



MEMBERS' SCHEDULE OF REMUNERATION

2026/27 MUNICIPAL YEAR (from 17 May 2026; as approved by Council 19 March 2026)

1 This Scheme is made under the Democracy and Boundary Commission Cymru etc. Act 2013 (Part 5A) with regard to remuneration of authority members, which apply to payments made to members and co-opted members of local authorities.

1. Basic Salary

1.1 A Basic Salary shall be paid to each elected Member of the Authority.

1.2 In accordance with the Regulations, the rate of the Basic Salary shall be reviewed annually as determined by the Democracy and Boundary Commission Wales (DBCC).

1.3 Where the term of office of a Member begins or ends other than at the beginning or end of a year, his/her entitlement to the Basic Salary will be pro-rata.

1.4 No more than one Basic Salary is payable to a Member of the Authority.

2. Senior Salaries & Civic Salaries

2.1 Members occupying specific posts shall be paid a Senior Salary as set out in **Schedule 1**.

2.2 In accordance with the Regulations, the rates of Senior Salaries and Civic Salaries shall be reviewed annually as determined by the Annual or Supplementary Report of the DBCC.

2.3 Only one Senior Salary or Civic Salary is payable to a Member of the Authority.

2.4 A Member of the Authority cannot be paid a Senior Salary and a Civic Salary.

2.5 All Senior and Civic Salaries are paid inclusive of Basic Salary.

2.6 A Senior Salary may not be paid to more than the number of members specified by the DBCC in its Annual Report and cannot exceed fifty percent of the total membership of the authority, except to include a temporary Senior Salary office holder providing temporary cover for the family absence of the appointed office holder.

2.7 Members of the Cabinet are permitted to 'job share'. Each 'sharer' will be paid an appropriate proportion of the salary as outlined in Schedule 1. However, the statutory

maximum for Cabinets cannot be exceeded so each job sharer will count toward the maximum.

- 2.8 A Member of the Authority in receipt of a Band 1 or Band 2 Senior Salary **cannot** receive a salary from any National Park Authority (NPA) or Fire and Rescue Authority (FRA) for which he/she has been nominated.
- 2.9 Where the term of Senior Salary or Civic Salary of a Member begins or ends other than at the beginning or end of a year, his/her entitlement to the Salary will be pro-rata.

3. Election to Forgo Entitlement to Allowance

- 3.1 A Member may, by notice in writing delivered to the Proper Officer¹ of the authority, personally elect to forgo any part of his/her entitlement to any salary, allowance or fee payable under this Scheme from the date set out in the notice.

4. Suspension of a Member

- 4.1 Where a Member of the Authority is suspended or partially suspended from his or her responsibilities or duties as a Member of the Authority in accordance with Part III of the Local Government Act 2000 (Conduct of Members), or regulations made under the Act, the part of the Basic Salary payable to him/her in respect of that period for which he or she is suspended will be withheld by the Authority (Section 155 (1) of the Measure).
- 4.2 Where a Member in receipt of a Senior Salary is suspended or partially suspended from being a Member of the Authority in accordance with Part III of the Local Government Act 2000 (Conduct of Members), or regulations made under the Act, the Authority must not make payments of the Member's Senior Salary for the duration of the suspension (Section 155 (1) of the Measure). If the partial suspension relates only to the specific responsibility element of the payment, the member may retain the Basic Salary.

5. Repayment of salaries, allowances or fees

- 5.1 Where payment of any salary, allowance or fee has been made to a Member of the Authority or Co-opted Member in respect of any period during which the Member concerned:
- (a) is suspended or partially suspended from that Member's/Co-opted Member's duties or responsibilities in accordance with Part 3 of the 2000 Act or regulations made under that Act;
 - (b) ceases to be a Member of the Authority or Co-opted Member; or
 - (c) is in any other way not entitled to receive a salary, allowance or fee in respect of that period,

the Authority will require that such part of the allowance as relates to any such period be repaid.

¹ Corporate Lead Officer: Democratic Services

6. Payments

- 6.1 Payments of all allowances will be made by *direct bank credit* in instalments of one-twelfth of the Member's annual entitlement on the last working day of each month.
- 6.2 Where payment has resulted in a Member receiving more than his/her entitlement to salaries, allowances or fees the Authority will require that such part that is overpayment be repaid.
- 6.3 All payments are subject to the appropriate tax and National Insurance deductions.

