



EUROPEAN COMMISSION

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COMMISSION DECISION

of

**on the financing of humanitarian actions in Guatemala from the general budget of the
European Union**

(ECHO/GTM/BUD/2010/01000)

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THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EC) No.1257/96 of 20 June 1996 concerning humanitarian aid¹, and in particular Article 2 and Article 15(3) thereof;

Whereas:

- (1) Guatemala was affected by a severe drought in 2009 and by a series of natural disasters in 2010 (Pacaya volcano eruption, Tropical Storm Agatha, Tropical Depression 11-E, etc.);
- (2) The coping capacity of the most vulnerable population has been eroded due to this succession of natural disasters. Harvest losses have seriously affected subsistence farmers, while opportunities to work as day labourers on bigger farms have diminished because of the floods;
- (3) The major problem according to aid agencies is not food availability but access to food. This problem is expected to become even more pronounced following the series of adverse weather events which have already affected the country this year, leading to an increase in the price of basic food products such as beans;
- (4) According to assessments, 47,000 families affected by the Pacaya/Agatha events are highly food insecure with a very low food consumption score. This group is characterized as depending on only one, unstable, income source from daily labour activities in the agricultural sector, with no food reserves for the coming months;
- (5) To reach populations in need, humanitarian aid should be channelled through non governmental organisations (NGOs) and international organisations including United Nations (UN) agencies. Therefore the European Commission should implement the budget by direct centralised management or by joint management;
- (6) An assessment of the humanitarian situation leads to the conclusion that humanitarian aid actions should be financed by the European Union for a period of 12 months;
- (7) It is estimated that an amount of EUR 1,000,000 from budget article 23 02 01 of the general budget of the European Union is necessary to provide humanitarian assistance to approximately 20,000 vulnerable people, taking into account the available budget, other donors' contributions and other factors. The activities covered by this Decision may be financed in full in accordance with Article 253 of the Implementing Rules of the Financial Regulation;

¹ OJ L 163, 2.7.1996, p. 1.

- (8) The present Decision constitutes a financing Decision within the meaning of Article 75 of the Financial Regulation (EC, Euratom) No 1605/2002², Article 90 of the detailed rules for the implementation of the Financial Regulation determined by Regulation (EC, Euratom) No 2342/2002³, and Article 15 of the internal rules on the implementation of the general budget of the European Union⁴;

HAS DECIDED AS FOLLOWS:

Article 1

1. In accordance with the objectives and general principles of humanitarian aid, the Commission hereby approves a total amount of EUR 1,000,000 for the financing of humanitarian actions in Guatemala from budget article 23 02 01 of the 2010 general budget of the European Union.
2. In accordance with Article 2 of Council Regulation No.1257/96, the principal objective of this Decision is to provide humanitarian aid to vulnerable people affected by natural disasters in Guatemala. The humanitarian actions shall be implemented in the pursuance of the following specific objective:
 - To contribute to improving the humanitarian situation of people affected by drought and flooding in Guatemala by providing multi-sectoral assistance

The full amount of this Decision is allocated to this specific objective.

Article 2

1. The period for the implementation of the actions financed under this Decision shall start on 1 February 2011 and shall run for 12 months. Eligible expenditure shall be committed during the implementing period of the Decision.
2. If the implementation of individual actions is suspended owing to force majeure or other exceptional circumstances, the period of suspension shall not be taken into account in the implementing period of the Decision in respect of the action suspended.
3. In accordance with the contractual provisions ruling the Agreements financed under this Decision, the Commission may consider eligible those costs arising and incurred after the end of the implementing period of the action which are necessary for its winding-up.
4. The Authorising Officer may, where this is justified by the humanitarian situation, extend the duration of the Decision for a maximum of 6 months provided that the total duration of the Decision does not exceed 18 months, in accordance with Article 90.4 of the Implementing Rules of the Financial Regulation.

² OJ L 248, 16.9.2002, p.1.

³ OJ L 357, 31.12.2002, , p.1.

