

Responsible Care Report 2020

December 2021

V2 (Final)

Fecc RESPONSIBLE CARE REPORT 2020 (Data 2019)

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1. Level of Responsible Care Participation in Europe (*Fecc* Membership)

The *Fecc* Member National Associations (NAs) have developed – over the last 20-25 years - local Responsible Care (RC) programmes in line with the *ICTA* Joint Responsible Care / Responsible Distribution Programme.

To obtain the right to use the Responsible Care logo, the NA must comply with the Responsible Care rules and sign a partnership agreement with the local manufacturers' association, endorsed by *Fecc* and *Cefic*.

Each year, *Fecc* collects a series of statistical data from its National Associations and Company Members (*Fecc* Survey). The collection, analysis and interpretation of this data allows *Fecc* to draw conclusions in different areas, amongst them Responsible Care and related KPIs (Key Performance Indicators). Regarding Responsible Care implementation, the percentage of distribution companies belonging to this voluntary initiative over the period 2009-2019 is 69%, while in 2019 the average amounts to 73%, roughly the same participation level as the last five years (see Figure 1).

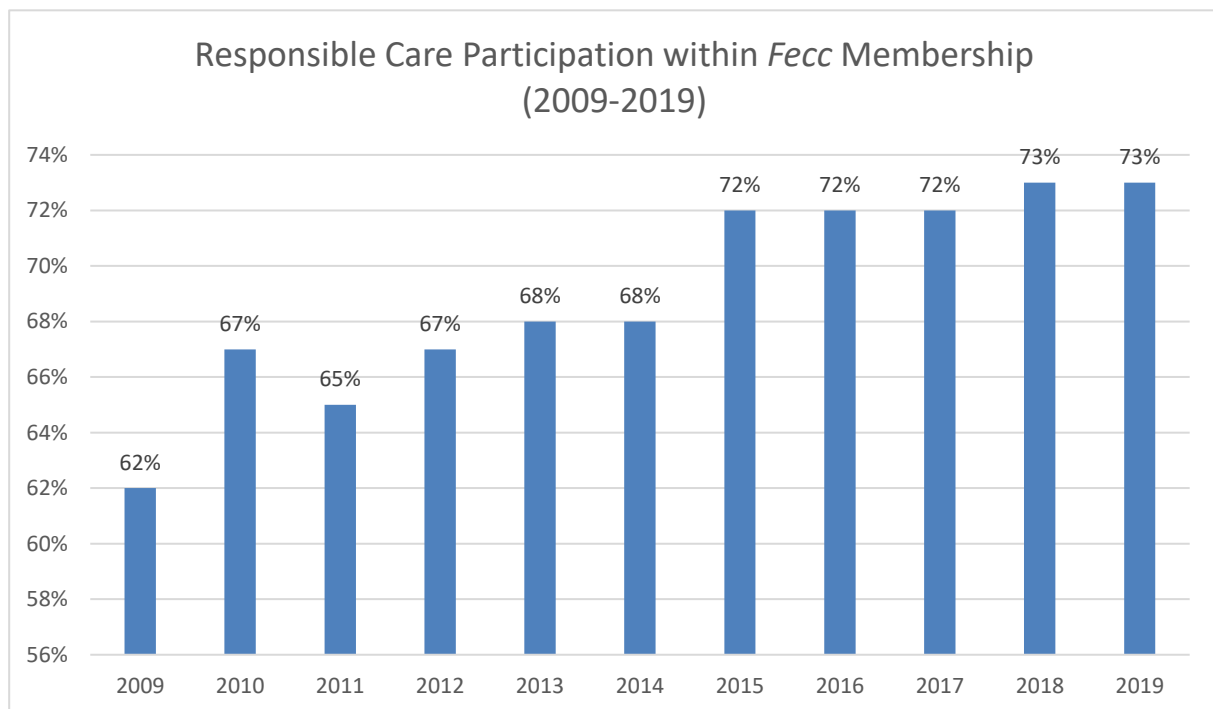


Figure 1: General Level of Responsible Care Participation in *Fecc* Membership (Data *Fecc* Survey 2020): Average per year in percentage.

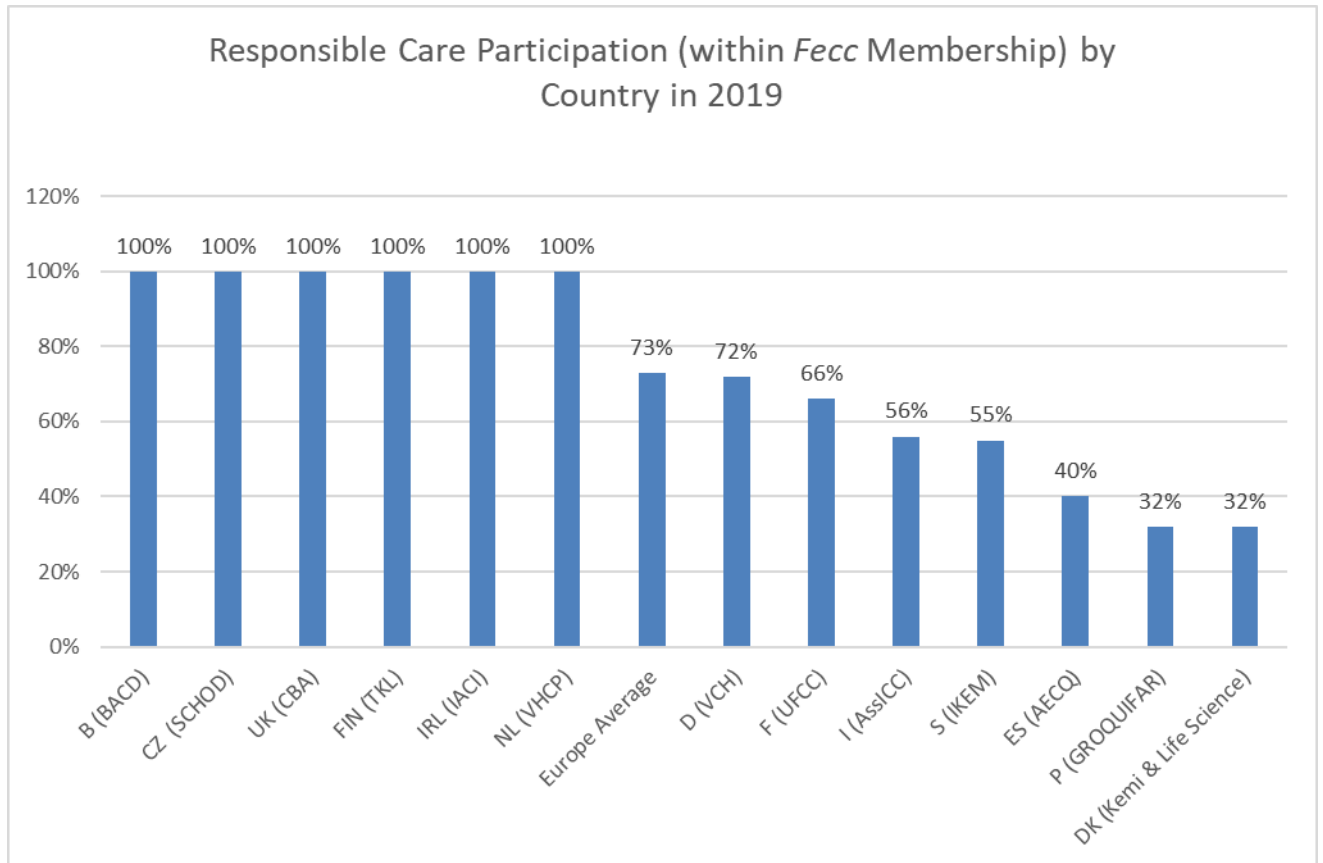


Figure 2: Level of Responsible Care Participation in Europe (Fecc Membership) per Country (Data Fecc Survey 2020)

The second graph (Figure 2) displays the results by country in 2019 and illustrates that significant differences in terms of Responsible Care implementation still exist when looking at the situation country by country.

Compared to the previous year, a slight change in Germany (increase), Sweden (increase) and Spain (decrease) occurred. Regrettably, however, no substantial change can be observed across Europe. It is worth noticing that in Belgium, Ireland, The Netherlands, Czech Republic, and the United Kingdom the Responsible Care participation is at 100% - this is due to the fact that Responsible Care participation is mandatory for National Association membership. The Fecc Responsible Care Committee continues its efforts to improve the situation further and calls on the National Associations concerned to improve their commitment to Responsible Care.

The Tables in ANNEX I (pp. 16-18) show in detail the “hard figures” behind the percentage for each year. The calculation of the percentage per country is based on the figures provided by

the NAs. The second column refers to the survey question “number of distributors committed to Responsible Care”.

Finally, we should be aware of the fact that the graph does not show the Responsible Care performance of Austria (*Wirtschaftskammer Österreich, WKÖ*) and Switzerland (*Scienceindustries, SGCI*), as these are special cases. In Austria three companies out of a total of 225 chemical distributors have a commitment to Responsible Care, and Switzerland does not communicate Responsible Care data to *Fecc* as this country reports directly to the *European Council of Chemical Manufacturers (Cefic)*, but *SGCI* might communicate Responsible Care data additionally to *Fecc* in the future.

The figures and graphs in ANNEX II (pp. 19-22) reveal the level of performance in the period 2013-2019 as regards the 8 Guiding Principles.

With regard to ‘Risk Management’, the Lost Time Injury Rate (LTIR) used in our graph (see Figure 3) is defined as the number of accidents leading to a minimum of 3 lost workdays per one million worked hours. The graph reveals a downward trend in the LTIR evolution from a peak in 2012 (10.86) to a European rate oscillating around 6.5 in the period 2013-2016 and a further decrease to 3.55 in 2018, and then an increase to 5.93 in 2019.

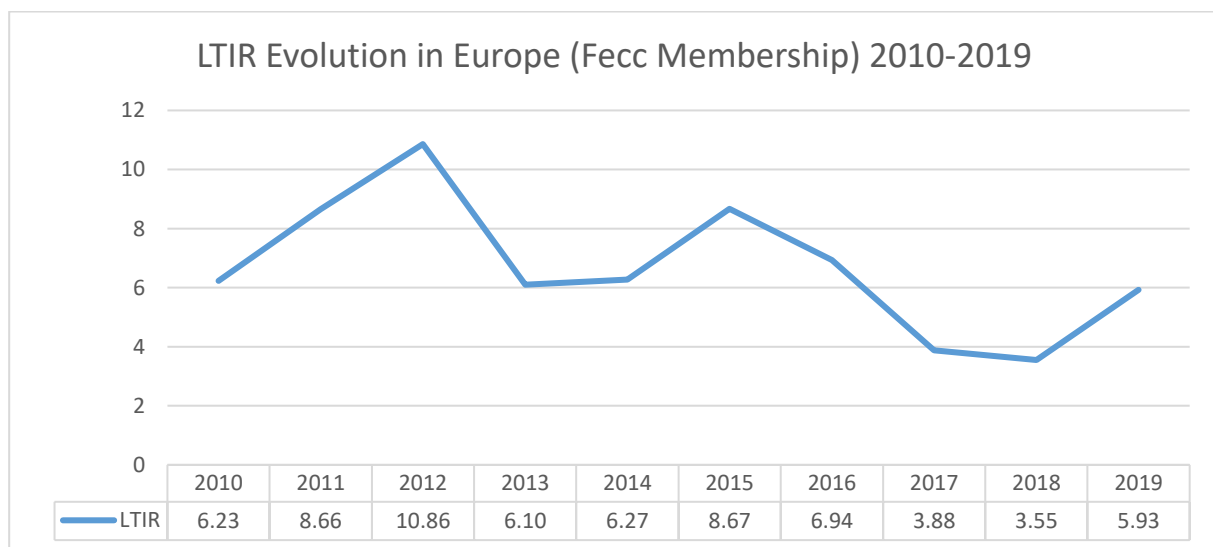


Figure 3: LTIR Evolution in Europe (Fecc Membership) 2010-2019 (Data Fecc Surveys 2011-2020).

