

JOINT COMMITTEE ON PUBLIC ACCOUNTS AND AUDIT

**Inquiry into Efficiency and Effectiveness: Inquiry into Auditor-General's Reports 25, 29, 38,
42, 44, 45 and 51 (2018-19)**

Performance audit (Auditor-General Report No. 38 of 2018–2019)

Application of cost recovery principles

Performance audit (Auditor-General Report No. 51 of 2018–2019)

Farm Management Deposits Scheme

PUBLIC HEARING

15 NOVEMBER 2019

DEPARTMENT OF AGRICULTURE

**Responses to questions from Ms Lucy Wicks MP (Chair) and Mr Julian Hill MP
(Deputy Chair)**

12. The department proposed to assess the impact of the 2016 policy changes through a broader evaluation of the Scheme within the next two years.

- a. Could you advise the committee of the progress of this evaluation and if there have been any significant findings?

Answer:

The Department of Agriculture has developed an ANAO Performance Audit: Farm Management Deposits Scheme Implementation Plan, which sets out implementation steps to complete an evaluation of the Farm Management Deposits Scheme by June 2021.

Early findings from the evaluation will not be available until early 2021, when key data becomes accessible, including through the completion of an Agricultural and Resource Economics and Sciences (ABARES) 2020-21 FMD supplementary survey.

13. With the Nation now experiencing the worst drought on record and more citizens being affected, what measures, monitoring and evaluation plans/actions have been put into place to help deliver the FMD?

Answer:

The Farm Management Deposits (FMD) Scheme is a long-term tax-linked financial risk management tool, designed to assist primary producers to deal more effectively with fluctuations in cash flows.

The Scheme aims to increase financial self-reliance among primary producers by helping them manage their financial risk and meet their business costs in low-income years, including during drought, by building up cash reserves.

Primary producers affected by drought can withdraw their FMDs before 12 months (the standard time required to hold an FMD for a tax concession) without losing any claimed taxation benefits if they:

- made their FMD in the previous financial year, and
- have held their FMDs for at least six months, and
- can demonstrate that an area of their farming property has been affected by a rainfall deficiency for six consecutive months. To be eligible, the rainfall must be within the lowest five per cent of recorded rainfall for the property for that six-month period.

The Department of Agriculture monitors monthly data collected from banks that offer FMD accounts to analyse drawdown trends in drought-affected states and sectors.

The evaluation of the FMD Scheme to be completed by June 2021, will consider the effectiveness of the early access trigger during times of drought.

HANSARD QUESTIONS TAKEN ON NOTICE

Mr HILL: Sure. I found this really interesting. I didn't know much about this area of what you do, so I found it interesting to read. It wasn't a bad report—it wasn't the best—but there are a few issues to explore. Thank you for coming in. The cost of the scheme is obviously significant and appears to be, overall, trending up, so it is important that we interrogate it. Tell me if I've got these figures right. It was \$245 million in 2016-17, which doubled to \$500 million just a year later, and it then dropped back a little, to \$345 million. If you have any information on your latest estimates about where you expect the trajectory to be, that would be interesting. You can take that on notice. Can you explain the policy rationale for the scheme?

Mr HILL: Right. Perhaps you can take it on notice because the answer you have provided, while I appreciate you are trying to give us some detail, still doesn't give me any confidence that the department is going to measure whether the scheme's primary purpose is being achieved, so if you could provide some more information. Can you provide an update on the current total amount of FMD funds?

Ms Crosthwaite: I will have to take that on notice.

Mr HILL: How much has been drawn down in the last 12 months?

Ms Crosthwaite: I may have that. For us to answer that question is difficult, because the data that we collect from banks is data about the amount of money which is held in accounts which can be treated as fund management deposits. We assume that not all of that is primary production income, which means it is not actually farm management deposit income.

Mr HILL: So you can sick away a bit of cash in the farm management deposit scheme?

Ms Crosthwaite: Yes, and we understand that people do.

