Dŵr Cymru Welsh Water

Linea
Fortran Road
St Mellons
Cardiff
CF3 0LT

Linea
Heol Fortran
Llaneirwg
Caerdydd
CF3 0LT

02920 740450
dwrcymru.com

Rt Hon Alistair Carmichael MP
Chair, Environment, Food and Rural Affairs Committee
House of Commons
London
SW1A 0AA

9 December 2025

*By email to **efracom@parliament.uk***

Subject: Debt Collection Practices

Dear Chair

Thank you for your letter of 26 November 2025, addressed to Pete Perry, who has asked me to respond on his behalf. I welcome the opportunity to explain our approach to debt collection, enforcement and how we safeguard and serve vulnerable customers. I enclose the requested information in spreadsheet form.

I have set out below the full answers to the supplementary questions and have taken some time to articulate our full collections journey and for context, where and when enforcement occurs. I have also endeavoured to explain some aspects of the water sector which bring unique challenges to debt collection and that inform our approach. Also, in anticipation it will be helpful, I set out the schemes, tariffs, processes, and initiatives we have in place to support vulnerable customers with the aim to keep them out of debt.

I trust this is useful and will support the committee's work.

Support for Vulnerable Customers

In July 2025 we published our new Vulnerability Strategy. Since the launch of our original strategy in 2018, we have made significant progress:

- 295,000 customers are now registered on our Priority Services Register (up from 80,000 in 2021) which demonstrates the focus on ensuring that we understand and address our customers' individual needs.
- 145,000 customers have received financial assistance through tailored schemes (up from 101,000 in 2018).
- We achieved ISO 22458:2022 accreditation in January 2024, demonstrating excellence in supporting vulnerable customers. We are measured against the British Standards and one element of that specifically audits how as a business we manage our debt processes for known vulnerable customers. This is an annual requirement.

- Our innovative ‘Cymuned’ (Community) Support Scheme — the first of its kind in the sector - addresses “targeted transient vulnerability” — supporting working households not traditionally eligible for help but struggling due to sudden economic hardship.
- Our Specialist Support Team has grown, handling over 55,000 customer contacts per year, and offering a case-managed approach with signposting to further support. The team are trained to identify wider support that can be offered such as benefit entitlement, energy support, wider debt related issues, and charities that can provide valuable support
- Our Community Hub and outreach efforts have expanded our face-to-face presence, attending over 1,400 events and building a partner network of over 300 organisations.
- This has been made possible by the plethora of communication channels we provide including telephone, webchat, face-to-face support, and a bilingual website, thereby ensuring accessibility for customers with varying needs. We also offer a nominee service, BSL video support, and assistive technologies like Recite Me.
- We leverage external data sources, such as WIMD and ONS, to identify operational areas with high deprivation, significant benefit uptake, and greater need for financial support. This ensures we stay focused on assisting those who need our help the most.
- We also seek to be visible in the community that we serve, and our community engagement strategy is embedded in our award-winning Water Resilient Communities approach. By working in areas of high deprivation and low engagement, we co-deliver targeted support and invest in education, efficiency, and trust-building activities across the relevant community.
- Our debt recovery teams organise local “Help with Bills” events, inviting customers with significant arrears to confidential, in-person consultations. At our most recent session in Cardiff Central Library (October 2025), 26 previously disengaged customers with significant arrears attended, resulting in the resolution of £22,000 of debt via payment plans or via a debt forgiveness fund (see below). Several customers experiencing major life challenges were signposted to the appropriate support service.
- Since 2015, our Debt Forgiveness Fund has been provided to 24,000 customers struggling with arrears and we have written off £20.5m in unpaid bills to help get them back on track.

Debt Collection Approach.

Our collection of unpaid charges from household customers is governed by a code of practice. Our overriding aim when collecting outstanding water and sewerage charges is to act fairly, proportionately and within the law. We encourage engagement from our customers, no matter what part of the debt recovery process they are on. It’s never too late to reach out for support. We are fully committed to supporting customers who are vulnerable, particularly where this impacts their ability to pay. A copy of the code is available here.

