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INQUIRY INTO THE BUSINESS INNOVATION AND INVESTMENT PROGRAMME (BIIP)

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Executive Summary

This submission responds to the House of Representatives Joint Standing Committee on Migration's inquiry into the Business Innovation and Investment Programme.

Immigration Solutions Lawyers is pleased to provide these submissions and notes that it regards the matters under review as being of considerable importance.

Immigration Solutions Lawyers submissions in relation to the Business Innovation and Investment Programme can be summarised as follows:

1. The failure of the BIIP may in part be due to the DIBP viewing itself as a "gatekeeper". This has resulted in the imposition of multiple and often irrational requirements which only complicates the application and processing process
2. A significant factor in discouraging potential applicants is the emphasis of the programme being on a temporary rather than a permanent visa
3. The complexity of these visas and the high risks involved also dissuades potential applicants:
 - The complex visa categories can become more complicated because they also involve multiple third party stake-holders such as the DIBP and State/Territory government agencies
 - There are serious risks involved for applicants including loss of capital as well as failure to attain permanent residency
4. Processing times are too long:
 - The current processing time of 9 months is too long
 - The DIBP needs to dedicate sufficient resources to enable the process to be completed swiftly and needs to remove any unnecessary barriers to approving applicants
5. The DIBP should focus on dispersing business migrants across Australia:

- The DIBP should seek to provide incentive for applicants to establish businesses in areas of low growth, low employment and rural areas
 - One method of doing this might be to relax the requirements for these areas
6. The DIBP sharing business migrants' information with the PRC Bureau of Public Security may be one of the causes of the decline in application rates:
- It constitutes a breach of privacy and puts the applicant at risk
7. The BIIP points test is ineffective:
- It does not make it very difficult for applicants with low skill and expertise levels to pass
 - The language requirement may deter many applicants
 - However, the special endorsement points that can be awarded by a State/Territory are a good way to meet skill shortages in specific labour markets
8. The BIIP is mistaken in its belief that business migrants are so attracted to Australia that they will abandon their established businesses overseas in order to move to Australia to create new opportunities in an isolated and stagnant business environment
9. The DIBP's commitment to the success of the BIIP is questionable due to the level of energy it expends on investigating applicants for concerning conduct. Some of this energy might be better spent looking to further the effectiveness of the programme

Immigration Solutions Lawyers would be pleased to respond to any queries that may arise concerning these submissions.

Introduction

1. This submission was prepared by Immigration Solutions Lawyers (“ISL”).
2. ISL welcomes the opportunity to make this submission to the House of Representatives Joint Standing Committee on Migration’s inquiry into the Business Innovation and Investment Programme (“BIIP”).
3. ISL has taken an active interest in this inquiry because it believes that the BIIP has the potential to be beneficial to the Australian economy. This is primarily because the programme is designed to vary the business expertise within Australia and because it will contribute to developing and boosting entrepreneurial talent.
4. Skilled migration is an integral part of Australia’s migration programme. Louise Markus, Deputy Chair of the Migration Committee, stated that, “It is important to encourage the creation of genuine and sustainable business opportunities that will generate economic growth, benefiting both the Australian economy and workforce.”¹
5. ISL has recently made a submission to the Department of Immigration and Border Protection on the Significant Investor Visa and as such will not be addressing issues related to that visa stream in this submission.
6. The lack of successful applications thus far in the BIIP may be due to the DIBP viewing itself as a “gatekeeper”. This has resulted in the imposition of multiple and often irrational requirements which only complicate the process.