Mr Hehir: It is in an account which is covered by the deposit scheme; it is not in the scheme.

Mr HILL: That opens up all sorts of opportunities for rorting, doesn't it?

Mr Morris: It could raise that opportunity but that is why the tax office needs compliance programs.

Mr HILL: We will get to compliance. Is the department able to identify where FMD funding is being drawn down, for example, by state breakdown?

Ms Crosthwaite: Yes, we can.

Mr HILL: Can you provide that information for the last three years?

Ms Crosthwaite: I would have to take it on notice.

Answer:

Trajectory on the expected cost of the scheme

The *2018 Tax Benchmarks and Variations Statement* Item B34 contains the latest estimates of the revenue forgone through the Farm Management Deposits (FMD) Scheme –

	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Revenue forgone (\$million)	170	240	250	500	370	*	*	*

Due to the volatility in the revenue impact in the scheme, projections beyond 2018-19 are not available. The *2019 Tax Benchmarks and Variations Statement*, due to be released in January 2020, will provide updated estimates of revenue forgone under the scheme.

Measuring whether the Farm Management Deposits Scheme's primary purpose (improved self-reliance) is being achieved

The evaluation of the FMD Scheme, to be completed by June 2021, will specifically address the extent to which the Scheme assists primary producers to become more financially self-reliant.

Similar to the 2017-18 Agricultural and Resource Economics and Sciences (ABARES) supplementary surveys of broadacre and dairy farms, a survey will be conducted by ABARES in 2020-21 to ask specific questions regarding the extent to which the Scheme assists primary producers to become more financially self-reliant.

Total Farm Management Deposits holdings

As at 31 October 2019, data collected from banks by the Department of Agriculture (the department) revealed that the level of FMD holdings was \$5.71 billion. This amount may be greater than the actual level of FMD holdings as primary producers may choose not to claim a tax deduction for all deposits held in FMD accounts.

Only the Australian Taxation Office (ATO) can determine the actual level of FMD holdings held through tax return data it receives. The department is working with the ATO to resolve data sharing and data integrity issues, to enable the department to obtain this information.

Total Farm Management Deposits drawdowns by state and territory

Only the ATO can determine the actual level of FMD drawdowns through tax return data it receives. The department is working with the ATO to resolve data sharing and data integrity issues, to enable the department to obtain this information.

The following table sets out FMD holding trends by State/Territory for the three years to 31 October 2019 according to data the department collects from the banks. The level of FMD holdings reported may be greater than the actual level of FMD holdings as primary producers may choose not to claim a tax deduction for all deposits held in FMD accounts.

FMD Holdings	31-Oct-17 (\$'000)	31-Oct-18 (\$'000)	% Change from 2017 to 2018	31-Oct-19 (\$'000)	% Change from 2018 to 2019	% Change from 2017 to 2019
New South Wales	1,386,560	1,414,768	2.0%	1,327,753	-6.2%	-4.2%
Victoria	980,496	1,110,221	13.2%	1,205,881	8.6%	23.0%
Queensland	1,203,555	1,204,189	.1%	1,218,477	1.2%	1.2%
South Australia	901,565	898,225	-.4%	943,095	5.0%	4.6%
Western Australia	722,361	745,375	3.2%	912,142	22.4%	26.3%
Tasmania	73,377	81,801	11.5%	88,535	8.2%	20.7%
Northern Territory/ACT	10,047	12,342	22.8%	10,227	-17.1%	1.8%
Total	5,277,961	5,466,921	3.6%	5,706,110	4.4%	8.1%

Source: FMDS Database, 31 October 2019

Mr HILL: Are you able to provide any further breakdown, as well as the state breakdown, on the turnover of the businesses that use it?

Ms Crosthwaite: Sure.

Mr HILL: And perhaps give us a sense, given your broader understanding of the industry, of where that sits in the two-thirds who don't use it. I'm curious as to understanding the focus of this scheme. Is it targeting the wealthier farmers or the smaller farmers?

