

# Raptors MOU Cooperating Partners Report Form

This is the Cooperating Partners Report form for the Memorandum of Understanding on the Conservation of Migratory Birds of Prey in Africa and Eurasia (Raptors MOU).

The purpose of the Report is to provide information on your organisation's implementation of the Raptors MOU including the Action Plan (Annex 3). The MOU's Technical Advisory Group (TAG) was tasked with developing a suitable format for reports, covering implementation of the MOU and its Action Plan as a whole. The proposed format provided here has been designed to generate information that can be synthesised in a comparable way for each future Meeting of Signatories; to give a meaningful picture of progress and reflect the achievements of Signatories and other stakeholders, but also to be as streamlined as possible to keep the work involved in reporting to a necessary minimum.

A formal proposal to adopt the format will be considered by the third Meeting of Signatories (MOS3) in 2022. In the meantime we are taking the opportunity to launch it in its provisional form, so that up to date information on national implementation can be available for MOS3. The Coordinating Unit of the Raptors MOU will compile and analyse the Reports for this purpose.

## Reporting period

To enable proper analysis, it is important that all respondents relate their answers (throughout this form) to the same reporting period. On this occasion we are asking you to report on the period **between July 2019 and the present**. (July 2019 was the date of the previous implementation survey, the results of which can be found in the first Review of the Action Plan). Future reporting cycles are likely to cover periods between one Meeting of Signatories and the next.

## Instructions

Please answer all questions as fully and as accurately as you can. Wherever possible, please indicate the source of information used to answer the question, particularly if a published reference or report is available. For each question there are blue icons that can be used to attach a document and/or provide a weblink.

When working on the online version of the report, save your information by clicking on the "Save all" button inside each section. An auto-save feature also saves any changed responses every 30 seconds, and whenever you move between sections.

Guidance notes are provided throughout the format to assist you in answering the questions.

**Please Note:** Before clicking on any hyperlink contained within this form, please press and hold the Ctrl button on your keyboard to open the link in a new tab.

**Deadline for submission: 31 October 2021**

## I. ADMINISTRATIVE INFORMATION

Name of Cooperating Partner:

> The Peregrine Fund

Date of signature of the MOU (DD/MM/YY):

> 24.10.2017

## Report Compiler

Name and title:

> Ralph Buij (Director Africa Program), Darcy Ogada (Assistant Director Africa Program), Chris McClure (Vice President of Science)

Department/office:

> The Peregrine Fund

Telephone

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Email:

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## **Designated Contact Point for the MOU**

Name and title of designated Contact Point:

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Department/office:

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Mailing address:

> The Peregrine Fund  
5668 West Flying Hawk Lane  
Boise, ID 83709, USA

Telephone:

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Email:

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## II. HIGH-LEVEL SUMMARY OF KEY MESSAGES

This section invites you to summarise briefly the most important positive aspects of Raptors MOU/Action Plan implementation in your area of operation and the areas of greatest concern.

Your answers should be based on the information contained in the body of the report: the intention is for this section to distil the technical information in the report into some very brief and simple “high level” messages for decision-makers and for wider audiences.

Although keeping it brief, please try also to be specific where you can, e.g. “New wildlife legislation enacted in 2020 doubled penalties for poisoning birds of prey” is more informative than “stronger laws”; “50% shortfall in match-funding for GEF project on vultures” is more informative than “lack of funding”. Please limit this specifically to the current reporting period only. For this present round of reporting, the period is from **July 2019 to the present**.

**In the reporting period, what has your experience of involvement with the Raptors MOU revealed about:**

**The most successful aspects of implementation of the MOU and/or Action Plan?**

(List up to five items)

>

**The greatest difficulties in implementing the MOU and/or Action Plan?**

(List up to five items)

> • Lack of funding. Most funding for implementation is sourced by NGOs and therefore it's only realistically possible to implement relatively small projects on a limited number of species.

• Lack of government commitment

• Lack of capacity. There are only a small number of well-trained ornithologists capable of correctly identifying raptors and many now work on development projects (i.e. assessing areas for wind farm development) where they are highly paid, making them unavailable and beyond the economic means of most conservation NGOs.