Background

7. This submission seeks to respond to each of the following terms of reference for the inquiry into the programme;
 - a) Assess whether the BIIP is meeting its intended objectives and if any adjustments are necessary;

¹ Jerry Gomez, *Parliament Seeking Ways to Boost Business and Investment Visa Uptake* (24th March 2014) Migration Alliance <<https://migrationalliance.com.au/immigration-daily-news/entry/2014-03-parliament-seeking-ways-to-boost-business-and-investment-visa-uptake.html>>

- b) Consider the conditions involved in the decline in rates of application for the BIIP, in light of rates of application for the previous Business Skills Program;
 - c) Evaluate the current eligibility criteria, with particular regard to the operation of the BIIP points test, and its effectiveness in selecting suitable migrants; and
 - d) Weigh the size of the current BIIP programme against the emphasis placed on other elements of the skilled stream of the migration programme in generating economic growth.
8. The BIIP is comprised of three separate visa subclasses; Business Innovation and Investment (Provisional) (188); Business Innovation and Investment (Permanent) (888); and Business Talent (Permanent) (132).
9. The requirements for the Business Innovation and Investment (Provisional) (188) visa are as follows:
- The candidate must invest funds in a business or designated investment in Australia for a period of four years
 - An Expression of Interest (EOI) must be lodged before candidates can be invited to apply
 - The candidate must be nominated by a State/Territory government agency
 - Candidates must be under the age of 55, however this can be waived by a State/Territory if the proposed business is perceived to be of exceptional economic benefit to that region
 - The candidate must score a minimum of 65 on the Innovation Points test. Points are awarded for; age, qualification, business turnover, English language ability, net person and business assets, innovation, and experience in business or investing
 - If applications are for the Business Innovation stream then candidates must have total assets of AU \$800,000, an annual turnover of AU \$500,000 in at least two of the four fiscal years prior to receiving the invitation to apply, have a successful business career and experience in managing a business
 - If applications are for the Investor Stream then candidates must have a net value of AU \$2.25 million for the two fiscal years prior to receiving the invitation to apply, have a successful investment record, have a minimum of three years' experience of directly managing a qualifying business or eligible investment, provide the investment before being granted a visa, and possess a genuine desire to continue their business and investment activity in Australia once the original investment has matured

10. The Business Innovation and Investment (Permanent) (888) visa is the second stage of the Business Innovation and Investment (Provisional) (188) visa. The requirements for it are as follows:
- No new EOI or invitation is required
 - If the candidate holds a 188 visa, the State/Territory which nominated them has not withdrawn their nomination, and they have met the requirements of the visa in the stream in which they first applied then they are eligible for the 888 visa
11. The Business Talent (Permanent) (132) visa is a permanent resident visa. The requirements for it are as follows:
- The candidate must be nominated by an Australian State/Territory government agency
 - The candidate must lodge an expression of interest through SkillSelect and then must be invited to apply by the minister
 - The candidate must also have a net business and personal assets of at least AU \$1.5 million and an annual business turnover of AU \$3 million, or they must have attained AU \$1 million in Venture Capital funding to begin the commercialisation and development of a high-value business idea in Australia

KEY OBJECTIVES OF THE REVIEW

a) Assess whether the BIIP is meeting its intended objectives and if any adjustments are necessary

12. The intended objectives of the programme are the contribution to the growth of the economy by:
- a) Generating employment
 - b) Increasing the export of Australian goods and services in Australia
 - c) Increasing the production of goods and services in Australia
 - d) Introducing new or improved technology
 - e) Increasing competition and commercial activity
 - f) Developing links with international markets

g) Increasing the dispersal of business migrants across Australia through State and Territory government sponsorship.²

13. A key objective of the BIIP is to attract entrepreneurs, thus diversifying and increasing entrepreneurial talent in Australia. By attracting such entrepreneurs who are amenable to making a large investment, this will help to advance Australia's economic growth and generate employment opportunities. However, there are a number of factors in the current programme that are discouraging possible applicants.
14. Currently applicants are dissuaded from applying due to the emphasis being not on a permanent visa, but only on a temporary one.
15. Business Innovation and Investor visas are extremely complex visa categories which can involve multiple third-party stake-holders such as State/Territory governments and the Department of Immigration and Border Security. The complex nature of these visas can dissuade potential applicants. The high risks involved, such as failure to obtain permanent residency and possible financial loss, can also contribute to dissuading applicants.³
16. Another factor deterring potential applicants is the processing time. The applications are not being processed in a reasonable and timely manner. The current processing time is 9 months.⁴ To rectify this, the DIBP must dedicate sufficient resources as well as remove any unnecessary barriers to the approval of applicants. The length of processing times is in part due to it involving the assessment of an applicant's capital and ensuring it was lawfully acquired, coupled with other visa requirements including national security, health and character checks. Despite predictions that the process would become streamlined over time this has failed to eventuate and as such attention should be focused in this area during the review. The targets for finalising applications were all met in 2012-2013, however the target timeframes themselves were quite long. For the onshore low-risk category 75% of applications were finalised within 11 months, and for the high-risk applications they were finalised within 22 months. For the offshore low-risk category 75% were finalised within 9 months, and for the high-risk category they were finalised within 28 months.⁵

