	 Gerritsen obstruction (inflatable slide collapse): significant fine imposed by Judge (\$115,000). Judge particularly vexed that WorkSafe's investigation was hampered by the offender and duty-holder not complying with WorkSafe's repeated information requests.
	 Southern Lakes Heliski avalanche skier death: adventure activities regulations apply; first significant investigation of this type.
Working Together	
Stakeholder engagement	 Organisation-wide plan, culture change initiatives: significant resource commitment for implementing the new regulatory framework preparations. Supporting the growth and effectiveness of industry leadership and advisory groups (e.g. FISC).
Worker engagement and participation	 Consultation and Guidance Group input on Draft Good Practice Guide on Worker Engagement and Participation received over quarter, closed 4 Dec 2015.
	 All WorkSafe staff eLearning module on Worker Engagement, Participation and Representation released (see IRF section on eLearning).
	 First 'Working Together' pages published on website, explains engagement,

WORKSAFE NZ-45263393

17 February 2015 | 2015-16 Quarterly Report WorkSafe New Zealand: Quarter 2

participation, and representation for business, workers, and HSRs.

Work with other agencies

Ensuring effective coordination, supporting compliance with new legislation

Working Smarter

•	Regulatory	relationships	policy c	on track	to be	signed	off ir	n the	first	half	of	2016	5.
---	------------	---------------	----------	----------	-------	--------	--------	-------	-------	------	----	------	----

 Work began with Statistics New Zealand, the Ministry of Health and Inland Revenue on occupational health research opportunities that big data sets may provide (e.g. a decision on WorkSafe involvement with Stats NZ's Integrated Data Infrastructure is expected in Feb 2016).

Working Smarter	
Research and Evaluation	 Research and Evaluation framework developed to assist with formative evaluation, project development, and evidence based intervention approach. Began building evidence base for national programmes of local and international research evidence. Identifying gaps in local knowledge and strategy for response including drawing on comparable international evidence that can inform NZ-based interventions. Evaluation of the <i>Safer Farms</i> campaign has begun, on track for final reporting in Feb 2016. <i>Safer Farms</i> monitoring report has been delivered to the project team and ACC. Evaluation plans for the <i>Safer Forests</i> campaign, Canterbury Rebuild, and Clean Air programme have been initiated. Interviews with employers (1,909) and workers (2,922) have been completed for the 2015 Health and Safety Attitudes and Behaviours Survey. Results will be used for operational and performance measurement. WorkSafe's 2015-16 Service Excellence Survey is underway, preliminary results available about the service provided by WorkSafe's Duty Holder Review Team (see page 7). Analysis of quad bikes incidents being conducted. Forthcoming report will update the 2008 work into quad bike injuries and fatalities farms/in agricultural production.
Operational Intelligence	 Data Visualisation Analytics tool rolled out to three pilot sites; a web-based data tool that utilises near real-time intelligence from WorkSafe and ACC data, via SAS VA. Focus is to shift to a proactive data intelligence-driven business practice, from a response-driven model. The project's design enables WorkSafe to best use its resources at the right site, at the right time, for the right reason.
Implementing the Regulatory Framework (IRF)	 On track. WorkSafe is very focussed on the 4 April implementation date. Detailed design phase of the programme is mostly completed and development of new processes, procedures, and tools is underway. Tranche one Regulations expected to be made mid-Feb 2016. This will impact final release date for formal guidance. A plan is in place to release interim material ahead of the formal guidance. Training material Managers' Packs on key concepts and implementation of HSWA were released to staff. The internal rollout of HSWA eLearning modules has begun; all staff will complete before 4 April 2016, and we are working on making this learning available to regulatory partners. Communications to targeted and general audiences continue. New web pages launched in Dec 2015 with ongoing additions planned. Begun targeted communication on new asbestos licencing requirements. Ongoing engagement programme with range of sectors through presentations, seminars, workshops, and participation/input to event organised by other industry bodies and organisations. Implementation date for Hazardous Substances Regulations is under discussion due to EPA adjusting its planned delivery date for some work and to align work as closely as possible. The designation of Maritime NZ and CAA as regulators under HSWA has been confirmed and will be gazetted during Feb 2016.
Safety Star Rating Scheme	 Pilot initiated (5 onsite assessments completed/underway, 10 self-assessments completed as at 31 Dec 2015), Pilot evaluation plan completed.

