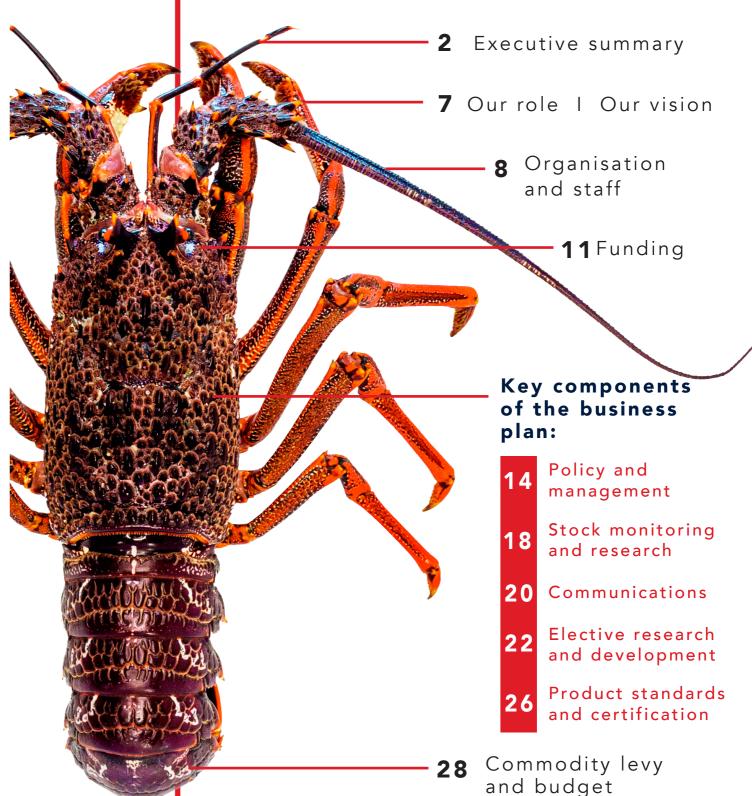




# TĒNĀ KOUTOU CONTENTS





## THE NEW ZEALAND ROCK LOBSTER INDUSTRY COUNCIL DELIVERS A WORK PROGRAMME TO SUPPORT THE SUSTAINABLE DEVELOPMENT OF THE ROCK LOBSTER INDUSTRY

As a representative body, NZ RLIC both guides and takes direction from all CRA and Packhorse Lobster (PHC) Quota Share Owners (QSOs), processing and export companies, vessel operators and iwi that comprise our sector.

We continue to influence legislation and public policy through professional engagement to support our efficient and high-value sector, whilst proactively seeking to maintain the necessary access to inshore fishing grounds and minimising unnecessary costs and restrictions. Our approach is intended to ensure a long-term future for our industry through best practice research and environmental performance informed by industry initiated and/or directly funded stock monitoring and research.

NZ RLIC's function is supported by engaged participation through its nine-person Board. The nine directors, each appointed by their respective Cray Management Area Councils (CRAMACs), have demonstrated a long-standing commitment to improved fisheries management and environmental performance.

The efforts by CRAMACs, our regional representative organisations and by our individual vessel operators – who provide their time and effort to consolidate logbook coverage and facilitate observer catch sampling – deserve wider acknowledgement. While we have come

a long way and progress has been made and setbacks avoided the challenges faced by New Zealand's rock lobster industry are daunting and increasing in scope and complexity.

The global COVID-19 pandemic continues to disrupt and impact on our sector. In 2020, the industry weathered the health crisis and contended with a complete shutdown of its principal export market. Revenue was hit hard and was compounded by ongoing disruption to transport logistics and increased freight costs. COVID-19 and geopolitical factors highlighted risks to market access and the desirability of diversification. However, despite considerable efforts by our exporters, there are no viable alternatives that can absorb the volume, or provide the return needed, to recognise current production costs.

New Zealand's rock lobster industry has a sustainable, food safe and highly desirable premium product to offer. However, as at June 2022, the situation in our principal market once again looks ominous. The early part of the 2022/23 fishing year has seen very constrained exports. Should this situation not improve, industry will need to work closely with its exporters and quota share and ACE owners to consider what steps could be taken to mitigate the consequences – including a prompt engagement with government on the matter.

COVID-19 has reinforced the importance of a strong relationship between the catching sector and quota share owners, processors and exporters and brought about positive changes in business arrangements.

Our industry must recognise and continue to give expression to the importance of their ongoing shared interests and responsibilities. That task is facilitated and supported within the CRAMAC operating model and NZ RLIC's working relationship with Lobster Exporters of New Zealand (LENZ).

