

THE PALA



CIVIL TIMES

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P2. NATIONAL



**Super El Niño may trigger 15,800 excess heat deaths in India -** Examines how an intense El Niño episode could amplify heat exposure and mortality in India, highlighting regional vulnerability.

P3 NATIONAL



**SC to examine BCI's power to regulate legal education :** Examines the Supreme Court's scrutiny of the BCI's authority over legal education and the potential conflict based on its role as a regulator.

P4. WORLD



**With Trump-Xi truce, China looks to reshape Asian order :** Examines the evolution of U.S.–China ties from engagement to strategic competition and the emerging effort to manage rivalry through dialogue.

P7. ECONOMICS

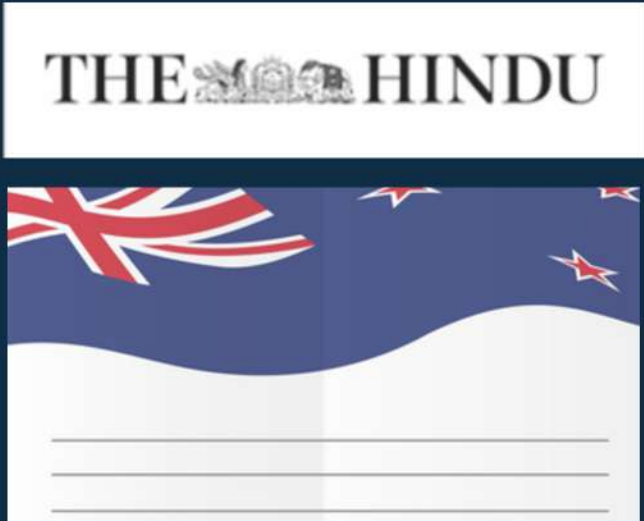


**Quality control and India's manufacturing growth**  
: Examines how India's evolving treaty network and arbitration framework seek to balance investor protection, State regulatory autonomy and efficient dispute resolution.

Editor's Note

What should worry us more? India's watchdog for free and fair elections revealing internal conflicts that raise questions about the SIR exercise and the integrity of the institution, or the possibility of more than 15,000 people losing their lives to extreme heat in the months ahead? This is how today's edition of the Pala Civil Times piques our curiosity. As public policy makers, we must remain attentive to questions of both national and international importance. In this edition, we explore some of them, one at a time. On the national page, we begin with the CIL report on heat-related mortality, the Arunachal Pradesh government's clearance for the Siang project, and the Supreme Court's examination of the BCI's role in legal education. Moving to the world page, we turn to the upcoming U.S.–China summit, where the two powers appear to be managing their differences while seeking greater strength in areas such as AI, rare earths and other strategic interests. On the economics page, we examine how Quality Control Orders can become restrictions in disguise, potentially affecting India's export ambitions. Our trusted Editorial Decoded section then turns to two contrasting themes: concerns over internal conflicts within the Election Commission and the growth opportunities emerging from the latest India–New Zealand FTA. Together, these topics offer different perspectives on the challenges and opportunities shaping public policy today. We hope readers make effective use of these notes to build a comprehensive understanding. Happy reading!

Editorials Decoded



Trading smart

Explains how the India–New Zealand FTA combines wider export and services access with protection for sensitive sectors and investment potential



Two ECs stand up to ask; CEC must answer, Supreme Court must not turn away

Examines the controversy surrounding electoral-roll revision, internal dissent within the ECI, and centralisation of voter databases.

## Super El Niño may trigger 15,800 excess heat deaths in India

A Climate Impact Lab (CIL) report projects around 15,800 additional heat-related deaths in India between September 2026 and February 2027 compared with a normal year, linking the projected increase to the current Super El Niño episode and associated abnormal warming.

### What is the Risk?

**Global Warming:** The report projects global land temperatures to be around 1.2°C above normal, with 44% more extremely hot days than expected in a normal year.

**Mortality possibilities :** Globally, the current El Niño episode is estimated to cause around 4.51 lakh excess deaths, including about 2.39 lakh during September 2026–February 2027.

**India's vulnerability:** India is projected to be the fourth hardest-hit country, with around 15,800 additional heat deaths during the six-month forecast period.