7. Contribution towards Costs of Care and Personal Assistance

- 7.1 Members, including co-opted members are entitled to claim towards the costs of care and personal assistance, for activities that the individual council has designated official business or an approved duty which might include appropriate and reasonable preparation and travelling time. It is a matter for individual authorities to determine specific arrangements to implement this; each authority must ensure that any payments made are appropriately linked to official business or approved duty.
- 7.2 Contributions must be for the **additional costs** incurred by Members to enable them to carry out their approved duties.
- 7.3 Claims can be made in respect of a dependant under 16 years of age, or a minor or adult who normally lives with the Member as part of their family and who cannot be left unsupervised.
- 7.4 Reimbursement for a Member's own care or support needs may be claimed where the support and / or cost of any additional needs are not available or not met directly by the authority (e.g. Access to Work, Personal Payments, insurance).
- 7.5 Contributions can be claimed for formal or informal care as follows:
- Formal (registered with Care Inspectorate Wales) care costs to be paid as evidenced;
 - Informal (unregistered) care costs to be paid up to a maximum rate equivalent to the Real UK Living Wage at the time the costs are incurred.

Care costs cannot be paid to someone who is part of a member's household.

- 7.6 All claims for contribution towards the costs of care or personal assistance should be made in writing to the Corporate Lead Officer: Democratic Services detailing times, dates and reasons for claim. Receipts are required for both informal and formal care arrangements.

8. Family Absence

- 8.1 Members are entitled under the provisions of the Family Absence for Members of Local Authorities (Wales) Regulations 2013 to a period of family absence, during which if they satisfy the prescribed conditions they are entitled to be absent from authority meetings.

- 8.2 Family Absence covers maternity, newborn, adoption and parental absences from official business.
- 8.3 When taking family absence Members are entitled to retain a basic salary irrespective of their attendance record immediately preceding the commencement of the family absence.
- 8.4 Should a senior salary holder be eligible for family absence they will be able to continue to receive their senior salary for the duration of the absence.
- 8.5 If the authority agrees that it is necessary to make a substitute appointment to cover the family absence of a senior salary holder the Member substituting will be eligible if the authority so decides to be paid a senior salary.
- 8.6 If the paid substitution results in the authority exceeding its maximum number of senior salaries, an addition to the maximum will be allowed for the duration of the substitution.
- 8.7 If the Council agrees a paid substitution for family absence, the DBCC must be informed, within 14 days of the decision of the details including the particular post and duration of the substitution. The Schedule of Member Remuneration must also be amended to reflect the implications of the family absence.

9. Sickness absence for Senior Salary Holders

- 9.1 The Family Absence Regulations (approved by the National Assembly in 2014) are very specific relating to entitlement and only available for elected members of principal councils. Absence for reasons of ill-health is not included.
- 9.2 The DBCC has considered concerns raised regarding the arrangements as compared to family absence and therefore has amended the Framework to provide specific arrangements for long term sickness as set out below:
 - a) Long term sickness is defined as certified absences in excess of 4 weeks.
 - b) The maximum length of sickness absence within these proposals is 26 weeks or until the individual's term of office ends, whichever is sooner (but if reappointed any remaining balance of the 26 weeks will be included).
 - c) Within these parameters a senior salary holder on long term sickness can, if the authority decides continue to receive remuneration for the post held.
 - d) It is a decision of the authority whether to make a substitute appointment but the substitute will be eligible to be paid the senior salary appropriate to the post.
 - e) If the paid substitution results in the authority exceeding the maximum number of senior salaries payable for that authority as set out in the Annual Report, an addition will be allowed for the duration of the substitution.
 - f) When an authority agrees a paid substitution the DBCC must be informed within 14 days of the decision of the details including the specific post and the estimated

length of the substitution. The authority's Schedule of Remuneration must be amended accordingly.

g) It does not apply to elected members of principal councils who are not senior post holders as they continue to receive basic salary for at least six months irrespective of attendance and any extension beyond this timescale is a matter for the authority.

9.3 This arrangement does not apply to co-opted members.

9.4 The Family Absence Regulations apply to elected members in cases of maternity, newborn, adoption and parental absences from official business (see above).