² Department of Immigration and Border Protection, *Fact Sheet 27- Business Migration* (15th January 2014) Australian Government <<https://www.immi.gov.au/media/fact-sheets/27business.htm>>

³ Linda McCreath, *Subclass 188 Visa- Business Innovation and Investment (Provisional)*, Abacus Visa Immigration Lawyers <[http://www.abacusvisa.com.au/visa-information/Business%20Skills/Subclass-188-Visa-Business-Innovation-and-investment-\(Provisional\)](http://www.abacusvisa.com.au/visa-information/Business%20Skills/Subclass-188-Visa-Business-Innovation-and-investment-(Provisional))>

⁴ Department of Immigration and Border Protection, *Business Innovation and Investment Visa Processing Times* (3rd March 2014) Australian Government <<https://www.immi.gov.au/about/charters/client-services-charter/visas/4.0.htm>>

⁵ Department of Immigration and Border Protection, 'Annual Report 2012-2013' (4th November 2013) 59 <<http://www.immi.gov.au/about/reports/annual/2012-13/pdf/2012-13-diac-annual-report.pdf>>

17. The DIBP focuses much energy on investigating applicants for money laundering and other conduct that is of concern. However, it does so to the extent that the commitment of the DIBP to the success of the programme is questionable. Some of that energy might be better spent on seeking to improve the programme and ensuring its effectiveness.
18. Another issue that requires attention is that DIBP case officers must have sufficient training in order to effectively consider complex cases. Skill and “real world” business experience is necessary in order for them to capably perform their duties.
19. The temporary-to-permanent visa pathways can be an effective method of attaining suitable permanent immigrants and meeting the objectives of the programme. This is because it allows those on temporary visas time to secure local contacts, learn how to successfully navigate the market and build their language skills.⁶ To be effective, these pathways must provide very simple and predictable rules for the transition from temporary to permanent residence and require the removal of outdated and unnecessary restrictions. This will contribute to not dissuading applicants and enables them to plan ahead. However, proven entrepreneurs and businesspeople who are recognised as the most talented among their peers are likely to have their choice of destinations and as such factors such as long waiting times, restrictive conditions and complicated application procedures will significantly increase the risk that they will be deterred.⁷ Therefore to secure these candidates, more streamlining for this category of immigrants to enable their applications to be considered in a swift manner with only very light administrative burden is desirable.
20. In order to meet the objective of dispersing business migrants across Australia, the DIBP should more actively encourage business migrants to establish businesses in rural, regional or low growth areas of Australia.⁸ One possibility might be to introduce a model that has more relaxed requirements for areas of low population and growth that is similar to the US model. This might help to encourage a more even distribution of investment funds. For example, the US EB-5 immigration visa does have a minimum qualifying investment of US \$1 million but this is reduced to \$500,000 in rural areas that are in need of employment creation and in areas that have unemployment that is 150 percent above that of the national average.⁹

⁶ Demetrios Papademetriou and Madeleine Sumption, *Eight Policies to Boost the Economic Contribution of Employment-Based Immigration* (June 2011) Migration Policy Institute
<http://migrationpolicy.org/research/boosting-economic-contribution-employment-based-immigration>

⁷ Ibid.