In seeking to address the challenges facing the industry, NZ RLIC's immediate level of cooperation and engagement is with CRAMACs and their membership of quota share owners, ACE owners, iwi, vessel operators and crew, Licensed Fish Receivers (LFRs) and exporters.

Our industry is full of hard working, inventive, positive and resourceful characters who continually demonstrate their commitment to stewardship of the resource which underpins future benefits for all stakeholders.

NZ RLIC wants to consolidate working relationships with iwi, their companies and asset management groups and seek to better understand and incorporate their values and aspirations, including through encouraging their involvement in CRAMACs.

We have a strong working relationship with Te Ohu Kaimoana (TOKM) and recognise their role in protecting the Fisheries Settlement, the importance of the Settlement to the integrity of the QMS and their mandate from Mandated Iwi Organisations (MIOs). Many of those MIOs are also rock lobster QSOs. Therefore, we work with them and TOKM so that our positions are aligned and mutually supportive.

Through our facilitation of the Commercial Fisheries Forum (CFF), NZ RLIC ensures the development of well formulated and integrated positions and collaborative working relationships with Sector Representative Entities (SREs) including the Pāua Industry Council, Fisheries Inshore New Zealand, Deepwater Group, Aquaculture New Zealand, Te Ohu Kaimoana and Seafood New Zealand, amongst others.

NZ RLIC also maintains positive relations with stakeholder groups including environmental NGOs and recreational fishers. We actively seek to instill a greater understanding amongst the public and the media of industry's efforts in responsible resource stewardship and the positive economic and social contributions made by the rock lobster industry.

We work constructively with central and local government agencies and Ministers. Some of this government's key policy priorities include the Resource Management Act (RMA) reform, climate change adaption and priorities in Oceans and Fisheries including marine protected areas and Revitalising the Gulf.

Our objectives are to engage to achieve improvements to the legislative and management frameworks that will deliver better outcomes and inform the

government of the implications of reform for our sector.

This business plan acknowledges the ongoing uncertainty and rapid pace of change in our operating environment, both in terms of government policy and reform but also the push toward ecosystem-based management.

The NZ RLIC is very aware of the environmental variability and regime shifts that affect rock lobster stocks and their habitats and we are responsive to advances in science and technology and increased attention on ethical and animal welfare matters.

Informed by credible evidence and good science, we remain focused on collaboratively addressing the ongoing government legislative and regulatory agenda which impacts on commercial

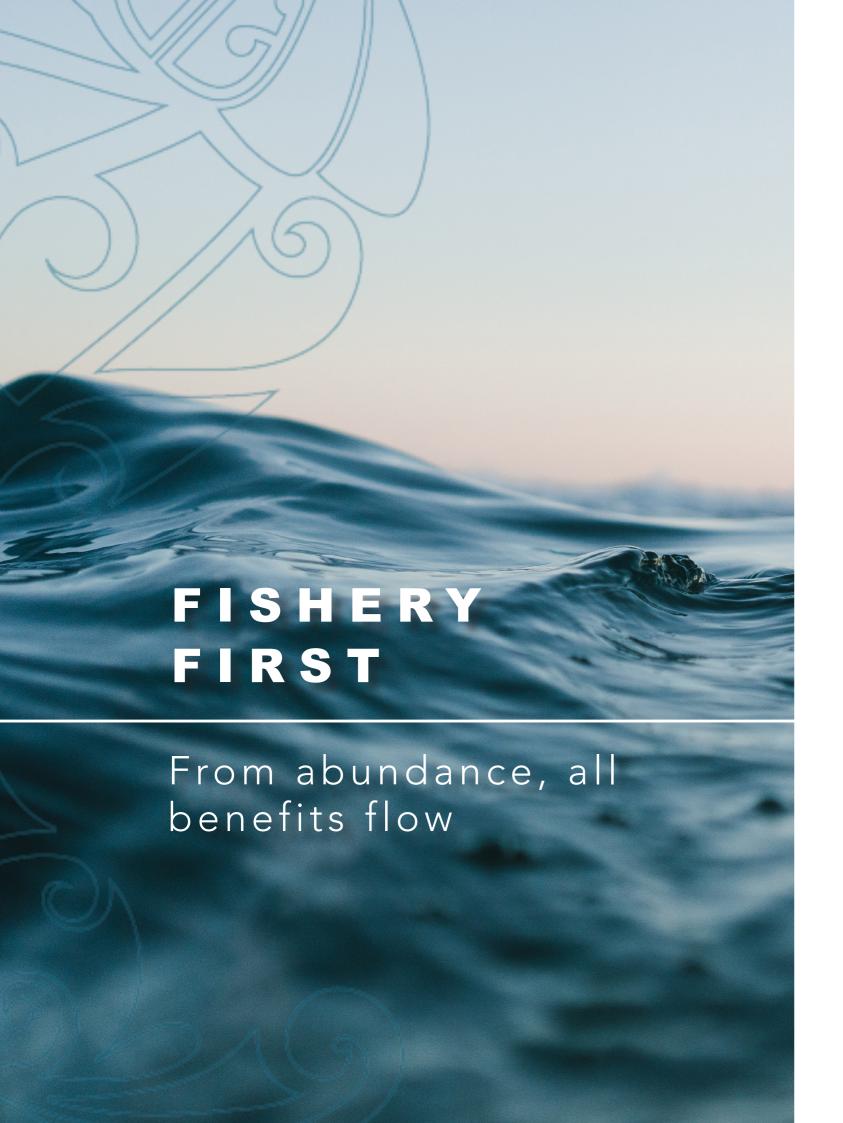
access and use rights.