10. Counselling Service

10.1 Members may access the Council's Counselling Service. The service is confidential and there are no records of who has contacted the Service and there's no limit on the support that can be received.

10.2 Other support available to Members include debt advice, free and impartial advice on managing money, practical support for anyone who may be in an abusive relationship and a health management platform.

11. Co-optees' payments

11.1 A Co-optees' daily fee (with a provision for half day payments) shall be paid to Co-optees, provided they are statutory Co-optees with voting rights.

11.2 Co-optees' payments will be capped at a maximum of the equivalent of 10 full days a year for each committee to which an individual may be co-opted.

11.3 The Corporate Lead Officer: Democratic Services is designated as the "appropriate officer" and will determine preparation time, travelling time and length of meeting, the fee will be paid on the basis of this determination.

11.4 The Corporate Lead Officer: Democratic Services can determine in advance whether a meeting is programmed for a full day and the fee will be paid on the basis of this determination even if the meeting finishes before four hours has elapsed.

11.5 A half day meeting is defined as up to 4 hours.

11.6 A full day meeting is defined as over 4 hours.

11.7 Payments can cover periods of attendance at appropriate meetings, authorised training events, conferences and pre-meetings with officers.

11.8 Time spent on preparation and travelling to/from meetings is eligible when assessing the level of fee payable. Preparation and travelling time can therefore be counted when determining whether the 4 hour period has been exceeded or not.

11.9 The daily and half day fee for the Chairpersons of the Standards Committee and Governance and Audit Committee, as determined by the DBCC, is set out in **Schedule 1**.

11.10 The daily and half day fee for other statutory Co-optees with voting rights, as determined by the DBCC, is set out in **Schedule 1**.

12. Travel and Subsistence Allowances

12.1 General Principles

12.2 Members and Co-opted Members may claim travelling expenses when travelling on the Authority's business for 'approved duties' as set out in **Schedule 2**. Where Members travel on the Authority's business they are expected to travel by the most cost effective means. In assessing cost effectiveness regard will be given to journey time. A Member who does not travel by the most cost effective means may have his/her claim abated by an appropriate amount.

12.3 If a Councillor intends to claim travelling and expenses costs, in person attendance at conferences, seminars, external meetings and training events outside of the County, should liaise with the Corporate Lead Officer, Democratic Services in order to ensure that there is provision in the budget and that there is a need to attend in person.

12.4 Where possible Members should share transport.

12.5 The distance claimed for mileage should be the shortest reasonable journey by road from the point of departure to the point at which the duty is performed, and similarly from the duty point to the place of return.

12.6 The rates of Members' Travel and Subsistence Allowances are set out in **Schedule 3** and are subject to annual review by the DBCC for Wales.

12.7 Where a Member is suspended or partially suspended from his or her responsibilities or duties as a Member of the Authority in accordance with Part III of the Local Government Act 2000 (Conduct of Members), or regulations made under the Act, any travel and subsistence allowances payable to him/her in respect of that period for which he or she is suspended or partially suspended must be withheld by the Authority.

13. Travel by Private Vehicle

13.1 The DBCC has determined that the maximum travel rates payable should be the rates set out by Her Majesty's Revenue & Customs (HMRC) for the use of private cars, motor cycles and pedal cycles plus any passenger supplement.

13.2 The mileage rates for private vehicles as determined by the DBCC are set out in **Schedule 3**.

- 13.3 Where a Member makes use of his/her private vehicle for approved duty purposes, the vehicle must be insured for business use. Proof of appropriate insurance must be provided to the Authority on request.

14. Travel by Public Transport

14.1 Rail/Coach Travel

Unless otherwise authorised rail tickets will be second-class.

Democratic Services will purchase requisite rail and coach tickets for Members in advance of journeys. In the unlikely event that a Member needs to purchase a ticket directly, payment will be reimbursed upon production of the used ticket and/or a receipt.

14.2 Taxi Fares

Taxi fares will only be reimbursed where their use has been authorised for cases of urgency, where no public transport is reasonably available, or a Member has a particular personal need. Re-imburement will be upon receipt only.

14.3 Other Travel Expenses

Members will be entitled to reimbursement of toll fees, parking fees, overnight garaging and other necessary travel associated expenses. Re-imburement will be upon receipt only.