⁸ Department of Immigration and Border Protection, *Fact Sheet 27- Business Migration* (15th January 2014) Australian Government <<https://www.immi.gov.au/media/fact-sheets/27business.htm>>

⁹ Matthew C. Schulz, *United States: Disappointing News for VC and Entrepreneurs Re The Startup Visa* (20th March 2014) Mondaq
<<http://www.mondaq.com/unitedstates/x/301232/Corporate+Commercial+Law/Disappointing+News+For+VC+And+Entrepreneurs+Re+The+Startup+Visa>>

21. The VCE stream has much potential in meeting the objectives of the programme but so far has not had any successful grants of applications. In order to qualify for the Venture Capital entrepreneur stream, the applicant must have already successfully sourced Venture Capital funding via a Venture Capital member of AVCAL.¹⁰ The Australian Venture Capital industry has been partnering with the government for the last decade in programmes including the Innovation Investment Fund.¹¹ However, the industry is relatively small. The chances of securing funding are not high due to the limited source of funding, since there are very few Venture Capital members of AVCAL who can source funding for these visas, and because there is significant competition for these funds. Lowering the Venture Capital investment threshold is essential to help combat these difficulties. The 1 million investment requirement is too high and lowering the threshold would potentially help to boost this visa stream as well as help in making our system more internationally competitive. Alternatively, diversifying the funding options might alleviate some of the difficulties associated with this stream.
22. The US has also proposed to create a new visa category that is based on receiving Venture Capital. It will be interesting to see what form it takes, how successful it is and whether it has any aspects that Australia might consider implementing in our programme. However, there is currently some controversy surrounding the proposed US requirements. For example, the Senate and House proposals require three to five full-time jobs to be created for US workers for which the wage was at least 250 times the federal minimum wage.¹² However, critics say this requirement is ignorant of how startups work; often founders and early employees are provided with stock options rather than salaries.¹³ Another criticism with the proposed version is the minimum investment level which is between US \$500,000 and \$1 million. It is argued that this investment level results in the Startup Visa not being available for most new ventures.¹⁴ Some of these criticisms should be kept in mind when reviewing the Australian Venture Capital stream.
23. The most important factors to successful economic-stream immigration systems are transparency, flexibility, predictability outcomes and remaining open to continual adaptation. To meet the programmes objectives and increase its effectiveness, these factors should underpin the entire immigration system. The labour market and migration flows are dynamic, therefore to remain effective immigration systems must

¹⁰ AVCAL, *Venture Capital Entrepreneur Factsheet* (2014) AVCAL <<http://www.avcal.com.au/looking-for-capital/venture-capital-entrepreneur-visa>>

¹¹ AVCAL, *Venture Capital* (December 2011) AVCAL <<http://www.avcal.com.au/documents/item/46>>

¹² Matthew C. Schulz, *United States: Disappointing News for VC and Entrepreneurs Re The Startup Visa* (20th March 2014) Mondaq <<http://www.mondaq.com/unitedstates/x/301232/Corporate+Commercial+Law/Disappointing+News+For+VC+And+Entrepreneurs+Re+The+Startup+Visa>>

¹³ Ibid.

¹⁴ Ibid.

be able to be flexible and adapt alongside them.¹⁵ Continual research and policy analysis is required in order to promote such continual adaptation, allow for effective reform, and improve policymakers' understanding of how the immigration system actually works.¹⁶

b) Consider the conditions involved in the decline in rates of application for the BIIP, in light of rates of application for the previous Business Skills Program

24. Between the periods of the 1st July 2012, the start of the reformed programme, and the 31st March 2014 a total of 652 visas were granted under the BIIP and there were 2309 applications. It is interesting to note that under the previous Business Skills Programme the figures were higher. Between 2009-2010, for example, 6790 visas were granted under this category, between 2008-2009 7400 visas were granted and between 2007-2008 6570 visas were granted.¹⁷ This represents an enormous decline in the number of visas granted during the old programme when compared to the new one.
25. It is difficult to understand why there is such a significant decline in the rates of application when there is a market for these visas. Now especially there should be a heightened demand due to some other nations now refusing these types of visa applications.
26. One possible explanation is the conduct of the DIBP in sharing information with the PRC Bureau of Public Security. This constitutes a breach of privacy, but also puts the applicant at risk.
27. An examination of the advantages and disadvantages facing immigrant entrepreneurs and businesspeople in establishing and maintaining successful businesses in Australia might be worthwhile. This might provide a better understanding of the constraints that could be deterring applicants and also indicate whether there is untapped potential for this group whose numbers and contributions could be improved.
28. Another reason for the decline in the number of applications could be awareness that few visas under this programme are granted in comparison to the number of applications received. There is a significant discrepancy between the number of

¹⁵ Demetrios Papademetriou and Madeleine Sumption, *Eight Policies to Boost the Economic Contribution of Employment-Based Immigration* (June 2011) Migration Policy Institute
<http://migrationpolicy.org/research/boosting-economic-contribution-employment-based-immigration>

¹⁶ Ibid.