The NZ RLIC will continue to identify opportunities and be proactive in addressing management and regulatory challenges while trying to reduce unwarranted restrictions and cost imposition.

It is important to improve public understanding and appreciation of what the rock lobster industry delivers to our nation.

Our sector has a compelling story to tell – one that paints New Zealand's commercial rock lobster fishery as a high-value, low environmental impact sector providing a significant economic contribution and employment regionally, and maximises the return to the national economy from the sustainable commercial harvest though its live exports.





#### **OUR ROLE**

The NZ Rock Lobster Industry Council Ltd (NZ RLIC) operates as the representative body and central service agency for the commercial lobster fishing industry. In that role we liaise with government, media, tangata whenua, environmental groups and other marine stakeholders on behalf of our constituents advocating for their best interests and that of the fishery.

#### **OUR MISSION**

The rock lobster industry has consistently supported and advocated for the New Zealand fisheries management regime including the Quota Management System (QMS). This regime set out in the Fisheries Act is based on ensuring sustainability through output controls on all extractive use, security and incentives created by rights, the resolution of competing interests and delivering on the Fisheries Settlement and addressing interactions with the marine environment by applying legislative principles. Further work is needed to apply this framework across all sectors and to realise its full potential.

Working within the Fisheries Act framework, the NZ RLIC will continue building a cohesive and sustainable industry operating to deliver responsible environmental performance, making a substantial economic contribution - regionally and nationally - and safeguarding the social and cultural value of New Zealand's rock lobster fishery through the practice of kaitiakitanga – guardianship and management – to ensure the health of the fishery now and in the future.

## **OUR VISION**



To be a united, prosperous and ecologically sustainable rock lobster industry valued and respected by Government and by the wider New Zealand community



To be regarded by local and international consumers as an industry that produces beyond premium, fresh seafood product



To be an industry well-equipped to take on a greater role in fisheries research and management and be acknowledged as a leader in sustainable and innovative management of rock lobster fisheries, both locally and abroad.



The NZ RLIC aims to operate with high standards of governance, prudent financial management and strict adherence to legislative and constitutional requirements, including those related to Health and Safety and an independently audited financial report.

We will apply energetic focus and well-informed representation on the many policy, operational and administrative issues that confront the lobster industry. The NZ RLIC team provides timely support and facilitation for the regional CRAMACs and for industry participants generally as requested.

Every effort will be made to provide the necessary submissions and manage programmes and deliverables to deadlines and within budget. The reactive nature of the operating environment requires responsiveness and adaption within the year and may lead to our team recommending adjustment of the programme to the NZ RLIC Board.

## NZ RLIC TEAM



JAMES ROBERTSON Chief Operating Officer



MARK EDWARDS Chief Executive Officer



Advisory & support role



**HELEN REGAN**Business manager



**LEIGH BROWN**Administrative support

The NZ RLIC also works closely with the professionals appointed by CRAMACs and with the CRAMAC executive committees to address issues in their regions and improve coordination and communication.

### OUR BOARD

NZ RLIC staff are guided and supported by the nine Board members nominated by each of the CRAMACs and the Chair.



**CRAMAC 1** Geoff Creighton



**CRAMAC 2 Butch Waterhouse** 



**CRAMAC 3** Salve Zame



**CRAMAC 4** Mark Peychers



**CRAMAC 5** Larnce Wichman



**CRAMAC 6** Terry Gittings



**CRAMAC 7** Chanel Gardner



CRAMAC 8 / **CHAIR** Malcolm Lawson



**CRAMAC 9** Sonya Tuerlings

## **NEW PREMISES**

Due to a revised earthquake rating on the previous office building, the NZ RLIC team will move into a new office in the third quarter of 2022. The new facilities will be co-located with other seafood representative bodies and Commercial Fisheries Services Ltd (FishServe) at NZ Post House in Wellington.