⁴ Commission Decision of 5.3.2008, C/2008/773

Article 3

1. In accordance with Article 253 of the Implementing Rules and having regard to the urgency of the action, the availability of other donors and other relevant operational circumstances, funds under this Decision may finance humanitarian actions in full.
2. Actions supported by this Decision will be implemented either by non-profit-making organisations which fulfil the eligibility and suitability criteria established in Article 7 of Council Regulation (EC) No 1257/96 or international organisations.
3. The Commission shall implement the budget:
 - either by direct centralised management, with non-governmental organisations;
 - or by joint management with international organisations that are signatories to the Framework Partnership Agreements (FPA) or the Financial Administrative Framework Agreement with the UN (FAFA) and which were subject to the four pillar assessment in line with Article 53d of the Financial Regulation

Article 4

This Decision shall take effect on the date of its adoption.

Done at Brussels,

For the Commission
Peter Zangl, Director-General



Humanitarian Aid Decision 23 02 01

Title: Commission decision on the financing of humanitarian actions in Guatemala from the general budget of the European Union.

Description: To provide humanitarian aid to vulnerable people affected by natural disasters in Guatemala.

Location of action: Guatemala

Amount of Decision: EUR 1,000,000

Decision reference number: ECHO/GTM/BUD/2010/01000

Supporting document

1 Humanitarian context, needs and risks

1.1 Situation and context

Guatemala's levels of structural food and nutritional insecurity are among the worst in the world. Guatemala has the highest national levels of chronic malnutrition (43.4%)¹ in the Western Hemisphere, levels that are higher than many African nations. Rural areas in the western highlands with indigenous populations show even higher rates, above 60%. Intermittent increases in acute malnutrition to alarm levels (around 10% global acute malnutrition rates) have been registered in the past (Sept./Oct. 2009) in localized areas in the Dry Corridor and the Western Highlands and have triggered the intervention of the international community, including DG ECHO² and the US Government. A variety of studies and documents published over the last years show that state interventions and invested funds are not sufficient to tackle the situation. The main reasons for food and nutritional insecurity in Guatemala are:

- Concentration of land ownership: 2% of farmers own 57% of agricultural land and 45.2% of farmers possess 3.2% of land (INE, 2003).

¹ National Survey on Maternal and Child Health (ENSMI), 2009. Percentage of children between the ages of 3 to 59 months with chronic malnutrition (height-for-age).

² European Commission Directorate General for Humanitarian Aid and Civil Protection (DG ECHO)

- Poverty, limiting economic access to food: basic salary of Quetzales 1,560 (around USD 195) which is below the basic food basket (Q 1,952, around USD 244).
- Lack of access to basic services to optimise food production and use (water, sanitation, health, education).
- Trade liberalization with international food imports at dumping prices, discouraging food productivity and undermining national markets.
- Lack of commitment or structural reforms (e.g. approval of water law pending for 10 years).
- Accumulation of natural disasters such as hurricanes (Mitch-1998, Stan-2005), tropical storm and depressions (TD-16, 2008; TS-Agatha, 5/2010; TD11-E, 9/2010) and droughts.

Guatemala was affected in 2009 by a severe drought and in 2010 by a series of natural disasters in 2010 (Pacaya volcano eruption, Tropical Storm Agatha, Tropical Depression 11-E, etc.). Tropical Depression 11-E heavily affected cultivated land, mainly on the coastal strip, and had a strong economic impact on transport, especially in the highlands, where multiple landslides blocked access to and from agrarian production areas. The final evaluation of crop losses (78,986 Ha), economic impact (505,275,644 Q = EUR 4,560,784) and affected families (122,253) between January and September 2010, due to drought and various tropical storms, is reflected in the following table. The most affected departments in terms of affected population are Santa Rosa, Escuintla, Retalhuleu, Sololá and Suchitepéquez.

DEPARTMENT	AFFECTED FAMILIES	ESTIMATION OF THE TOTAL AREA LOST (Has.)	LOSS ESTIMATION IN QUETZALES
Zacapa	1113	2675.84	51,828,087.50
Quetzaltenango	1218	450	1,791,655.30
Escuintla	13,884	17,349	149,947,694.10
Jalapa	2315	614	2,499,582.52
Huehuetenango	2061	291	1,687,834.22
Chiquimula	1058	561	1,719,857.52
Suchitepequez	9320	7294	24,561,263.75
Retalhuleu	11,252	11,238	18,622,738.52
Alta Verapaz	3185	2131	6,054,452.50
Baja Verapaz	4130	1808	4,037,266.00
Solola	10,906	2185	24,959,325.74
Totonicapan	2100	210.29	513,426.00
Sacatepequez	5814	1375.23	5,393,477.88
El Progreso	3418	2627	52,264,495.00
Guatemala	3107	2654.85	13,146,758.75
Jutiapa	2814	2030	8,997,324.33
San Marcos	7268	1097	3,704,157.48
Quiche	3059	1059	8,800,866.78
Santa Rosa	14,645	4278	21,698,819.52
Izabal	5188	5434	22,076,926.40
Chimaltenango	8488	2179	27,369,564.21
Peten	5910	9444	27,200,600.00
TOTAL	122,253	78,986	505,275,644.00

