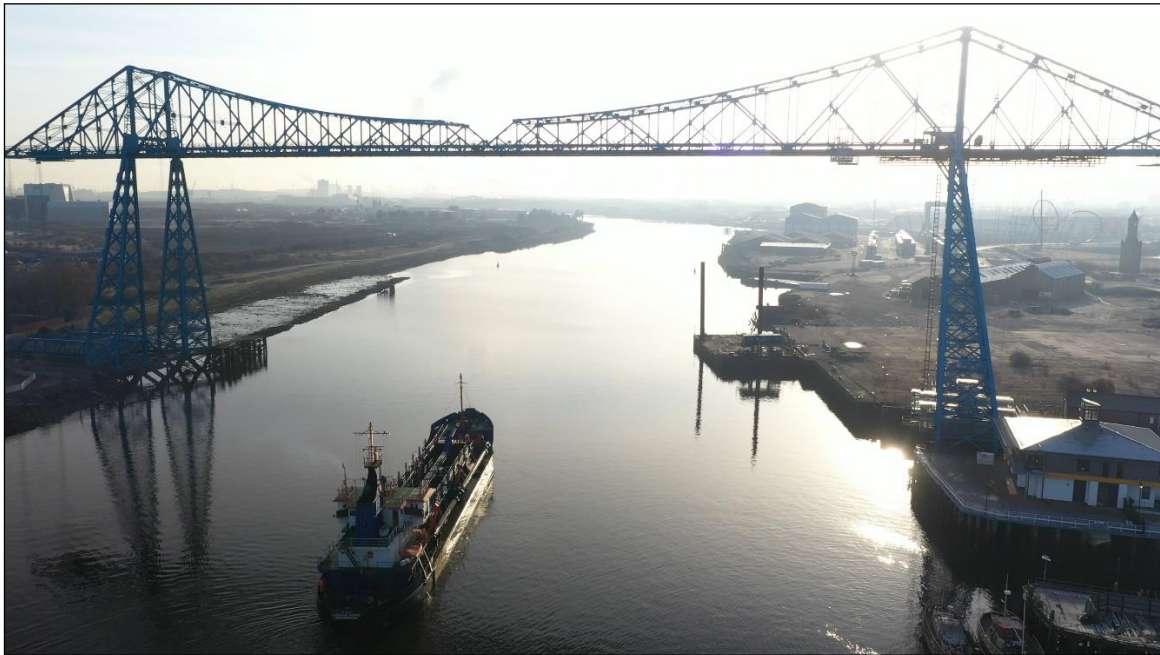




PD TEESPORT LIMITED

**PORT MARINE SAFETY CODE
ANNUAL PERFORMANCE REVIEW 2020**



Issue: 01
Date: January 2021

1. INTRODUCTION

The "Port Marine Safety Code" (the "Code") establishes a national standard for every aspect of port marine safety and aims to enhance safety for those who use or work in ports, their ships, passengers and the environment.

The Code and the associated Guide to Good Practice, play an instrumental role in achieving this by providing a pragmatic and proportionate approach to safety standards, which enable everyone who is involved, from major ports to smaller marine terminals and harbours, to apply the principles upon which it is based.

The Code refers to some of the existing legal duties and powers that affect organisations in relation to marine safety, but it does not in itself create any new legal duties. However, although not mandatory, there are several measures which are key to the successful implementation of the Code. Therefore, in order to comply with the Code, Statutory Harbour Authorities must consider the following:

- Duty Holder
- Designated Person
- Legislation
- Duties and Powers
- Risk Assessment
- Marine Safety Management System
- Review and Audit
- Competence
- Plan
- Aids to Navigation

The Annual Performance Review is prepared following an internal audit, which is carried out every year. The internal audit was based on the Maritime & Coastguard Agency ("MCA") "Aide-Memoire", as included in the Guide to Good Practice.

This review provides a statement of performance and a summary of marine activities, which can be used by the Designated Person when presenting to the Duty Holder.