	 Operational policy work undertaken on possible target market, delivery options, and funding model.
Workforce Development	 On track. A team was established mid-2015 to deliver a workforce development plan by mid-2016 to bridge work health and safety capability and capacity gaps contributing to serious harm in workplaces.
	 Phase one intelligence gathering near completion. Working with MBIE and stakeholder team has built evidence on current state and identified opportunities to inform development of interventions.
	 Transition training and a unit standard for HSRs is progressing. This will improve training quality and introduce measurement of training. An online pilot programme is complete, delivery begins Feb 2016. HSR unit standard submitted to NZQA for approval and will be registered to the New Zealand Qualifications Framework (NZQF) before new legislation is implemented.
	 Continued work on the Targeted Review of Qualifications (TRoQ); a review of generalist health and safety qualifications to ensure existing qualifications are aligned to the new legislation, and industry needs are met. Draft qualifications complete and released on the skills.org website for public comment.
	 Continued work with HASANZ to deliver a register of health and safety professionals within the latter half of 2016. Progressed accreditation of health and safety practitioners with the New Zealand Institute of Safety Management.
Strengthening our org	ganisation
Internal development	 New practice framework, embedding performance systems, monitoring and evaluation systems.
	 Workshops for Inspectorate Leaders began in Nov 2015 to provide an overview of Inspectorate Good Practice curriculum. Workshops have been designed so Leaders can embed the good practice principles into the organisational culture. The Good Practice curriculum has been developed to support consistency in practice.
	 During Q2 a review was completed on the structure of the National Programmes team, with implementation for Q3.
ICT project	 Finalised terms and conditions, signed contract with the preferred supplier in Nov 2015. Two prototypes have been developed and delivered for review. On track to go live with Release 1 pilot (Major Hazards Facilities and Petroleum & Geothermal teams) Feb 2016.
	 Exploring resource issues against expectations with the supplier following re- baselining activity in Dec 2015.
	 Project Brief drafted for Digital Platform project; due to commence Jan 2016.
Delivery of core operational policy	 On track for delivery of current plan by Jun 2016 as forecast. The Enforcement Policy has been approved. Other policies are on track to be approved by Jun 2016. Implementation planning has begun.
	 WorkSafe positions have been agreed by SLT and are being used internally. All positions are likely to be approved by Jun 2016, with implementation staged to align with messaging around the new legislation.
Targeted, Independent Review (TIR) Funding, Fees and Levies	 Several parties have been interviewed to support the TIR, including yourself, large companies, and small firms who had recently been investigated or assessed. The final report, including WorkSafe's response to findings and recommendations, is expected in mid-Feb 2016.
reviews	 Work has commenced on the 2016 Funding Review between WorkSafe and MBIE to ensure WorkSafe is appropriately funded to deliver the Government's priorities and core statutory functions.
	 Progress is being made on the WorkSafe and MBIE Review of fees and levies in the workplace health and safety system. The work focusses on the High Hazards area; the two agencies have been working closely to prepare advice for Feb 2016.

FOCUS FOR NEXT QUARTER

Our focus in Quarter 3 will include:

- Developing **business cases and proposals** for additional ACC funding of core programmes under the Joint Injury Prevention Action Plan.
- Working with other agencies on Occupational Health: agreements to access Statistics NZ and Ministry of Health linked datasets (IDI Project); attendance at Strategic Workshops on ACC's Investment Logic Map to ensure Worker Health is considered; establishment and terms of reference for cross-agency Occupational Health working group.
- **Clean Air Programme** focus on testing the newly developed guidance internally and externally and on the roll out of the Phase 2 outputs.
- Finalising the joint MBIE/WorkSafe Fees Review.
- Implementing WorkSafe's response to the Targeted, Independent Review as part of the broader work programme.
- **Re-warranting** all currently warranted staff under HSWA; re-educating all staff, managers, and technical specialists and training in new processes, policies, and practices.
- Raising hazardous substances capability for new regulatory regime, building the Technical Programmes and Support team, and completing National Programmes recruitment by March 2016, and evaluative framework.
- Delivering the forestry implementation plan. Commencing evaluation of Safer Forests (2013-15).
- Developing **Strategic Research Agenda** to ensure research on and by WorkSafe is co-ordinated and consistent with business need.
- **Surveys:** Reviewing WorkSafe's Service Excellence Survey to ensure it is relevant to the current environment and aligns to the new legislation. Completion of the 2015-16 Service Excellence Survey and initial reporting. Developing dissemination strategy for the 2015 Health and Safety Attitudes and Behaviours Survey, along with analysis and initial reporting of the 2015 results and 2014 survey comparisons.