Source: Field Study MAGA and Information from Farmer Organizations

1.2 Identified humanitarian needs

The humanitarian situation in Guatemala is rather complex, with an extremely high rate of chronic malnutrition, a variety of sequential natural disasters, institutional weakness and an absence of comprehensive sector coordination mechanisms.

Due to persistent heavy rains, areas in the west and east have reported major crop damage, particularly of corn and beans. Possible post harvest losses, caused partly by aflatoxin³, are an additional concern. Fungal diseases are affecting coffee crops and this is likely to decrease labour demand. In the same areas, these shocks follow drought-related food insecurity in 2009. Lean seasons are expected to begin two to three months earlier.

The coping capacity of the most vulnerable population has been eroded, due to the sequence and accumulated impact of natural disasters. Harvest losses due to repeated heavy rainfall have seriously affected subsistence farmers, while opportunities to find work as day labourers in bigger farms have diminished because of the floods. Food reserves are extremely limited, compounded by the fact that livelihoods of vulnerable farmers are endangered. On the other hand, the situation in different communities even within the same district can vary, depending mainly on topological characteristics. Targeting is hence a major necessity and challenge.

The major problem according to aid agencies is not food availability but access to food. This problem is expected to become even more pronounced after the series of adverse weather events which have already affected the country this year, leading to an increase in the price of basic food products such as beans.

A variety of data on chronic and acute malnutrition is available from different sources. However, the representativeness and reliability of the data remains questionable. A comprehensive, reliable information system is key to identifying the areas of highest vulnerability.

Coordination in food assistance and nutrition is very weak, which poses a further obstacle to a coherent response to the humanitarian situation. There is neither a cluster system nor sectoral working groups (the latter being the most widely accepted mechanism in many Latin American and Caribbean countries). A sectoral working group on humanitarian food security, led by World Food Programme (WFP) and Food and Agriculture Organization (FAO) could address the problem more holistically and against the background of the Global Food Security Cluster⁴. United Nations Children's Fund (UNICEF), the global nutrition cluster lead, should also set up a sectoral working group on nutrition in order to map interventions and provide the necessary advice and guidance on the application of nutrition protocols.

Through the International Donor Conference for the Reconstruction with Transformation of Guatemala (11-12 October), the Government of Guatemala appealed for USD 980,000,000 to

³ Produced by a fungus which can colonize and contaminate grain before harvest/during storage.

⁴ The goal of the Cluster is to improve food security response in humanitarian situations through the provision of predictable support to country-level clusters addressing food availability, food access and food consumption/utilization concerns. The Global Agriculture Cluster is merged into the new Cluster. Food security partners include NGOs, the Red Cross/Red Crescent Movement and donors. The establishment of the cluster followed discussion at the Inter-Agency Standing Committee Working Group meeting in July 2010.

support reconstruction of infrastructure and rehabilitation of the agriculture and health sectors.

1.3 Risk assessment and possible constraints

There may be problems of access, depending on the location of the intervention and existing communications. New natural disasters might occur in the intervention area. Furthermore, the security situation might deteriorate. For these reasons, implementation of the actions funded under this Decision might be delayed or impeded.

2 Proposed DG ECHO response

2.1 Rationale

In response to the crop losses due to drought periods and following heavy rainfall in 2009 and 2010, protection of the livelihoods of the most vulnerable population in the Dry Corridor and the western highlands should be envisaged, to avoid further degradation in the population's coping mechanisms and to provide them with food assistance until the next harvest (in August 2011).

Food assistance

In coherence with DG ECHO's food assistance policy, a clear and well-defined intervention is proposed to meet the humanitarian needs of the affected population and prevent a deterioration of their food security/nutritional situation, which, in the absence of support, is likely to happen because of the gap between the end of the food reserve and the next harvest.