2. DUTY HOLDER

As the Statutory Harbour Authority for the port of Tees and Hartlepool, PD Teesport Limited ("PDT") is vested with powers to regulate, maintain and improve the Harbour and the navigation of vessels within its jurisdiction. Its powers are predominantly derived under the **Tees and Hartlepoons Port Authority Act 1966**, but it further enjoys various powers under other legislation applicable to all Harbour Authorities. PDT is also the Competent Harbour Authority ("CHA") for the purposes of pilotage in its area.

The Duty Holder is accountable for compliance with the Code and performance in ensuring safe marine operations.

PDT have implemented Duty Holder fixed terms of reference which the individual Duty Holders sign and accept, which outline their individually and collective accountability with regards to the marine safety.

As part of the role, the Duty Holder should report compliance with the Code to the MCA every 3 years.

The following Statement of Compliance was issued to the MCA on 9 February 2018:

"I, Jerry Hopkinson, Chief Operating Officer and Vice Chairman, on behalf of PD Teesport being the Port Marine Safety Code Duty Holder for the Ports of Tees and Hartlepool, having considered all the requirements of the Port Marine Safety Code, including reviewing the risk assessment and safety management system, certify that the Ports of Tees and Hartlepool meet the standards required by the Port Marine Safety Code."

A "Commitment to Compliance" is also published on the PD Ports' website within the Port Marine Safety Code section.

MIN 641(M) sets out the PMSC compliance date for UK Ports, Harbours and Marinas for the period of 2021-2024. The next round of compliance statements is due on or before the 31st March 2021

3. **DESIGNATED PERSON**

A Designated Person, (Jon Armstrong - PD Ports Head of Operational Finance) has been appointed to provide independent assurance in relation to the operation of PDT's Marine Safety Management System ("MSMS").

The Designated Person has direct access to the Duty Holder.

The role of the Designated Person does not absolve the Duty Holder and the Board Members from their role and collective responsibility for compliance with the Code.

The Designated Person takes appropriate measures to determine whether the individual elements of the MSMS meet the specific requirements of the Code. This is partly discharged via the quarterly Port Marine Safety Code Designated Person Committee Meeting, which is chaired by the Designated Person.

4. **LEGISLATION, DUTIES AND POWERS**

PDT has published a Marine Safety Plan ("MSP"), dated January 2021. The MSP commits PDT to undertaking the management and regulation of marine operations and, in particular, safe navigation, within the scope of its powers and authorities in a way that safeguards the port infrastructure and port users, including members of the public and the marine environment.

PDT recognises that it must treat its duties to ensure the safety of all activities within its jurisdiction and to serve the public interest as primary; that it is accountable for what it does and fails to do in this regard. PD Teesport must adopt measures to ensure that it discharges its responsibilities in accordance with nationally agreed standards and in compliance with the law.

PDT is entrusted with a public and statutory power to conserve and facilitate the safe use of the port, its environment and the community. PD Teesport undertakes, to conduct its business in a transparent and open manner. To this end, it will report on its performance, both good and bad, against national standards and standards of operation to which it adheres.

5. **RISK ASSESSMENT**

The Navigational Risk Assessment (“NRA”) report has been prepared by Marine and Risk Consultants for PDT.

The NRA complies with the Code and its associated Guide to Good Practice on Marine Operations and was conducted in accordance with the International Maritime Organisation’s Formal Safety Assessment methodology for risk assessment. It comprises of the following four stages;

- Stage 1: Data Gathering and Vessel Traffic Analysis
- Stage 2: Hazard identification
- Stage 3: Risk Assessment
- Stage 4: Risk Controls

One of the aims of the NRA was to enhance safety within the Ports of Tees and Hartlepool by ensuring that all marine navigation hazards are identified, control measures are in place and the risks are at acceptable levels.

The Ports Ranked Risk Register holds a total of 145 navigational related hazards in PDT’s statutory area and approaches. Those hazards have been grouped into three Risk Registers, with 49 identified hazards in the River Tees, 33 in the Hartlepool area and 63 in the Offshore area. Hazman II (risk assessment software) Risk Registers have been configured for each of these areas to provide a complete and "fit for purpose" baseline risk register of navigational hazards for PDT.

The NRA process is continuous to ensure that new navigational hazards and changes to existing hazards are properly identified and addressed.

Risk Assessments are reviewed on a planned periodic basis, post-incident/accident, post-review of a relevant marine accident, or a health check trend report, as detailed in the Code.