### What is El Niño ?

El Niño involves abnormal warming of the equatorial Pacific Ocean, which can suppress the Indian monsoon and contribute to higher temperatures.

### Why India is Vulnerable

**Regional Variation:** Northern India normally experiences sufficiently cold winters for heat-related mortality to remain relatively low, whereas southern India has warmer winter temperatures that can already cause heat-related deaths. Additional warming therefore produces a stronger mortality effect in the south.

**Delayed Peak:** India's heat-related mortality is projected to build over time rather than peak early. Around 7,400 additional deaths are projected between December 2026 and February 2027, with the risk expected to continue rising into India's summer months.

## India: 15,800 Additional Deaths

Projected additional heat-related deaths:

-  Nigeria — 31,400
-  Indonesia — 19,300
-  Sudan — 17,600
-  India — 15,800
-  Brazil — 13,300

Across the Sahel region alone, researchers estimate 66,800 additional deaths.

### How the Estimate is Derived

CIL estimates temperature-related mortality using relationships developed separately for 24,378 regions worldwide, accounting for differences in local climate, vulnerability and adaptive capacity. These relationships are applied to the ECMWF seasonal forecast and compared against the 1996–2025 average.

The uncertainty in the projections reflects both variation across the 51-member weather-forecast ensemble and uncertainty in the estimated temperature–mortality relationships.

### Opportunity for Preparedness

The key policy significance is the advance warning provided by seasonal forecasts. Governments and humanitarian agencies can use this lead time to strengthen:

- Heat early-warning systems
- Cooling centres and hydration stations
- Worker protection measures
- Health-system outreach and preparedness

The CIL report therefore presents the projected heat episode as a near-term opportunity for anticipatory action, because interventions can be undertaken before the forecast heat translates into avoidable mortality.

## PYQ COMPASS



Q. With reference to 'Indian Ocean Dipole (IOD)' sometimes mentioned in the news while forecasting Indian monsoon, which of the following statements is/are correct? (2017)

1. The IOD phenomenon is characterised by a difference in sea surface temperature between tropical Western Indian Ocean and tropical Eastern Pacific Ocean.
2. An IOD phenomenon can influence an El Niño's impact on the monsoon.

Select the correct answer using the code given below:

- a) 1 only b) 2 only c) Both 1 and 2 d) Neither 1 nor 2

## SC to examine BCI's power to regulate legal education

The Supreme Court is examining the extent of the Bar Council of India's (BCI) authority over legal education. The issue arose from a challenge to the BCI-PEARL FIRST Trust and its establishment of law institutions.

**Regulation:** The Court indicated that the BCI may have a role in prescribing general standards such as curriculum and course duration, but questioned whether that authority extends to controlling the functioning of educational institutions.

**Expertise:** The Bench questioned whether the BCI, primarily a regulator of the legal profession, should exercise detailed control over legal education when academic matters also involve specialised expertise from legal scholars and educationists.

**Dual Role:** The petition alleges a potential conflict of interest where the BCI simultaneously sets standards, inspects law institutions and is associated with establishing or managing educational institutions through the PEARL-FIRST Trust.

**IIULER:** The BCI-PEARL FIRST Trust established the India International University of Legal Education and Research (IIULER), Goa, while a similar institutional model has been proposed in Andhra Pradesh.

The central legal question is whether the BCI's statutory mandate to "promote legal education and lay down standards" under Section 7(1)(h) of the Advocates Act, 1961 extends to controlling the functioning and governance of law universities. The Court has issued notice and sought responses. It has not yet given a final ruling on the issue.

## Arunachal Cabinet clears panel for Siang dam survey



Amid protests by communities along the Siang River, the Arunachal Pradesh Cabinet on September 23, 2026 approved an Empowered High-Level Committee to guide and coordinate the pre-feasibility survey for the proposed Siang Upper Multipurpose Project (SUMP), an estimated 11,000 MW or more hydropower project.

### Why it matters?

**Energy:** SUMP is expected to strengthen India's energy security through large-scale hydropower generation and support long-term economic development of the Siang region.

**Water Security:** The project is also presented as a means to strengthen water management and flood mitigation in the Siang-Brahmaputra basin.

**Strategic significance:** Declared a national project in 2008, SUMP has acquired strategic importance amid China's construction of a major hydropower project on the Yarlung Tsangpo in Tibet.

