NAFTA Secretariat, Canadian Section

1999-2000 Estimates

A Report on Plans and Priorities

Approved

Honourable Sergio Marchi. Minister for International Trade

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Section I: Messages

A. The Minister's Message

Canada benefits from a fair and effective system of trade rules between nations that allows Canadians to compete on equal terms in foreign markets.

The North American Free Trade Agreement (NAFTA), which helps to set the rules for liberalized trade between Canada, the United States and Mexico, came into effect on January 1, 1994. An important element of the NAFTA has been its innovative dispute resolution mechanisms. These processes provide the means for NAFTA governments and firms to raise and resolve disputes in some of the world's most active trading relationships. NAFTA countries and companies are provided with the assurance that trade disagreements will be dealt with in a fair and open manner.

The administration of NAFTA's dispute settlement provisions is the responsibility of the NAFTA Secretariat, which is comprised of Canadian, U.S. and Mexican national Sections. The NAFTA Secretariat is also mandated to assist the Commission of Ministers responsible for NAFTA to support a number of non-dispute related committees and working groups.

In the first ten months of fiscal year 1998-99, the NAFTA Secretariat administered 19 panel reviews under Chapter 19 and two arbitral panel proceedings under Chapter 20 of the NAFTA. The Secretariat issued six Chapter 19 panel decisions during this period.

The Canadian Section of the NAFTA Secretariat has achieved a consistently high level of satisfaction among its primary client base (panelists who have served in Canadian panel proceedings). According to survey results compiled since 1994 by an independent firm, on average, 97 percent of the Canadian Section's clients are very satisfied (the highest possible rating), with the NAFTA Secretariat, Canadian Section. Furthermore, an average of 93 percent of clients believe that the Canadian Section is very important to the dispute settlement processes of the NAFTA.

The Canadian Section of the NAFTA Secretariat recorded significant cost savings over the past several years through initiatives such as co-location, shared services, contracting out, cost recovery measures and through the innovative use of information technologies. The Canadian Section continues to seek ways to reduce costs and this year is in the process of negotiating an agreement with the Office of the Auditor General, in order to provide the Canadian Section with shared access to its Financial Information Strategy (FIS) compliant system.

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Looking ahead to the 1999-2000 fiscal year, some of the key initiatives to be undertaken are:

- The NAFTA Secretariat, Canadian Section will continue to endeavour to provide an exemplary level of service to its clients. After a comprehensive review of the results of the last three-years' monitoring reports and the 1994 Service Standards Survey (benchmark), management has raised the stated performance indicators to 80% for the future fiscal year;
- The Canadian Section's role has been evolving as Canada's trade link's with the world have been evolving. The NAFTA Secretariat, Canadian Section's mandate has been further expanded to include responsibility for administration of the dispute settlement provisions of the Softwood Lumber Agreement between the Government of Canada and the Government of the United States of America. In July 1998, the Canadian Section was called upon to administer the first panel proceeding formed under the Softwood Lumber Agreement and will continue to do so into 1999; and
- The Canadian Section will carry out its Year 2000 (Y2K) action plan to ensure that all computerized systems and communications will be Y2K compliant, with contingency plans drawn up to handle potential related problems.

Canada's commitment to a more open and rules-based global trading system was recognized by the recent World Trade Organization (WTO) Trade Policy Review of Canada, which reported positively on Canada's trade performance. The NAFTA Secretariat, Canadian Section has played an important part in helping Canada earn a positive reputation and take advantage of the benefits of the government's policy of trade liberalization.

The Honourable Sergio Marchi Minister for International Trade

B. Management Representation Statement

I submit, for tabling in Parliament, the 1999-2000 Report on Plans and Priorities (RPP) for the NAFTA Secretariat, Canadian Section.

To the best of my knowledge the information included:

- a. accurately portrays the department's mandate, plans, priorities, strategies and expected key results of the organization;
- b. is consistent with the disclosure principles contained in the *Guidelines for Preparing a Report on Plans and Priorities*;
- c. is comprehensive and accurate; and
- d. is based on sound underlying departmental information and management systems.

I am satisfied as to the quality assurance processes and procedures used for the RPP's production.

The planning and reporting structure on which this document is based has been approved by Treasury Board Ministers and is the basis for accountability for the results achieved with the resources and authority approved.