¹⁷ Department of Immigration and Border Protection, 'Annual Report 2009-2010' (31st July 2013) 52
<<http://www.immi.gov.au/about/reports/annual/2009-10/pdf/diac-annual-report-2009-10-full-version.pdf>>

applications made and the number of applications approved. For example; between 1st July 2012 and 31st March 2014 there were 1168 applications for the Business Innovation Visa but only 388 were granted, there were 127 applications for the Investor Visa but only 18 were granted, and although there were 241 primary applications under the Business Talent Visa only 72 were granted. Also, there have been no visas granted under subclass 132 from within the Venture Capital Entrepreneur stream, making it the most unsuccessful stream by far.

29. These numbers are surprising low, especially when compared to other international investor visa programmes. The numbers in the US, for example, are much higher even given the population difference. The EB-5 visa had an allocation of 10,000 visas to be issued in the 2013 fiscal year, and 8,567 were issued.¹⁸ In only the first few months of the 2014 fiscal year 4,748 EB-5 visas were already issued which is an increase of 50.2% from the same period as the previous year.¹⁹
30. Another possible explanation for the decline in rates of application might be the general difficulties for applicants in attempting to provide enough evidence regarding ownership and source of funds.

c) Evaluate the current eligibility criteria, with particular regard to the operation of the BIIP points test, and its effectiveness in selecting suitable migrants

31. Whilst venture backing is an effective way of identifying the elite tier of applicants who are particularly promising and is a good way to avoid putting government officials in the complicated position of having to identify entrepreneurial talent, it does result in other equally promising individuals not qualifying.²⁰ As a method of preventing this, allowing for larger numbers of successful applicants and finding other criteria by which to admit them is worth considering.
32. The BIIP points test is a good system in theory. However, in practice the points test is relatively ineffective in that it is easy for applicants with low skill and expertise levels to pass.

¹⁸ IUSA, *US Department of State Statistics on EB-5 Visa Usage Indicate Backlog in FY2014 is Likely* (23rd December 2013) Association to Invest In the USA <<https://iusa.org/blog/government-affairs/dept-state-statistics-eb5-visa-usage-backlog-fy2014/>>

¹⁹ Ibid.

²⁰ Madeleine Sumption, *Visas for Entrepreneurs: How Countries are Seeking Out Immigrant Job Creators* (13th June 2012) Migration Policy Institute <<http://www.migrationpolicy.org/article/visas-entrepreneurs-how-countries-are-seeking-out-immigrant-job-creators>>

33. The eligibility criteria is overly onerous in some respects. The BIIP points test dissuades applicants who can't demonstrate at least a functional level of English; those who can't demonstrate this level don't receive any points and are subject to a second instalment visa application charge.²¹
34. A desirable candidate is someone between 35-39 years of age, with a business turnover that is not under \$1 million, with at least 4 years business experience and who has \$1.3 million in assets. However, such a candidate would be unlikely to elect Australia due to heavy government regulation, taxation, and it being a relatively small market on the very outskirts of the Pacific Rim. What the candidates are interested in Australia for is the lifestyle it offers; most candidates' primary goal is relocating their families to Australia.
35. The special endorsement points that can be awarded by a State/Territory that considers a business to be unique and critical to the State/Territory is a positive attribute of the current points test. It allows these skilled migrants to meet any skill shortages that are present in local labour markets.²²

d) Weigh the size of the current BIIP programme against the emphasis placed on other elements of the skilled stream of the migration programme in generating economic growth

36. The BIIP relies on the notion that candidates are so consumed with a desire to come to Australia and that in order to do so they will risk their established businesses elsewhere in order to migrate here where opportunities are not as widespread and where the economy is perhaps not as fertile. However, this notion cannot be relied upon. The risks attached to the temporary visa offered under the BIIP deters even overly enthusiastic potential applicants.
37. Although the BIIP aims to generate growth through introducing capital and securing entrepreneurs who seek to create jobs and opportunities within the Australian market, the complexity of Australian migration law combined with the unstable and constantly changing public policy have the effect of continually deterring candidates.