### Key Concerns

**Local Opposition:** Communities in Siang and Upper Siang districts have raised concerns over the pre-feasibility survey and the project's potential impact on project-affected families and local communities. Participation: The State Cabinet has stressed that the survey should be transparent, peaceful and people-centric, with sustained engagement with affected residents.

**Outreach attempts:** Local authorities have also conducted awareness programmes, including school exhibitions involving 640 students across four schools, focusing on river management, sustainable hydropower and the proposed project.

### Strategic Context

The Yarlung Tsangpo enters Arunachal Pradesh as the Siang and later joins the Dibang and Lohit to form the Brahmaputra in Assam. The Centre and State governments therefore view SUMP not only as an energy and development project but also within the broader context of India's water and strategic interests in the Brahmaputra basin.

## PYQ COMPASS



Q. With reference to India, consider the following statements: (2022)

1. Government law officers and legal firms are recognised as advocates, but corporate lawyers and patent attorneys are excluded from recognition as advocates.
2. Bar Councils have the power to lay down the rules relating to legal education and recognition of law colleges.

Which of the statements given above is/are correct ?

- (a) 1 only (b) 2 only (c) Both 1 and 2 (d) Neither 1 nor 2

## With Trump-Xi truce, China looks to reshape Asian order

Against the backdrop of intensifying U.S.–China competition over trade, technology, AI, semiconductors, rare earths and Taiwan, Chinese President Xi Jinping's September 2026 visit to the U.S. marks an attempt by both powers to extend their ongoing truce and manage rivalry through dialogue rather than allow it to escalate.

### Why the Relationship Matters

**Stability:** The latest U.S.–China engagement seeks to establish a "constructive relationship of strategic stability", managing competition and unresolved differences through dialogue while stopping short of ending the underlying rivalry.

**Competition:** The two powers remain deeply engaged in economic, technological and strategic competition, particularly over tariffs, AI, semiconductors, critical minerals, supply chains and Taiwan, making their relationship central to the evolving global and Indo-Pacific order.

**Impact:** As the world's two major powers and key actors in global trade, advanced technology and the Indo-Pacific security architecture, the trajectory of U.S.–China relations has wider implications for global economic stability, technology governance, supply-chain security and Asian strategic stability.

### Evolving nature of U.S.–China ties

The latest U.S.–China engagement seeks to establish a "constructive relationship of strategic stability", managing competition and unresolved differences through dialogue while stopping short of ending the underlying rivalry.

### Evolution of the Relationship

**Engagement:** From 1972–2017, U.S.–China relations combined expanding trade, economic cooperation and diplomatic engagement with underlying strategic differences.

**Competition:** From 2018 onwards, the relationship shifted towards comprehensive strategic competition, following growing U.S. concerns over China's challenge to American power, technological leadership, economic security and the existing strategic order.

**Management:** The current phase seeks to manage rather than eliminate rivalry, combining competition with dialogue, crisis management and selective cooperation to prevent strategic confrontation from escalating.

### Key Areas of U.S.–China Competition

**Trade:** Tariffs and trade restrictions have increased economic tensions and supply-chain vulnerabilities, while both countries are increasingly seeking risk reduction without completely severing economic interdependence.

**Semiconductors:** U.S. restrictions on advanced semiconductor technology reflect concerns over China's access to dual-use technologies, while encouraging Beijing to pursue greater technological self-reliance and domestic innovation.

**AI:** AI has become a major arena of economic, technological and military competition, even as both sides recognise the need for dialogue because neither can easily eliminate the other's technological leverage.

**Rare Earths:** China's control over rare-earth resources and related processing capabilities provides strategic economic leverage, making critical-mineral supply chains an important component of U.S.–China competition.

**Taiwan:** Taiwan remains the principal security flashpoint, with Beijing treating it as a core sovereignty issue and opposing U.S. support and arms sales to Taiwan, creating the possibility of direct military confrontation.

### U.S.–China Relations: Broader Context and Present Phase

The current truce can be viewed either as a tactical pause allowing both sides to reduce vulnerabilities and build leverage, or as an attempt at strategic stability, as growing interdependence and narrowing power differentials make sustained confrontation increasingly costly. For India, the relationship matters primarily because U.S.–China competition shapes the Indo-Pacific balance of power, regional security, technology and semiconductor supply chains, critical-mineral security and India's strategic partnerships, particularly with the U.S., Japan and Australia.