**The main priorities for future implementation of the MOU and/or Action Plan?**

(List up to five items)

> • Reducing poisoning and other persecution

• Reducing electrocution and other energy related mortality, notably wind energy

• Assessing raptor populations and trends both within Kenya and across Africa

• Creating awareness about the importance and need to conserve raptors both within communities, but also among professionals, e.g. engineers who design power poles, police and rangers who may respond to a poisoning incident.

### III. RAPTOR CONSERVATION STRATEGIES AND EQUIVALENT DOCUMENTS

A central provision of the MOU (paragraph 12) is for Signatories to prepare national or regional (e.g. EU) strategies or equivalent documents (e.g. Single Species Action Plans) for category 1 and, where appropriate, category 2 species in Table 1 in the Action Plan. The Action Plan itself foresees its listed actions being addressed by these strategies / equivalent documents.

#### **Has your organisation cooperated in specific ways with the development of any national and/or regional Raptor Conservation Strategy or equivalent document?**

*Please select only one option*

- ☒ Yes  
☐ No

Please state the title, scope and country/ies covered by the strategy/ies or equivalent document/s, and summarise the current status of preparation:

Please use the icons below to provide a copy of the document(s) concerned, and/or provide a website link that will give access to the relevant text.

> Kenya is currently working on a National Action Plan to conserve vultures. (unsure of the exact title as yet)

We have held a few meetings and although we currently have no funding to hold stakeholder meetings, we have been moving ahead with starting to draft a plan that can be shared virtually with relevant stakeholders if need be. A funding proposal that includes money for both Kenya and Tanzania to develop National Action Plans has been submitted, but no decisions have been made as yet.

#### **Has your organisation cooperated in specific ways with the implementation of any national and/or regional Raptor Conservation Strategy or equivalent document?**

*Please select only one option*

- ☒ Yes  
☐ No

Please state the title, scope and country/ies covered by the strategy/ies or equivalent document/s, and summarise the contribution made to implementation:

> Vultures MsAP for Africa-Eurasian Vultures.

Action 1.1.2. D. Ogada is a co-coordinator of the African Wildlife Poisoning Database. She oversees the collection and reporting of wildlife poisoning incidents for East, West, and North Africa. A new dashboard for sharing of summary information on poisoning incidents was developed <https://awpd.cloud/>.

Actions 1.1.3, 1.2.1, 1.2.2, 1.2.6, 5.4.1 are addressed by our Coexistence Co-op project that operates in Laikipia and adjacent areas of Samburu counties. During the reporting period 1071 community members were trained about the importance of predators and scavengers, the dangers of using highly toxic pesticides, and the construction of predator-proof livestock enclosures to prevent predator conflict that lead to poisonings. An additional 191 conservancy rangers, Kenya Wildlife Service personnel, Dept of Criminal Investigation officers, and prison wardens were trained about the importance of preventing poisoning and how to rapidly and effectively respond to poisoning incidents.

Result 4.1 we are involved in a collaboration led by the IUCN Conservation Planning Specialist Group to develop a Conservation Plan for West Africa's Critically Endangered Vultures. The development of the plan will likely run through 2022, and perhaps beyond.

Objectives 6 & 7. We have started a wildlife-energy working group that involves public institutions, and private sector and NGO stakeholders. We have coordinated a MoU between Kenya Power and the National Museums of Kenya concerning the reporting and collecting of data relating to wildlife-energy infrastructure. We have planned initial awareness meetings with public-sector energy providers, but these have not started due to covid restrictions and ongoing government reorganization of the key energy provider.

Actions 8.2.4 & 8.2.5 we have obtained funding and are currently collaborating with the newly-formed Wildlife Research & Training Institute to obtain a permit and conduct a project on the feasibility of operating a community-benefitting vulture restaurant in northern Kenya. The challenge is that 'baiting of animals' is against the law in Kenya's current Wildlife Act (2013).

Action 9.1.1. we have conducted aerial surveys of almost all previously known Ruppell's Vulture nesting cliffs to assess current levels of activity and population numbers. We also conduct twice annual aerial surveys of the three largest breeding cliffs of this species.

Action 9.1.2. we are working with conservation partners to get an important Ruppell's Vulture breeding cliff and the surrounding forest recognized as a KBA.

Action 11.1.1. We conduct twice annual aerial surveys of the three largest breeding cliffs of this species.

Action 11.1.3. We currently have 6 active tagged vultures in northern Kenya and have tagged a total of 30 vultures since 2015.