As it has done since 1996, the NZ RLIC will coordinate the delivery of a wide range of technical, science, legal and policy advice to CRAMACs and individual industry members. On request from the CRAMACs, financial administration of rock lobster Stock Specific Levy income is undertaken by the NZ RLIC.

#### FUNDING

THE NZ RLIC HAS PRIMARY RESPONSIBILITY FOR THE ROCK LOBSTER COMMODITY LEVY, FIRST IMPLEMENTED IN 2013 AND RENEWED IN 2018. A FURTHER RENEWAL IS BEING CANVASSED IN 2022.

That renewal will include a distinct levy for packhorse rock lobster at the request of those QSOs. The administration of the mandatory levy (invoicing and debt collection) is contracted to Commercial Fisheries Services Ltd (FishServe).

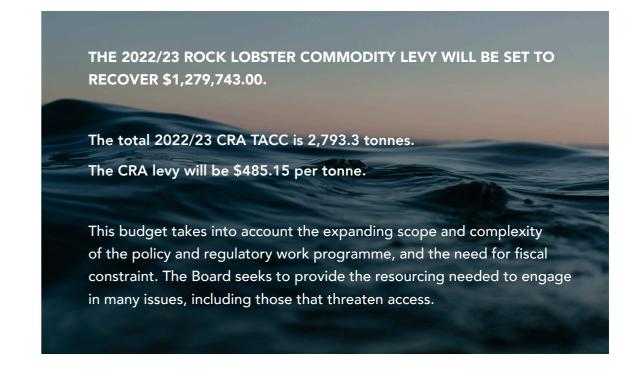
The NZ RLIC has a separate income stream from the operation of the rock lobster stock monitoring contract with the Ministry for Primary Industries.

Income is also derived from providing a range of contract management, financial management and administrative services to a small number of clients. Income

required to be collected by way of the Rock Lobster Commodity Levy.

The NZ RLIC operational expenses for the period 1 October 2022 through to 30 September 2023, have been constrained but remain sufficient to fund the capacity, services and activities needed to address risks and opportunities identified by the Board.

The NZ RLIC operating budget has been under pressure in both 2020/21 and 2021/22. As such, close financial management of expenditure and careful prioritisation of available resources have earned in this manner offsets the amount been made with the Board's oversight.



10. 11.





NZ RLIC seeks to influence the development and implementation of policy, legislation, regulation and the performance of the fisheries management framework, nationally and regionally, to support environmentally sustainable, efficient, ethical and economically and socially optimal benefits from the use of the rock lobster resource.

The security and confidence to invest in the resource and its future is underpinned by the rights and incentives inherent in the QMS and ongoing non-exclusive access to inshore fishing grounds.

The range of access and allocation pressures will continue to be a primary focus along with progress in addressing actual risks to the health and productivity of the inshore marine environment.

The NZ RLIC's approach will always be underpinned by science and evidence and developed in collaboration with other representative bodies where appropriate so that integrated and cost effective positions are developed through resource sharing and collaboration.

#### **OBJECTIVE 1:**

#### Enhance performance of the fisheries management framework

#### **ACTIONS**

- Work with the National Rock Lobster Management Group (NRLMG) in the annual review of rock lobster stocks, the TAC, TACC allowances and regulatory controls including ensuring that all extractive use is effectively measured and managed
- Pursue cooperation to develop and achieve revised management targets and create shared incentives including through improved certainty about allocation
- Engage constructively in the recognition and provision for customary rights through customary marine title applications, settlement legislation and mechanisms under Part IX of the Fisheries Act, while ensuring there is appropriate consideration of ability to utilise commercial entitlements
- Aspirations for finer scale management and localised abundance need to be cognisant of information requirements, cost and implications for access rights.

#### **OBJECTIVE 2:**

Legislative reform provides for confidence and sustainable development of the rock lobster sector

#### **ACTIONS**

- Seek to resolve policy issues with landings and returns and decision rules through the Amendment Bill provisions and transitional arrangements
- Engage with government on the new resource management Bills, and in particular, seek to address the overlap in function with the Fisheries Act
- Seek reform to marine biodiversity conservation legislation integrated with the Fisheries Act
- Work with agencies on other reform including conservation statutes and Revitalising the
- Promote policies and plans that support adaption of the industry to climate change.

14. 15.

#### **OBJECTIVE 3:**

#### **Enable responsive and equitable management**

#### **ACTIONS**

- Support the development of new TAC decision rules and the associated mechanisms to adjust management controls
- Seek improvement in the measurement and management of recreational fishing, and clarity about how allowances will be adjusted in relation to changes in the TAC.