Ms Crosthwaite: Sure.

Answer:

The below information on the turnover of businesses and the industries using Farm Management Deposits (FMDs) comes from the 2017-18 Agricultural and Resource Economics and Sciences (ABARES) supplementary surveys of broadacre and dairy farms.

It should be noted that the sample size for some of these categories is relatively low and this is reflected in some high Relative Standard Errors (RSEs), which suggests these estimates are less reliable. This is particularly the case where the proportion of farms in any category is relatively small.

Proportion of farms by turnover, by FMD holdings, broadacre and dairy farms, Australia, 2017–18

Region/size	Unit	Farms with FMDs at 30 June 2018	RSE	Farms without FMDs at 30 June 2018	RSE
Australia					
Small (Less than \$500,000 turnover)	%	51	(5)	71	(2)
Medium (\$500,000 to \$1million turnover)	%	25	(9)	15	(9)
Large (\$1million to \$5million turnover)	%	23	(8)	13	(5)
Very large (More than \$5million turnover)	%	1	(30)	1	(29)
New South Wales					
Small	%	49	(10)	79	(2)
Medium	%	30	(16)	11	(14)
Large	%	20	(14)	10	(10)
Very large	%	1	(73)	0	–
Victoria					
Small	%	51	(8)	68	(5)
Medium	%	23	(17)	20	(18)
Large	%	26	(14)	12	(12)
Very large	%	0	–	0	–
Queensland					
Small	%	63	(5)	73	(4)
Medium	%	23	(17)	16	(16)
Large	%	13	(18)	10	(10)
Very large	%	1	(83)	1	(22)
South Australia					
Small	%	55	(9)	67	(5)
Medium	%	16	(22)	18	(13)
Large	%	28	(19)	14	(18)
Very large	%	1	(129)	1	(57)
Western Australia					
Small	%	31	(30)	57	(7)
Medium	%	35	(28)	11	(25)

-6-

Large	%	31	(25)	30	(11)
Very large	%	3	(36)	2	(120)
Tasmania					
Small	%	76	(10)	57	(8)
Medium	%	5	(134)	15	(30)
Large	%	19	(8)	27	(10)
Very large	%	0	-	1	(67)

RSE Figures in parentheses are standard errors expressed as a percentage of the estimate.

Note: Insufficient sample size to include results for the Northern Territory.

Source: ABARES Australian Agricultural and Grazing Industries Survey and ABARES Australian Dairy Industry Survey

Mr HILL: The 2017-18 ABARES survey showed that an average of \$274,000 was held in FMD accounts, which is well below the now \$800,000 limit. Do you have data about the range of upper and lower amounts held in FMDs?

Ms Crosthwaite: We do. Yes, I can provide that on notice.

Answer:

The following table sets out the number of accounts and account balances as at 31 October 2019 according to monthly data the Department of Agriculture (the department) collects from the individual banks.

The level of Farm Management Deposits (FMD) holdings reported may be greater than the actual level of FMD holdings as primary producers may choose not to claim a tax deduction for all deposits held in FMD accounts. In addition, the total number of account holders is not completely accurate as primary producers may hold accounts at different banks (ie the number may be overestimated).

Only the Australian Taxation Office (ATO) can determine the actual number of FMD holders through data it receives from taxpayers and the banks. The department is working with the ATO to resolve data sharing and data integrity issues, to enable the department to obtain this information.

Account Balances	Account Holders		Account Holder Balances	
	Number	% of total	\$	% of total
Less than \$100,000	21,605	53.6%	895,756,611	15.7%
\$101,000 to \$200,000	9,712	24.1%	1,361,400,994	23.9%
\$201,000 to \$300,000	3,794	9.4%	964,270,779	16.9%
\$301,000 to \$400,000	2,456	6.1%	891,078,526	15.6%
\$401,000 to \$500,000	1,070	2.7%	488,571,372	8.6%
\$501,000 to \$600,000	706	1.8%	393,816,486	6.9%
\$601,000 to \$700,000	399	1.0%	262,361,854	4.6%
\$701,000 to \$800,000	568	1.4%	448,855,113	7.9%
Total	40,310	100.0%	5,706,111,736	100.0%

Source: FMDS Database, 31 October 2019

Mr HILL: I have a series of questions on risk we can get to in a moment but just to finish the opening questions. The last one I have is: can you tell us the average age of FMD fund holders?