### PYQ COMPASS



Q. 'The West is fostering India as an alternative to reduce dependence on China's supply chain and strategically to counter China's political and economic dominance.' Explain this statement with examples. (GS II - 2024)

## Trading smart: On the India-New Zealand FTA

The India–New Zealand FTA, set to come into force on 20 October, seeks to expand a relatively modest trade relationship while giving Indian exporters an alternative market amid a difficult global trade environment. The agreement combines broad export access with protection for sensitive sectors, services mobility and investment commitments.

### Why It Matters

**Diversification:** Although bilateral goods trade is only around \$1.1–1.3 billion, the agreement can provide Indian businesses, particularly MSMEs, with an additional export channel and reduce dependence on a limited set of major markets.

**Market Access:** New Zealand has agreed to provide duty-free access for 100% of Indian exports, creating opportunities for both labour-intensive and capital-intensive sectors.

**Resilience:** Wider access to alternative markets can help exporters manage disruptions arising from tariffs, trade restrictions and changes in global supply chains.

### Key Outcomes

**Exports:** Indian exports such as textiles, apparel, leather, handicrafts, pearls and semi-precious stones, pharmaceuticals, engineering goods, electrical machinery, mineral fuels and iron and steel stand to benefit from improved market access.

**Sensitive Sectors:** India has excluded dairy from tariff concessions and kept nearly 30% of its import lines outside tariff concessions, allowing greater protection for sensitive domestic sectors.

**Services:** Improved access and mobility provisions for professionals and students can support India's technology, consulting, engineering, healthcare and education services.

**Investment:** New Zealand has committed to facilitate \$20 billion of investment in India over 15 years, adding an investment dimension to the trade partnership.



### Modern Trade Framework

**Beyond Tariffs:** The agreement reflects the growing importance of customs procedures, regulatory predictability, certification, trade facilitation and non-tariff barriers, alongside conventional tariff reductions.

**Trade Facilitation:** Faster customs clearances, digital certification and simplified procedures can reduce transaction and inventory costs and improve supply-chain certainty.

**Rules of Origin:** Preferential access depends on products satisfying prescribed Rules of Origin (RoO) and documentation requirements, making traceability and compliance essential for businesses seeking tariff benefits.

### Business Implications

The FTA shifts the focus from merely obtaining lower tariffs to actually utilising preferential market access. Indian businesses need to review HS classifications, RoO eligibility, supply-chain documentation, sector-specific opportunities and landed costs to convert the agreement's concessions into actual exports.

### Broader Significance

The agreement illustrates India's emerging approach of combining trade openness with strategic protection: expanding export opportunities and alternative markets while retaining safeguards for vulnerable sectors. Its significance therefore extends beyond the size of India–New Zealand trade to the broader goal of building more diversified, resilient and facilitation-oriented trade relationships.

PYQ COMPASS



## Two ECs stand up to ask; CEC must answer, Supreme Court must not turn away

The Special Intensive Revision (SIR) of electoral rolls has brought the ECI under scrutiny over voter deletions, registration requirements and the management of electoral-roll data. The controversy intensified after Election Commissioners Sukhbir Singh Sandhu and Vivek Joshi reportedly recorded at least 14 objections over 10 months, including concerns about Form 6, centralisation of electoral-roll databases and decisions allegedly taken without their knowledge.

### Why It Matters

**Integrity:** Electoral-roll revision must maintain the accuracy and integrity of voter lists while ensuring that eligible citizens are not excluded from exercising their franchise.

**Independence:** The controversy raises broader questions about the institutional independence and internal functioning of the ECI, particularly whether its three-member structure operates through genuine deliberation and legally prescribed decision-making. Under the 2023 Act, ECI business is to be conducted unanimously as far as possible, with differences decided by majority.

### Evolution of the Present Controversy

**SIR:** The exercise began as an electoral-roll revision to identify and correct discrepancies, but its implementation generated concerns over the documentation burden, voter deletions and accessibility of the revision process. Recent investigation reports say that more than 13 crore names were struck from draft rolls across 30 States and Union Territories.