Food assistance should focus on food-for-work and cash-for-work activities, while food aid distribution should be seen only as an emergency response mechanism. Through distribution of agricultural inputs and facilitation of income-generation activities, livelihoods and early recovery can be fostered.

Nutrition

A nutritional surveillance system, as part of the Ministry of Health structure, has to include active outreach screening of the nutritional status of children under 5 years. Therapeutic and supplementary feeding programmes should be foreseen for acute malnourished children. Health and nutritional education at the community level and capacity building for health and community staff is a priority.

Water and Sanitation

Better access to drinking water will improve the health and nutritional status of the affected population. This can be done through the rehabilitation of water supply systems or wells and the chlorination of drinking water. Such activities have to be accompanied by improved sanitation and hygiene education, including awareness as to proper water storage.

Disaster risk reduction

Since Guatemala is highly disaster prone, Disaster-risk reduction should be systematically mainstreamed in every food assistance response DG ECHO provides in the region, enhancing local communities' preparedness to better cope with future natural disasters.

2.2 Objectives

- **Principal objective:** To provide humanitarian aid to vulnerable people affected by natural disasters in Guatemala.

- **Specific objective:** To contribute to improving the humanitarian situation of people affected by drought and flooding in Guatemala by providing multi-sectoral assistance.

2.3 Components

Food Assistance: food aid distribution, when and where absolutely necessary; food-for-work/cash-for-work activities (income generation); emergency agricultural activities (seeds and other agricultural inputs); development of sentinel sites for food and nutrition insecurity; training in soil preservation and best practices in farming;

Nutrition: nutritional surveillance with active screening of nutritional status of children below 5 years; treatment of acute malnourished children, including therapeutic and supplementary feeding; training and equipment of nutritional health and community based services; promotion of nutritional education including breast-feeding and hygienic practices;

Water and Sanitation: basic rehabilitation of water and sanitation systems; water treatment; improvement of household water storage, hygiene promotion;

Disaster Risk Reduction: strengthening of local capacities in risk management and disaster preparedness; contingency planning; strengthening local emergency committees' equipment for disaster response; small-scale mitigation works.

2.4 Complementarity and coordination with other EU services, donors and institutions

(See table 3 in annex)

The EU Delegation is addressing Food Security with two instruments:

- **Food Facility:** EUR 16,000,000, 11/2009-10/2011, implemented through WFP, FAO, OIKOS⁵, ICU⁶, Mercy Corps, FUNDAP⁷. Part of the funds might be adapted by partners to changing needs, caused by ongoing La Niña Phenomenon.
- **Budget support:** EUR 33,800,000, 2009-2012, through SESAN⁸, the Ministry of Agriculture, Livestock and Food (MAGA), the Ministry of Public Health and Welfare (MSPAS) and other ministries, 2010-2012, and will increase by EUR 6,200,000 for 2011. Only 13% of funds are committed so far.

FAO and WFP are implementing projects under the Food Facility. The two organisations are making an effort to cooperate. However, in general there seems to be a lack of regular exchanges involving all actors involved in food security/nutrition, including NGOs.

⁵ OIKOS - Cooperação e Desenvolvimento. (NGO Portugal)