Cathy Beehan
Canadian Secretary
NAFTA Secretariat, Canadian Section

Date

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Section II: Departmental Overview

A. Mandate, Roles and Responsibilities

1. Mandate

The NAFTA Secretariat is a unique organization created by the North American Free Trade Agreement (NAFTA) for the administration of the dispute settlement provisions of the NAFTA. The mandate of the Secretariat is set out in Article 2002.3 of the NAFTA and reads:

The Secretariat shall:

- (a) provide assistance to the Commission;
- (b) provide administrative assistance to:
 - (i) panels and committees established under Chapter Nineteen (Review and Dispute Settlement in Antidumping and Countervailing Duty Matters), in accordance with the procedures established pursuant to Article 1908, and
 - (ii) panels established under this Chapter, in accordance with procedures established pursuant to Article 2012; and
- (c) as the Commission may direct:
 - (i) support the work of other committees and groups established under this Agreement, and
 - (ii) otherwise facilitate the operation of this Agreement.

The Canadian Section of the NAFTA Secretariat has been also given added responsibilities. In 1997 the Section's mandate was expanded to include administration of the dispute settlement process under Chapter 8 of the Canada - Isräel Free Trade Agreement. Additionally, the Canadian Section's mandate has been further enhanced to include similar provisions under Chapter N of the Canada - Chile Free Trade Agreement.

2. Roles and Responsibilities

The NAFTA Secretariat has Canadian, U.S. and Mexican Sections which have been established as "mirror-images" of each other to carry-out its mandate. In the administration of the dispute settlement provisions, the NAFTA Secretariat provides legal, professional and advisory support to panels and committees, operates a court-like registry and co-ordinates all panel and financial aspects of the process.

B. Program Objective

The NAFTA Secretariat, Canadian Section's program objective is to implement the dispute settlement provisions of the North American Free Trade Agreement (NAFTA), the Canada - Isräel Free Trade Agreement (CIFTA) and the Canada - Chile Free Trade Agreement (CCFTA), by providing support to panels established under the relevant agreements and by maintaining a court-like registry system relating to panel, committee and tribunal proceedings.

Specific provisions of the relevant agreements from which the NAFTA Secretariat, Canadian Section derives its responsibilities in providing administrative assistance are highlighted in the following figure.

Figure 1 - Chart of Dispute Settlement Provisions

	North American Free Trade Agreement							
Chapter 11	disputes regarding investment matters	may be referred to certain international arbitral mechanisms						
Chapter 14	disputes relating to financial services provisions	may be referred to Chapter 20 dispute settlement procedures						
Chapter 19	disputes relating to anti-dumping, countervailing duty, injury final determinations	may be referred to a binding review process as an alternative to judicial review						
Chapter 20	disputes concerning the interpretation or application of the Agreement	may be referred to arbitral panels						
	Canada - Isräel Free Trade A	Agreement						
Chapter 8	disputes concerning the interpretation or application of the Agreement	may be referred to panels of experts						
	Canada - Chile Free Trade Agreement							
Chapter N	disputes concerning the interpretation or application of the Agreement	may be referred to arbitral panels						

C. Operating Environment

1. Background

Under the Canada - United States Free Trade Agreement (FTA), a Binational Secretariat was created in 1989 to administer the Agreement's procedures to resolve trade disputes. In 1994, pursuant to the Parties' obligation under the NAFTA to establish permanent, national Section offices in each country, the Binational Secretariat, Canadian and United States national Sections became the NAFTA Canadian and United States national Sections, and with the addition of the Mexican Section, make up the NAFTA Secretariat. The national Sections are located in Ottawa, Washington and Mexico City and are headed by the Canadian, United States and Mexican Secretaries.

Canada's trade relationship with the United States is the largest between any two countries in the world – more than a billion dollars in trade occurs every day. With this volume of trade, disputes are inevitable. It is estimated that about 5% of Canada's bilateral trade with the United States is currently under dispute.

While Canada's bilateral trade volumes with Mexico (\$8.243 billion in 1997, an increase of 13.1% from 1996), Isräel (\$458 million for January - October 1997) and Chile (\$717.3 million) are relatively small, the existence of effective dispute settlement mechanisms is encouraging business entities in these countries to pursue trade and investment opportunities.

2. Corporate Objectives

In support of the Program Objective of the NAFTA Secretariat, Canadian Section, the following five corporate objectives have been developed.