While there are multiple ways, we can support customers who are vulnerable or struggling to pay (listed above), our expectation is that all customers must pay for the service they receive. Non and late payment contribute to the company's overall bad debt provision, which is ultimately borne by our paying customer base and is reflected in the price of bills.

A factor unique to our sector is that we cannot disconnect or withhold our service in the event of non-payment. Therefore, if customers do not pay, arrears continue to accrue throughout our collections process, making early contact and remediation an imperative to preventing the build-up of debt.

Another unique factor is the lack of a mandatory sign-up process to access the service. The relationship between Water and Sewerage Undertaker and end-user is a statutory rather than a contractual one. Unlike other utilities, the service is always available regardless of registration. While many customers do register with us when they move into properties, some may give us minimal information, and which does not disclose their vulnerability or economic circumstance. Some do not register at all, and we must supplement our understanding of them and their needs from other sources of information. However, there is not one single source of information or database which provides data on vulnerable customers in all cases.

Further, for properties served by a water and sewerage undertaker operating wholly or mainly in Wales, landlords are legally obliged to provide the undertaker with details of tenants occupying their housing stock. This is helpful however, the only information they must disclose is the tenant's name, tenancy start date and date of birth (if known)[1]. These tenants, once registered by their landlords, may never engage with us or pay their water bills. This lack of an overall mandatory sign up means there isn't an automatic affordability or vulnerability check available to us.

Given this challenge in our sector, our debt collection process typically last 4 months. This is an extended period of forbearance before enforcement is considered. We primarily rely on our customers engaging with us, disclosing any vulnerabilities, and seeking support when needed. However, whilst vulnerable customers must be reminded of the requirement to pay for water and sewerage charges, we make them aware of the support available to them when doing so.

Our bills and dunning literature heavily focus on the support available as well as informing customers of the consequences of non-payment and non-engagement. We strike a balance between reminding our customers of the need to pay and signposting help. Often, it is the debt collection and enforcement process which prompts vulnerable customers to finally contact us and seek the appropriate help and support. In these instances, we are able to work with the customer on the appropriate resolution.

Customers may not pay / stop paying for a variety of reasons. These include life events such as short and long-term illness, a job loss or relationship breakdown etc. Some may be

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[1] The Water Industry (Undertakers Wholly or Mainly in Wales) (Information about Non-owner Occupiers) Regulations 2014

financially struggling, while others can pay but choose not to do so. Some customers may have vacated the property without telling us. Without engagement from these customers, we have no way of ascertaining which reasons for non-payment relate to which customer, and customers in arrears are less likely to engage.

Our collections process encourages customers to speak to us, so we can understand and find a solution, but ultimately if customers do not pay or engage, we need to take appropriate action to collect charges for the services we have supplied and to prevent bad debt from escalating.

Dwr Cymru Welsh Water's Collection Process

I set out below the relevant timeline of events and activities which occur before enforcement is considered. The timeline assumes no engagement from the customer~~,~~ but if the customer engages (which the process is designed to prompt), the collections process is paused while we work with them to try and agree a solution. If agreed, a sustainable payment plan takes them out of the collections process entirely.

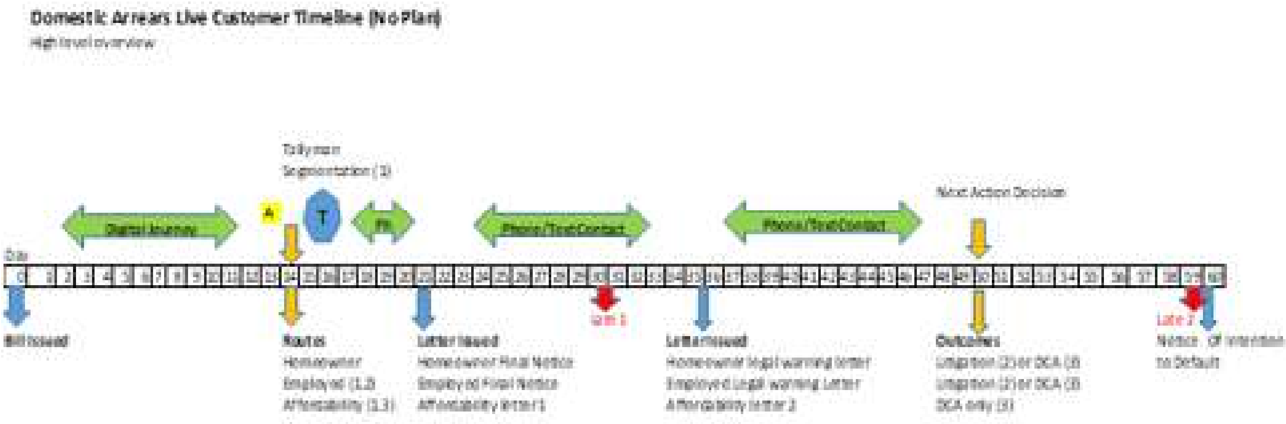
Stage one: Early Arrears Timeline (no engagement) day 1- 50