⁶ Instituto per la Cooperazione e Universitaria

⁷ Fundación para el desarrollo Integral de proyectos socio-económicos

⁸ The Secretary of Food and Nutritional Security for Guatemala

- **WFP Emergency Operation for Guatemala (EMOP)** (originally USD 14,000,000, from March 2010 –March 2011) oriented to identified vulnerable families by recent Emergency Food Security Assessment (EFSA). WFP needs additional USD 12,000,000.
- **WFP Country Programme**, approved in February 2010, has four components: i) reduce chronic malnutrition ii) improve livelihoods of subsistence farmers, iii) Purchase for Progress⁹ (P4P); and iv) strengthening capacities of government institutions, aimed at improving food security and nutrition for the most vulnerable people, focusing on areas with the highest chronic malnutrition rates; Project duration 2010-2014 with a budget of USD 20,000,000 (not fully funded yet). Food Facility-EU-Delegation: WFP (EUR 6,350,000) together with FAO (EUR 4,490,000) to be implemented over 2 years (11/2009-10/2011) Food For Work (FFW)-activities, maize production for P4P and Vitacereal production.
- **WFP Protracted Relief and Recovery Operations (PRRO 104570)** provides supplementary feeding with Vitacereal, a fortified blended food for pregnant and lactating women and children 6-36 months. The implementation is the responsibility of the Ministry of Health, in coordination with SESAN, which provides basic health services, breastfeeding promotion, supplementary feeding and nutritional education. The project will end in November/December 2010.
- **WFP Regional Protracted Relief and Recovery Operations (PRRO 104440)** reaches approximately 75,000 people, providing food-for-work rations for emergency preparedness and climate change adaptation practices in communities prone to natural disasters. The programme will end in December 2010.
- First Flash Appeal (Drought), March-August 2010, USD 34,200,000, financed to 35% (not including USD 5,000,000 United Nations Central Emergency Response Fund - CERF)
- Second Flash Appeal (Tropical Storm-Agatha), June to December 2010, USD 16,000,000, financed to 32% (not including USD 3,300,000 CERF-funds) with WFP programmed for USD 6,000,000 for food and FAO with USD 1,400,000 for Agriculture. A revised version has maintained the same amount, but has been slightly restructured according to the current needs.

The United States Agency for International Development (USAID) envisages to focus on enhancing smallholders' capacity to produce high-value crops (e.g. coffee) for export and focus on five departments in the Western highlands which combine both high chronic malnutrition and poverty rates (see "Feed the Future, Guatemala, FY 2010 Implementation Plan"). Guatemala is one of the five pilot countries in which the EU and the US (under their "Feed the Future" initiative) have agreed to work together regarding food security. This will be an interesting experience, especially as regards the compatibility of approaches. A USAID financed network of US-NGOs are currently working in the Dry Corridor.

⁹ P4P (Purchase for Progress): WFP- Guatemala, together with FAO, the Ministry of Agriculture and the Secretariat of Food and Nutritional Security, implemented a project in 2007 to produce local maize for the production of Vitacereal. The Howard G. Buffet Foundation (HGBF) provided support to expand the project in 2008 to 13 organizations which became a P4P pilot in 2009 with additional funding. In 2010, WFP implements the initiative with resources from the EU- Food Facility project, the Canadian Government and HGBF. WFP plans to reach 14,500 women and men farmers by the year's end with an estimated budget of USD 4,000,000.

International NGOs such as Acción Contra el Hambre (ACH) have already advanced (with DG ECHO and Spanish Agency for International Development Cooperation (AECID)-funding) with strategies on livelihood recovery, with Cash-for-Work and Food-for-Work activities, Sentinel Sites (early warning systems including indicators of food security and nutrition) and with a strong input into supporting the national nutritional surveillance system (Ministry of Health) and response strategies for acute malnutrition.

In view of the general high vulnerability of the population and weak overall coordination, proper linking of emergency and more long-term food assistance is a particular challenge.

2.5 Duration

The duration for the implementation of this Decision shall be 12 months. Humanitarian actions funded by this Decision must be implemented within this period.

Expenditure under this Decision shall be eligible from 1 February 2011.

Start Date: 1 February 2011

If the implementation of the actions envisaged in this Decision is suspended due to force majeure or any comparable circumstance, the period of suspension will not be taken into account for the calculation of the duration of the humanitarian aid actions.

Depending on the evolution of the situation in the field, the Commission reserves the right to terminate the Agreements signed with the implementing humanitarian organisations where the suspension of activities is for a period of more than one third of the total planned duration of the action. In this respect, the procedure established in the general conditions of the specific agreement will be applied.

3 Evaluation

Under Article 18 of Council Regulation (EC) No.1257/96 of 20 June 1996 concerning humanitarian aid the Commission is required to "regularly assess humanitarian aid actions financed by the Union in order to establish whether they have achieved their objectives and to produce guidelines for improving the effectiveness of subsequent actions." These evaluations are structured and organised in overarching and cross cutting issues forming part of DG ECHO's Annual Strategy such as child-related issues, the security of relief workers, respect for human rights, gender. Each year, an indicative Evaluation Programme is established after a consultative process. This programme is flexible and can be adapted to include evaluations not foreseen in the initial programme, in response to particular events or changing circumstances. More information can be obtained at:

http://ec.europa.eu/echo/policies/evaluation/introduction_en.htm.