²¹ *Introduction of the Business Innovation and Investment Programme* (30th May 2012) Deloitte
<http://www.deloitte.com/view/en_AU/au/services/tax/globalemployerservices1/485b4fdc413e7310VgnVCM2000001b56f00aRCRD.htm>

²² *Immigration South Australia, About Immigration South Australia* (18th October 2013) Government of South Australia <https://www.migration.sa.gov.au/about_immigration_sa>

Recommendations

- Cut processing times
- Reassess some of the criteria used to admit candidates

- Undertake a study of the advantages and disadvantages facing immigrant entrepreneurs and businesspeople in establishing successful businesses in Australia
- Increase the number of primary visa grants in order to decrease the disparity in the numbers of applications received and applications granted
- Provide more options for conferring immediate permanent residency. This should be focused on especially in regards to highly desirable candidates such as proven entrepreneurs and businesspeople who are likely to have their choice of destinations
- Simplify the nature and procedures of the visas
- In the transition from temporary to permanent residence, ensure the rules are simple and predictable to allow applicants to plan ahead
- The DIBP should more actively encourage business migrants to establish businesses in rural, regional or low growth areas of Australia. Relaxing the requirements for areas of low population and growth might be a good method of executing this
- In order to encourage the success of the Venture Capital entrepreneur stream of the Business Talent visa, the investment threshold should be lowered and funding options should be diversified

Conclusion

The Business Innovation and Investment Programme is in need of reform in order to maximise the potential of the scheme.

The effectiveness of the scheme is currently hindered by a multitude of factors including;

- Long processing times
- Strict requirements
- The complexity of the process
- The DIBP breaching the privacy of applicants
- The high level of risk involved in terms of losing capital and failing to secure permanent residency
- There are also numerous unnecessary barriers to approving applicants which adds to the length of the process and contributes to the complexity of the visas

Madeleine Sumption, a Senior Policy Analyst at the Migration Policy Institute, explains the importance of ensuring the entire visa system is flexible and attractive.²³ She indicates that future entrepreneurs often choose their host country well in advance of being in a position to qualify for entrepreneur visas, and initially enter as temporary workers or students.²⁴ This is because it is essential for entrepreneurs to have local knowledge, experience in the receiving country and established networks.²⁵ Therefore, making the entire immigration system flexible and inviting is essential to securing entrepreneurial talent at an early stage.

Australia is a very popular destination among business migrants, however it is not attracting them in the numbers it should be. This is primarily due to the fact that Australian immigration laws are just not “global”. There are many similar visas on offer elsewhere that are less complex and more migrant friendly. To compete with these overseas programmes and provide incentive for investors, the BIIP needs to provide a streamlined, more efficient and investor-friendly system.

Acknowledgements

²³ Madeleine Sumption, *Visas for Entrepreneurs: How Countries are Seeking Out Immigrant Job Creators* (13th June 2012) Migration Policy Institute <<http://www.migrationpolicy.org/article/visas-entrepreneurs-how-countries-are-seeking-out-immigrant-job-creators>>

²⁴ Ibid.

²⁵ Ibid.