• Commitment to an Unbiased and Equitable Administrative Process -

the NAFTA Secretariat, Canadian Section, is committed to administering the dispute settlement provisions of the relevant Free Trade Agreements¹ in a manner which ensures unbiased administrative processes, equity, security and fairness.

For the purposes of this document, the Free Trade Agreements are the North American Free Trade Agreement, the Canada - Isräel Free Trade Agreement and the Canada - Chile Free Trade Agreement.

Commitment to Service Quality -

the NAFTA Secretariat, Canadian Section, is committed to maintaining the highest quality of administration of all dispute settlement proceedings.

• Support to Stakeholders -

the NAFTA Secretariat, Canadian Section, is committed to supporting and providing services to its stakeholders in a manner that is impartial, responsive, accessible and timely.

• Openness and Accountability -

the NAFTA Secretariat, Canadian Section, is committed to ensuring openness and accountability to the Government, the relevant Free Trade Commissions² and to the public.

• Operational Efficiency and Effectiveness -

in keeping with the *Blueprint for Renewing Government Services Using Information Technology*, the NAFTA Secretariat, Canadian Section, is committed to pursuing alternative service deliveries through the employment of new technologies which enhance information sharing and improved operating practices.

3. External Factors Influencing the Business Line

The external factors that influence the operational expenditures of the NAFTA Secretariat, Canadian Section and for which limited control may be exercised are the:

- direct costs of panel reviews as they represent non-discretionary costs;
- number of panels to be formed in any given year; and
- ability to accept or refuse a request for panel review.

For the purposes of this document, the Free Trade Commissions are the (NAFTA) Free Trade Commission, the Canada - Isräel Trade Commission and the Canada - Chile Free Trade Commission.

D. Financial Spending Plan

The NAFTA Secretariat, Canadian Section's operating budget for 1998-99 is \$2,209,000. Based on current patterns of expenditures it is estimated that the net program spending to March 31, 1999 for the 1998-99 fiscal year will be \$1,588,000. This reduced level of spending in 1998-99 is attributable to a delay in the operation of panel reviews and reduction in operating costs resulting from information technology efficiencies and improvements in operating practices.

Figure 2 - Financial Spending Plan (000)

	Forecast Spending 1998-99	Planned Spending 1999-00	Planned Spending 2000-01	Planned Spending 2001-02
Gross Program Spending	1,654	2,224	2,224	2,224
Less: Revenue Credited to the Consolidated Revenue Fund	(200)	(300)	(300)	(300)
Plus: Costs of Services Provided by Other Departments (notes 1 & 2)	134	134	134	134
Net Cost of Program	1,588	2,058	2,058	2,058

Notes: 1. Accommodation received without charge from Public Works and Government Services Canada (PWGSC).

In 1999-2000 it is anticipated that the net program spending will be \$2,058,000 as a result of a carry-over of a number of panel proceedings from the previous fiscal year, the early filing of new requests for panel proceedings and an increase level of activity associated with the bilateral Softwood Lumber trade agreement between the Government of Canada and the Government of the United States of America. Increase in program spending for 1999-2000 fiscal year will also occur as a result of the resumption of collective bargaining and the signing of new collective agreements.

^{2.} Services received without charge from Treasury Board for government payments to employee insurance plans.

Section III: Plans, Priorities, Strategies and Expected Results

A. Summary of Priorities and Expected Results

1. Results Commitment

The following results commitment was made by the NAFTA Secretariat, Canadian Section in Annex B of the 1998 Treasury Board President's Report to Parliament: *Managing Results*.

Figure 3 - Results Commitment

The NAFTA Secretariat, Canadian Section						
to provide Canadians with:	to be demonstrated by:					
appropriate administration of the dispute settlement provisions of the North American Free Trade Agreement (NAFTA), the Canada - Isräel Free Trade Agreement and the Canada - Chile Free Trade Agreement in a manner which ensures unbiased administrative processes, equity, security and fairness while providing quality services	stakeholder feedback					
	client satisfaction surveys					
	public access to and provision of information including decisions, reports and statistics in accessible formats					

B. Program and Business Line Plans

To assist in fulfilling the above noted Program Objectives and results commitment, the Canadian Section will carry out the following plans and priorities:

- Complete the Year 2000 action plan to prepare the NAFTA Secretariat, Canadian Section's systems for Year 2000 compliance (see Year 2000 Compliance Section III. D. 1., on page 13).
- Remain ready to assist with the start-up of the Chilean national Section, for the administration of the dispute settlement provisions of the CCFTA. The Chilean national Section is required to be established pursuant to Article N.02 of the CCFTA. The Canadian Section has extended to the Chilean national Section an offer of professional support to assist them with the development of procedures, the implementation of the registry function, the design of other information systems and the drafting of

appropriate financial procedures.