4 Management Issues

Humanitarian aid actions funded by the European Union are implemented by NGOs and the Red Cross National Societies on the basis of Framework Partnership Agreements (FPA), by Specialised Agencies of the Member States and by United Nations agencies based on the Financial Administrative Framework Agreement with the UN (FAFA) in conformity with

Article 163 of the Implementing Rules of the Financial Regulation. These Framework agreements define the criteria for attributing grant agreements and financing agreements in accordance with Article 90 of the Implementing Rules and may be found at http://ec.europa.eu/echo/about/actors/partners_en.htm

For NGOs, Specialised Agencies of the Member States, Red Cross National Societies and international organisations not complying with the requirements set up in the Financial Regulation applicable to the general budget of the European Union for joint management, actions will be managed by direct centralised management.

For international organisations identified as potential partners for implementing the Decision, actions will be managed under joint management.

Individual grants are awarded on the basis of the criteria enumerated in Article 7.2 of the Humanitarian Aid Regulation, such as the technical and financial capacity, readiness and experience, and results of previous interventions.

5 Annexes

Annex 1 - Summary decision matrix (table)

Principal objective To provide humanitarian aid to vulnerable people affected by natural disasters in Guatemala				
Specific objectives	Allocated amount by specific objective (EUR)	Geographical area of operation	Activities	Potential partners¹⁰
To contribute to improving the humanitarian situation of people affected by drought and flooding in Guatemala by providing multi-sectoral assistance	1,000,000	Guatemala: Dry Corridor and the western highlands	- Food assistance - Nutrition - Water and sanitation - Disaster risk reduction	<u>Direct centralised management</u> - ACH- ESP - CARE - FR - COOPI - CROIX-ROUGE - NLD - OXFAM - UK - TROCAIRE <u>Joint management</u> - FAO - PAHO - UNICEF - WFP-PAM
Contingency reserve	0			
TOTAL	1,000,000			

¹⁰ ACCION CONTRA EL HAMBRE, (ESP),CARE FRANCE, (FR),COOPERAZIONE INTERNAZIONALE (ITA),HET NEDERLANDSE RODE KRUIS (NLD),OXFAM (GB),Trocaire, (IRL),UNICEF,UNITED NATIONS - FOOD AND AGRICULTURE ORGANIZATION,UNITED NATIONS - PAN AMERICAN HEALTH ORGANIZATION,WORLD FOOD PROGRAM

Annex 2 - List of previous DG ECHO decisions

List of previous DG ECHO operations in GUATEMALA				
Decision Number	Decision Type	2008 EUR	2009 EUR	2010 EUR
ECHO/-AM/BUD/2008/01000 (*)	Non-emergency	270,000		
ECHO/-CM/BUD/2008/01000 (*)	Emergency	300,000		
ECHO/DIP/BUD/2008/03000 (*)	Non-emergency	1,965,000		
ECHO/DRF/BUD/2008/01000 (*)	Non-emergency	15,865		
ECHO/GTM/BUD/2009/01000	Non-emergency		1,325,000	
ECHO/-CM/BUD/2010/01000 (*)	Primary Emergency			1,714,000
ECHO/DRF/BUD/2010/03000 (*)	Non-emergency			200,000
ECHO/DIP/BUD/2010/03000 (*)	Non-emergency			1,815,000
	Subtotal	2,550,865	1,325,000	3,729,000
	TOTAL	7,604,865		

Date : 23/11/2010

Source : HOPE

(*) decisions with more than one country

Annex 3 - Overview table of the humanitarian donor contributions

Donors in GUATEMALA over the last 12 months			
1. EU Member States (*)		2. European Commission	
	EUR		EUR
Austria	15,000	DG ECHO	5,320,000
Germany	232,500		
Italy	75,000		
Luxembourg	200,000		
Netherlands	75,000		
Spain	1,500,000		
Sweden	1,538,334		
United Kingdom	121,604		
Subtotal	3,757,438	Subtotal	5,320,000
TOTAL	9,077,438		

Date : 23/11/2010

(*) Source : DG ECHO 14 Points reports. <https://webgate.ec.europa.eu/hac>

Empty cells : no information or no contribution.