15. Overnight Accommodation

- 15.1 Overnight stays will only be permitted where the Authority's business extends to two days or more, or the venue is at such a distance that early morning or late night travel would be unreasonable. All overnight stays must receive prior authorisation from the Corporate Lead Officer: Democratic Services.

- 15.2 Overnight accommodation will be booked by Democratic Services. Wherever possible the overnight accommodation will be pre-paid or invoiced.

- 15.3 Direct booking of overnight accommodation by a Member will only be permitted in the event of an emergency. Reimbursement will only be made upon the production of a receipt and will be at a level deemed reasonable and not in excess of the rates set out in **Schedule 3**.

16. Subsistence Allowance

- 16.1 The day subsistence rate to meet the costs of meals and refreshments in connection with approved duties (including breakfast when not provided as part of overnight accommodation) is set out in **Schedule 3**. The maximum daily rate covers a 24 hour

period and can be claimed for any meal that is relevant, providing such a claim is supported by receipt(s)

16.2 No provision is made for subsistence claims within the County.

17. Claims and Payments

17.1 A claim for travel and subsistence allowances must be made within one month of the end of the calendar month in which entitlement to allowances arises and must be accompanied by the relevant receipts.

17.2 Claims are submitted via the Ceri Self-Service system.

17.3 Allowances will be paid by the Corporate Lead Officer: Democratic Services by *direct bank credit*.

17.4 Allowances will not be paid for claims made more than 3 months (92 days) from the date of the entitlement to the allowance arises.

18. Members' Support Allowance

18.1 An opt-in allowance of £10.00 per month will be available to Members to cover the cost of telephone, broadband and postage costs.

18.2 A Member may, by notice in writing delivered to the Proper Officer² of the authority, opt-in to the Members' Support Allowance, from the date set out in the notice.

19. Pensions

19.1 The Authority shall enable its Members who are eligible to join the Local Government Pension Scheme.

20. Supporting the work of Members

20.1 Members will be provided with a Council e-mail address and ICT equipment in order to carry out their duties in person or remotely.

20.2 The Democratic Services Committee will periodically review the level of support provided to Members to carry out their duties.

21. Compliance

21.1 In accordance with the Regulations, the Authority must comply with the requirements of the DBCC in respect of the monitoring and publication of payments made to members and co-opted members as set out in **Schedule 4**.

² Corporate Lead Officer: Democratic Services

Members are reminded that expense claims are subject to both internal and external audit.

SCHEDULE 1

SCHEDULE OF REMUNERATION 2026/2027

MEMBERS ENTITLED TO BASIC SALARY	ANNUAL AMOUNT OF BASIC SALARY
<p>The following named elected members of the authority</p> <ol style="list-style-type: none"> 1. Councillor Euros Davies 2. Councillor Gethin Davies 3. Councillor Ifan Davies 4. Councillor Marc Davies 5. Councillor Meirion Davies 6. Councillor Rhodri Davies 7. Councillor Endaf Edwards 8. Councillor Raymond Evans 9. Councillor Elaine Evans 10. Councillor Eryl Evans 11. Councillor Keith Henson 12. Councillor Hugh Hughes 13. Councillor Chris James 14. Councillor Ceris Jones 15. Councillor Gareth Lewis 16. Councillor Maldwyn Lewis 17. Councillor Sian Maehrlein 18. Councillor Ann Bowen Morgan 19. Councillor Mark Strong 	<p>£21,044</p>

	SENIOR SALARIES ENTITLEMENTS (includes basic salary)		ANNUAL AMOUNT OF SENIOR SALARY	BAND
	ROLE	MEMBER		
1.	Leader	Councillor Bryan Davies	£67,079	1
2.	Deputy Leader	Councillor Alun Williams	£46,955	1
3.	Cabinet Member	Councillor Shelley Childs	£40,247	2
4.	Cabinet Member	Councillor Catrin M.S. Davies	£40,247	2
5.	Cabinet Member	Councillor Clive Davies	£40,247	2
6.	Cabinet Member	Councillor Gareth Davies	£40,247	2
7.	Cabinet Member	Councillor Wyn Thomas	£40,247	2
8.	Cabinet Member	Councillor Matthew Vaux	£40,247	2