- Remain ready to assist with the establishment of the designated Isräeli Agency, for the administration of the dispute settlement provisions of the CIFTA. The Isräeli designated Agency is required to be created pursuant to Article 8.3 of the CIFTA. The Canadian Section has extended to the Isräeli designated Agency an offer of professional support to assist them with the development of procedures, the implementation of the registry function, the design of other information systems and the drafting of appropriate financial procedures.
- Establish liaison relationship and assist the Administrative Secretariat for the Free Trade Area of the Americas as this initiative progresses.
- Continue to administer the procedures related to trade dispute provisions of the Softwood Lumber Agreement between the Government of Canada and the Government of the United States of America.

C. Details by Program, Business and Service Lines

1. Business Line

The NAFTA Secretariat, Canadian Section has one business line, namely, the administration of the dispute settlement provisions of the North American Free Trade Agreement (NAFTA), Canada - Isräel Free Trade Agreement and the Canada - Chile Free Trade Agreement.

2. Service Lines

The NAFTA Secretariat, Canadian Section's has five service lines related to the performance of its mandate and business line. They are as follows:

- Professional Support to Panels;
 (legal advisory and administrative role of the Secretaries)
- Registry Operations and Document Control; (administer and operate a court-like registry for the filing and processing of legal pleadings in the panel reviews)
- Panel Planning and Co-ordination of Panel Reviews; (co-ordinate and provide administrative support to all dispute panels established under the relevant Free Trade Agreements)

- Panel Financial Administration; and (provide financial administration support for all panelists and their assistants and co-ordinate payment and reimbursements of panel review expenditures to and from other national Sections)
- Liaison and Co-ordination with Free Trade related
 Organizations.
 (the NAFTA Secretariat, Canadian Section is part of the
 international Secretariat created by the NAFTA, CIFTA and
 CCFTA and therefore must liaise and co-ordinate with other
 national Sections in fulfilling the mandate of the Secretariat,
 including the preparation of status and annual reports and the
 administration of other inter-related activities)

3. Expected Results

The NAFTA Secretariat, Canadian Section has developed the following performance commitments and indicators. The commitments and indicators outlined below reflect how the NAFTA Secretariat, Canadian Section manages the agency's activities and holds itself accountable.

Figure 4 - Performance Commitments and Indicators

Performance Commitments:	Performance Indicators:
the appropriate administration of the dispute settlement provisions of the North American Free Trade Agreement (NAFTA) and NAFTA related bilateral agreements in which Canada is a Party, such as the Softwood Lumber Agreement between the Government of Canada and the Government of the United States of America, the Canada - Isräel Free Trade Agreement and the Canada - Chile Free Trade Agreement in a manner which ensures unbiased administrative processes, equity, security and fairness while providing quality service	at least 80% ³ of stakeholders indicating that they are fully satisfied that the NAFTA Secretariat, Canadian Section, administered the dispute settlements provisions of the Free Trade Agreements in a manner which ensures unbiased administrative processes, equity, security and fairness
the appropriate administration of a court-like registry for the panel review process at a level comparable to other registries of superior courts of record in Canada	at least 80% of stakeholders indicating that they are very satisfied with all aspects of the administration of the NAFTA Secretariat's court-like registry

The 75% target was set based on a comprehensive benchmark survey conducted in 1994, adjusting for anticipated impacts on performance of increased responsibilities with decreasing resource levels. However, after a comprehensive review of the results of the last three-years' monitoring reports and the 1994 Service Standards Survey (benchmark), Management has raised the stated performance indicators to 80% for future fiscal years.