Action 11.4.4. we are involved in a collaborative study that is looking at the effectiveness of VSZs for African

vultures. We expect it to be published in 2022.

If you have answered “yes” to either of the two questions above, what is your overall view of the completeness (by reference to the activities listed in Table 2 of the Action Plan) of the strategy/ies or equivalent document/s to which your answers refer?

*Please select only one option*

- ☐ Fully complete
- ☐ Partly complete/some gaps
- ☒ Incomplete/serious deficiencies

Please state the nature of the gaps/deficiencies:

>

Please state the nature of the gaps/deficiencies:

> NOTE: It might be good next time if you include a copy of the Action Plan to which you refer. I can't find a Table 2 in the version I'm looking at.

Even though I can't find the Table, I would guess there's serious deficiencies because in Kenya we are largely only addressing the conservation of vultures, and to a lesser extent touching on the conservation/threats affecting most of the other raptor species covered by CMS.

## IV. LEGAL PROTECTION OF SPECIES AGAINST KILLING AND UNSUSTAINABLE EXPLOITATION

**Has your organisation assisted in specific ways with measures to apply legal protection against deliberate killing, taking, trade or other forms of exploitation that may impact negatively on the conservation status of species listed in Annex I of the Raptors MOU?**

Follow this link to see the species listed in Annex 1.

If you are answering "yes, please make sure the statute(s) concerned is/are clearly identified by giving details of title, date, etc.

*Please select only one option*

☐ Yes

☒ No

(a) indicate the country/ies concerned:

>

(b) summarise the scope of the statute/s involved:

>

(c) summarise the nature of the assistance provided:

>

## V. SPECIES POPULATION MANAGEMENT AND RECOVERY PROGRAMMES

**Has your organisation been involved with the development or implementation of any Single or Multi-species Action Plans for any species of migratory bird of prey in the geographical area covered by the MOU?**

Please use the icons below to provide a copy of the document(s) concerned, and/or provide a website link that will give access to the relevant text.

*Please select only one option*

- ☒ Yes  
☐ No

(a) give the title, species and geographical area covered by the plan/s:

> Not sure if 'migratory bird of prey' covers vultures, but as mentioned above we are involved in developing a National Action Plan for vultures in Kenya.

(b) summarise the nature of your organisation's involvement:

> We are one of three leading organisations involved in drafting the plan and will provide most, if not all, of the vulture population and movement data.

**Has your organisation been involved with any reintroduction or restocking projects involving migratory birds of prey in accordance with prevailing international guidelines?**

One of the most relevant international guidelines documents for this question is the IUCN publication "Guidelines for reintroductions and other conservation translocations".

*Please select only one option*

- ☐ Yes  
☒ No

Please identify the country or countries concerned, give a brief summary and indicate whether or not captive breeding is involved:

>

**Has your organisation been involved with any supplementary feeding initiatives for necrophagous birds of prey?**

*Please select only one option*

- ☒ Yes  
☐ No

Please identify the country or countries concerned, and give a brief summary:

> Kenya, see Action 8 under section III.

## VI. CONSERVATION AND MANAGEMENT OF HABITATS AND SITES

### Has your organisation assisted in specific ways with measures to improve or restore the habitat of species of birds of prey?

*Please select only one option*

- ☐ Yes  
☒ No

Please give a brief summary, and identify the country/ies to which this relates:

Please indicate what habitat type, where, and (broadly) what type of measures were involved. Comments on success (or otherwise) would also be valuable.

>

### Has your organisation been involved in identifying, protecting or managing nationally and internationally important sites for birds of prey (including any of the sites listed in Table 3 of the Action Plan)?

**NOTE:** It is acknowledged that Table 3 is currently incomplete. A revised Table 3, following the inputs received at the 2nd Meeting of Signatories, is being finalised, and following comments by the Technical Advisory Group it will be circulated alongside the 'Form to propose internationally important sites for addition to Table 3 of the Raptors MoU'. Signatories will be asked to comment on the list and invited to propose new sites of international importance. The list, including any comments received as per the Rules of Procedure, will be reviewed by the Technical Advisory Group and circulated for the 3rd Meeting of Signatories to consider. In the meantime, if you have information relating to countries included in the current Table, please refer to the sites that are listed there.