The prescribed periodic review period within Hazman II ranges between 6 months to 2 years depending on hazard ranking.

The number of Hazard Reviews conducted during the period 1 January 2020 to 31 December 2020 were, as follows:

- River Tees 60
- Hartlepool Area 30
- Offshore Area 68

Higher ranked hazards are reviewed more frequently than those ranked lower and require greater management time and attention.

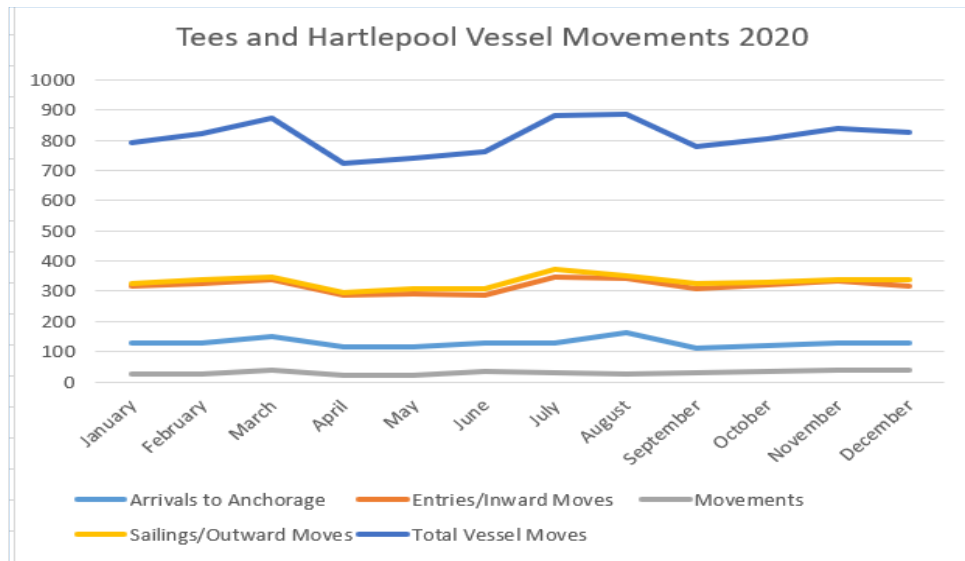
Details of the Risk Review Log/Amendments are recorded within the Hazman software for auditing purposes.

6. MARINE MANAGEMENT SYSTEM

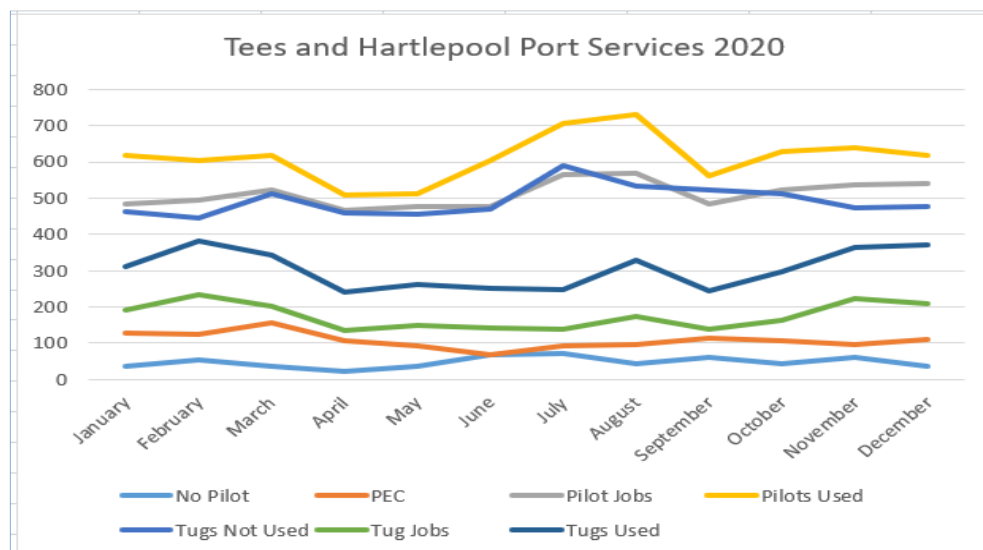
6.1 Vessel Activity

During 2020 there were a total of 9728 vessel moves within the Port of Tees and Hartlepool, details of which are shown below:

Vessel Movements	2020												2020 Total
	January	February	March	April	May	June	July	August	September	October	November	December	
Arrivals to Anchorage	127	128	151	114	115	129	131	165	111	119	127	129	1546
Entries/Inward Moves	315	325	337	289	293	289	346	344	310	320	333	316	3817
Movements	25	28	38	23	23	34	30	27	31	35	40	40	374
Sailings/Outward Moves	327	340	349	297	310	309	374	352	327	329	338	339	3991
Total Vessel Moves	794	821	875	723	741	761	881	888	779	803	838	824	9728

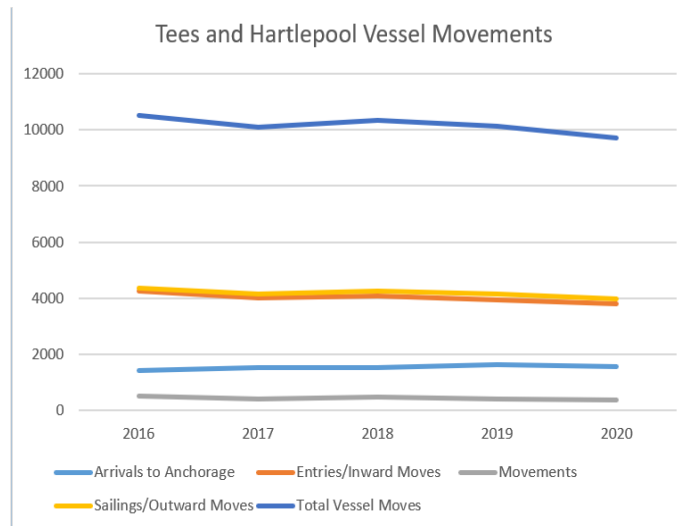


Port Services	2020												2020 Total
	January	February	March	April	May	June	July	August	September	October	November	December	
No Pilot	35	54	36	22	34	67	71	41	60	43	61	34	558
PEC	128	124	154	106	93	68	91	95	113	105	95	109	1281
Pilot Jobs	484	494	522	466	476	475	565	569	484	521	536	540	6132
Pilots Used	619	604	619	508	513	603	706	730	562	630	639	616	7349
Tugs Not Used	464	445	512	458	454	470	589	532	522	513	474	475	5908
Tug Jobs	192	233	203	136	149	141	138	173	137	161	221	209	2093
Tugs Used	310	382	341	240	260	251	249	327	245	295	365	370	3635

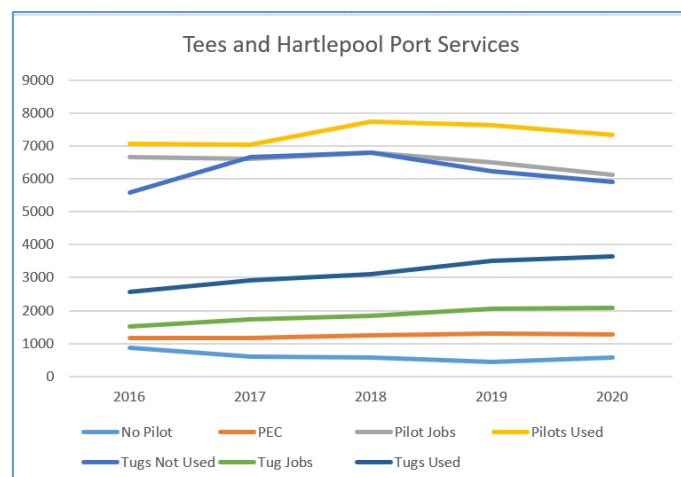


Comparison of the 2020 performance versus the last five years:

Vessel Movements					
	2016	2017	2018	2019	2020
Arrivals to Anchorage	1431	1524	1528	1642	1546
Entries/Inward Moves	4242	3993	4070	3945	3817
Movements	511	415	490	401	374
Sailings/Outward Moves	4352	4160	4248	4142	3991
Total Vessel Moves	10536	10092	10336	10130	9728