#### **OBJECTIVE 4:**

Regional coastal plans and policies address threats to coastal marine ecosystems and provide certainty for the wild harvest sector

#### **ACTIONS**

- Continue to engage and advocate in regional planning process including challenging encroachment in fisheries management and duplicating issues that are addressed through the Fisheries Act
- Re-direct regional coastal plans and policies to focus on addressing threats to the health and productivity of marine ecosystems
- Encourage integrated monitoring and management of all activities across the coastal marine environment
- Participate in upcoming coastal plan reviews.

#### **OBJECTIVE 5:**

Seek improvement in the regulatory environment to deliver to outcomes while being practical and cost effective

#### **ACTIONS**

- Continue the initiative to improve the quality of at sea reporting to inform science and management
- Resolve ongoing issues and costs with digital monitoring
- Pursue an enhanced role for industry in management and service delivery to support

- responsive and lower cost management including enabling collective decision making, ACE shelving and fishery management planning
- Ensure cost recovery is consistent with the legal framework, only the actual costs of services are levied, and seek improvement in service transparency and cost effectiveness
- Continue collaborative work with MPI Compliance to better estimate and reduce illegal activities, and improve voluntary compliance.

#### **OBJECTIVE 6:**

#### Better management outcomes through collaboration

#### **ACTIONS**

- Enable and support CRAMAC initiatives and provide oversight and support on policy and operational issues and regular face to face engagement
- Support cohesive and credible whole of industry positions on all legislative and policy matters affecting the seafood industry by facilitating the Commercial Fisheries Forum
- Encourage alignment and recognition of the shared interests and responsibilities of the catching sector and quota share owners
- Support and work with LENZ on their export and market related initiatives
- Maintain information sharing and co-investment initiatives with Australian rock lobster industry groups and agencies
- Work to maintain and develop constructive relationships with recreational and eNGO groups and representatives and build on areas of common interest.

#### **OBJECTIVE 7:**

#### Improved response and support for fisher wellbeing

#### **ACTIONS**

- Ensure regulators understand the consequence of imposition of restrictions and advocate for interventions supported by evidence and cost effective in their design to achieve good fishery management outcomes
- Support the development of the "FirstMate" wellbeing initiative to provide targeted counselling and support services to fishers, while avoiding overlap in function with SREs and maintaining cost-effective scale
- Explore opportunities to coordinate NZ RLIC and CRAMAC activities to the "First Mate" initiative.

16. 17.



To maintain sustainable levels of harvest and environmental performance, the NZ RLIC invests in world-leading and innovative stock monitoring and stock assessment.

We seek continuous improvement in the quality of the information, data and science that informs management and delivers social, economic and cultural benefits to all stakeholders.

Greater understanding of the environmental variables that impact on the productivity of rock lobster stocks informs responsive management and will support delivery of an ecosystem approach to fisheries management that is inherent in the Fisheries Act.

Overall annual commercial rock lobster harvest has remained steady at approx. 2700 tonnes since 1990, but catch rate (CPUE) has increased by over 300%

#### **OBJECTIVE 1:**

Invest in research to inform decisions on sustainable levels of harvest

#### **ACTIONS**

- Fund research that assesses stock biomass relative to targets and limits
- Support the peer review, transparency and publication processes that give government and the public confidence in the quality and integrity of the science that informs rock lobster management
- Facilitate research planning that identifies priority areas to invest in new science and information
- Monitor developments in research and science in other jurisdictions to identify improvement opportunities.

#### **OBJECTIVE 2:**

Coordinate collection of stock monitoring information that provides key information to inform stock assessment and assess impact of spatial exclusions

#### **ACTIONS**

- Organise for the collection of spatially and temporarily representative fishery dependent information including length frequency, sex and state from observer catch sampling and the voluntary vessel logbook programme
- Implement tag release and recapture programmes to provide growth estimates and movement information to inform length-based population models
- Support revised approaches to collect information on strength of recruiting year classes.

#### **OBJECTIVE 3:**

Commission science that supports responsive management

#### **ACTIONS**

Support the development of new stock management targets and the formulation
of a new generation of management procedures to provide clarity and responsive
adjustments to the TAC with new information.



We will communicate the New Zealand rock lobster's reputation as a premium value, healthy, sustainably and ethically harvested food with substantial export returns to the NZ economy, and a generator of significant economic activity in regional towns and communities.

Developing a level of understanding and awareness among government and the public of the sector's positive contributions is central to the opportunity to engage in decision making and influence processes to achieve our vision.

We will maintain a calm, evidence-based and rational approach to our advocacy and maintain constructive relationships with government and all fisheries stakeholders.

NZ RLIC's internal communications will endeavor to inform, coordinate and connect industry so there is commonality of purpose and an understanding of our responsibilities and outcomes that are sought.