*Please select only one option*

- ☒ Yes  
☐ No

(a) give a brief summary, and identify the country/ies to which this relates:

> Kenya, development of a KBA for an important Ruppell's vulture breeding cliff. The development is just getting started, so this work is ongoing.

(b) add any comments on your overall view of the adequacy of protection and management of the important sites to which your answer to (a) relates, taking into account the conservation requirements of migratory birds of prey, and specifying any particularly notable gaps or deficiencies:

> We have recently outlined the inadequacy of protection for raptors in a paper that will likely be published in the first week of November 2021. Titled, 'Evidence of widespread declines in Kenya's raptor populations over a 40-year period'. I suggest you refer to it once published in Biological Conservation.

## VII. ASSESSING AND RESPONDING TO THREATS AND PRESSURES

**Has your organisation undertaken or cooperated in any assessments of the nature, likelihood, severity or potential consequences of threats facing birds of prey, and measures identified to maintain their Favourable Conservation Status?**

“Favourable Conservation Status” should be interpreted for this question in accordance with the definition provided in Article I (1) (c) of the Convention on Migratory Species. (Link to text here).

*Please select only one option*

☒ Yes

☐ No

Please give a brief summary:

> Mainly the impact of poisoning on vultures, and measures to prevent such poisoning from occurring. Also, our organization is involved in the response to poisoning of raptors, notably vultures, when they happen. The goal is to prevent poisoning as much as possible and to minimize losses of raptors of poisoning does happen. See section III for additional activities related to energy threats.

Please identify (tick) the **three most important** categories of threat which, according to your assessment (or informed judgement), are affecting birds of prey in the area(s) you work in:

This question asks you to identify the important pressures that are reliably known to be having an actual adverse impact on migratory birds of prey at present. Please avoid including speculative information about pressures that may be of some potential concern but whose impacts have not yet been demonstrated.

☒ Direct killing and taking

☒ Collisions and electrocution

☐ Other mortality

☐ Alien and/or invasive species

☐ Disturbance and disruption

☒ Habitat destruction/degradation

☐ Climate change

☐ Levels of knowledge, awareness, legislation, management etc.

☐ Other (please specify)

>

Add comments here on any particular actions in response to these threats:

You may find it helpful here to refer to actions assisted by relevant existing response tools and initiatives in the framework of mechanisms such as the CMS. Examples could include the Intergovernmental Task Force on Illegal Killing, Taking and Trade of Migratory Birds in the Mediterranean (MIKT), the CMS Energy Task Force, and the adopted Guidelines to Prevent the Risk of Poisoning to Migratory Birds.

> We are recording casualties of electrocution and collisions to identify major mortality sites and to take action to reduce such mortality in the near future, for example through retrofitting powerlines. Our organization is involved in the response to poisoning of raptors, notably vultures, when they happen. The goal is to prevent poisoning as much as possible and to minimize losses of raptors of poisoning does happen. We also are conducting trainings that aim to prevent conflict, and therefore vulture poisonings. This is noted in section III.

**Has your organisation assisted in specific ways with measures to ensure that proposals for activities that may have significant effects on birds of prey or their habitats are subject to Environmental Impact Assessments (EIA) or Strategic Environmental Assessments (SEA)?**

Helpful pointers on this subject (and reference to sources of further guidance) are given in CMS Resolution 7.2 (Rev.COP12) on “Impact assessment and migratory species”. Comments on the general standard and quality of EIAs/SEAs that are undertaken would be valuable. Any use that has been made of “sensitivity mapping” techniques in this context should be mentioned here.

*Please select only one option*

☒ Yes

☐ No

(a) indicate the country/ies concerned:

> Kenya

(b) summarise the nature of the measures involved:

> We regularly comments on EIAs for power line and wind farms development projects. We were previously involved in a SEA for wind energy and wildlife in Kenya. Unfortunately, due to running out of funding, the SEA was never fully completed, i.e. adopted and implemented by the Kenyan government, Ministry of Energy.

(c) summarise the nature of the assistance provided:

› We provide comments and maps and sometimes maps of tracking data for vultures to developers to either assist them, or to deter their developments in sensitive areas. Most projects in sensitive areas go ahead anyway, despite what we say.

(d) add any comments on the extent to which the results of these assessments are used to inform relevant decisions (e.g. permission for a development project) and associated mitigation measures:

› As noted above, most/all projects that we provide a negative review of end up going ahead. Sometimes do not even see EIAs. We are effectively voiceless.