Port Services					
	2016	2017	2018	2019	2020
No Pilot	870	603	562	431	558
PEC	1172	1166	1242	1295	1281
Pilot Jobs	6664	6628	6818	6501	6132
Pilots Used	7080	7041	7749	7636	7349
Tugs Not Used	5598	6666	6796	6236	5908
Tug Jobs	1526	1732	1839	2053	2093
Tugs Used	2558	2928	3108	3500	3635



6.2 Incident Reports

The duties of an SHA include an obligation to converse and facilitate the safe use of the harbour and a duty of care against loss caused by the SHA's negligence. Such losses may be caused by accidents within an SHA's area of jurisdiction.

The PMSC relies upon the principle that duties and powers in relation to marine operations in ports should be discharged in accordance with a MSMS. That system should be informed by and based upon a formal risk assessment. The aim is to establish a system covering all marine operations in ports, which ensures that risks are both tolerable and as low as reasonably practicable.

It is recognised, however, that no matter how informed the risk assessment process and how effective the MSMS regime is, accidents and incidents do occur. The MSMS does address the potential for incidents to occur and provides instructions and guidance on any investigations.

An incident within the Port of Tees and Hartlepool is categorised using the Trigger Table shown below:

		CONSEQUENCES					
		1	2	3	4	5	6
SEVERITY		Damage to Port infrastructure	Injury to Person or Persons	Damage to the Environment – Release of Hazardous Substance to Water Column or Air	Disruption to Business Continuity	Accident to Ship (PMSC) One or more of the IMO categories which will result in the following	Effect of Negative Publicity on the Company
0	Potential for Incident	Threat of damage.	Threat of injury.	Threat of damage to the environment.	Threat of disruption to the port or vessels.	Threat of damage to vessel or marine structure.	No publicity.
1	Insignificant Incident	Cosmetic damage.	Person receives First Aid.	Small area of sheen <10msq. Small gas release. No clean up required. No action by workforce.	Incident closes port for up to 1 hour. Vessel(s) delayed for a period of up to 6 hrs.	Cosmetic damage. Vessel drags anchor but is under control. Vessel sustains major system failure (engines, etc).	Incident results in small item on 'Local News'.
2	Minor Incident	Loss of timbers from fendering. Bent ladders. Coping stones cracked.	Person visits doctor for treatment (not in ambulance).	Area of metallic appearance <50msq. Pollution team called out - no action. Terminal workforce in containment area onsite.	Incident closes port for up to 3 hours. Vessel(s) delayed for a period up to 18 hrs.	Bent rails. Vessel anchors against advice. Denting to hull.	Regional news with press statement required.
3	Moderate Incident	Bollards <u>broken</u> , berth used with care. Tow lines part. Significant damage to fendering system/ berth.	Fracture of fingers or toes. Immersion in water. Person taken to A&E but not kept in or injury other than major which results in 3 consecutive days' incapacity.	Discontinuous true colour >50msq. Pollution team called out; up to 1 day clean up. Terminal workforce in containment area offsite.	Incident closes port for up to 6 hours. Vessel(s) delayed for a period up to 36 hrs.	Vessel in collision, <u>grounding</u> or floods. Actual damage to hull, cargo gear or accommodation. Vessel fails to respond to instruction to weigh anchor. Mooring lines part.	National news. Journalists attend. Interviews required.
4	Serious Incident	Fender system compromised, requires repair before use. Pipeline damage.	Major injury (MAIB); limb fracture; loss of limb; loss of sight; penetrating eye injury; 24 hrs hospitalisation. Person suffers hypothermia.	Serious pollution (IMO). Pollution team called out, up to 3 <u>days</u> clean up. Local evacuation.	Incident closes port for up to 24 hrs.	Structural damage rendering the ship unseaworthy (IMO). Breakdown necessitating towage. Vessel drags over pipeline. Master/Pilot/Seaman under the influence. Master takes the Con from Pilot	National and international journalists attend. Media management required. A <u>24 hr</u> response may be needed.
5	Very serious Incident	Berth closed for rebuild. Pipeline breach.	Loss of life (IMO).	Severe pollution (IMO). Pollution team called out. Up to 7 <u>days</u> clean up. Large scale evacuation.	Incident closes port for more than 24 hrs.	Total loss of vessel (IMO).	World agencies require 24 hr information for prolonged period.