Ms Crosthwaite: I can take that on notice. I don't believe I have that.

Mr HILL: If you had the average age that would be helpful and if you had a sense, even in a graphical form, of the spread of ages that would be interesting. I've got lots of other topics but that's a start.

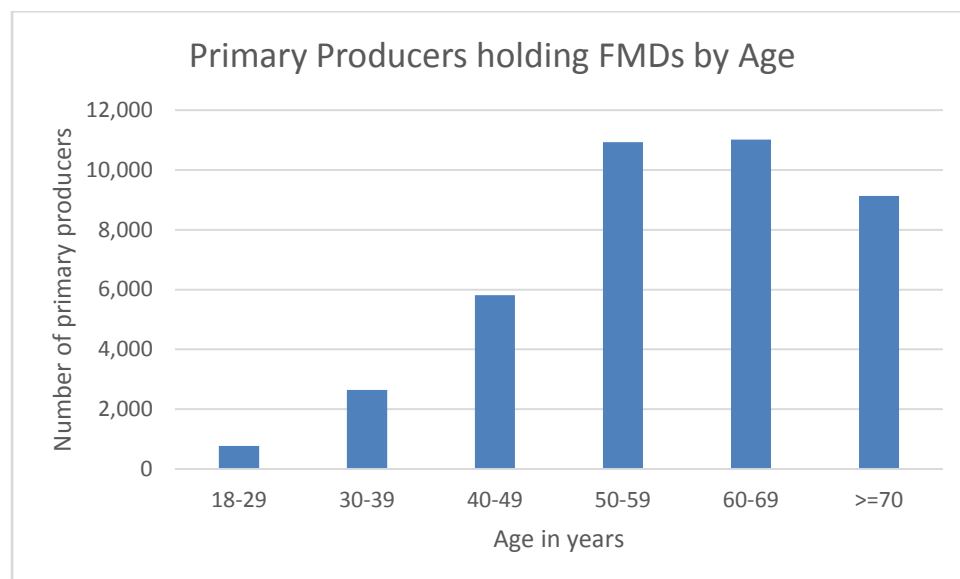
Answer:

As at 31 October 2019, according to monthly data the Department of Agriculture (the department) collects from individual banks, the average age of primary producers holding Farm Management Deposits (FMDs) is 60.

Derived from the same dataset, the following chart shows the distribution of primary producers by number and age that hold FMDs.

The number of primary producers reported may be more than the actual number as primary producers may hold accounts at different banks. This means that the average age may actually be higher, although not greatly, than what the numbers would suggest.

Only the Australian Taxation Office (ATO) can determine the actual number of FMD holders, and therefore allow an accurate calculation of average ages, through data it receives from taxpayers and the banks. The department is working with the ATO to resolve data sharing and data integrity issues, to enable the department to obtain this information.



CHAIR: In relation to policy changes introduced on 1 July, 2016, firstly and briefly, can you just outline the steps taken during consultation with stakeholders and members of the public before these policy changes were implemented? Also could you advise whether these steps were the same or similar for those taken for other policy measures introduced in the agriculture competitiveness white paper.

Ms Crosthwaite: The *Agricultural competitiveness white paper* was written in the period of around 2015. Consultation on the 2016 changes to the Farm Management Deposits scheme occurred as a part of that. I wasn't in the department at that time, so I can't speak to the specifics of that, but I can take on notice the details of the consultation process. I understand that that was also outlined in the audit report. The department consulted with key stakeholders to discuss, specifically, the loan offset proposal in August 2015, prior to the release of the exposure draft of the legislation, which was in November 2015. The other elements of the 2016 changes were consulted on throughout the white paper consultation process, but that was one which was done separately.