Due to a lack of harmonization in Europe direct comparisons of the LTIR are difficult. However, it is possible to illustrate the trend by country in this field based on figures provided by the NAs, see ANNEX III (pp. 22-26).

The Secretariat will continue its analysis exploring how and to what extent the parameters in different countries differ, in particular whether the type of accidents/incidents communicated is comparable and how the number of working hours is counted. This research aims at harmonizing input parameters to enhance the comparability of data.

2. Review of the *Fecc* European Responsible Care Programme

2.1. The *Fecc* European Responsible Care Programme

The Programme's core principles are based on the eight guiding principles of the *International Chemical Trade Association's (ICTA) Joint Responsible Care / Responsible Distribution Programme*. It offers harmonized implementation in Europe, and it is tailor-made for the distribution sector. The Programme provides appropriate tools to demonstrate distributors' responsible handling and use of chemicals. Moreover, it simultaneously addresses the stakeholders' expectations about the distributors' activities. One key element of the Programme is the mandatory Third-Party Verification (TPV) of the company's compliance with Responsible Care requirements (e. g. use of ESAD assessment system as one of the possible tools for a basis of TPV).

The *Fecc* European Responsible Care Programme is tailored for distributors in countries where no chemical distributor association exist, that is, especially Central and Eastern European countries. In addition to this option, NAs have the possibility to use the Programme as their own or they can outsource their Responsible Care activities to *Fecc*. The Programme also addresses Pan-European companies that — with previous authorisation of their NA - may apply to *Fecc* for the Responsible Care Programme in the countries where Responsible Care is already run by NAs. An amendment to the *Fecc* Responsible Care Programme, worked out by the Responsible Care Committee, and which is part of Version 2.3. since January 2016, introduces

– by exception – the possibility of a Second-Party Verification under certain conditions. This alternative has not been used yet.

As regards the further development of the Programme, a proposal was made how to integrate the Responsible Care Self-Assessment excel and webtool, thus allowing a step forward in the direction of digital solutions (see also chapter 2.4).

2.2. Fecc European Responsible Care Programme Participation

As regards the *Fecc* European Responsible Care Programme, there is a small number of Pan-European distributor companies in the programme, with some entities ‘on hold’ for the time being. In 2020, no Evaluation Report was submitted to the Responsible Care Committee which - according to a standard procedure - approves the prolongation (3 years) of the use of the Responsible Care logo, confirmed in an Authorization Report and Responsible Care Attestation issued by *Fecc*. The Evaluation/Authorization Reports are an integral part of the Programme and are intended to analyse the company’s TPV assessment and improvement plans to enable a decision on granting permanent use of the Responsible Care logo.

Two NAs (*AECQ*, Spain and *BACD*, Belgium) have adapted the *Fecc* European Responsible Care Programme. One NA (*GROQUIFAR*, Portugal) uses the *Fecc* European Responsible Care Programme.

2.3. ESAD and Responsible Care

Since 2004, ESAD (European Single Assessment Document) is a joint initiative of the chemical manufactures (*Cefic*) and distributors (*Fecc*) that offers a tool for assessing Health, Safety, Security and Environmental Protection (HSSE) compliance of the chemical distribution companies. ESAD is designed around the Eight Guiding Principles of the *ICTA* Joint Responsible Care/Responsible Distribution Programme and therefore provides an excellent TPV tool for assessing the distributors’ compliance with the Responsible Care programme. A SQAS/ESAD Distributors assessment does not lead to a certificate but offers a detailed factual report which each chemical company needs to evaluate according to its own requirements.

Key principles of ESAD:

- Eight RC Guiding Principles as specified in the *ICTA* programme are included.
- Validity of the report is for three years.
- An improvement plan can be uploaded in the relevant section of the report.
- Reports are digitally available.
- Reports can only be seen by selected users (e.g. *Fecc*) who have been granted access to the individual report.

The current [SQAS / ESAD Questionnaires 2019](#), replacing the revised version ESAD 2015 (integrating CSR/Sustainability issues and incorporating enhanced questions to address the European Commission requirements in terms of security), which will be used in all SQAS assessments, were launched in January 2019 (for more details see the embedded link). *CBA* was actively engaged in *Cefic*'s development of the new SQAS/ESAD Questionnaires with *Fecc* support. *Fecc/CBA* participated particularly in the Core modules, as well as the Transport Service module. In this context, *Fecc*'s key objective remained to align the new Questionnaires with the new *TfS (Together for Sustainability)* Questionnaire and thus achieve recognition of ESAD by *TfS*. The SQAS Core has also now been adopted as the basis of the ESAD Questionnaire, supplemented by any questions in the Di document not covered in the SQAS Core. Existing questions and guidelines in ESAD 'Site' Questionnaire are now intelligently aligned/updated with revised Transport Service / Warehouse / Tank Cleaning modules content.

Since 2018 new questions on alternative schemes (*Ecovadis, TfS*) are integrated into the *Fecc* Annual Survey – based on the analysis of a *TfS-ESAD* Survey among Committee Members.

A successful ESAD F&G Workshop & Training for Assessors, at a *Hedinger (Fecc Member Company)* site in Central Germany in conjunction with *Cefic* and an external consultancy (*MB-QAR*) was organized on 14-15 January 2020. 16 Assessors enjoyed the outstanding hospitality offered by *Hedinger*'s Managing Director Frank Milek on *Hedinger*'s premises at Teutschenthal near Halle/Saale, Saxony-Anhalt. The programme covered topics such as “storage in tanks and silos”, “Loading/Unloading”, “dispatch and transport”, “(re-)packaging”, “warehousing”, “Product Stewardship”, “Quality Management”, and diverse “corrective actions”. The highlights consisted of several site tours, during which product reception/unloading sampling, testing, release, packaging and warehousing of products could

be observed by the participants who were actively engaged and enthusiastic about all the explanations they received from the experts. Differences between industrial chemicals and pharmaceutical starting materials were also explained. At the end, the assessors had to undergo a written examination. Updated on the new 2019 SQAS/ESAD Questionnaires and enriched by numerous insights, not only the assessors but also the joint organization team (*Hedinger/Fecc/Cefic/MB-QAR*) came to the overall conclusion that the next training should not wait again seven years (looking at the past intervals: 2006-2013-2020).

On 10 December 2020, a SQAS Logistics & Distributors Workshop was held with the objective to illustrate how companies use the SQAS system and, hence get insight how to improve the system. *Fecc* member *Ravago* made a presentation on the use of ESAD.

Regarding SQAS/ESAD data, the data cycle is consistent with the three-year cycle of assessment renewals (see Figures 4-7 below).

Figure 7 breaks the total number of Active ESAD Reports in 2016-2019 down to country level – with a variation spanning from 1 (Denmark, Hungary, Sweden, and Switzerland) to a maximum of 11 (Germany) in 2019.

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transport Service	401	413	444	464	440	504	551	510	544	572	573	547
Cleaning Stations	164	131	165	190	191	197	221	190	245	253	248	231
Rail Operators	9	7	14	4	12	30	17	20	37	17	30	35
Warehouses	35	38	43	62	69	45	78	73	64	85	77	82
ESAD (Distributors)	66	111	95	74	102	120	63	110	89	44	92	65
Total	675	700	761	794	814	896	930	903	979	971	1020	960

Figure 4: Number of SQAS Assessments per Module and Year (*Cefic SQAS/ESAD Statistics*) – Table.

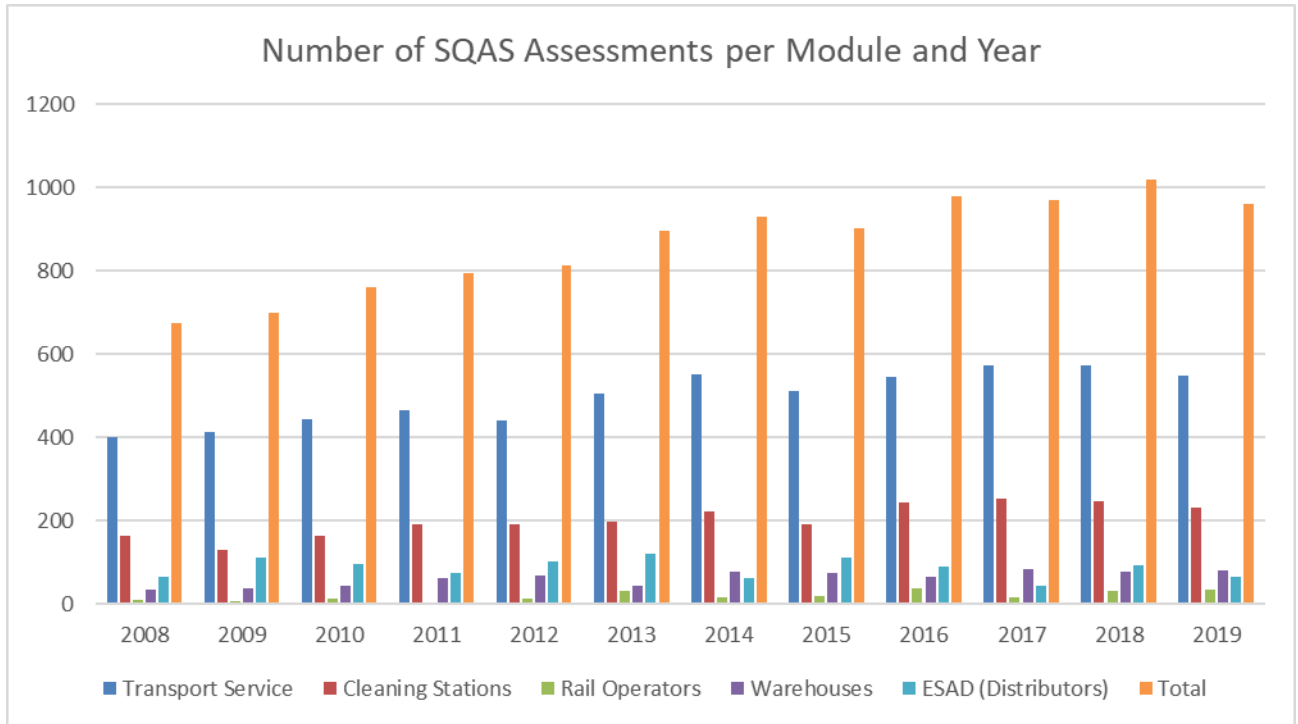


Figure 5: Number of SQAS Assessments per Module and Year (Cefic SQAS/ESAD Statistics) – Graph.