2020 Incident Statistics with comparison for the last four years, based on the above Trigger Table are shown below:

Severity	Number of Incidents			
	2017	2018	2019	2020
1	24	27	17	20
2	13	10	10	7
3	6	6	8	4
4	3	-	3	1
5	-	-	2	2

The above statistics include all incidents reported to PDT in its capacity as SHA, including those not related to safety of navigation. All incidents are reviewed in accordance with the Safety Management System. None of the above reported incidents resulted from or resulted in a non-compliance of the PMSC

7. **AUDIT AND REVIEW**

7.1 During the period 1 January 2020 to 31 December 2020, the following Audits/Reviews have been conducted:

	Date	Status
Publish Annual Port Marine Safety Code Performance Review	January 2020	Complete
Trinity House Inspection	November 2020	Complete
Internal Port Marine Safety Code Audit	November 2020	Complete
Management Standards review	Ongoing	Ongoing
Navigation Risk Assessment Hazard Reviews	Ongoing	Ongoing
General Directions Review	December 2019	Complete Q1 2020
Byelaw Review	September 2020	Progressing. Expected completion 2021
Development of Duty Holder Fixed Terms of Reference	October 2020	Complete
Marine Safety Management System (MSMS) System Manual Replacement	October 2020	Complete
Incorporate an annual towage audit as part of the towage licensing procedures	June 2020	Complete

7.2 **Port Marine Safety Code - External Audit**

In July 2019 PDT appointed Marine and Risk Consultants to undertake an external audit covering all aspects of compliance with the Code and the accompanying Guide to Good Practice on Port Marine Operations.

The audit was commissioned to provide re-assurance to the Harbour Master and Duty Holder that the Port remains compliant with all aspects of the Code.

Conclusion

Notwithstanding the Recommendations and Improvement Opportunities identified, the Ports of Tees and Hartlepool were found to be compliant with the requirements of the Code in all areas reviewed.

No Non-Conformities were identified.

See below updated progress within 2020, with regards to the recommendations and improvement opportunities identified.

Recommendations Identified	Status		
	Complete	Progressing	Pending
6	5	1	0
Improvement Opportunities Identified	Status		
	Complete	Progressing	Pending
13	11	1	2

Notwithstanding the Recommendations and Improvement Opportunities identified, the Ports of Tees and Hartlepool were found to be compliant with the requirements of the Code in all areas reviewed.

7.3 **Accredited Spill Response Organisation**

PDT has been accredited as a Spill Response Operator to carry out spill response for the following categories designated under the MCA UK National Standard for Marine Oil Spill Response organisation:

- Sheltered/Enclosed Waters
- Coastal and Large Estuary
- Shoreline Clean-up

The Accreditation is valid until 2 August 2022.

7.4 **Trinity House - Inspection**

Empowered by the Merchant Shipping Act 1995, Trinity House have a statutory duty as the General Lighthouse Authority (GLA) for England, Wales, the Channel Islands and Gibraltar.

The General Lighthouse Authorities are responsible for the superintendence and management of all lighthouses, buoys or beacons within their respective areas. They have a duty to inspect all lighthouses, buoys, beacons and other navigational aids belonging to, or under the management of a local lighthouse authority. (PMSC 4.1 & Section 195 MSA 1995).

Conclusion

The local aids to navigation under the management of PDT at Tees Bay and River Tees were inspected on 05/11/2020 by an Officer of Trinity House and found to be in good and efficient order.

7.5 **Port Marine Safety Code - Internal Audit**

2019 updated internal audit status report.

Recommendations/ Improvement Opportunities	Status
It is recommended that the Duty Holder/Designated Person adopts formal terms of reference and Port Marine Safety Code training should be formally recorded.	Completed October 2020
Develop a matrix to highlight trigger dates for PMSC documentation; therefore expiry dates are not missed.	Completed June 2020
Establish a formal procedure for the notification of various publication (MAIB Reports, etc.)	Completed - standing item on the PMSC Designated Person Committee Meeting Agenda
Include an MAIB trigger within the current Trigger Table used for incident reporting.	Completed– November 2020. Management Standard Review to incorporate MAIB Reporting Requirements

2020 internal audit outcome.