**Dissent:** The issue expanded from an external debate over SIR to an internal institutional controversy when Sandhu and Joshi reportedly objected repeatedly to decisions concerning new-voter registration, voter deletion and electoral-roll management.

**Centralisation:** The Commissioners also raised concerns about the gradual centralisation of the electoral-roll database, particularly whether centralised software could restrict the statutory role of ground-level Electoral Registration Officers (EROs).

According to the CEC and Other Election Commissioners Act, 2023 - The CEC and ECs will be appointed by the President upon the recommendation of a Selection Committee which will consist of the Prime Minister, a Union Cabinet Minister, and Leader of Opposition in Lok Sabha.

### Key Issues

**Voter Registration:** Changes to Form 6, the application for new voters, reportedly introduced SIR-related questions that the two Commissioners argued could not be made without following the prescribed legal process.

**Database:** The concern is that centralised control of electoral-roll software could reduce the operational autonomy of EROs, affecting their role in implementing decisions on voter inclusion and correction.

**Deletion:** SIR highlights the need to balance removing ineligible or duplicate entries with protecting every legitimate voter's continued presence on the electoral roll.

**Accountability:** The reported objections questioned whether significant decisions and communications received the requisite approval of the full Commission, making procedural transparency important to institutional accountability.

The ECI has disputed the interpretation of the internal objections, stating that written notes, differing views and internal checks are normal parts of institutional deliberation and that final decisions over the past year were unanimous and legally sanctioned. It has also defended its digital platforms as operating with data-security and audit controls.

## PYQ COMPASS



Q. Consider the following statements: (2017)

1. The Election Commission of India is a five member body.
2. The Union Ministry of Home Affairs decides the election schedule for the conduct of both general elections and by-elections.
3. Election Commission resolves the disputes relating to splits/mergers of recognized political parties.

Which of the statements given above is/are correct?

- (a) 1 and 2 only (b) 2 only (c) 2 and 3 only (d) 3 only

## Quality control and India's manufacturing growth

India has rapidly expanded Quality Control Orders (QCOs) to improve product quality and standardisation, but concerns have emerged that mandatory certification can restrict input availability, raise compliance costs and disrupt manufacturing supply chains. The 2026 QCO reassessment and transition measures seek to address these concerns.

### Why It Matters

**Quality:** QCOs can strengthen product standards and improve the quality and reliability of goods manufactured and sold in India.

**Competitiveness:** When QCOs cover critical intermediate inputs, certification requirements can increase costs and restrict access to inputs, affecting the competitiveness of downstream industries.

### Evolution of QCO Policy

**Expansion:** Products covered by QCOs increased sharply from 88 in 2019 to 765 by December 2024, before the pace of expansion slowed in 2025.

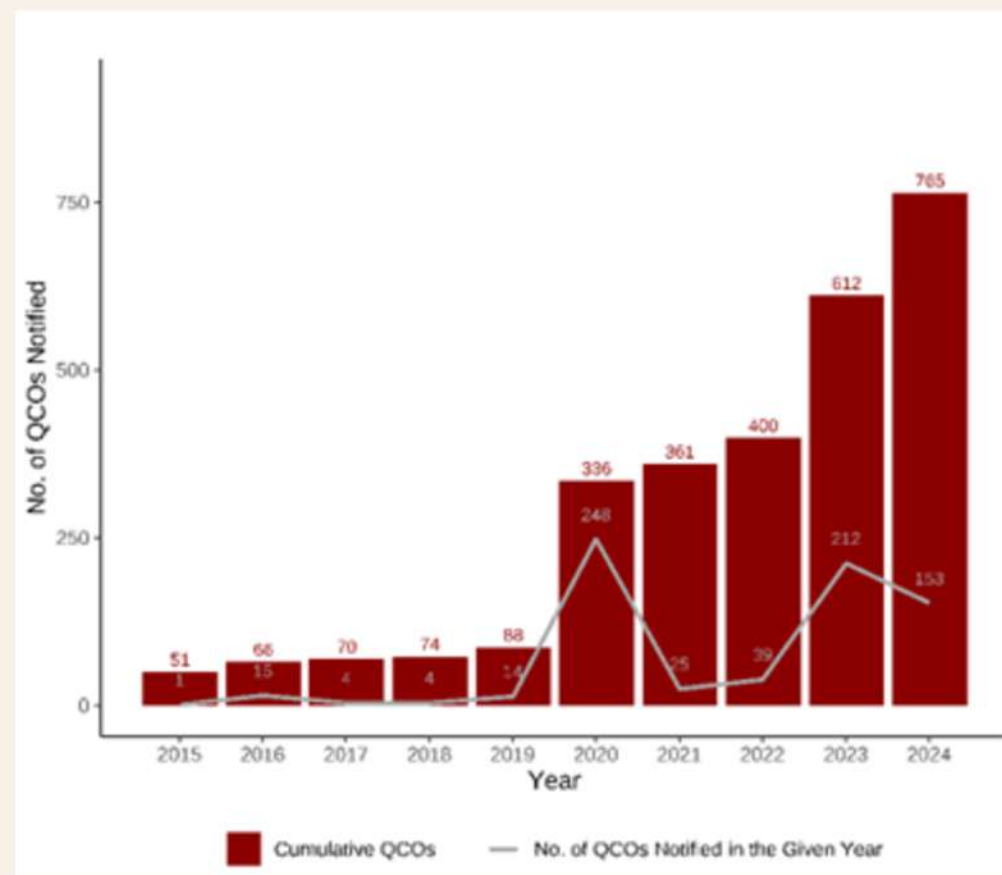
**Rationalisation:** Several QCOs, particularly those covering intermediate goods, were revoked or suspended as concerns emerged over input availability and supply-chain disruptions.