It is important to improve public understanding and appreciation of the industry's low environmental impact and significant economic contribution

#### **OBJECTIVE 1:**

Increasing public understanding of the rock lobster industry's environmental and sustainability credentials and its contributions to New Zealand's social and economic fabric.

#### **ACTIONS**

- Reinforce the image of the rock lobster sector as responsible, with a strong commitment to sustainable use of the fishery, including a long-standing record of constructive management and investment into fishery through science and monitoring
- Targeted communication addressing inaccurate and imbalanced information and educating the public on the science and management principles behind the New Zealand fisheries management framework
- Build a better-informed audience and engagement through social media platforms
- Convey the value contributed by the industry to regional towns and communities including through associated servicing and support businesses and employment.

#### **OBJECTIVE 2:**

Establish consensus within industry about the outcomes we seek to achieve and the role components of industry play

#### **ACTIONS**

 NZ RLIC will ensure there is regular engagement and discussion with the CRAMAC membership to ensure unity of purpose and understanding of our priorities and responsibilities.

#### **OBJECTIVE 3:**

Ensure NZ RLIC is using the most effective communication approach and tools

#### **ACTIONS**

- Take steps to implement the new communication strategy, in coordination with CRAMAC initiatives
- Maintain and enhance the NZ RLIC website to ensure content is relevant, current, accurate and easily accessible by all, and encourage CRAMAC use of their sections of the site.

20. 21.



## Sustainable use of a marine resource throws up constant challenges.

We need to be aware of emerging food safety and biosecurity risks and threats to the health and welfare of lobsters. Marine biotoxin events have been occurring with greater frequency and intensity with serious implications if they were to be detected in export shipments.

Industry must continue to build on past work by considering scientific and procedural developments that support assessments. We must also continue to monitor advances in animal husbandry and respond to changes in protected species interactions.

The NZ RLIC will invest through direct purchase or elective research to allow the industry to act responsibly, adapt, progress and be resilient.

Rock lobster is the most commercially valuable of New Zealand's wild harvest fisheries

#### **OBJECTIVE 1:**

Ensure responses to emerging risks and opportunities are informed through investment in science

#### **ACTIONS**

- Monitor research on biotoxins in Australasia including their detection, testing mechanisms, accumulation and persistence in crustaceans
- Examine developments in the science related to crustacean welfare and support the development of standards that meet or exceed international best practice
- Scan for new or emerging threats, including biosecurity risks.

#### **OBJECTIVE 2:**

Reduce the risk of whale interactions and support positive outcomes to any entanglements

#### **ACTIONS**

- Promote and disseminate the revised WhaleSafe Manual and OceanSnap application
- Review best practice approaches and gear modifications that have reduced the incidence of entanglements in other jurisdictions
- Work with DoC to deploy the GPS location buoys purchased by the NZ RLIC to allow timely intervention in any entanglement incident.

#### **OBJECTIVE 3:**

Ensure vessel operators and catch sampling technicians have the equipment and support required

#### **ACTIONS**

- Invest in maintaining and updating electronic vessel logbook platforms
- Ensure electronic data collection and data storage protocols meet or exceed the required standards
- Maintain the TagTracker database that provides key growth increment data and provide upgraded feedback reports to vessel operators who report rock lobster tag recaptures.

#### **OBJECTIVE 4:**

Collect economic data to inform industry positions on spatial access loss, re-allocation and other mechanisms impacting on economics of operation

#### **ACTIONS**

• Establish a pilot programme to collect specific, credible economic data on the components of the industry and the impact of restriction and increased cost.