We are grateful for the contributions from the following people:

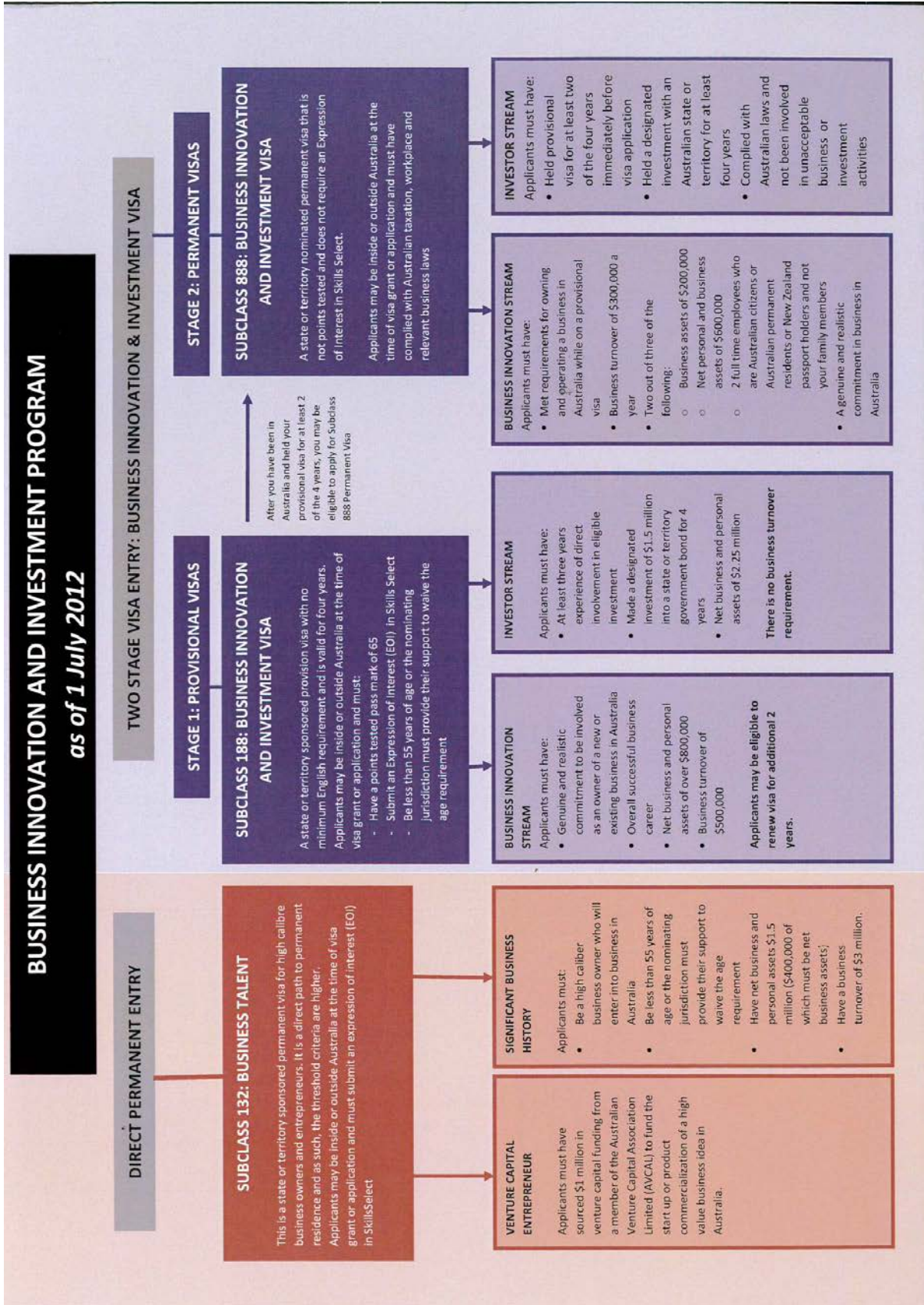
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Comparison between the BIIP and the Business Skills Programme

Business Innovation and Investor Programme 2012-2014	Business Skills Programme 2009-2010	Business Skills Programme 2008-2009	Business Skills Programme 2007-2008
652 visas granted	6790 visas granted	7400 visas granted	6570 visas granted

Comparison between the Australian BIIP and the US EB-5 visa

	USA EB-5	AUSTRALIA BIIP
Top Country	China	China
Number of Visas Issued (2013)	8567 EB-5 visas during the fiscal year	156 BII primary visa grants during 2012-13 programme year
Number of Visas Issued (2014)	4748 EB-5 visas issued already during the fiscal year	362 BII primary visa grants thus far for 2013-14 programme year
Population (2013)	316,148,990	23, 193, 673