**Global Scrutiny:** Concerns over QCOs and other non-tariff barriers were also raised during the WTO's eighth Trade Policy Review of India in July 2026 by the EU, US and several BRICS members.

### Recent Reforms

**Transition:** The Transition Facilitation (Quality Control) Order, 2026, notified by DPIIT on June 25, allows eligible firms facing difficulties in obtaining BIS Scheme-I certification to temporarily source specified products from BIS Scheme-II-licensed suppliers in sectors such as toys, footwear and air conditioners, subject to prescribed conditions and committee approval.

**Reassessment:** More than 600 QCO-covered products remain to be reassessed, particularly intermediate inputs used in chemicals, steel, textiles, machinery, electronics, rubber and plastics.



### Impact on Downstream Industries

A study by the Centre for Social and Economic Progress (CSEP) on chemical inputs illustrates why intermediate goods require particular attention.

**Exposure:** Chemical products covered by QCOs increased from the first order in 2018 to 52 products by 2024, while the share of chemical-using firms exposed to input-side QCO regulation increased from 11.8% in 2019 to 56.6% in 2024.

**Large Firms:** Input QCOs were associated with a 9.6% increase in production but a 37% decline in GVA, suggesting that firms could sustain output while facing pressures on value addition, potentially through higher input costs.

**Small Firms:** QCOs had no statistically significant effect on production or GVA but were associated with a 47.6% decline in profitability, indicating their greater difficulty in absorbing input and compliance costs.

**Reassessment:** More than 600 QCO-covered products remain to be reassessed, particularly intermediate inputs used in chemicals, steel, textiles, machinery, electronics, rubber and plastics.

QCOs should be designed and reassessed by considering input availability, costs, downstream linkages and domestic value addition, not quality alone. MSMEs need targeted certification support, compliance assistance and suitable transition periods where regulatory costs are high. Ultimately, QCOs should improve quality without compromising the scale, efficiency and competitiveness of Indian manufacturing.

## PYQ COMPASS



Q. Faster economic growth requires increased share of the manufacturing sector in GDP, particularly of MSMEs. Comment on the present policies of the Government in this regard. (GS III - 2023)

## PYQ Compass



Q. With reference to 'Indian Ocean Dipole (IOD)' sometimes mentioned in the news while forecasting Indian monsoon, which of the following statements is/are correct? (2017)

1. The IOD phenomenon is characterised by a difference in sea surface temperature between tropical Western Indian Ocean and tropical Eastern Pacific Ocean.
2. An IOD phenomenon can influence an El Nino's impact on the monsoon.