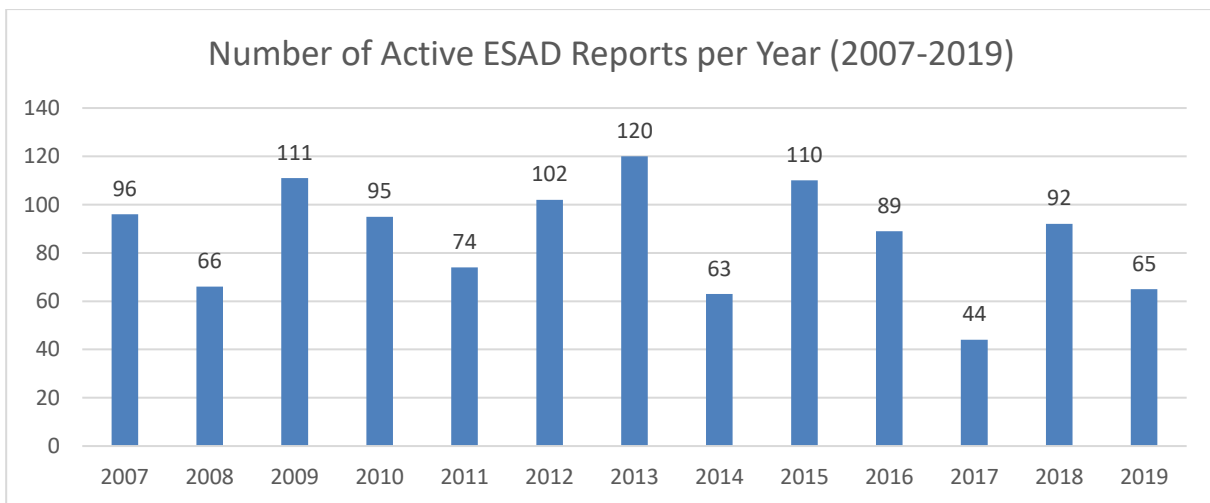


Figure 6: Number of Active ESAD Reports per Year (Cefic SQAS/ESAD Statistics).

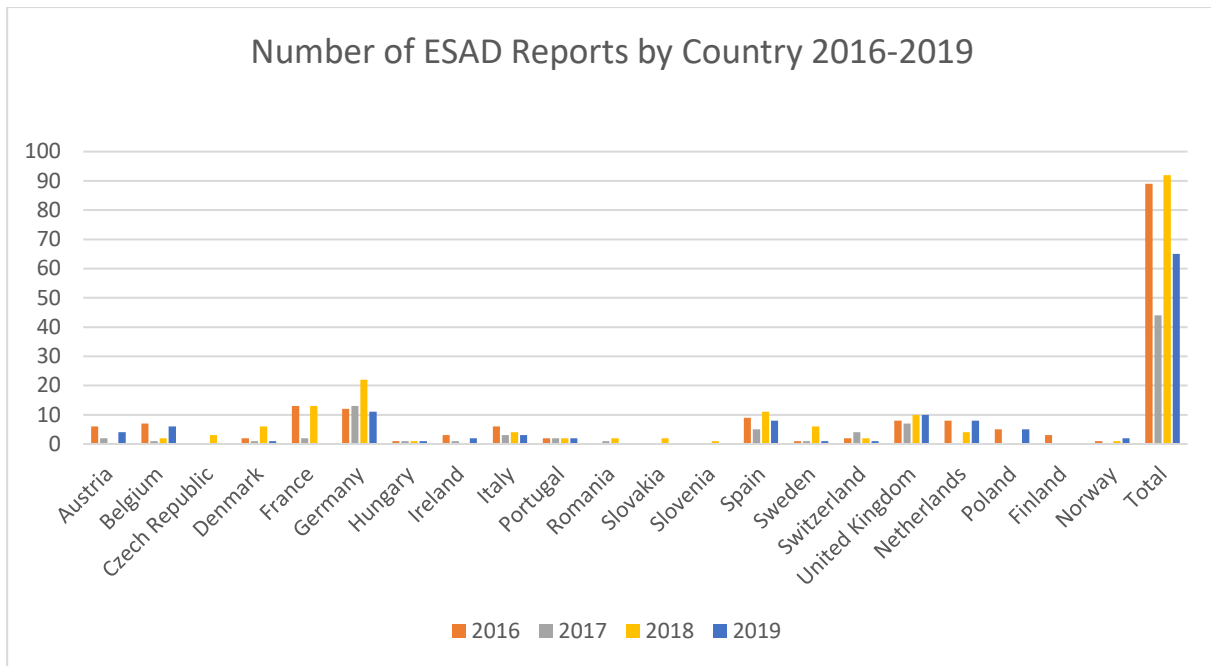


Figure 7: Number of Active ESAD Reports by Country 2016-2019 (Cefic SQAS/ESAD Statistics).

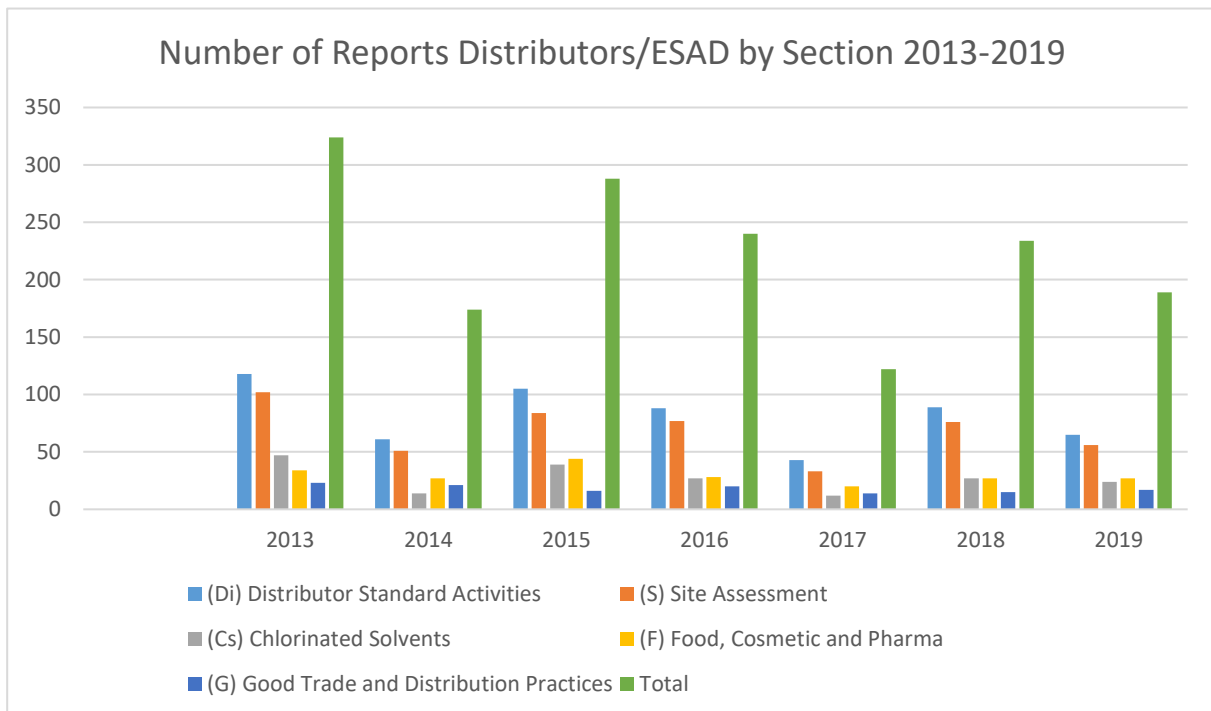


Figure 8: Number of Reports in Distributors/ESAD in 2013-2019 (Cefic SQAS/ESAD Statistics).

A closer look at the Distributors/ESAD module by section (Figure 8) reveals that 65 ESAD reports were registered in Di (Distributor Standard Activities), and

- 56 in S (Site),
- 24 in CS (Chlorinated Solvents),
- 27 in F (Food, Cosmetics and Pharma),
- 17 in G (Good Trade and Distribution Practices).

Added up, this amounts to a total of 189 reports in 2019, compared with a total of 240 in 2016, illustrating a significant and worrying decrease within the last three-year-cycle.

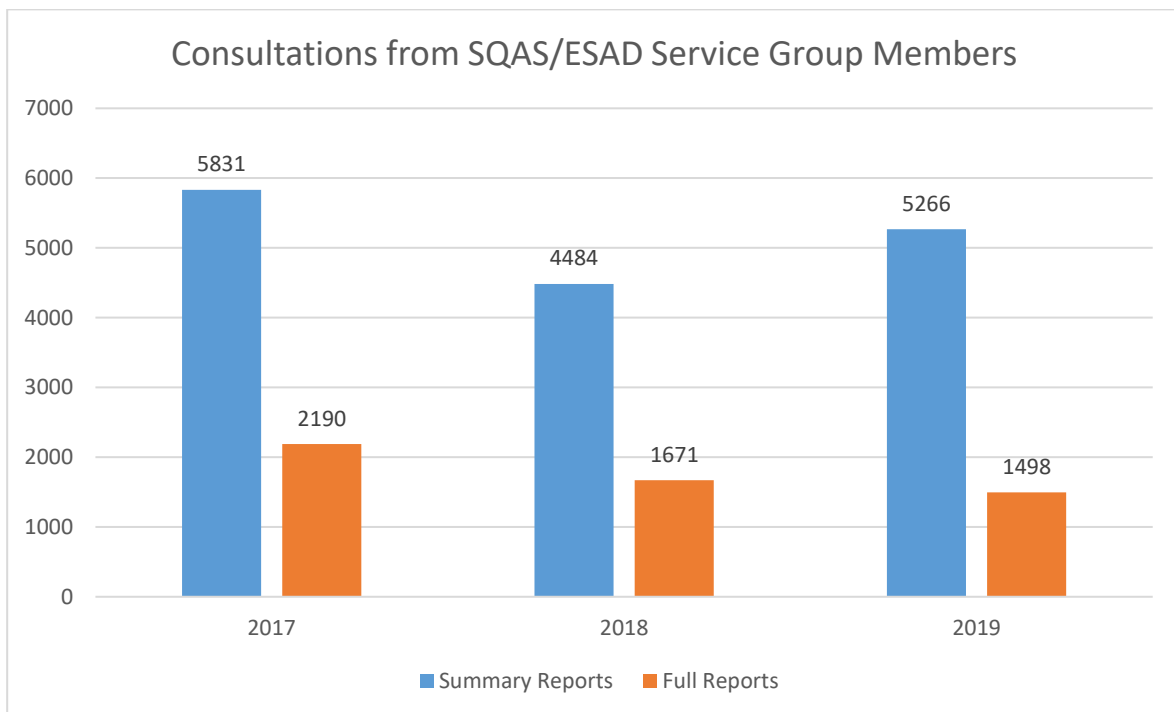


Figure 9: Consultations from SQAS/ESAD Service Group Members (2017-2019)

Figure 9 demonstrates a clear downward trend as regards consultations of full reports compared to consultations of summary reports. However, for a clear-cut conclusion a longer time period has to be observed. The same holds true for Figure 10.