Answer:

Similar to other measures announced as part of the *Agricultural Competitiveness White Paper* (White Paper), stakeholder views on the Farm Management Deposits (FMD) Scheme were sought:

- during the Agricultural Competitiveness Issues Paper consultation process (the Issues Paper was released on 6 February 2014)
- during the Agricultural Competitiveness Green Paper consultation process (the Green Paper was released on 20 October 2014) - stakeholder views were sought specifically on increasing the deposit limit for FMDs and to re-establish early access provisions in times of drought.

Following the release of the White Paper, on 25 August 2015, the department met with representatives of the Australian Banking Association, the Customer Owned Banking Association, a number of individual banks involved in agricultural lending, the Treasury and the Australian Taxation Office.

The meeting was held to identify issues and settle next steps in progressing changes to the FMD Scheme announced as part of the White Paper. Following this meeting, the department and the Treasury held teleconferences with individual banks to discuss the issues further, particularly in relation to the FMD loan offset measure.

The Treasury conducted a consultation process through an exposure draft for legislative changes to the Scheme (which was issued on 26 November 2015).

Mr HILL: I will just pick up on the \$800,000 figure. I think you said that the figure arrived because the minister told you that was the figure. Could you take this on notice, to provide us with a list of which stakeholders suggested \$1 million?

Ms Crosthwaite: Sure.

Mr HILL: The Auditor-General has noted that, once you were told that was the figure, the department then provided some advice to the minister, and that advice noted that the \$800,000 would likely benefit a small number of primary producers. Who are those primary producers?

Ms Crosthwaite: I'll have to take on notice the way that that figure was modelled.

Mr HILL: It says that they would benefit a small number of primary producers. What's the number?

Ms Crosthwaite: I'll take that on notice.

Answer:

Stakeholders that suggested the FMD cap should be raised to \$1 million

During the 2014 Agricultural Competitiveness Issues Paper consultation process, some stakeholders in their submissions called for a significant increase to the Farm Management Deposits (FMD) Scheme cap. In its submission, WAFarmers, the peak body representing primary producers in Western Australia, indicated that the \$400,000 upper limit was insufficient given season volatility and seasonal income spikes of over \$1 million.

The Agricultural Competitiveness Green Paper released on 20 October 2014, included reference to suggestions that the deposit limit for FMDs be increased to \$1 million. The following stakeholders supported this in their submissions:

- AgForce
- Ag Institute
- Australian Banker's Association (now the Australian Banking Association)
- Australian Honey Bee Industry Council Inc.
- CPA Australia
- Fonterra Cooperative Group
- Grain Producers SA
- GrainGrowers
- National Australia Bank
- New South Wales Primary Industries Ministerial Advisory Council
- Latrobe City Council
- Victorian Farmers Federation
- WAFarmers
- Western Australian Government*

- * In its submission, the Western Australian Government suggested that the cap be increased to \$1.2 million to allow FMDs to have a ceiling or maximum value equivalent to the average annual operating cost of broadacre properties in Western Australia 'as per the 2013-14 Planfarm Bankwest Benchmarks'.

The National Farmers Federation, in its May 2015 submission to the Australian Government's 2015 Tax Discussion Paper, suggested that the government should examine the merits of increasing the FMD deposit limit to \$1 million.

Modelling for the \$800,000 Farm Management Deposits Cap

In April 2015, the \$800,000 FMD limit was provided to the Department of Agriculture (the department) by the then Minister's office, and was subsequently incorporated into the exposure draft legislation.

Information provided by the department for the process indicated that the proposal would provide a benefit to a small number of primary producers who would be able to set aside amounts in excess of \$400,000. This was based on earlier analysis (from 2011) which indicated that less than one per cent of FMD accounts held more than \$350,000.