When accounts enter our arrears process, we may have minimal customer engagement or information to assess beyond a name and date of birth. We purchase additional data from credit reference agencies to give us an indication of likely affordability. This data segments arrears customers into the following:

- Homeowner
- Employed
- Affordability

Our internal collections process lasts 50 days before an escalation occurs. In that time, we will send letters, emails and text messages, and call these customers (depending on the contact information we have available). We only consider litigation on accounts where we understand that the customer to be a homeowner or employed and as a last resort. Customers identified as potentially having affordability challenges are referred to Debt Collection Agencies at the end of the 50-day period to collect on our behalf as part of a further effort to engage. These agencies do not separately litigate or enforce on any of these matters. For context, in 2024 only 0.1% of all arrears accounts were litigated. 70% were remediated via our own collection processes and 18% were referred to third party debt collection agencies.

A typical timeline of an unpaid bill with no engagement from the customer is below:



Stage 2: Homeowner / Employed Assessment for Litigation and the Pre Action Protocol (no engagement) day 50 - 80

Where an account is labelled as Homeowner or Employed, has arrears greater than £750 and has no payment plan at day 50, and the customer is below 65 years of age, the account is considered for litigation and identified vulnerability is one of the factors used to determine whether it is appropriate to proceed.

If it is deemed inappropriate to litigate at that time, the matter will be referred to a Debt Collection Agency, and its dunning process will commence for circa 240 days. This extends forbearance to around 8 months, after the 50-day period, before the matter is returned to us for a further review, giving customers more time to pay and engage.

The Debt Collection Agencies we instruct are robustly procured through a demonstration of sufficient processes, policies and training to identify and manage vulnerability during the debt collection process. Their vulnerability practices have been assessed and are in compliance with the ISO 22458:2022 accreditation.

For accounts assessed for litigation, we comply with the Civil Procedure Rules, including the Pre-action Protocol for Debt Claims. A formal letter of claim is sent, and the customer has 30 days to respond. This means that even if we do decide an account is suitable for litigation, there is a further opportunity for customers to engage and explain their circumstances before a claim is issued.

Stage 3: Claim Issue to County Court Judgment (CCJ) (no engagement) day 80 - 100

At the relevant expiry of the letter of claim, we will issue a claim at the Court who will then serve it on the customer by post. The customer will have 14 days from date of service to respond to the claim and decide whether to defend it. A customer can still contact us directly and we keep our approach to the litigation under review subject to what the customer tells us.

Stage 4: Post CCJ Period (no engagement) day 100 - 130

If a CCJ is awarded, the customer has 30 days to pay it in full in order to prevent it being publicly recorded at Registry Trust. We issue two reminder letters during this period, including an income and expenditure form for the customer to complete with an offer of payment.

Stage 5: Enforcement– A review takes place at day 131

Enforcement is considered through the following hierarchy ranked in priority for consideration first. Our preference is always charging orders as we receive security for our debt. Our second is attachment of earnings, as we will be guaranteed to receive payment if the order is made. Bailiff action is ranked lowest as there is no guarantee that the enforcement will succeed as the customer may not engage with the process or have any assets to levy against.