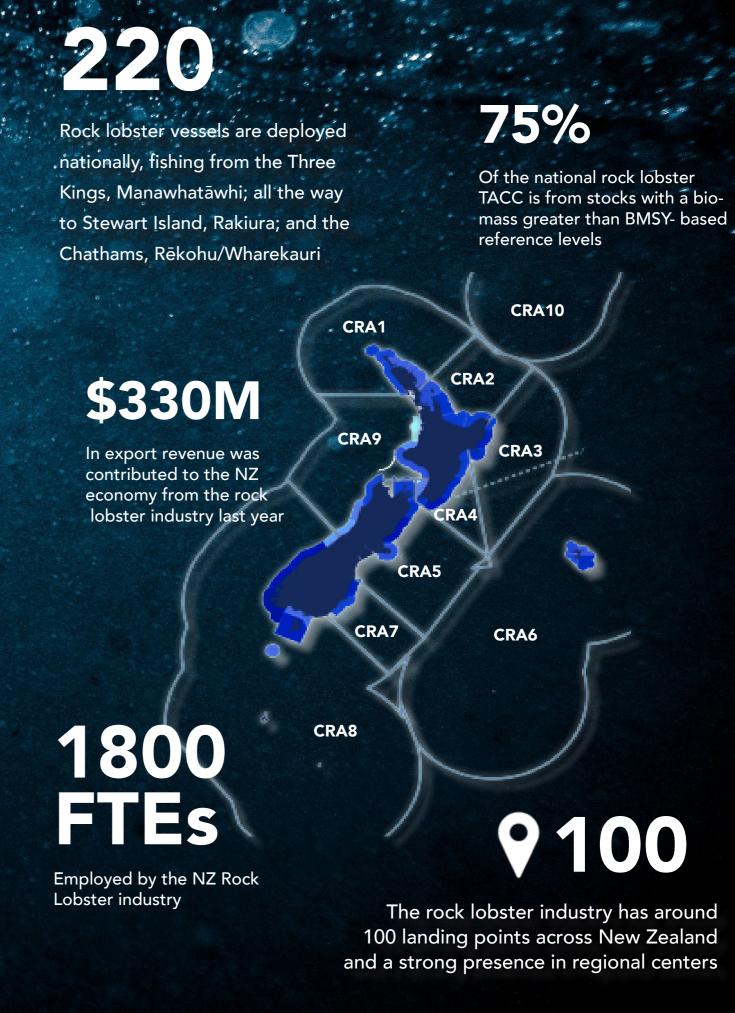
#### **OBJECTIVE 5:**

Inform response to our environmental footprint including greenhouse gas (GHG) emissions

#### **ACTIONS**

• Assess GHG emissions for the rock lobster industry and potential mitigation responses.







Obtaining maximum value from quota limited landings is critically dependent on maintaining market access for live rock lobster exports and quickly addressing any barriers or threats to access.

There is a need to be responsive to new issues and changes in the requirements and standards that apply in export destinations and changes in preferences or requirements in the market. The NZ RLIC will continue to work closely with LENZ and the Seafood Standards Council (SSC) in these areas. The global COVID-19 pandemic continues to cause serious market risks and operational difficulties.

NZ RLIC needs to support LENZ's work to mitigate those risks and consider what steps the sector can take to develop resilience. There is also ongoing work needed to provide accessible and authoritative information to demonstrate the environmental sustainability of rock lobster fishing.

We support industry meeting food safety standards, maintaining market access and achieving required skills and competencies. 99

- SEAFOOD STANDARDS COUNCIL

#### **OBJECTIVE 1:**

Coordinate industry responses to issues that have implications for market access and food security including food safety, quality, animal welfare and environmental performance

#### **ACTIONS**

- Commission elective research and undertake analysis to address risks and issues concerning food safety, biotoxins, biosecurity, product standards and animal welfare
- Continue the development of the National Marine Biotoxin Risk Management Plan to ensure readiness and response, and coordinate its implementation with CRAMACs
- Promote ethical treatment in handling, processing and distribution of lobsters.

#### **OBJECTIVE 2:**

Support LENZ initiatives to examine market opportunities, and promote and enhance the reputation of rock lobster as a "beyond premium" product

#### **ACTIONS**

- Facilitate work by LENZ to promote and market rock lobster, explore opportunities to diversify markets and address challenges including freight and logistic issues, including through seeking support from and advocacy with government agencies
- Monitor developments and the uptake of third-party certification, seafood labeling and traceability in the China market and coordinate the development of appropriate responses
- Support the operation of the OpenSeas initiative, including using the revised risk assessment framework to certify rock lobster fisheries
- Encourage and facilitate use of environmentally friendly packaging.