It is important to note that this percentage would have been based on data the department collected from the banks. The total number of account holders used to calculate the percentage would not have been the actual number (ie there would be less holders) as producers may hold accounts at different banks.

Any further modelling/costings was completed by the Treasury, which may have relied on more accurate Australian Taxation Office information.

Who are the primary producers that would benefit from the \$800,000 cap?

Larger primary producers with higher costs would benefit by allowing them to build sufficient FMD holdings to prepare for low income years.

Mr HILL: So the minister gave you an instruction to double the cap, which no-one else had suggested, and that decision, with no analysis, was to benefit a small number of producers with higher cash flows—so the big business end of town, not the SME farmers, not the small, struggling farmers, as people might say?

Ms Crosthwaite: I believe so.

Mr HILL: The budget cost of that was \$20 million over the forward estimates. Has the department got any updated advice on how that's tracking? Is it costing that much as expected or is it looking to cost more or less?

Ms Crosthwaite: The cost of the change to that—?

Mr HILL: Of that measure.

Ms Crosthwaite: I'll have to take that on notice.

Mr HILL: With regard to the loan offset measure, the minister's office also indicated in January that the minister wanted the loan offset measure included, yet the first public consultation on the loan offset proposal occurred in November. There were concerns raised, including that by the Australian Banking Association. Was advice provided to the minister regarding those concerns?

Ms Crosthwaite: I believe it was, but I'll have to take it on notice.

Answer:

Budget cost of the \$800,000 cap measure versus actual costs

The impact of the increased deposit limit from 1 July 2016 is included in the *Tax Benchmarks and Variations Statement* (2018 Item B34) with the overall estimates of revenue forgone of the Farm Management Deposits (FMD) Scheme. Separate estimates of the impact of the increased deposit limit are not available.

Advice provided regarding stakeholder concerns with the FMD loan offset measure

On 26 November 2019, the Department of Agriculture (the department) provided advice to the then Minister for Agriculture regarding stakeholder feedback on the FMD Scheme loan offset measure.

The department advised the changes were not supported by the finance sector, due to the claimed expense of developing and implementing new FMD products, the revenue they expect to lose because of the offset arrangements, and the cost of holding higher levels of cash reserves that would be needed under the prudential requirements of the Australian Prudential Regulation Authority. In addition, the advice included that a number of banks would not be in a position to offer FMD loan offset products from the start date of 1 July 2016.

Mr HILL: Sure. But I'm trying to understand why, given we've got a figure of \$400,000 and someone said \$1 million and the minister decided \$800,000, the Treasury was preparing a budget proposal for \$500,000. Why did they pick \$500,000, and who instructed them to prepare that proposal? Was it Agriculture or did they just think it was a good idea that day?

Ms Rauter: We don't have any evidence on who instructed that.

Mr HILL: Do you have anything, Ms Crosthwaite?

Ms Crosthwaite: No, I don't. I can take that on notice, but it was during the green and white paper development process, so that was the policy development process.

Answer:

A range of policy options were considered throughout the policy development process. The Government ultimately decided to increase the deposit cap from \$400,000 to \$800,000.

Mr HILL: Could you provide two things: first, a list from your departmental systems of all the classifications that are searchable to understand that 6.8 per cent—that is, if it's an Excel spreadsheet, what the headings are, and, if it's a database, what the search fields are. Second, can you provide a report giving us analysis on each of those searchable fields?

Ms Crosthwaite: Yes.

Answer:

The data was extracted from the Farm Management Deposits (FMD) Scheme database as an excel worksheet for the month ending 30 September 2019. Pivot table search fields were then applied to the worksheets including:

- unique identifier – representing the de-identified personal identification number (PIN) for individual account holders
- closing balance - representing the total amount of FMD holdings for each individual account holder

An Excel function was then applied to count:

- A. the total number of unique identifiers with holdings of more than \$400,000 (2,766)
- B. the total number of unique identifiers (37,746)

The number of unique identifiers with holdings of more than \$400,000 was then divided into the total number of unique identifiers to determine the percentage:

$$2,766 \div 37,746 = 6.8 \text{ per cent}$$

There are limitations with this percentage, as the total number of account holders is not the actual number given primary producers may hold accounts at different banks (ie there may be less holders), although it is expected to be a reasonable estimate.