Service Excellence Survey – Duty Holder Review Team

The Service Excellence Survey provides a rich set of results about WorkSafe's workplace health and safety education, engagement, and enforcement activities. The survey measures the experience of workplaces that we recently assessed or investigated. In 2015-16, the survey also included workplaces taking part in duty-holder reviews.

Preliminary results show that duty-holders (employers and principals who control or influence how work is carried out in a workplace) are very satisfied with the review service, and they value the process and contact with WorkSafe's Duty Holder Review (DHR) Team. The results indicate that the DHR service is a successful engagement and education strategy, helping to shape responses that will reduce workplace injuries and contribute to WorkSafe achieving its national targets. The DHR process encourages businesses to take ownership of improving workplace health and safety, and the positive feedback on the service is a useful example of how businesses and WorkSafe can work together to achieve this.

Duty-holder reviews are investigations of health and safety incidents carried out by the duty-holders themselves. Reviews are supported by WorkSafe's DHR Team, which was set up in November 2014. The reviews encourage duty-holders to investigate what happened after an incident, establish the underlying cause, and make improvements to workplace health and safety systems that are sustainable. At the time of the survey, the DHR Team's work had covered over 400 incidents.

The survey provides feedback on the service provided by the DHR Team and, like the main Service Excellence Survey, it also asks duty-holders whether they thought they were treated fairly and in a consistent manner, and if the service was value for money. Around half of the duty-holders (155) invited to take part completed the online survey.

Preliminary results show that:

- The service scored very highly on key aspects of customer service: timeliness, ease of contact and being kept informed throughout the process:
 - Between 8 and 9 out of 10 participants said they were satisfied (satisfied or very satisfied) with these aspects of the service.
 - Over 9 out of 10 said they were satisfied with the service overall.
- Duty-holders had a good perception of the DHR team's service:
 - Almost 9 out of 10 participants agreed or strongly agreed that they had been treated fairly, staff were competent, and staff did what they said they would do.
 - Around two-thirds of participants agreed that they were treated in a consistent manner and that the service was value for money.
 - Two-thirds agreed that they had a better understanding of health and safety rights and responsibilities as a result of their contact with WorkSafe.
 - Six out of 10 participants said the most useful parts of the service were the first discussion with a DHR Officer on the phone and the information sent out by the Officer about the review.

These were the top two (of seven) aspects of the service considered most useful by duty holders.

• Three-quarters of participants felt that the service they received was better or much better than expected.

Final results will be available in quarter four, along with those from the main Service Excellence Survey.

OUR ENABLERS

Staff (as at 31 December 2015)

Group	Total Staff	Group	Total Staff
Operations and Specialist Services	299	Corporate/Finance	19
Response and Investigations, Assessments	299	Human Resources	16
High Hazards and Energy Safety	45	Legal	12
Operational Policy	67	Communications	9
Strategy and Stakeholder Engagement	31	Office of the Chief Executive	2
Total		571 (500 Permanent/Temporary empl 62 contractors; 9 employees yet to	

Inspectorate* (as at 31 December 2015)

	Chief Inspectors	Managers	Response/ Assessment/ Investigations Inspectors	Assistant Inspectors	Trainee Inspectors	Duty Holder Review Officers	Admin Support/ Others	TOTAL
Response & Investigations	1	9	34	5	4	5	7	65
Assessments – Northern	1	6	17	10	14	-	8	56
Assessments – Central	1	8	27	14	15	-	9	74
Assessments – Southern	1	7	12	16	12	-	7	55
Total	4	30	90	45	45	5	31	250
			185 He					

Inspector current warrant status

	No Warrant	HSE Warrant only	HSE and HSNO Warrant	TOTAL
Response & Investigations	6	19	23	48
Assessments – Northern	8	19	14	41
Assessments – Central	12	28	16	56
Assessments – Southern	8	23	9	40
Total	34	89	62	185

* Excludes High Hazards Unit (14 Inspectors). 3 Quarry Inspectors in the HHU are included in the 200 target for 30 June 2016.