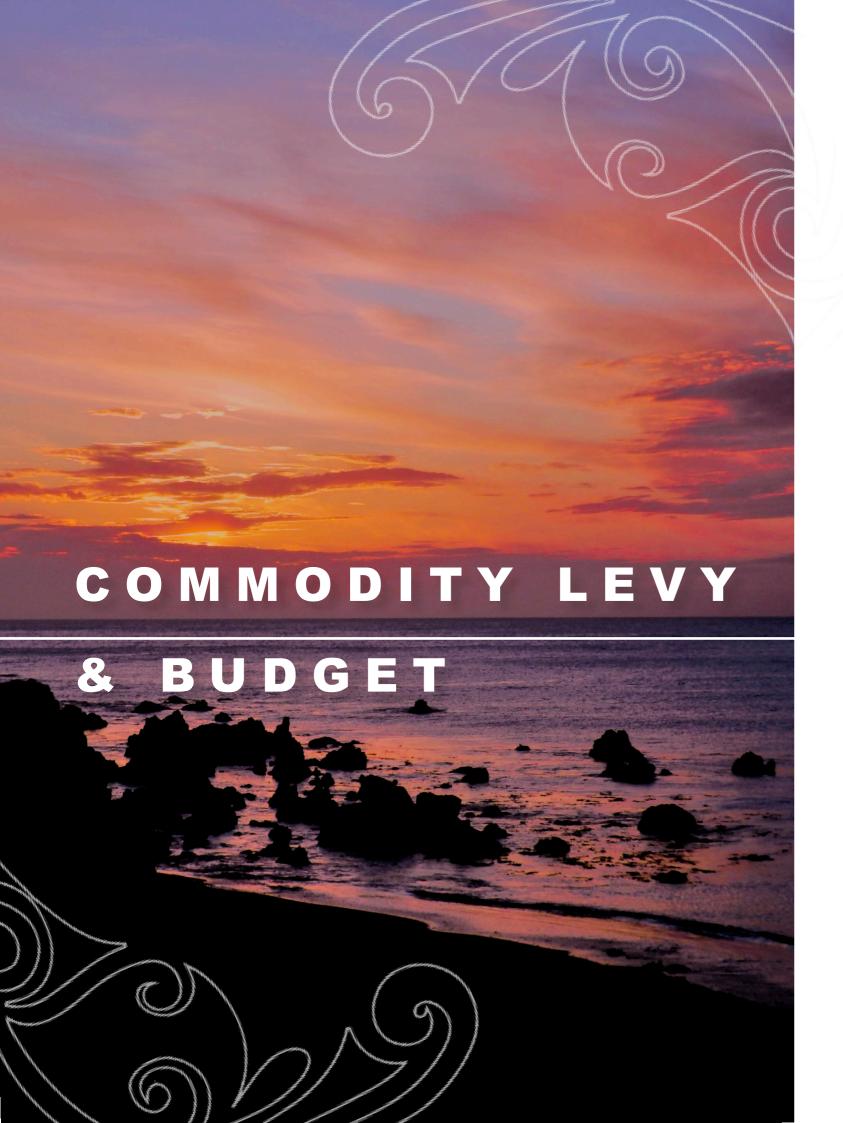
#### **OBJECTIVE 3:**

Support industry managing and adapting to market disruption and access issues and COVID-19 response

#### **ACTIONS**

- In the event of market access issues, work urgently with government to develop and implement adjustment and mitigation mechanisms
- Work with the SSC to provide COVID-19 protocols, information and advice when Alert Levels change, including requirements to maintain and operate "essential service" status and protect health, safety and wellbeing.

26. 27.



## **COMMODITY LEVY**

The NZ RLIC shareholders agreed that the **2022/23** Rock Lobster Commodity Levy will be set to recover **\$1,279,743** to offset NZ RLIC operational expenses and support CRAMACs for the period 1 October 2022 through to 30 September 2023.

TOTAL CRA TACC FOR 2022/23:

CRA COMMODITY LEVY:

**2,793.3** TONNES

**\$458.15** PER TONNE

Should you have any enquiries about the proposed 2022/23 NZ RLIC Business Plan and Budget, or about the Rock Lobster Commodity Levy, please contact the NZ RLIC office at your convenience.

**NZ Rock Lobster Industry Council Ltd** 

JM/L Edwards

Mark Edwards
Chief Executive Officer



## BUDGET

2022 / 23

INCOME	BUDGET 2020/21	BUDGET 2021/22	BUDGET 2022/23
Commodity Levy	\$899,488.93	\$982,867.51	\$1,279,743.00
External Service Provis	sion \$21,100.00	\$20,000.00	\$25,000.00
MPI Research Contrac	t \$597,600.00	\$485,100.00	\$623,700.00
Surplus Carried Forwa	rd \$105,000.00	-	-
Total Income	\$1,623,188.93	\$1,487,967.51	\$1,928,443.00

EXPENSES	BUDGET 2020/21	BUDGET 2021/22	BUDGET 2022/23
D.I. O.M	¢05,000,00	\$200,000,00	¢075 000 00
Policy & Management	\$95,000.00	\$200,000.00	\$275,000.00
Communication	\$74,660.00	\$83,300.00	\$61,350.00
Elective Research	\$30,500.00	\$25,000.00	\$48,000.00
Product Standards	\$61,269.00	\$45,000.00	\$80,000.00
Staff and Resources	\$717,259.93	\$649.667.51	\$ 730,093.00
MPI Research Contract	\$469,500.00	\$350,000.00	\$559,000.00
Direct Purchase Researc	h \$175,000.00	\$135,000.00	\$175,000.00
Total Expenses	\$1,623,188.93	\$1,487,967.51	\$1,928,443.00