Performance Commitments:	Performance Indicators:
the ongoing development and the implementation of programs, systems and procedures which are relevant to clients, impartial, responsive, accessible, timely and independent	at least 80% of stakeholders indicating that they are fully satisfied with the systems and procedures provided by the NAFTA Secretariat, Canadian Section and that they are relevant, accurate, impartial, responsive, accessible, timely and independent
the required information and support to panels to ensure their work is accurate, impartial, responsive, accessible, timely and independent	at least 80% of panelists and their assistants indicating that they are fully satisfied with the information and support provided to panels by the NAFTA Secretariat, Canadian Section
open and accountable management and administration of the NAFTA Secretariat, Canadian Section	providing access to decisions, reports and statistical information prepared by this Agency and by the reduction in expenditures in selected areas through progressive management initiatives
improved overall effectiveness and efficiency through the use of information technologies	facilitating greater access for the primary stakeholders through the ongoing maintenance and updating of a searchable (word and phrase) World Wide Web Internet Site implementing enhanced NAFTA Secretariat Integrated Information System, which includes the redesign of the: - Registry Information System; - Motions and Orders Research Database; and - Trilateral Financial System. ensuring that all systems and communication networks are Y2K compliant and preparing contingency plans to ensure the operations of the Canadian Section would not be disrupted by any Y2K problem that might occur
assist with the start-up of the designated Isräeli agency and the Chilean national Section, for the administration of the dispute settlement provisions of the Agreements	establishing a liaison relationship with the appropriate trade officials in Isräel and Chile
provide assistance to the Administrative Secretariat for the Free Trade of the Americas	establishing a liaison relationship with the appropriate trade officials in the Administrative Secretariat for the Free Trade of the Americas

4. Planned Spending by Business Line

As the NAFTA Secretariat, Canadian Section has only one business line the detailed explanation of forecast spending for the 1998-99 fiscal year and planned spending for the 1999-2000 to 2001-02 fiscal years provided at the Program level also applies for the business line (see Financial Spending Plan Section II. D., on page 8).

Figure 5 - Financial Spending Plan by Business Line

Financial Spending Plan (\$000)							
Business Line	Forecast Spending 1998-99	Planned Spending 1999-00	Planned Spending 2000-01	Planned Spending 2001-02			
NAFTA Secretariat, Canadian Section							
Gross Expenditures	1,654	2,224	2,224	2,224			
Net Expenditures	1,654	2,224	2,224	2,224			

D. Consolidated Reporting

1. Year 2000 Compliance

In response to the Year 2000 (Y2K) issue, the NAFTA Secretariat, Canadian Section:

- is implementing the Y2K action plan to ensure that all:
 - internal systems,
 - external systems (eg. Central Agencies),
 - off-the-shelf standard office software (eg. WordPerfect, Word, Excel, etc.),
 - work-stations and network operating systems, and
 - all hardware (eg. work-stations, file servers, etc.) meet Year 2000 requirements;
- will ensure that all new and revised NAFTA Secretariat Integrated Information Systems are designed to meet Y2K requirements;
- is preparing contingency plans to ensure the operations of the Canadian Section would not be disrupted by any Year 2000 problem that might occur;
- will engage an external resource to test and certify that all systems

2. Financial Information Strategy (FIS)

Pursuant to the changes in the Government of Canada accounting practices, with the introduction of accrual accounting under the FIS and complying with directives issued by the Comptroller General of Canada, the NAFTA Secretariat, Canadian Section is in the process of developing a detailed action plan for the implementation of the FIS.

This action plan will include details for such items as:

- negotiation of an agreement with the Office of the Auditor General, for that department to provide the Canadian Section with shared access to its Financial Information Strategy (FIS) compliant system. This agreement will allow the Canadian Section to off-set system development costs by sharing the system with another department;
- verification and valuation of capital assets;
- identification of training requirements for staff and management; and
- conversion of internal financial management policies, procedures and chart of accounts to reflect changes in FIS related policies.

Modern comptrollership philosophy, which is an integral part of FIS, may result in a shift in the accountability and associated roles and responsibilities between finance and operational and senior managers involving financial management practices. Implementation of FIS will entail that management review its current accountability structure to see if any changes are required to comply with this initiative.