Non- conformities Identified	Status		
	Complete	Progressing	Pending
0	-	-	-
Observations and Improvement Opportunities Identified	Status		
	Complete	Progressing	Pending
10	5	1	4

7.6 Management Standards

In accordance with PDT MSMS, all Standards must be reviewed at regular intervals, but not exceeding two years.

2020 Review performance: -

Number of Management Standards	Number of management standards reviewed within a 2 Year Period	Number of management standard exceeding the 2 Year Review Period
125	79	46

The outstanding reviews from 2020 have been identified as a key action for 2021

8. **COMPETENCE**

PDT assess the fitness and competence of all persons appointed to those positions responsible for safe navigation.

PDT must ensure their staff meet the nationally agreed standards of competence or, alternatively, be able to show that their local competency standards are fully equivalent.

Achieving marine port safety is a team operation and people in these roles must be competent and adequately trained.

9. **MARINE SAFETY PLAN (“MSP”)**

PDT publishes a Marine Safety Plan, as required by the Code.

The MSP and policy statements have been reviewed and accepted for the current time period of 2021 -2024, which sets out ongoing standard and period performance targets.

Communication, consultation and feedback is a fundamental requirement in ensuring the safety and navigational requirements are understood and are continually reviewed. The following are undertaken to ensure the maintenance of an effective Safety Management System in support of compliance with the requirements of the PMSC:

- Daily communications between the Duty Assistant Harbour Master (AHM) and Port Services (Pilots, Foyboatmen, Towage Operator, Agents and Berth Operators) in relation to the safe and efficient regulation of vessel movements within the Port of Tees and Hartlepool and its approaches.
- Dedicated risk assessments of new and existing marine operations and services as required.
- The proactive and reactive review of identified hazards to navigation and the associated risk control measures that mitigate those risks to an acceptable (As Low Reasonably Practicable) level.
- Port Liaison Committee Meeting.
- Conservancy Liaison Meeting.
- PMSC Designated Person Committee Meeting.
- Marine Services/Safety Forum.
- North East Ports Group.
- The investigation of all reported marine incidents.
- Regular internal and external audits and reviews of the SMS, its functions and procedures.

- The maintenance and exercising of PDT's Emergency Plans and procedures, including oil spill management.

Standing Objectives

	Service Provision/Activity Target	Target
1	Navigational and Marine Incidents	<ul style="list-style-type: none"> ▪ No major incidents, serious injuries or serious pollution as a result of a failure of the Port's Safety Management System. ▪ Thorough reporting, investigation and analysis of Navigational and Marine Incidents and Occurrences. ▪ Ensure all risk assessments are appropriate to prevent any major navigation or pollution incidents.
2	Vessel Traffic Service	<ul style="list-style-type: none"> ▪ Maintain an effective VTS in accordance with National, IALA and IMO Standards. ▪ Ensure infrastructure is properly maintained to ensure continued operation.
3	Provision of a Pilotage Service including the Authorisation of Pilotage Exemption Certificates	<ul style="list-style-type: none"> ▪ No major incidents resulting from Pilotage or Pilotage Exemption errors ▪ Provide trained and qualified pilots to ensure an effective 24/7 pilotage service is maintained.
4	Conservancy and Hydrographic Service	<ul style="list-style-type: none"> ▪ Ensure the survey schedule is maintained. ▪ Ensure the survey is promulgated to stakeholders as deemed necessary. ▪ Through appropriate reporting, maintenance and response ensure Local Aids to Navigation availability meets Trinity House targets.
5	Liaison and consultation with Port Stakeholders	<ul style="list-style-type: none"> ▪ Ensure, through regular routine meeting/forums as described above, that appropriate and open consultation with port stakeholders is maintained regarding proposed amendments to Port Byelaws, General Directions and operational Management Standards.