	SENIOR SALARIES (includes basic salary)	ENTITLEMENTS	ANNUAL AMOUNT OF SENIOR SALARY	BAND
	ROLE	MEMBER		
9.	Chairperson of the Corporate Resources Overview and Scrutiny Committee	Councillor Gareth Lloyd	£31,567	3
10.	Chairperson of the Healthier Communities Overview and Scrutiny Committee	Councillor Amanda Edwards	£31,567	3
11.	Chairperson of the Learning Communities Overview and Scrutiny Committee	Councillor Caryl Roberts	£31,567	3
12.	Chairperson of the Thriving Communities Overview and Scrutiny Committee	Councillor Gwyn Wigley Evans	£31,567	3
13.	Chairperson of the Overview and Scrutiny Co-ordinating Committee	Councillor Keith Evans	£31,567	3
14.	Chairperson of the Development Management Committee	Councillor Carl Worrall	£31,567	3
15.	Chairperson of the Licensing Committee	Councillor Gwyn James	£31,567	3
16.	Chairperson of the Democratic Services Committee	Councillor Elizabeth Evans	£31,567	3
17.	Leader of the Largest Opposition Group	Councillor Rhodri Evans	£31,567	4
A maximum of 17 senior salaries for Ceredigion County Council may be paid and this has not been exceeded.				

ENTITLEMENT TO CIVIC SALARIES		ANNUAL AMOUNT OF CIVIC SALARY	BAND
ROLE	MEMBER		
Civic Head (Chair of the Council)	Councillor John Roberts	£31,567	3
Deputy Civic Head (Vice Chair of the Council)	Councillor Wyn Evans	£25,253	5

ENTITLEMENT AS STATUTORY CO-OPTees		AMOUNT OF CO-OPTees ALLOWANCES
ROLE	MEMBER	
Chairperson of Ethics and Standards Committee	Caryl Davies	£268 (4 hours and over) £134 (up to 4 hours) (£33.50 per hour)
Chairperson of Governance and Audit Committee	Alan Davies	£268 (4 hours and over) £134 (up to 4 hours) (£33.50 per hour)
Ordinary Members of - Ethics and Standards Committee, - Learning Communities Overview and Scrutiny Committee - Governance and Audit Committee	<u>Standards:</u> Alan Davies Mary Dodd Andrew Lemmon Gail Storr <u>Scrutiny</u> Nia Wyn Evans Sian Jones <u>Governance and Audit</u> Andrew Blackmore Caroline Whitby	£210 (4 hours and over) £105 (up to 4 hours) (£26.25 per hour)
Community and Town Councillors sitting on Standards Committee	Councillor Delyth James Councillor Elen Page	£238 (4 hours and over) £119 (up to 4 hours) (£29.75 per hour)

MEMBERS ELIGIBLE TO RECEIVE CONTRIBUTIONS TOWARDS THE COSTS OF CARE OR PERSONAL ASSISTANCE

All Members

All claims must be supported by receipts from the carer.

- Formal (registered with Care Inspectorate Wales) care costs to be paid as evidenced;
- Informal (unregistered) care costs to be paid up to a maximum rate equivalent to the Real UK Living Wage at the time the costs were incurred

Care costs cannot be paid to someone who is part of a Members' household.

SCHEDULE 2

Members, including co-opted members are entitled to claim reimbursement of travelling costs, for activities that are designated official business or an approved duty by Ceredigion County Council. In accordance with the Local Government and Elections (Wales) 2021 Act, members are able to attend all official Council meetings remotely or in person.

Unless specifically requested to attend in person, members are expected to attend remotely, contributing to the economic as well as environmental benefits to the Council.

Members, including co-opted members are also eligible to claim towards necessary costs for the care of dependent children and adults and for personal assistance needs, in accordance with the specifications of DBCC, as adopted by Ceredigion County Council. This must be for the **additional costs** incurred by members to enable them to carry out official business or approved duties, on production of receipted from the care provider.

Approved duties:

Councillors should liaise with the Corporate Lead Officer: Democratic Services if they intend to claim travelling and expenses costs, for in person attendance at conferences, seminars, out of county meetings and training events to ensure that there is provision in the budget and that there is a need to attend in person.