Charging Order- The Court secures the unpaid Judgment against the customer's interest in a property. In determining whether we will apply for a charging order, we review the following:

- *Whether there has been any additional information obtained from the customer on their circumstances during any admission or defence;*
- *Whether any payments have been made which may indicate a willingness to enter into a payment plan;*
- *Whether the customer can be matched during a land registry search; and*
- *An assessment of the equity position to decide if any charging order would provide sufficient security. Equity is determined by the age of the mortgage, a recent property valuation and the number of any prior charges.*

2. **Attachment of Earnings-** The Court compels the customer's employer to pay an amount to us each month. If we have information confirming the customer's employment, we will make an application for an Attachment of Earnings using those details. The Court decides the rate of payment.

4. **Warrant of Control**- The Court bailiff attends the customer's property to seize and sell assets, where deemed appropriate and a payment arrangement is not agreed. This is used when the judgment balance is typically under £750, which has been deemed appropriate for Court bailiffs to collect on. We consider the following criteria before selecting this enforcement method:

- *No Affordability flags identified*
- *Not on the following PSR: Dialysis, Serious Illness, Physical Disability, Learning, Disability, Braille, Housebound, Older Customer*

- *Under 65 years*

5. **High Court Enforcement** – A High Court Enforcement Officer the customer's property to seize and sell assets, where deemed appropriate and a payment arrangement is not agreed. This enforcement process typically used in the case high judgment balances. The criteria for selection is as follows:

- *No Affordability flags identified*
- *Not on the following PSR: Dialysis, Serious Illness, Physical Disability, Learning, Disability, Braille, Housebound, Older Customer*
- *Under 65 years*
- *Not paying new charges.*
- *Not paying CCJ balance*

Summary

Between collections commencing, and an account being selected for enforcement, forbearance of over 4 months will have elapsed. In that time, we endeavour to stop the matter escalating via our collections process. I reiterate, as we cannot stop supplying the service, new bills may be added which compound the customer's overall debt position. Enforcement is considered a necessary and proportionate step, on appropriate accounts, to seek a resolution and get the customer back on track. If as part of the enforcement process, severe vulnerability is identified, our instructions to bailiffs and staff are to withdraw the enforcement and use the contact details obtained to work directly with the customer.

Bailiff and Enforcement Agents

As indicated above, enforcement visits are only commenced after all other options have been considered, despite High Court Enforcement being our most effective method of recovering unpaid charges for which we have obtained a CCJ. Some further information may also be of assistance to the committee:

- We are currently contracted with two High Court Enforcement Providers that have been robustly procured through a demonstration of sufficient processes, policies and training to identify and manage vulnerability during the debt collection process. We have key performance monitoring controls to ensure compliance.
- We were the first creditor organisation to work with the Enforcement Conduct Board ("ECB") and mandate ECB accreditation for its panel of HCE providers.[2]
- The CEO of the ECB publicly cited our enforcement approach as an example of responsible and fair enforcement after a review of our processes. See ***annex 1***

[2] Chief Executive's Report, July 2023 - enforcementconductboard see section 21

- 4% of HCE matters are withdrawn from the enforcement agents and taken back for management by us when the enforcement action resulted in direct engagement from the relevant customers and we were able to negotiate a payment plan. 14.5% were closed and returned after the enforcement agents identified vulnerability. See ***annex 2***

Order to Obtain Information (OFFI) and Suspended Committal Orders (SCOs)

OFFIs have historically been part of our collection process and favoured on accounts where information on the customer has been minimal. The examination process at Court was considered appropriate in order for us to understand the customer's circumstances / ability to pay and decide the appropriate next step. Further, in our experience, after the customer became aware of the OFFI, many would directly engage with us, so this would be an opportunity to gather more information on the customer's circumstances before any enforcement action takes place.

We curtailed our use of this court process during and following the Covid pandemic due to an increase in customer non-attendance at the hearings and for commercial reasons. The OFFI process is resource intensive, requiring physical and personal service of the Court Order on the judgment debtor by process servers and we saw rising costs due to the impact of the pandemic on the process server industry. We do not currently seek OFFIs.

We consider that any Suspended Committal Order, because of a judgment debtor failing to attend Court in response to an OFFI, is a matter for the Court as it is a consequence available to it where a judgment debtor has failed to comply with the OFFI.

In our experience, the approach adopted by the Courts was to continually suspend the committal order each time the judgment debtor did not attend each hearing after being personally served with the Court Order requiring them to do so. We did not have a policy of seeking the enforcement of a committal order and we are not aware of any that were. Our general approach at the time was to make two attempts at personal service and if the customer failed to attend the second hearing, we would request the OFFI be withdrawn from Court.