Period Targets-2018 – 2021

	Service Provision/Activity Target	Target	Status
1	Navigational Risk Assessment (NRA)	Total review of the Navigational Risk Assessment in accordance with the principles, contents and details set out in the Code and associated Guide to Good Practice. The NRA forms an essential part of managing a port safely and ensures that appropriate risk control measures are put in place, eliminating risk where possible, or reducing it to acceptable levels. As part of this process, PDT introduced an electronic Marine Risk Management System.	Complete 15 July 2019
2	Port Emergency Plan	Total review of the Port Emergency Plan. The Port Emergency Plan will be developed, as far as practicable, based on the formal risk assessment, published and exercised.	Complete 1 May 2019
3	Marine Safety Plan	Introduce and publish a Marine Safety Plan and report annually against it.	Complete 20 February 2018
4	The Tees and Hartlepool Byelaws	Byelaws to be reviewed and updated, as necessary.	In Progress – Expected 2021
5	Marine Policy Statement	Introduction and maintenance of Policy Statements for Safety of Navigation, Enforcement, Health and Safety and Environment. Publish these Statements on the PD Ports website	Complete 20 February 2018
6	Harbour Office and Tees VTS relocation	Maintain an effective VTS and marine operations during relocation.	Complete 2018
7	Harbour Office and VTS Staff Training - Continual Professional Development	Enhance CPD to include personal insights and profile training.	In Progress – Expected Completion 2021

9. **AIDS TO NAVIGATION**

PDT acts as the Local Lighthouse Authority and has the power to carry out and maintain the marking or lighting of any part of the harbour within the Authority's area.

All aids to navigation maintained must comply with the "International Association of Lighthouse Authorities Guidelines and Recommendations".

As noted in section 7.4, the local aids to navigation under the management of PDT were inspected on 05/11/2020 by an Officer of Trinity House and found to be in good and efficient order.

In 2020 the availability of the Local aids to Navigation were as follows:

Aton Availability By Category									
IALA Category	No Of Aids	Total Hours	No Of Failures	OOS Hours	MTTR	MTBF	Availability	Target Availability	
P1916 : Tees Bay and River Tees									
1	6	52,704	1	112.16	112.16	52591.44	99.79 %	99.80 %	
2	1	8,784	0	0.00	0.00	0.00	100.00 %	99.00 %	
3	189	1,660,176	35	3637.16	103.55	47329.41	99.78 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	196								
P1917 : Tees and Middlesbrough									
1	0	0	0	0.00	0.00	0.00	0.00 %	99.80 %	
2	1	8,784	0	0.00	0.00	0.00	100.00 %	99.00 %	
3	76	667,584	13	4349.52	334.36	51018.01	99.35 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	77								
Overall Report Total									
IALA Category	No Of Aids	Total Hours	No Of Failures	OOS Hours	MTTR	MTBF	Availability	Target Availability	
1	6	52,704	1	112.16	112.16	52591.44	99.79 %	99.80 %	
2	2	17,568	0	0.00	0.00	0.00	100.00 %	99.00 %	
3	265	2,327,760	48	7987.08	166.24	48328.36	99.66 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	273								

Three-year availability of Local aids to Navigation were as follows:

Aton Availability By Category									
IALA Category	No Of Aids	Total Hours	No Of Failures	OOS Hours	MTTR	MTBF	Availability	Target Availability	
P1916 : Tees Bay and River Tees									
1	6	157,824	6	1182.36	197.06	26106.54	99.25 %	99.80 %	
2	1	26,304	1	527.48	527.48	25776.12	97.99 %	99.00 %	
3	189	4,971,456	110	26391.13	239.55	44955.08	99.47 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	196								
P1917 : Tees and Middlesbrough									
1	0	0	0	0.00	0.00	0.00	0.00 %	99.80 %	
2	1	26,304	0	0.00	0.00	0.00	100.00 %	99.00 %	
3	76	1,942,992	37	15737.26	425.20	52087.58	99.20 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	77								
Overall Report Total									
IALA Category	No Of Aids	Total Hours	No Of Failures	OOS Hours	MTTR	MTBF	Availability	Target Availability	
1	6	157,824	6	1182.36	197.06	26106.54	99.25 %	99.80 %	
2	2	52,608	1	527.48	527.48	52080.12	99.00 %	99.00 %	
3	265	6,914,448	147	42128.38	286.35	46750.28	99.39 %	97.00 %	
Not Specified	0	0	0	0.00	0.00	0.00	0.00 %	0.00 %	
Total	273								