- attendance at a meeting of the Authority or of any committee of the Authority or of any body to which the Authority makes appointments or nominations or of any committee of such a body;
- attendance at a meeting of any association of authorities of which the Authority is a member;
- attendance at any other meeting the holding of which is authorised by the Authority or by a committee of the Authority or by a joint committee of the Authority and one or more other Authorities;
- a duty undertaken for the purpose of or in connection with the discharge of the functions of Cabinet;
- attendance at any training or developmental event approved by the Authority or its Cabinet;
- any other duty approved by the Authority, or any other duty of a class so approved, undertaken for the purpose of, or in connection with, the discharge of the functions of the Authority or any of its committees.
- attendance at conferences, seminars and other meetings to which Members have been authorised to attend.
- attendance at meetings of consultative fora, partnerships, and panels or working groups.

- attendance at meetings of outside bodies to which Members have been authorised to attend, or when it cannot be held remotely.
- attendance at bona fide meetings with officers of the Council and other bodies in pursuance of carrying out their functions as members.
- attendance by non-Executive Members at meetings of Cabinet by invitation, or as observers, where they cannot attend remotely.

N.B. Members cannot claim for travelling expenses, subsistence or car parking whilst undertaking constituency duties.

SCHEDULE 3

Mileage Rates

All sizes of private motor vehicle Up to 10,000 miles Over 10,000 miles	45p per mile 25p per mile
Private Motor Cycles Pedal Cycles	24p per mile 20p per mile
Passenger supplement i.e. per passenger carried on authority business	5p per mile

Subsistence Allowance

The day subsistence rate is up to a maximum of £28 and covers a 24 hour period and can be claimed for any meal if relevant provided such a claim is supported by receipts (including breakfast where not provided in the overnight charge).

The maximum subsistence allowances are as follows:

Maximum Subsistence Allowances All claims must be supported by receipts and only apply for Council duties outside the County	
Breakfast: for an absence of more than 4 hours prior to 11.00am and when not provided as part of overnight accommodation	£6.30
Lunch: for an absence of more than 4 hours including the period 12.00 noon to 2.00pm	£8.65
Tea: for an absence of more than 4 hours including the period 3.00pm to 6.00pm	£3.45
Evening Meal: for an absence of more than 4 hours, ending after 7.00pm	£11.55
SUBJECT to a daily maximum of:	£28.00
N.B. <ul style="list-style-type: none">• The £28 per day is the maximum that can be claimed based on an overnight stay (therefore the maximum if there isn't an overnight stay would be less than £28);• If the Councillor has stayed overnight and the accommodation includes breakfast, then the £28 limit should exclude the cost for a breakfast.	

Re-imbusement of alcoholic drinks is not permitted.

There is no entitlement to claim subsistence allowances when on Council duties within the County of Ceredigion.

Overnight Stay

The maximum allowances for an overnight stay are £200 for London and £95 for elsewhere (accommodation only). A maximum of £30 is available for an overnight stay with friends or relatives whilst on approved duty.

Opt-in allowance for Members' support

Members are entitled to opt-in to an allowance of £10 per month to cover telephone, broadband and postage costs.

Car Parking for Members

Members are entitled to claim for car parking, subject to providing a receipt. Car parking costs will not be paid for claims made more than 3 months (92 days) from the date of the entitlement to the reimbursement of cost arises.

All claims must be submitted within 3 months (92 days) from the date of the entitlement to the reimbursement of cost arises, with supporting receipts.

SCHEDULE 4

Compliance

- The authority will arrange for the publication on the Council's website the total sum paid by it to each Member and co-opted member in respect of salary, allowances, fees and reimbursements not later than 30 September following the close of the year to which it relates. In the interests of transparency this will include remuneration from all public service appointments held by elected members.
- The authority will publish on the Council's website a statement of the basic responsibility of a councillor and role descriptors for senior salary office holders, which clearly identify the duties expected.
- The authority will publish on the Council's website the annual schedule of Member Remuneration not later than 31 July of the year to which the schedule refers.
- The authority will send a copy of the schedule to the DBCC not later than 31 July of the year to which the schedule refers.
- The authority will maintain records of Member/co-opted members' attendance at meetings of Council, Cabinet and Committees and other approved duties for which a Member/co-opted member submits a claim for reimbursement.
- The authority will arrange for the publication on the Council's website of annual reports prepared by members.
- When the authority agrees a paid substitution for family absence it will notify the DBCC within 14 days of the date of the decision of the details including the particular post and the duration of the substitution.
- The maximum limit of Senior Salaries set for the Council (i.e. 17) has not been exceeded.