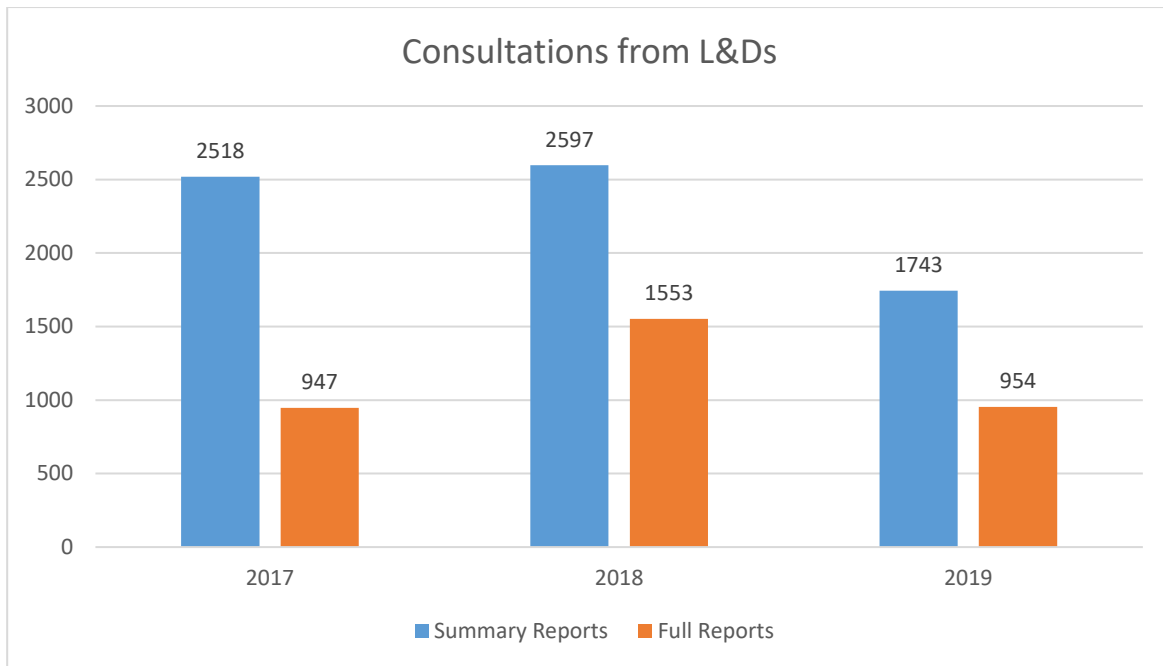


Figure 10: Consultations from L&Ds (2017-2019)

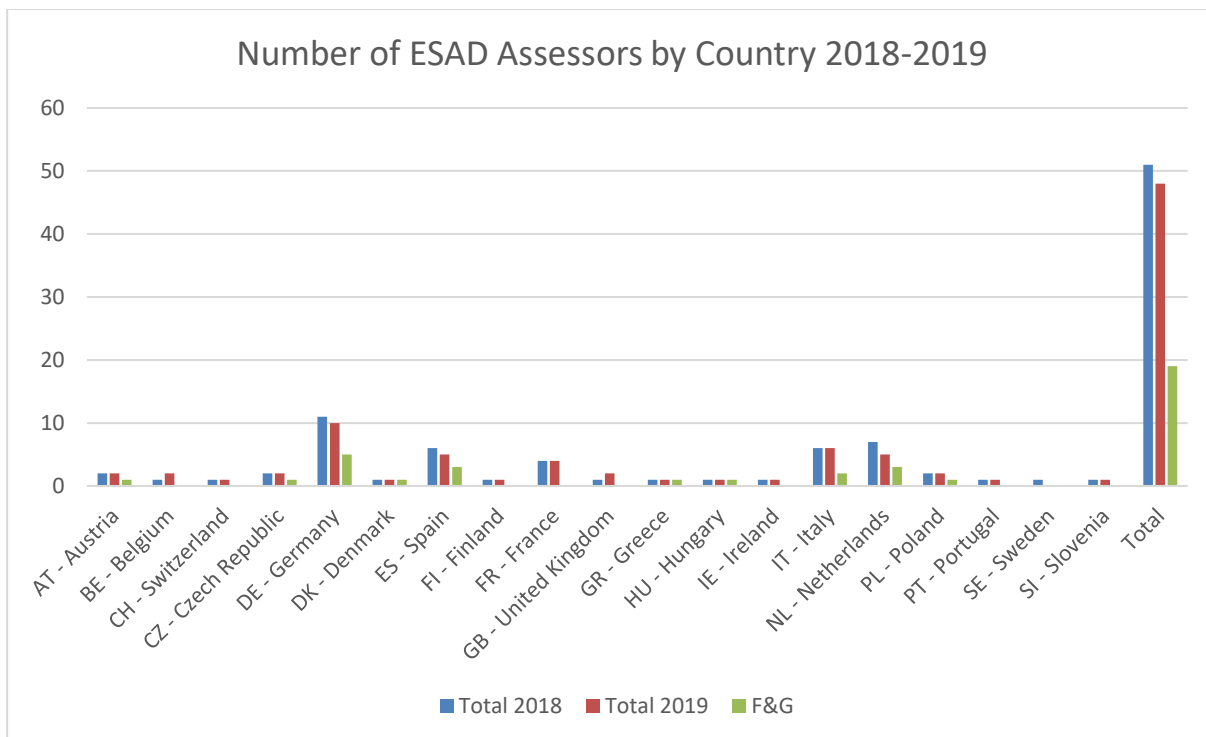


Figure 11: Number of Accredited ESAD Assessors by Country 2018-2019

Figure 11 displays the spread of different situations in Europe as far as the number of accredited ESAD assessors per country is concerned: from 10 in Germany to just one in each of Greece, Hungary, Ireland, Portugal, Slovenia, Sweden, Poland, Czech Republic, and Denmark or even

none as in Ireland (2019). The total number decreased from 51 in 2018 to 48 in 2019 whereas the number of assessors in F&G remains stable at 19.

The COVID-19 pandemic triggered discussions on the possibility of remote assessments in the SQAS Technical & Accreditation Committee as well as in the ESAD Steering Committee which led to sufficiently successful pilot partial remote assessments and finally resulted in a guidance document outlining the rules and recommendations how to carry out [remote SQAS Assessments](#). After an in-depth debate the ESAD Steering Committee decided to extend the validity of ESAD assessments until 31 August 2020, which was prolonged at a later discussion – based on the evolution of the pandemic - until 31 December 2020.

As regards measures to mitigate the impact of the COVID-19 pandemic on the SQAS system, a dedicated SQAS T&A Meeting on 7 December 2020 decided the following extension of cut-off dates for remote assessments:

- 30 June 2021: limit for remote assessments
- 30 September 2021: limit for onsite assessments linked to remote assessments.

Furthermore, new [SQAS Service Group Operating Rules](#) were published in July 2020. (see also [SQAS website](#) for all SQAS related documents).

2.4. Fecc Responsible Care Committee

The *Fecc* Responsible Care Committee consists of Company Responsible Care Coordinators, as well as National Association Representatives. Since December 2011, the Responsible Care Chairman is Robert Stuyt, Secretary General of the Dutch National Association of Chemical Distributors *VHCP*.

The *Fecc* Secretariat and the Responsible Care Committee offer support and practical help to companies and NAs which implement Responsible Care across Europe. In 2020, *Fecc* organised two Responsible Care Committee Meetings - thus providing a platform for Responsible Care Coordinators and Responsible Care National Association Representatives to interact and share best practices. During the Responsible Care Committee Meetings in 2020 the following presentations were made:

- *Brenntag*: Practice Example for Continuous Improvement Process in companies.
- *UFCC* (French National Association): New Legislation in France for IBCs and Warehousing/Storage.
- *Cefic* (Head of Sustainability Forum): Sustainability Assessments.

Since 2017 the renewed cooperation with *Cefic* is based on an updated version of the Responsible Care Partnership Agreement (Memorandum of Understanding) which was signed by the DGs of the two associations. This agreement aims at endorsing the ongoing close cooperation between both parties in the promotion and implementation of Responsible Care initiatives all over Europe. In this context, *Fecc* suggested that its Member National Associations refresh and re-evaluate their national Responsible Care Partnership Agreement with their respective national Manufacturers Association.

Fecc continued to play an active role in *Cefic*'s Responsible Care Rejuvenation Issue Team which was formed end of 2017 to strengthen the RC initiative in Europe.

After a *Fecc* Working Group, led by *CBA*, adjusted the *Cefic* Responsible Care Self-Assessment Excel Tool to chemical distributors and approved by the Committee as well as accepted by *Cefic*, the Committee also approved the cooperation with IT service provider *ARCADIS* for the technical adjustments which were made in the first quarter of 2020 after a brief kick-off meeting. The launch of the tool took place on 28 April 2020, in a virtual format, due to the COVID-19 pandemic which set in during March 2020.

The next step was the development of a Responsible Care Self-Assessment Webtool which is based on the Excel Tool (Questionnaire) and which was launched on 9 December 2020 for the *Fecc* Membership - after an intensive testing phase (with the participation of numerous chemical distributors) to detect bugs. Joint launch webinars for 2021 with national associations were in the planning phase end of 2020.

In the same context, a proposal was made how to integrate the Responsible Care Self-Assessment excel and webtool into the *Fecc* European Responsible Care Programme (see also chapter 2.1.).

To explore the link between the Responsible Care Self-Assessment Webtool and SQAS/ESAD a dedicated Working Group with *Brenntag* in the lead was established at the last Committee Meeting in December 2020.

The Working Group tasked to update the [Fecc Note on Sustainability](#) taking into account new elements, such as the EU Commission's Green Deal Initiative, links between the UN SDGs and chemical distribution, and including new references to the revised SQAS/ESAD Questionnaire met for the first time in January 2020.

Another Working Group, led by *Brenntag/Fecc*, established in view of organizing a joint Workshop *Eurochlor-Fecc-Brenntag* and other potential stakeholders such as *ECTA* and *Swimming Pool Associations* - aiming at the development of awareness-raising/training tools, including guidance material at European level, was put on hold, now deliberating on the transformation of the event into an online event (webinar) on account of the ongoing COVID-19 pandemic.

In October 2020, *Fecc* succeeded again becoming a partner in the new EU-OSHA Healthy Workplaces Campaign 2020-22 'Lighten the Load' focussing on musculoskeletal disorders (MSDs). To get involved and receive more information about the campaign, *Fecc's* National Association members are advised and invited to contact the respective [National Focal Points](#).