Request for Data on enforcement agents and SCOs. (Spreadsheet enclosed)

In respect of the attached spreadsheet, I set out below some clarification to explain how we have presented the data. Our records go back to 2015. When you refer to debt value, I assume you refer to the value of the CCJ subject to the OFFI or being recovered by the enforcement agent. However, this may not represent the total debt owed by the customer.

A customer has one account with us but can have multiple schedules such as their 'live' schedule (to which the balance of new bills for ongoing charges are added); a 'final schedule' for a closing balance from a previous address; or a 'litigation schedule' where arrears from the live schedule are crystalised and ringfenced and when court action-commences. As explained, as we cannot disconnect the service, new bills will be added to the live schedule if the customer remains in occupation.

For example, a customer may owe us £1,000 on their live schedule, £1,000 on their litigation schedule, and £1,000 on a final schedule. The amount sent for enforcement would be for £1,000 on the litigation schedule, but their total debt would be £3,000.

I have therefore provided two views on the data ***'CCJ Debt'*** and ***'total Debt.*** We always consider total debt when making any collections decision, as any engagement from the customer will enable us to discuss the total debt they owe.

1. **In how many cases were enforcement agents (bailiffs) sent to a home?**
    - In total 18,949 matters were referred to Court Bailiffs (7,347) and HCE agents (11,602). It is not possible to ascertain how many of these referrals resulted in a visit. Matters may have been withdrawn prior to a visit, or the customer paid the enforcement agent in full before the visit. Available data does not have sufficient granularity to report on this, however annex 2 may support with some data into closure reasons.
2. **How many of these cases concerned debts of under £1,000?**
    - In total 8,909 referrals were for CCJs less than £1,000 (6,234 for Court Bailiffs and 2,675 for HCE agents.) For total debt less than £1,000, 3,330 referrals were made (2,548 for Court Bailiffs and 782 for HCE agents.)
3. **How many Suspended Committal Orders (SCOs) have you sought against customers in total?**
    - Of the 7,549 OFFIs applied for, SCOs were ordered by the Court on 1,291 occasions. This may include instances of 1 OFFI having up to two SCOs ordered on it.
4. **Of these, how many owe less than £1,000 in water and/or sewerage charges?**
    - 667 for CCJs less than £1,000 and 216 for total debt less than £1,000.
5. **Of these, how many have been granted?**
    - It would be helpful to receive clarification on this question as I am unsure what is meant by an SCO being granted. If it refers to the Court ordering a Committal Order for a Judgment Debtor, we are not aware that any were granted or actioned in respect of OFFIs sought by us. As indicated, our approach was to withdraw the OFFI after two attempts to get the customer to attend the hearing and our preference would have always been that the SCO was never 'granted' or enforced.
6. **How many of these cases relate to debtors who were known to be in receipt of means-tested benefits at the time of enforcement?**
    - Of the total number of County Court Warrants, HCE Writs and OFFIs for which we applied (26,948), 861 were known to be in receipt of a means-tested benefit at the time of enforcement.
7. **How many complaints were made to the Consumer Council for Water in connection with your company's enforcement actions and failure to follow Ofwat's Paying Fair guidelines on recovering debt?**

- The Consumer Council for Water (CCWater) receive complaints which they review. However, these are not always referred back to the Company. Therefore, we would be unable to provide the most accurate numbers on all complaints made. CCWater may be able to provide this information.

8. **Please also confirm the associated costs to your organisation of applying for and pursuing Suspended Committal Orders against those with debts of less than £1,000**.
    - We have calculated on the basis that the Court fee for the OFFI was £131.00. (*This fee has been subject to several increases, but I have based the calculation on the current fee*); Process Serving fees were £105 (two attempts); and the Court fee to swear the affidavit of personal service was £7 (two affidavits). Each matter would cost £355.00. For the total amount of associated costs for SCOs awarded for CCJs less than £1,000, this totals £236,785 (£355 x 667) over a 10-year period. For total debt less than £1,000, the total associated costs are £76,680 (£355 x 216).