## VIII. ACTION / INTEGRATION ACROSS SECTORS

**Has your organisation been involved in any efforts to ensure that the conservation of migratory birds of prey is integrated within the policies of sectors such as agriculture, forestry, energy, transport, waste, tourism and others?**

*Please select only one option*

☐ Yes

☒ No

(a) give a brief summary, and identify the country/ies and sector/s to which this relates:

>

(b) add any comments on your assessment of the effectiveness or otherwise of the integration instances to which your answer to (a) relates:

>

**Has your organisation cooperated in any programmes that have been implemented during the reporting period among government departments (other than the department that has lead responsibility for the Raptors MOU) to inform decision makers of the conservation needs of migratory birds of prey?**

*Please select only one option*

☐ Yes

☒ No

Please give a brief summary, and identify the country/ies to which this relates:

>

## IX. RESEARCH, MONITORING AND INFORMATION MANAGEMENT

Please use the icons below each question to provide a copy of any relevant documents, and/or provide a website link that will give access to relevant material.

**Has your organisation undertaken or cooperated in any overall assessments of the status and trends of any populations of migratory birds of prey in the geographical area of the MOU, during the reporting period?**

*Please select only one option*

- ☒ Yes  
☐ No

Please give a brief summary, specify the geographical scope, and highlight any particularly significant declines or increases that have been revealed for relevant species:

> We have assessed, through road transect surveys done by ourselves and others in our region and across Africa, the long-term population trends in raptors. The surveys were performed during and before the reporting period, but the analyses were performed during the reporting period. We have two important pending publications relating to the population declines of raptors. One is the publication mentioned above on population declines of Kenya's raptors over 40 years. The second publication will assess population declines of raptors across Africa. It should be published in early/mid 2022.

**Has your organisation undertaken or cooperated in any systematic and coordinated monitoring programmes in relation to breeding populations, reproductive success or migration counts of any of the birds of prey that are covered by the taxonomic and geographical scope of the MOU?**

*Please select only one option*

- ☒ Yes  
☐ No

Please give a brief summary, and identify the country/ies to which this relates:

> Yes, through the same road surveys and surveys of key nesting areas for raptors, in Kenya. Also through twice annual aerial surveys of Ruppell's Vulture nesting cliffs as mentioned above.

**Has your organisation assisted with or otherwise been involved with publishing any guidelines or protocols concerning systematic or coordinated monitoring programmes for migratory birds of prey?**

*Please select only one option*

- ☐ Yes  
☒ No

Please give the source reference(s) and a brief summary, including the nature of your organisation's involvement:

>

**Has your organisation assisted with any process for establishing multi-stakeholder agreements about priorities for research on issues of relevance to the conservation of birds of prey?**

*Please select only one option*

- ☐ Yes  
☒ No

Please give a brief summary, and identify the country/ies to which this relates:

>

**Has your organisation cooperated in any platforms for exchanging knowledge, experience and information about the conservation of birds of prey?**

*Please select only one option*

- ☒ Yes  
☐ No

(a) identify the relevant platform(s):

> <https://www.globalraptors.org/grin/indexAlt.asp>

You have attached the following Web links/URLs to this answer.

<http://www.globalraptors.org/grin/indexAlt.asp>

(b) summarise its/their scope and function, including the country/ies involved:

› More than half of the world's raptor species have declining populations and nearly 20% are threatened with extinction. The need to monitor raptors and understand the threats they face is therefore as pressing now as ever. The Global Raptor Impact Network (GRIN) was created by expanding the African Raptor DataBank globally and combining it with The Peregrine Fund's Global Raptor Information Network—all in an effort to monitor and conserve the world's raptors. GRIN gives raptor researchers tools to more efficiently conduct their own studies while contributing to a global program. GRIN also provides citizen scientists a way to participate in raptor science and conservation.

The database of raptor sightings held by GRIN (the GRIN DataBank) already approaches 200,000 entries, thanks largely to help from raptor researchers, bird-watchers, and bird atlassing projects. It is designed to use all different types of raptor observations, from road counts, foot transects, and static count data through to satellite tracks, mortality incidents, and museum data.

(c) summarise the nature of your organisation's involvement:

› The GRIN DataBank is coordinated through The Peregrine Fund and managed by Habitat Info.