The number of Inspectors who hold both a HSE and a HSNO warrant is lower than projected due to delays in completing the on-job supervision component by HSNO-warranted Inspectors. As at 31 January 2016 72 HSE-warranted Inspectors have completed the HSNO learning programmes and are waiting only on the on-job supervision component to be undertaken/completed.

Finance

The year to date position is a \$0.3m surplus, compared to a planned deficit of \$2.0m. The result is split as follows:

- Workplace Health and Safety- \$0.3m deficit against \$2.4m planned deficit
- Energy Safety \$0.6m surplus against \$0.4m planned surplus

There are no specific issues and risks to report.

Financial Performance (1 July 2015 to 31 December 2015)							
\$000	YTD Actual (Q2)	YTD Budget	Variance	Estimated Outturn (year-end estimate)	SPE Budget (year-end estimate)		
Revenue							
Revenue Crown	43,431	43,431	0	86,862	85,994		
Interest Revenue	408	346	62	589	500		
Other Revenue	1,204	869	335	2,217	841		
Total Revenue	45,043	44,646	397	89,668	87,335		
Expenditure							
Personnel & Contractors	28,914	29,715	801	59,926	55,161		
Other Expenditure	15,204	16,386	1,182	34,891	36,368		
Depreciation	492	478	(14)	983	1,533		
Capital Charge	97	96	(1)	198	600		
Total Expenditure	44,707	46,675	1,968	95,998	93,662		
Surplus/(Deficit)	336	(2,029)	2,365	(6,330)	(6,327)		

We forecast that the current YTD actual surplus of \$0.3m will soon move to a deficit and continue to grow towards the \$6m expected deficit. This is expected to use up surpluses generated in 2013/14 and 2014/15.

Changes in Equity (as at 31 December 2015)						
\$000	YTD Actual (Q2)	Estimated Outturn (year-end estimate)	SPE Budget (year-end estimate)			
Equity at beginning of year	17,549	17,549	17,761			
Capital contribution from the Crown	0	12,349	4,415			
Energy Safety surplus to the Crown	(630)	(635)	(850)			
Net Surplus/(Deficit)	336	(6,330)	(6,327)			
Equity as end of the period	17,255	22,933	14,999			

Summary Balance Sheet (as at 31 December 2015)						
\$000	YTD Actual (Q2)	Estimated Outturn (year-end estimate)	SPE Budget (year-end estimate)			
Assets						
Cash and Bank	20,359	19,680	3,389			
Debtors	801	331	500			
Fixed Assets	7,919	13,749	16,699			
Total	29,079	33,760	20,588			

WORKSAFE NZ-45263393

17 February 2015 | 2015-16 Quarterly Report WorkSafe New Zealand: Quarter 2

Summary Balance Sheet (as at 31 December 2015)			
\$000	YTD Actual (Q2)	Estimated Outturn (year-end estimate)	SPE Budget (year-end estimate)
Liabilities			
Creditors and Payables	5,234	4,640	849
Employment Liabilities	4,579	5,552	3,890
Energy Safety Surplus Repayable	2,011	635	850
Total	11,824	10,827	5,589
Equity			
Opening equity	17,549	17,549	17,761
Capital Injection	0	12,349	4,415
Energy Safety Surplus	(630)	(635)	(850)
YTD surplus	336	(6,330)	(6,327)
Grand Total	17,255	22,933	14,999

Given the projected increased level of cash at 30 June 2016 and changes in expected timing of capital expenditure, deferral of \$6.552 million of budgeted capital injection from 2015/16 to 2016/17 is being investigated for inclusion in the March Baseline Update.