I trust this response is sufficient but if you require any clarification or further information, please do not hesitate to contact me.

Yours sincerely

Kit Wilson

Director of Household Customer Services

Attached – answers to queries in spreadsheet form

Annex 1-Social Media Post Dated 17/07/25

Chris Nichols · 1st
CEO, Enforcement Conduct Board
4mo ·

I grabbed a moment of peace earlier in this spot in Abergavenny, where we had a super Board meeting across the last two days.

Yesterday we discussed our response to the MoJ's consultation on giving the ECB statutory powers, plans for future publication of consolidated evidence on the market and the scope of our new thematic review into linking of enforcement cases and charging of multiple enforcement stage fees. A busy agenda!

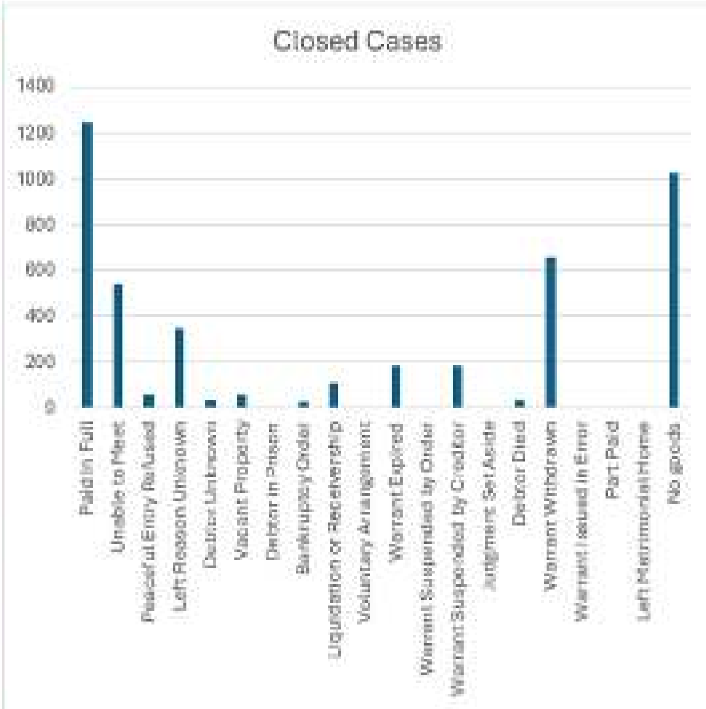
Today had a wonderful session with Leon Hughes at Dŵr Cymru Welsh Water, who were one of the very first creditors, back in 2023, to commit to only working with ECB accredited enforcement firms. It was a fascinating discussion with some particularly heartening insights on the pre-enforcements checks that responsible creditors can introduce to support fair enforcement.

My CEO Report to the Board is now available here:
https://lnkd.in/dndwdP4q

Minutes of the last Board meeting are also on our website.

Annex 2 – closure report from one HCE provider

Closed Cases			
Code	Description	Cases	%
1	Paid In Full	1248	27.5%
2	Unable to Meet	537	11.8%
3	Peaceful Entry Refused	58	1.3%
4	Left Reason Unknown	350	7.7%
5	Debtor Unknown	37	0.8%
6	Vacant Property	56	1.2%
7	Debtor in Prison	8	0.2%
8	Bankruptcy Order	32	0.7%
9	Liquidation or Receivership	109	2.4%
10	Voluntary Arrangement	3	0.1%
11	Warrant Expired	187	4.1%
12	Warrant Suspended by Order	6	0.1%
13	Warrant Suspended by Creditor	182	4.0%
14	Judgment Set Aside	5	0.1%
15	Debtor Died	37	0.8%
16	Warrant Withdrawn	660	14.5%
17	Warrant Issued in Error	0	0.0%
18	Part Paid	0	0.0%
19	Left Matrimonial Home	2	0.0%
20	No goods	1023	22.5%
	Grand Total	4540	



Year	Warrant Vol	Warrant Vol Under £1000
2015	775	754
2016	927	922
2017	746	696
2018	881	874
2019	616	614
2020	154	151
2021	720	717
2022	961	717
2023	736	505
2024	831	284
2025	0	0
Total	**7,347**	**6,234**