ANNEX I

Level of Responsible Care Participation in Europe (*Fecc* Membership: National Associations) per Country

Tables: Level of Responsible Care Participation in Europe per Country (Data *Fecc* Surveys 2010- 2020) – Participation in Responsible Care

	# distributors	# committed	%	# distributors	# committed	%
	2009	2009	2009	2010	2010	2010
Belgium	27	16	59	29	29	100
Czech Republic	18	8	44	15	9	60
Germany	108	67	62	109	67	61
Denmark	31	6	19	29	5	17
Spain	58	24	42	59	20	34
France	76	45	59	69	42	61
Finland	17	16	94	16	16	100
Italy	231	43	19	79	44	56
Ireland	12	12	100	12	12	100
The Netherlands	53	53	100	53	53	100
Portugal	33	11	33	31	11	36
Sweden	25	18	72	47	21	45
UK	95	95	100	92	92	100
Average %			62			67

	# distributors	# committed	%	# distributors	# committed	%
	2011	2011	2011	2012	2012	2012
Belgium	29	29	100	30	30	100
Czech Republic	15	9	60	15	9	60
Germany	107	67	63	106	68	65
Denmark	31	5	16	31	5	16
Spain	54	20	37	52	14	27
France	70	42	60	64	42	66
Finland	17	15	88	16	15	94
Italy	79	45	57	74	42	57
Ireland	9	9	100	9	9	100
The Netherlands	38	38	100	31	31	100
Portugal	44	11	25	43	10	23
Sweden	45	18	40	28	18	64
UK	93	93	100	92	92	100
Average %			65			67

	# distributors	# committed	%	# distributors	# committed	%
	2013	2013	2013	2014	2014	2014
Belgium	28	28	100	28	28	100
Czech Republic	14	9	64	13	11	85
Germany	106	65	61	102	65	70
Denmark	38	9	24	38	9	24
Spain	50	22	44	51	20	40
France	63	40	63	66	41	62
Finland	15	15	100	18	18	100
Italy	72	41	57	72	41	57
Ireland	9	9	100	10	8	80
The Netherlands	39	39	100	34	34	100
Portugal	42	11	26	41	12	29
Sweden	40	17	43	40	17	43
UK	89	89	100	93	93	100
Average %			68			68

	# distributors	# committed	%	# distributors	# committed	%
	2015	2015	2015	2016	2016	2016
Belgium	24	24	100	24	24	100
Czech Republic	12	12	100	13	13	100
Germany	101	72	71	101	71	70
Denmark	31	9	29	29	9	31
Spain	52	25	48	58	26	45
France	68	41	60	67	44	66
Finland	16	16	100	20	20	100
Italy	72	42	58	72	42	58
Ireland	10	10	100	10	10	100
The Netherlands	27	27	100	31	31	100
Portugal	41	12	29	38	12	32
Sweden	35	15	43	43	13	30
UK	90	90	100	91	91	100
Average %			72			72

	# distributors	# committed	%	# distributors	# committed	%
	2017	2017	2017	2018	2018	2018
Belgium	23	23	100	21	21	100
Czech Republic	13	13	100	13	13	100
Germany	107	75	70	104	74	71
Denmark	29	9	31	28	9	32
Spain	58	26	45	58	26	45
France	65	43	66	65	43	66
Finland	15	15	100	15	15	100
Italy	72	40	56	70	40	56
Ireland	10	10	100	11	11	100
The Netherlands	31	31	100	31	31	100
Portugal	38	12	32	38	12	32
Sweden	34	14	41	34	14	41
UK	90	90	100	89	89	100
Average %			72			73

	# distributors	# committed	%
	2019	2019	2019
Belgium	22	22	100
Czech Republic	13	13	100
Germany	104	75	72
Denmark	28	9	32
Spain	65	26	40
France	65	43	66
Finland	15	15	100
Italy	70	40	56
Ireland	12	12	100
The Netherlands	31	31	100
Portugal	38	12	32
Sweden	34	19	55
UK	93	93	100
Average %			73

ANNEX II

Data Eight Guiding Principles 2013-2019

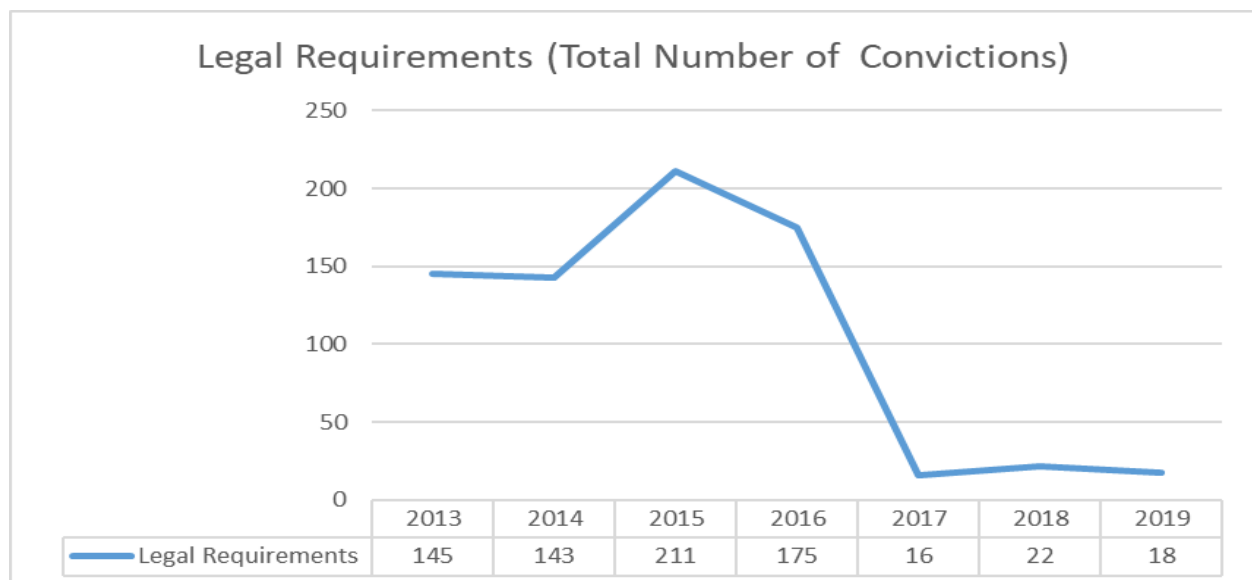
Explanatory note:

The data below refer to questions in the *Fecc* Annual survey for NAs.

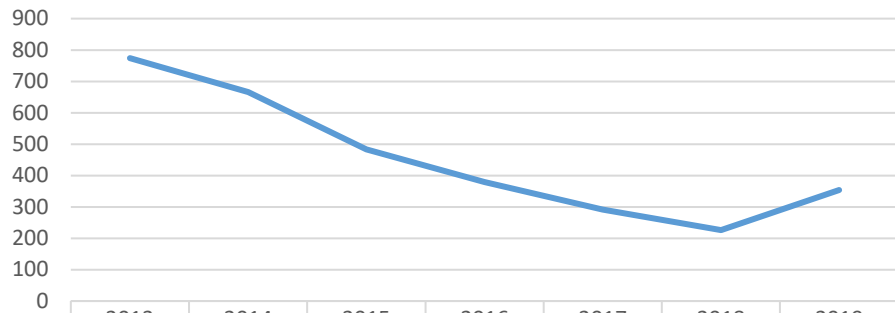
No data are available for Portugal, Italy, and France in 2019 (Survey 2020).

Definitions:

- Policies & Documentation: Number of Distributor Members having at least one ISO certificate.
- Emergency Response System (ERS): Number of Members having an ERS 24/24 hours and 365 days per year in place.
- Ongoing Improvements: Number of Members having an Improvement Plan (IP) in place.
- Training: Number of Members having Responsible Care as part of the Training Programme for new employees.
- Community Interaction: Number of Members having at least one community interaction last year.

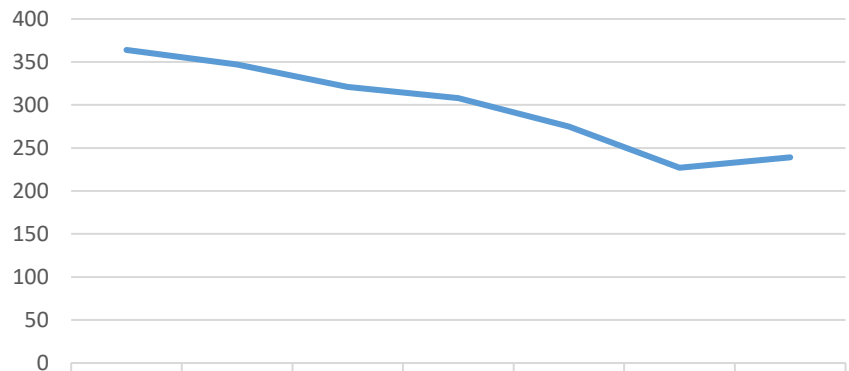


Management of Risk (Total Number of Transport and Non-Transport Incidents)



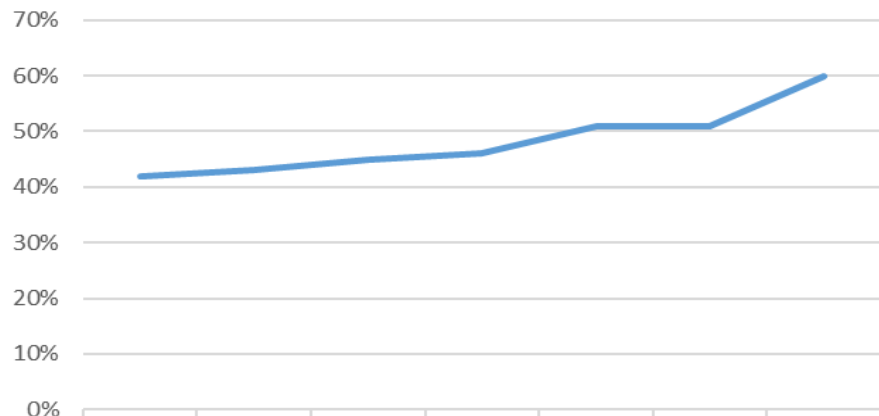
Year	2013	2014	2015	2016	2017	2018	2019
Management of Risk	774	666	483	379	291	226	354

Policies & Documentation



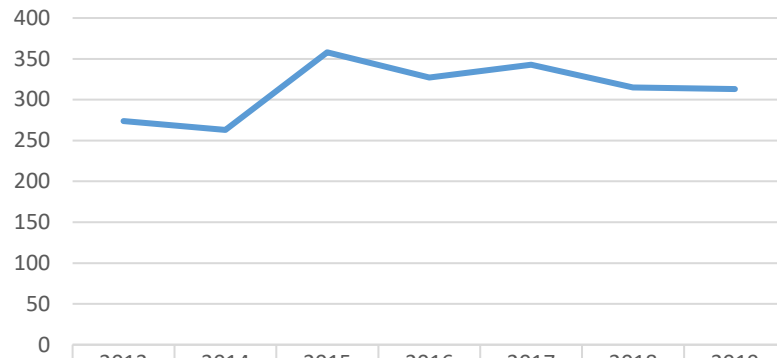
Year	2013	2014	2015	2016	2017	2018	2019
Policies & Documentation	364	347	321	308	275	227	239

TPV Implementation



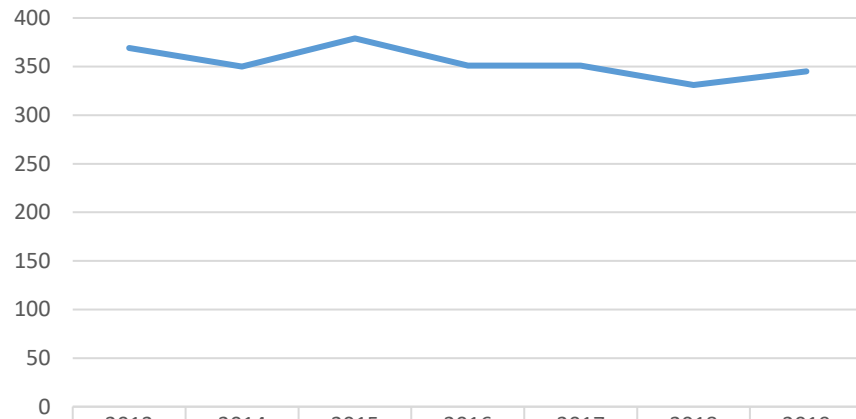
Year	2013	2014	2015	2016	2017	2018	2019
TPV Implementation	42%	43%	45%	46%	51%	51%	60%