## X. RAISING AWARENESS

**Has your organisation undertaken or cooperated in any public awareness programmes during the reporting period specifically to promote the importance of birds of prey, their migrations and their conservation needs?**

*Please select only one option*

☒ Yes

☐ No

Please give a brief summary, and identify the country/ies to which this relates:

Comments on the impact and success (or otherwise) of these programmes would also be valuable.

> We regularly give presentations (now virtual) about vultures and raptors, and our conservation work in Kenya/Africa.

**Has your organisation undertaken or cooperated in any education programmes during the reporting period specifically to inform young people and students about migratory birds of prey and their conservation needs?**

*Please select only one option*

☒ Yes

☐ No

Please give a brief summary, and identify the country/ies to which this relates:

> • Education programmes on the value of vultures to ecosystems and people, and the dangers of poisoning wildlife, in southern and northern Kenya

• Regularly give presentations to university students. Most presentations are to international, rather than local audiences. USA mostly. Also to UK.

## XI. STRENGTHENING CAPACITY

**Has your organisation undertaken or cooperated in any training or other support programmes during the reporting period to strengthen the capacity of agencies responsible for the application of relevant laws and regulations?**

*Please select only one option*

- ☒ Yes  
☐ No

Please give a brief summary, and identify the country/ies to which this relates:

> See section III related to training of KWS rangers, Directorate of Criminal Investigation officers, and also police officers and prison wardens.

**Has your organisation undertaken or cooperated in any training or other initiatives during the reporting period to support activities undertaken by local communities or voluntary groups in relation to birds of prey surveys, monitoring, site protection work or related outreach?**

*Please select only one option*

- ☒ Yes  
☐ No

Please give a brief summary, and identify the country/ies to which this relates:

> • Nest surveys of raptors by locals in southern Kenya, training of nest monitoring methods

**During the reporting period, has your organisation provided any new financial or other resources for conservation activities specifically benefiting migratory birds of prey?**

“Other resources” in this context could include, for example, “in-kind” forms of support such as staff time or administrative infrastructure, loan of equipment, provision of data processing facilities or technology transfer. (Do not include training or mentoring schemes and other initiatives for capacity building however, as these are covered separately in the preceding two questions).

*Please select only one option*

- ☒ Yes  
☐ No  
☐ Not known

Please state the beneficiary/ies concerned and the activities supported:

- > • staff time  
• administrative infrastructure  
• loan of equipment  
• technology transfer

Beneficiaries were Kenyans involved in the protection of birds of prey, or the mitigation of threats such as carnivore-livestock conflict which drives poisoning in our region to a large extent.

Please state why not:

>

**During the reporting period, has your organisation received any new financial or other resources for conservation activities specifically benefiting migratory birds of prey?**

See guidance on interpretation of “other resources” provided in relation to the preceding question.

*Please select only one option*

- ☒ Yes  
☐ No  
☐ Not known

Please state the source(s) concerned and the activities supported:

- > • BAND foundation  
• WWF  
• Whitley Fund for Nature  
• Many zoos/aquariums in the USA  
• National Geographic  
• Lion Recovery Fund  
• Tusk Trust  
• AZA

Activities:

- Anti-poisoning response  
• Carnivore-livestock conflict mitigation

- Community and ranger trainings

Please state why not:

>

## XII. INTERNATIONAL COOPERATION

**During the reporting period, has your organisation participated in any international cooperation activities as provided by paragraph 8 of the MOU?**

*Please select only one option*

- ☒ Yes  
☐ No  
☐ Not known

Please give a brief summary:

- > • International collaboration with other organisations (NGOs) involved in the conservation of raptors, such as HawkWatch International, Endangered Wildlife Trust, WWF, WCS  
• Also international collaboration with predator NGOs such as Lion Landscapes, Lion Recovery Fund  
• We are also members/co-chairs of the Vulture Specialist Group  
• We collaborate with international universities for research and mentoring students

Please state why not:

>

**During the reporting period, has your organisation taken any steps to support or encourage any Range State(s) to sign the Raptors MOU?**

*Please select only one option*

- ☐ Yes  
☒ No  
☐ Not known

Please identify the Range State(s) concerned, and the nature of the support or encouragement given:

>

Please state why not:

- > We do not typically operate at that level.