Year	HCE Vol	HCE Vol Under £1000
2015	145	48
2016	1222	457
2017	296	108
2018	795	187
2019	2139	880
2020	1575	562
2021	1382	135
2022	1730	211
2023	1307	60
2024	748	20
2025	263	7
Total	**11,602**	**2,675**

Year	OFFI Vol	OFFI With SOC Vol	OFFI With SOC Vol Under £1000
2015	730	63	37
2016	1,594	269	143
2017	2,272	440	227
2018	2,320	437	218
2019	500	73	42
2020	23	0	0
2021	0	0	0
2022	0	0	0
2023	108	9	0
2024	2	0	0
2025	0	0	0
Total	**7,549**	**1,291**	**667**

Year	Warrant Vol	Warrant Vol On HelpU	Warrant Vol On HelpU Now Not
2015	775	0	0
2016	927	1	1
2017	746	15	7
2018	881	76	44
2019	616	65	32
2020	154	24	9
2021	720	87	41
2022	961	95	50
2023	736	84	28
2024	831	87	35
2025	0	0	0
Total	**7,347**	**534**	**247**

Year	HCE Vol	HCE Vol On HelpU	HCE Vol On HelpU Now Not
2015	145	0	0
2016	1,222	0	0
2017	296	5	1
2018	795	37	18
2019	2,139	89	47
2020	1,575	21	7
2021	1,382	1	1
2022	1,730	6	5
2023	1,307	2	2
2024	748	1	0
2025	263	11	1
Total	**11,602**	**173**	**82**

Year	OFFI Vol	OFFI Vol On HelpU	OFFI Vol On HelpU Now Not
2015	730	0	0
2016	1,594	0	0
2017	2,272	43	27
2018	2,320	66	40
2019	500	38	20
2020	23	0	0
2021	0	0	0
2022	0	0	0
2023	108	7	3
2024	2	0	0
2025	0	0	0
Total	**7,549**	**154**	**90**

Year	Warrant Vol	Warrant Vol Customer Under £1000
2015	775	532
2016	927	564
2017	746	409
2018	881	359
2019	616	262
2020	154	39
2021	720	178
2022	961	113
2023	736	55
2024	831	37
2025	0	0
Total	**7,347**	**2,548**

Year	HCE Vol	HCE Vol Customer Under £1000
2015	145	16
2016	1,222	268
2017	296	41
2018	795	48
2019	2,139	271
2020	1,575	99
2021	1,382	9
2022	1,730	13
2023	1,307	6
2024	748	7
2025	263	4
Total	**11,602**	**782**

Year	OFFI Vol	OFFI With SOC Vol	OFFI With SOC Vol Customer Under £1000
2015	730	63	23
2016	1,594	269	94
2017	2,272	440	66
2018	2,320	437	28
2019	500	73	5
2020	23	0	0
2021	0	0	0
2022	0	0	0
2023	108	9	0
2024	2	0	0
2025	0	0	0
Total	**7,549**	**1,291**	**216**

Year	Warrant Vol	Warrant Vol On HelpU	Warrant Vol On HelpU Now Not
2015	775	0	0
2016	927	1	1
2017	746	15	7
2018	881	76	44
2019	616	65	32
2020	154	24	9
2021	720	87	41
2022	961	95	50
2023	736	84	28
2024	831	87	35
2025	0	0	0
Total	**7,347**	**534**	**247**

Year	HCE Vol	HCE Vol On HelpU	HCE Vol On HelpU Now Not
2015	145	0	0
2016	1,222	0	0
2017	296	5	1
2018	795	37	18
2019	2,139	89	47
2020	1,575	21	7
2021	1,382	1	1
2022	1,730	6	5
2023	1,307	2	2
2024	748	1	0
2025	263	11	1
Total	**11,602**	**173**	**82**

Year	OFFI Vol	OFFI Vol On HelpU	OFFI Vol On HelpU Now Not
2015	730	0	0
2016	1,594	0	0
2017	2,272	43	27
2018	2,320	66	40
2019	500	38	20
2020	23	0	0
2021	0	0	0
2022	0	0	0
2023	108	7	3
2024	2	0	0
2025	0	0	0
Total	**7,549**	**154**	**90**