Emergency Response System (ERS)



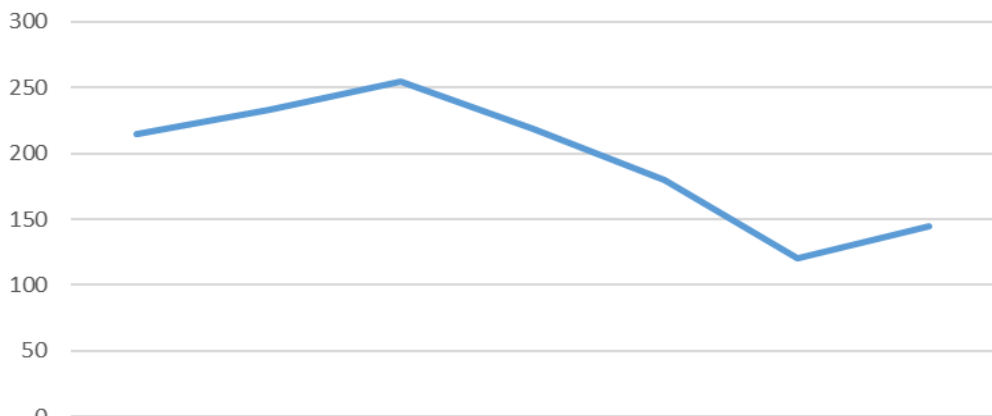
	2013	2014	2015	2016	2017	2018	2019
Emergency Response System (ERS)	274	263	358	327	343	315	313

Ongoing Improvements



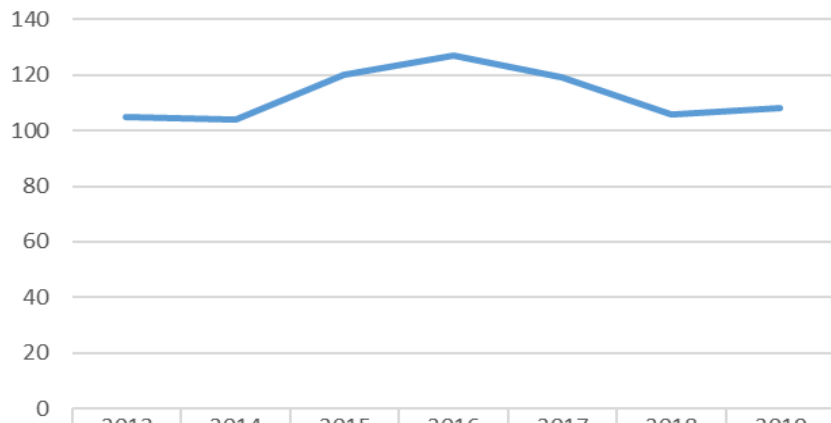
	2013	2014	2015	2016	2017	2018	2019
Ongoing Improvements	369	350	379	351	351	331	345

Training



	2013	2014	2015	2016	2017	2018	2019
Training	215	233	255	219	180	120	145

Community Interaction



	2013	2014	2015	2016	2017	2018	2019
Community Interaction	105	104	120	127	119	106	108

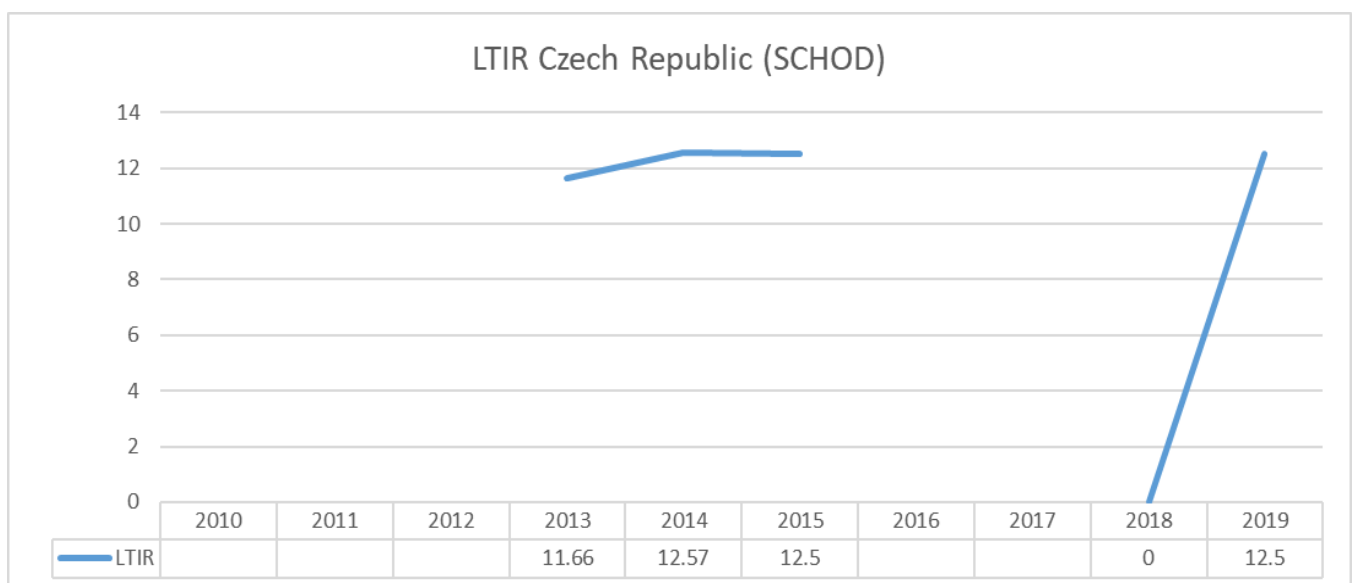
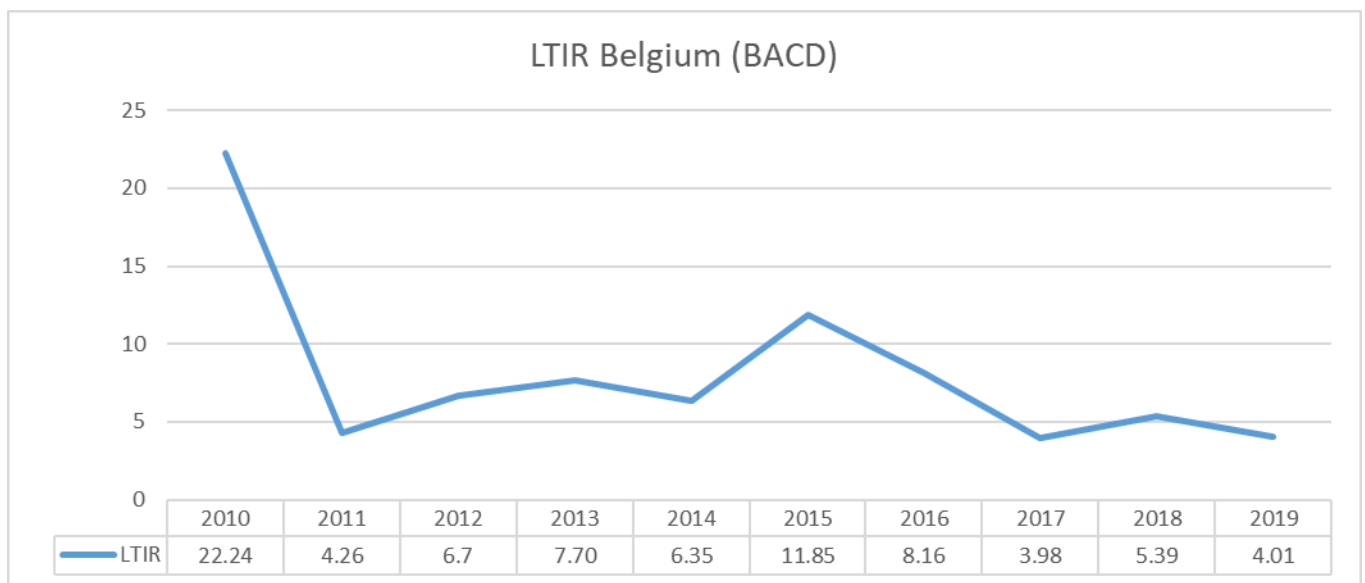
ANNEX III