Select the correct answer using the code given below:

- a) 1 only
- b) 2 only
- c) Both 1 and 2
- d) Neither 1 nor 2

**Ans : b**

Statement 1: The IOD, also known as the Indian Niño, is an irregular oscillation of sea-surface temperatures in which the western Indian Ocean becomes alternately warmer and then colder than the eastern part of the Indian ocean (not tropical eastern pacific ocean).

Statement 2: IOD has a much more significant effect on the rainfall patterns in south-east Australia than the El Niño-Southern Oscillation (ENSO) in the Pacific Ocean as shown in several recent studies.

Q. With reference to India, consider the following statements: (2022)

1. Government law officers and legal firms are recognised as advocates, but corporate lawyers and patent attorneys are excluded from recognition as advocates.
2. Bar Councils have the power to lay down the rules relating to legal education and recognition of law colleges.

Which of the statements given above is/are correct ?

- (a) 1 only
- (b) 2 only
- (c) Both 1 and 2
- (d) Neither 1 nor 2

**Ans : b**

Statement 1: This is incorrect. Under the Advocates Act, 1961, any person enrolled with a Bar Council is recognized as an advocate. This includes corporate lawyers and patent attorneys, provided they meet the qualifications and are enrolled. There is no exclusion for corporate lawyers or patent attorneys under the Act.

Statement 2: This is correct. Bar Councils, particularly the Bar Council of India (BCI), have the power to lay down rules relating to legal education and the recognition of law colleges. The BCI sets standards for legal education and approves institutions imparting legal education in India.

## PYQ Compass



Q. Consider the following statements: (2017)

1. The Election Commission of India is a five member body.
2. The Union Ministry of Home Affairs decides the election schedule for the conduct of both general elections and by-elections.
3. Election Commission resolves the disputes relating to splits/mergers of recognized political parties.

Which of the statements given above is/are correct?

- (a) 1 and 2 only
- (b) 2 only
- (c) 2 and 3 only
- (d) 3 only

**Ans : d**

Statement 1: This is incorrect. The Election Commission of India (ECI) is a three-member body, consisting of the Chief Election Commissioner (CEC) and two Election Commissioners. It is not a five-member body.

Statement 2: This is incorrect. The Election Commission of India, not the Ministry of Home Affairs, decides the election schedule for general elections and by-elections. The ECI is an independent constitutional authority under Article 324.

Statement 3: This is correct. The ECI resolves disputes related to splits or mergers in recognized political parties under the Election Symbols (Reservation and Allotment) Order, 1968. It decides which faction is entitled to the party's name and symbol.

### PRACTICE QUESTIONS

Q. With reference to Quality Control Orders (QCOs) in India, consider the following statements:

- 1.QCOs can improve product quality and standardisation through mandatory compliance requirements.
- 2.QCOs affecting intermediate goods can have implications for downstream industries through changes in input availability and costs.
- 3.The effectiveness of QCOs can be assessed solely on the basis of the number of products brought under mandatory regulation.

Which of the statements given above is/are correct?

- (a) 1 and 2 only
- (b) 2 and 3 only
- (c) 1 and 3 only
- (d) 1, 2 and 3

**Ans: (a) 1 and 2 only**

**Statement 1 is correct.** QCOs are intended to ensure compliance with specified quality standards.

**Statement 2 is correct.** Regulation of intermediate inputs can affect downstream production, costs and value addition.

**Statement 3 is incorrect.** The effectiveness of QCOs should be judged by whether they improve quality without undermining scale, efficiency and manufacturing competitiveness.

Q. With reference to Rules of Origin (RoO) under a Free Trade Agreement, consider the following statements:

- 1.Rules of Origin determine whether a product qualifies for preferential treatment under an FTA.
- 2.Compliance with Rules of Origin can require documentation and traceability of the product's supply chain.
- 3.Once an FTA provides zero-duty access to a country's exports, all products exported by that country automatically qualify for preferential tariffs.

Which of the statements given above is/are correct?

- (a) 1 and 2 only
- (b) 2 only
- (c) 1 and 3 only
- (d) 1, 2 and 3

**Ans: (a) 1 and 2 only**

**Statement 1 is correct.** RoO establish whether goods satisfy the conditions for preferential treatment.

**Statement 2 is correct.** Businesses may need to demonstrate origin through prescribed documentation and traceability.

**Statement 3 is incorrect.** Preferential access is conditional on satisfying the applicable RoO and other requirements.