Only the Australian Taxation Office (ATO) can determine the actual number of FMD holders through data it receives from taxpayers and the banks. The department is working with the ATO to resolve data sharing and data integrity issues, to enable the department to obtain this information.

-15-

CHAIR: I'm conscious of time. Could you advise whether the stakeholders who provided submissions and advice to the government on the white paper were primary producers?

Ms Crosthwaite: I'll have to take that on notice.

Answer:

Yes. Primary producers and peak bodies representing primary producers provided advice to the government during the *Agricultural Competitiveness White Paper* consultation processes.

CHAIR: If you could, thank you. Table 2.1 of the report states that stakeholders were supportive of increasing the cap on deposits above \$400,000. What was their reasoning or support for increasing the deposit limit?

Ms Crosthwaite: I'll take that on notice.

Answer:

A higher Farm Management Deposits cap would allow larger primary producers with higher costs to build sufficient FMD holdings to prepare for low income years.

WAFarmers, in its submission to the Agricultural Competitiveness Green Paper, indicated that it is now common in each five year period for primary producers to experience one very large surplus, two large losses and two break even years.

CPA Australia, in its submission stated that the \$400,000 threshold was historical and had not kept pace with Australian income growth.

CHAIR: If you could, thank you. Table 2.1 of the report states that stakeholders were supportive of increasing the cap on deposits above \$400,000. What was their reasoning or support for increasing the deposit limit?

Ms Crosthwaite: I'll take that on notice.

Answer:

A higher Farm Management Deposits cap would allow larger primary producers with higher costs to build sufficient FMD holdings to prepare for low income years.

WAFarmers, in its submission to the Agricultural Competitiveness Green Paper (Green Paper), indicated that it is now common in each five year period for primary producers to experience one very large surplus, two large losses and near two break even years.

CPA Australia, in its submission to the Green Paper stated that the \$400,000 threshold was historical and had not kept pace with Australian income growth.



Australian Government
Department of Agriculture

Mrs Lucy Wicks MP
Chair
Joint Committee of Public Accounts and Audit
Parliament House
CANBERRA ACT 2600

Dear Chair

Having reviewed the proof transcript of the Joint Committee of Public Accounts and Audit hearing regarding Auditor-General's Reports Nos 25, 29, 38, 42, 44, 45 and 51 (2018-19) on Friday 15 November 2019, I would like to make a correction to my response to a question by Senator Hill. The relevant dialogue is on page 34 of the Hansard:

Mr HILL: You've suggested that the department believes that many farmers are using this for tax management purposes. Is there any evidence that farmers are using it for personal retirement savings?

Ms Crosthwaite: Not that I'm aware of.

I wish to highlight to the committee that on page 34, I mistakenly stated that I was not aware of evidence that primary producers are using Farm Management Deposits (FMDs) for personal retirement savings. The text should be displayed in Hansard follows:

Ms Crosthwaite: Yes, there is evidence that farmers are using FMDs for personal retirement savings. As part of its findings from the 2017-18 Australian Agricultural and Grazing Industries Survey and Australian Dairy Industry Survey, the Australian Bureau of Agricultural and Resource Economics and Sciences found that an estimated 18 per cent of primary producers indicated FMDs were held for personal or retirement savings. This statistic was also reported in paragraph 2.42 of the *Farm Management Deposits Scheme* Auditor-General report that was released on 26 June 2019.

Thank you for the opportunity to review the transcript and to provide clarification on the above points.

Yours sincerely

Kerren Crosthwaite
Assistant Secretary
Financial Policy and Farm Business Support Branch

5

December 2019