Section IV: Supplementary Information

A. Spending Authorities

Table 1: - Spending Authorities - Ministry Summary Part II of the Estimates

Vote		1999-2000 Main Estimates (\$000)	1998-99 Main Estimates (\$000)
	NAFTA Secretariat, Canadian Section		
55	Program Expenditures	2,086	2,064
(S)	Contributions to Employee Benefit Plans (EBP)	138	145
	Total Agency	2,224	2,209

B. Personnel Information

1. Mandated Responsibilities Structure

The organization is headed by the Canadian Secretary who reports to the Minister for International Trade for Parliamentary accountability and to the appropriate Trade Commission for the administration of the dispute settlement processes under the NAFTA, the Canada - Isräel Free Trade Agreement and the Canada - Chile Free Trade Agreement.

CANADA / CHILE **NAFTA** CANADA / ISRÄEL TRADE **TRADE TRADE** COMMISSION **COMMISSION** COMMISSION U.S. & Mexican Chilean Isräeli Designated Canadian National National Section **National Sections** Agency Section Head of Isräeli U.S. & Mexican Chilean Designated Secretary Secretary Canadian Secretary Agency

Table 2.1: - Mandated Responsibilities Chart

Table 2.2: - Planned Full Time Equivalents (FTEs) by Business Line

	Forecast 1998-99	Allocated 1999-2000	Allocated 2000-01	Allocated 2001-02
NAFTA Secretariat, Canadian Section	9	13	13	13
Total	9	13	13	13

C. Capital Project Information

Table 3.1: - Capital Spending by Program and Business Line - Not Applicable

Table 3.1: - Capital Projects by Program and Business Line - Not Applicable

 Table 3.3: Status of Major Crown Projects - Not Applicable

D. Additional Financial Information

Table 4: - Departmental Summary of Standard Objects of Expenditures

	Forecast 1998-99 (\$000)	Planned 1999-2000 (\$000)	Planned 2000-01 (\$000)	Planned 2001-02 (\$000)
Personnel:				
Salaries and Wages	498	692	692	692
Contribution to Employee benefit plans	145	138	138	138
Sub-Total	643	830	830	830
Goods and Services:				
Transportation and Communications	150	340	340	340
Information	15	10	10	10
Professional and special services	775	971	971	971
Rentals	2	2	2	2
Purchased repair and maintenance	2	4	4	4
Utilities, materials and supplies	40	50	50	50
Construction and/or Acquisition of Machinery or Equipment	25	15	15	15
Other subsidies and payments	2	2	2	2
Sub-Total	1,011	1,394	1,394	1,394
Total	1,654	2,224	2,224	2,224

Table 5: - Program Resources by Program and Business Line for the Estimate Year (\$000)

		Budş	getary		Non- budgetary				
Program & Business Line	FTE	Operating	Capital	Transfer Payments	Planned Spending	Loans Investments and Advances	Gross Planned Spending	Less: Revenue Credited to Vote	Net Planned Spending
NAFTA Secretariat, Canadian Section	13	2,224	0	0	2,224	0	2,224	0	2,224
Total	13	2,224	0	0	2,224	0	2,224	0	2,224

Table 6: - Transfer Payments by Program and Business Line - Not Applicable

Table 7: - Revenue by Program

Revenue Credited to the Consolidated Revenue Fund (CRF) (\$000)	Forecasted Revenues 1998-99	Planned Revenues 1999-2000	Planned Revenues 2000-01	Planned Revenues 2001-02
NAFTA Secretariat, Canadian Section	200	300	300	300
Total Revenue	200	300	300	300

Table 8: - Net Cost of Program for the Estimate Year (\$000)

	NAFTA Secretariat, Canadian Section	Total
Gross Planned Spending	2,224	2,224
Plus		
Services received without charge		
Accommodation provided by Public Works and Government Services	99	99
Contributions covering employer's share of employees' insurance premiums and costs paid by TBS	35	35
Total Cost of Program	2,358	2,358
Less		
Revenues Credited directly to the Consolidated Revenue Fund	(300)	(300)
1999-2000 Estimated Net Cost	2,058	2,058

- **Table 9.1: Revolving Fund Statement of Operations Not Applicable**
- **Table 9.2: Revolving Fund Statement of Changes in Financial Position Not Applicable**
- **Table 9.3: Revolving Fund Projected Use of Authority Not Applicable**
- **Table 10: Loans, Investments and Advances by Program and Business Line Not Applicable**
- **Table 11: - Tax Expenditures** Not Applicable

E. Other Information

- Table 12: Listing of Statutes and Regulations Not Applicable
- **Table 13: References Not Applicable**

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