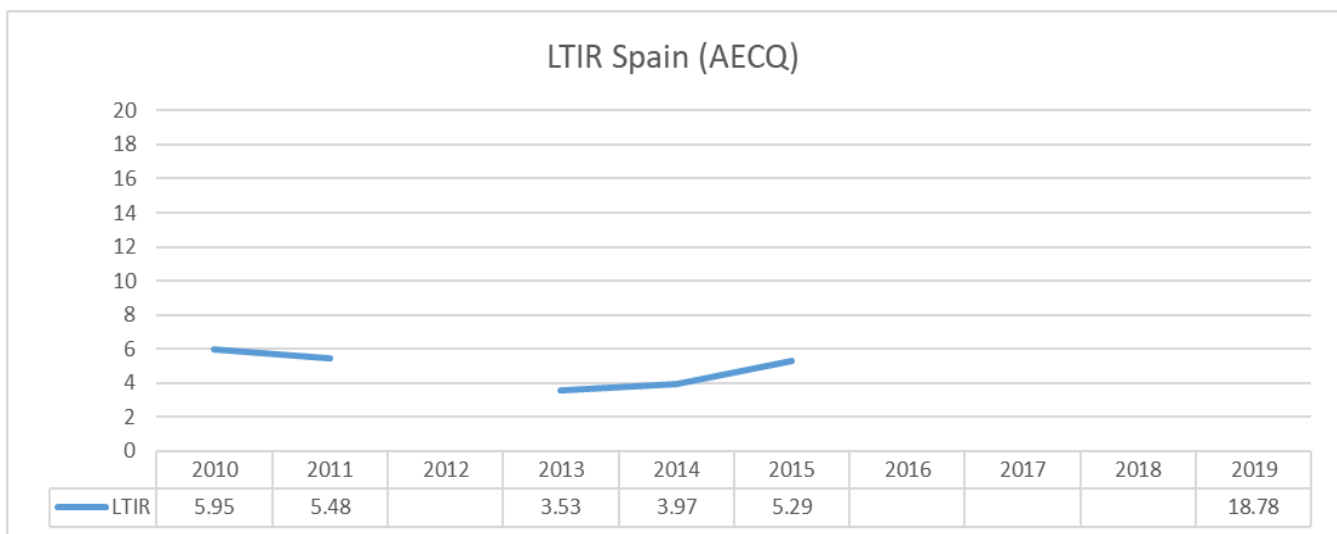
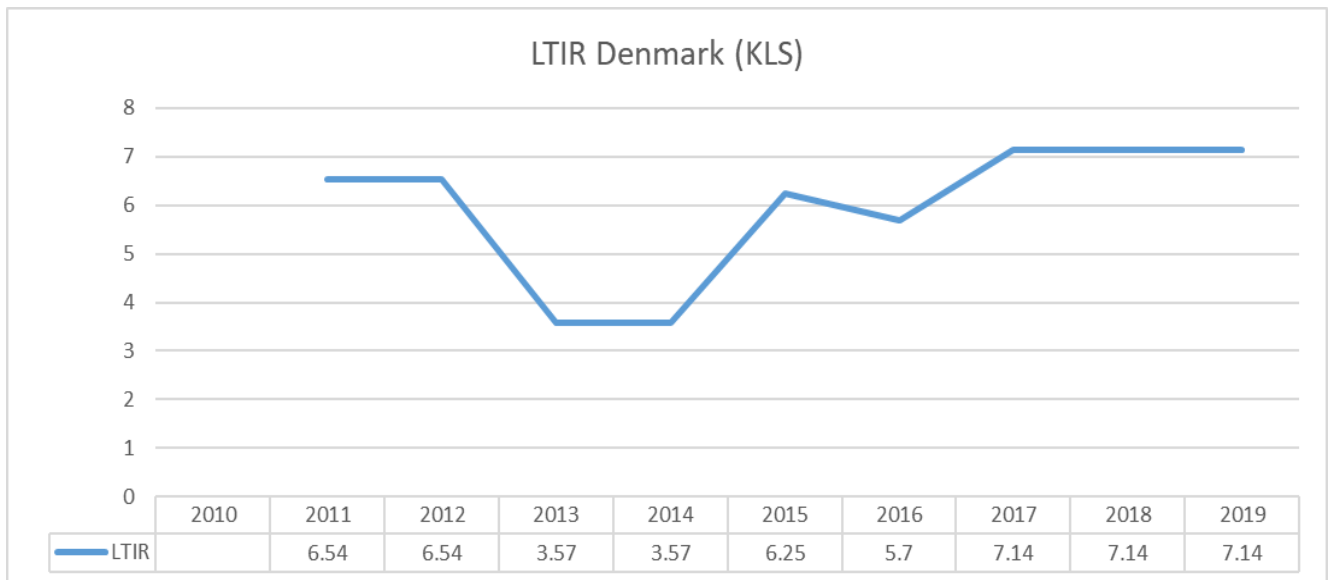
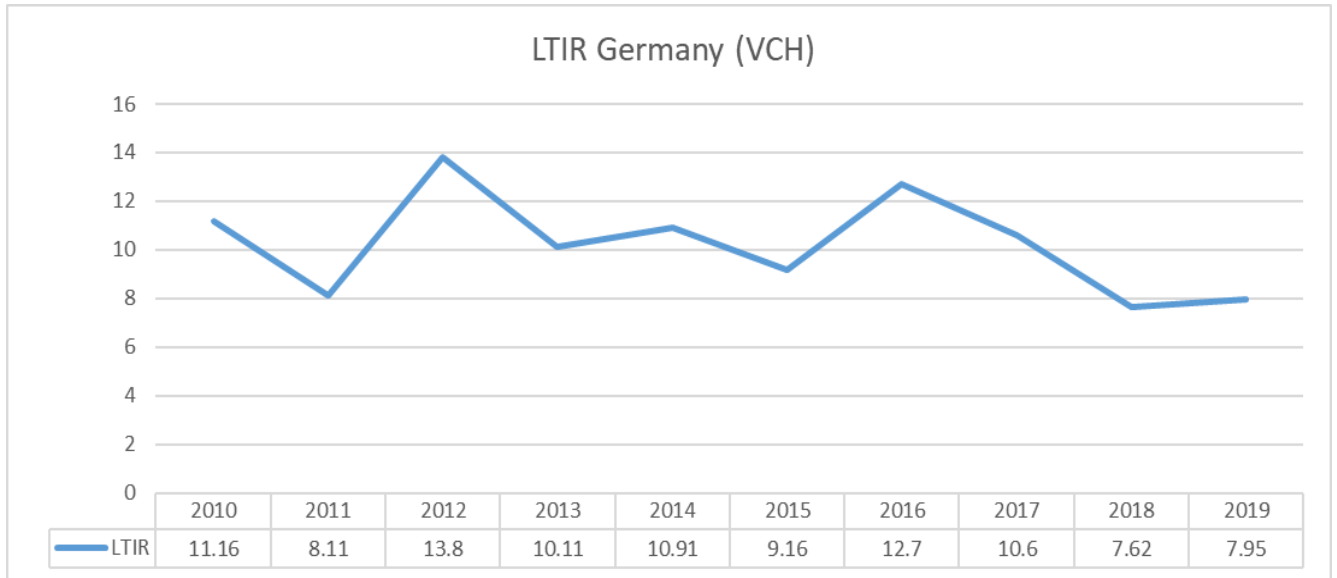
Data Lost Time Injury Rate (LTIR) by Country 2010-2019

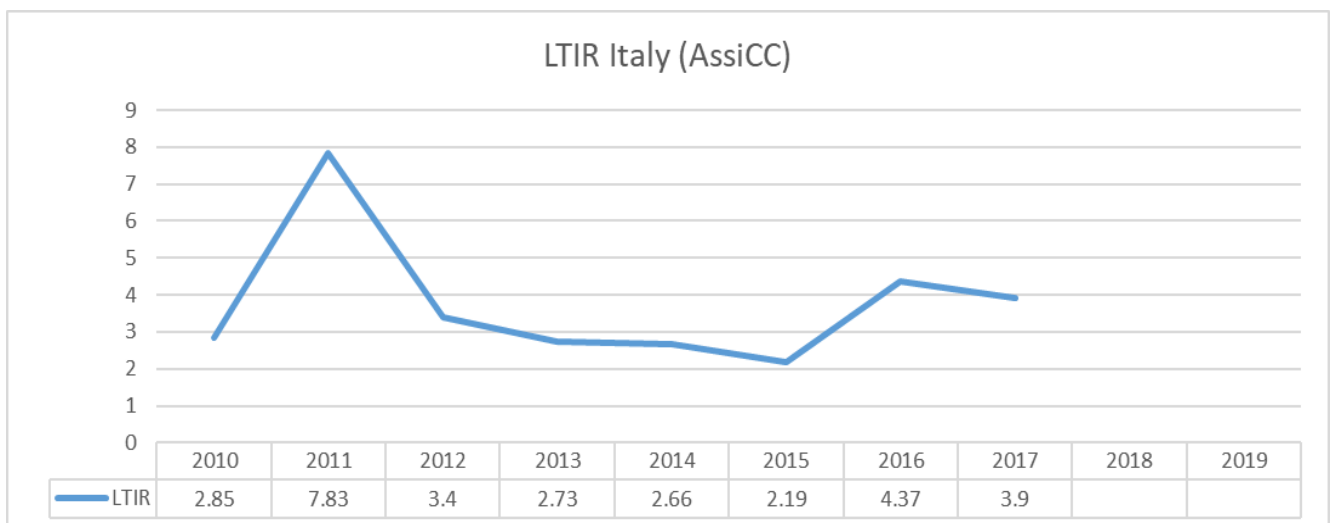
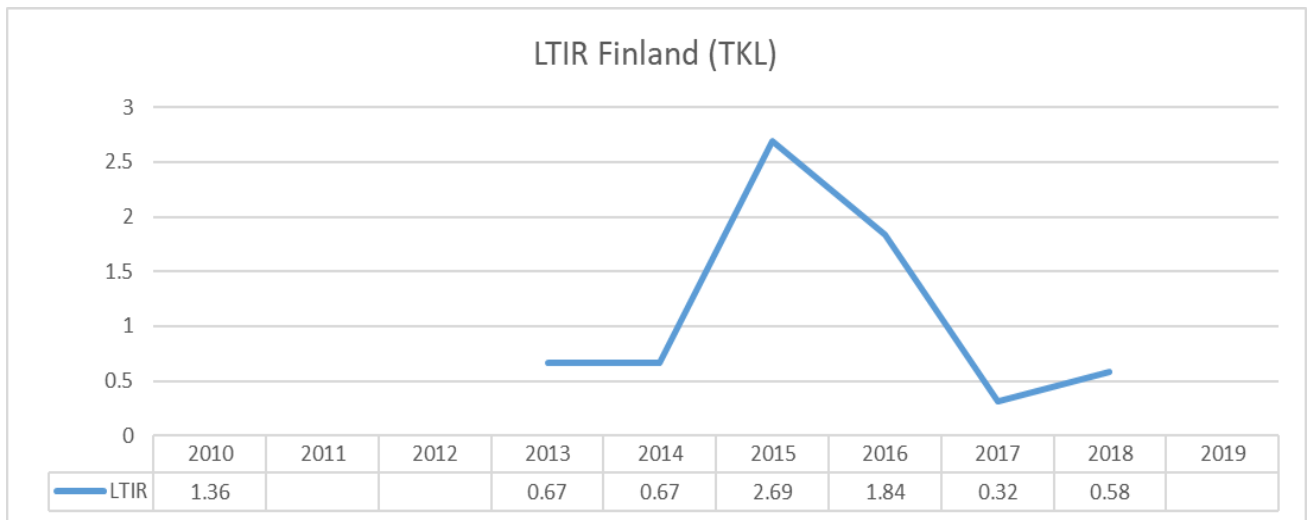
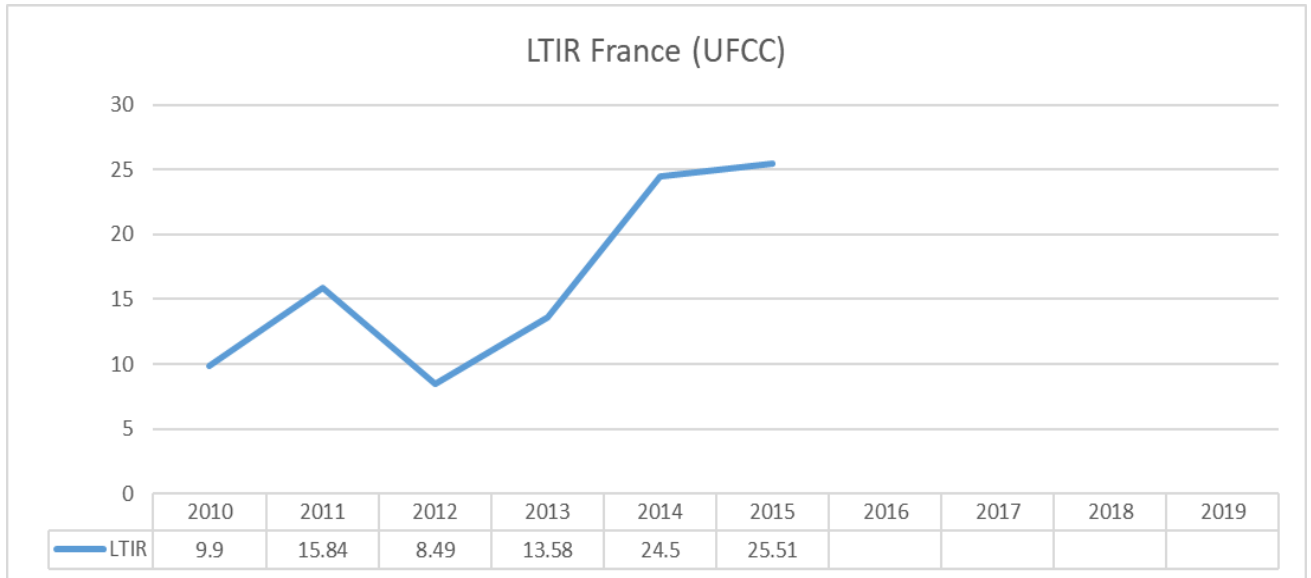
Explanatory note:

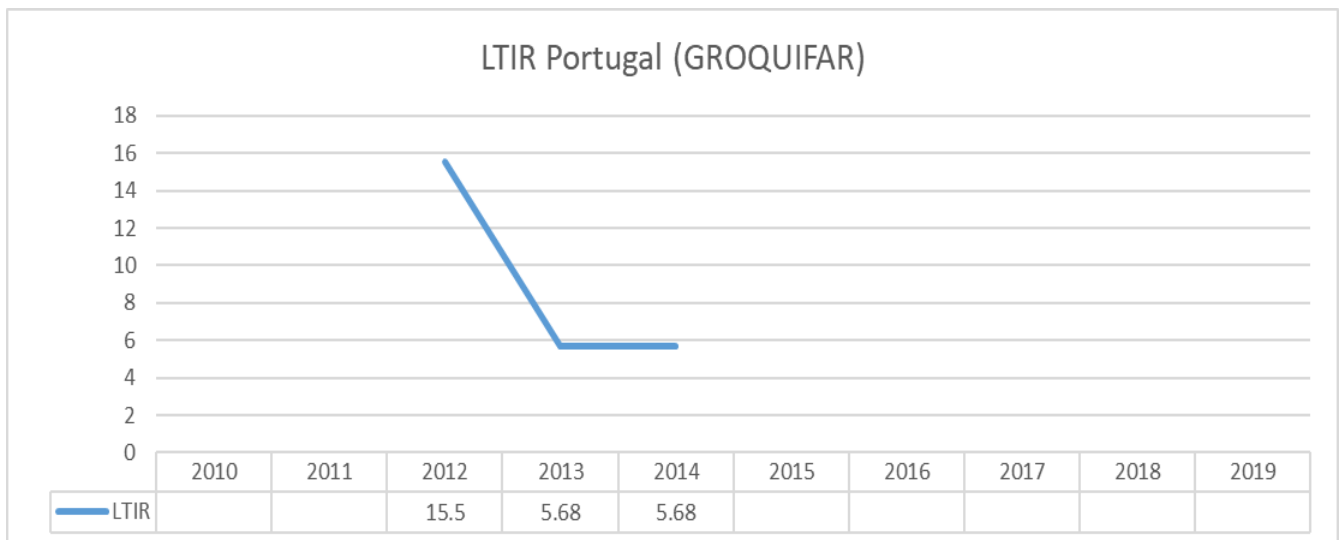
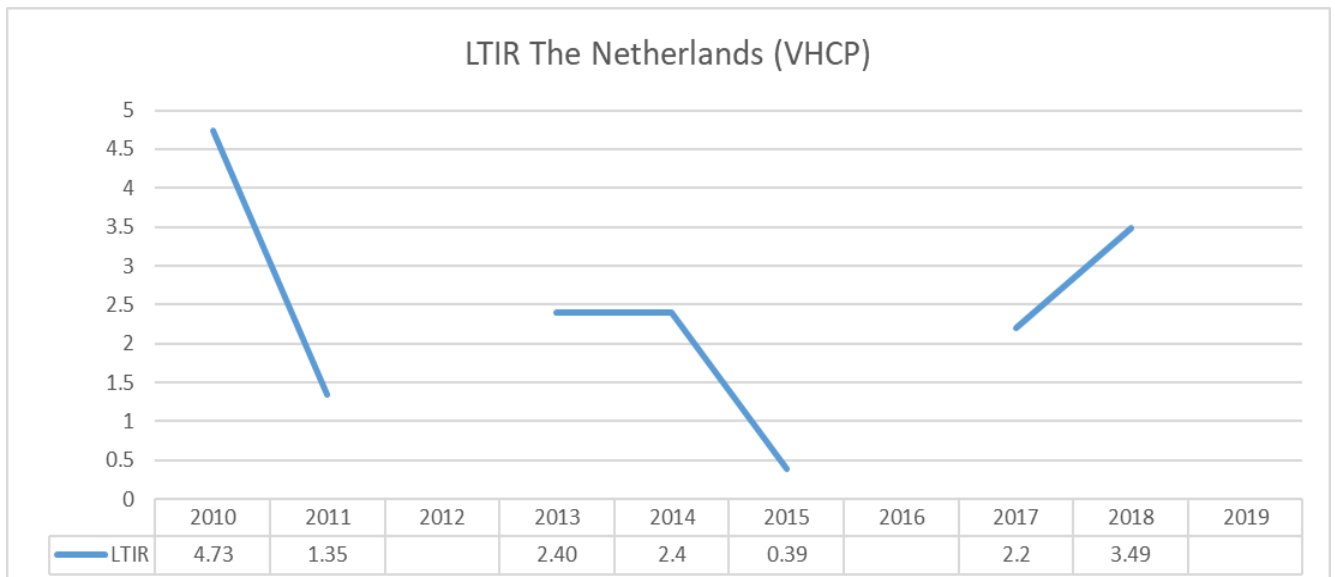
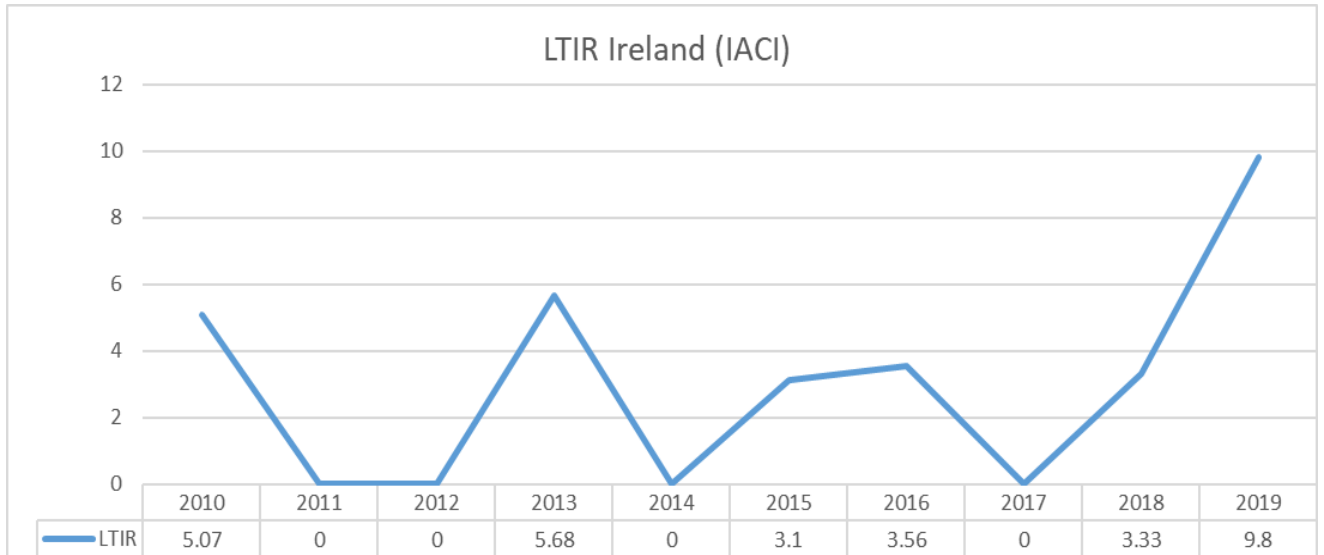
Lost Time Injury Rate (LTIR) is defined as the number of accidents leading to a minimum of 3 lost workdays per one million worked hours (Total number for all respective NA member companies).

A blank box for certain years means no data (“not indicated”) submitted by the NA in the survey.

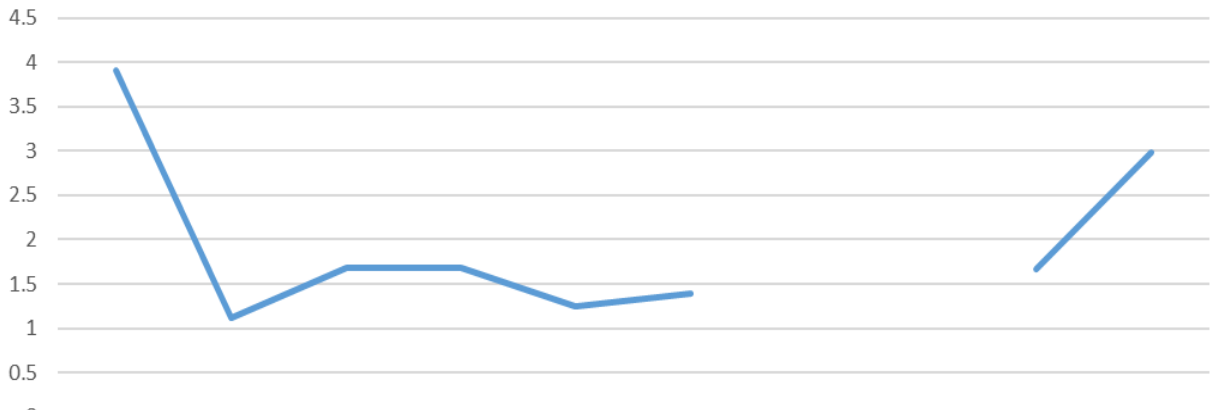






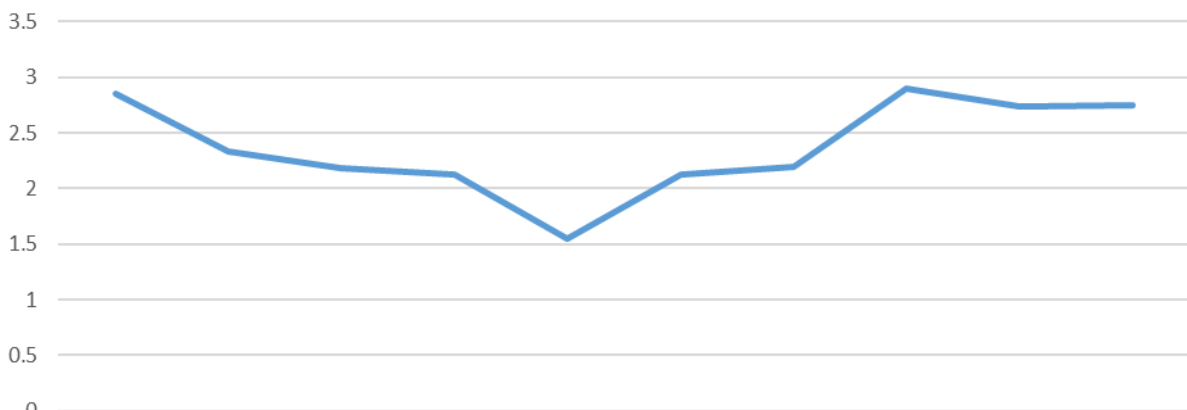


LTIR Sweden (IKEM)



	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LTIR	3.91	1.11	1.68	1.68	1.25	1.39			1.66	2.98

LTIR United Kingdom (CBA)



	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Series1	2.85	2.33	2.18	2.13	1.55	2.12	2.2	2.9	2.74	2.75