CERTIFIED PUBLIC ACCOUNTANT

FOUNDATION LEVEL 2 EXAMINATIONS

F2.4: TAXATION

DATE: MONDAY 26, FEBRUARY 2024

MARKING GUIDE AND MODEL ANSWERS

QUESTION ONE

Marking guide

a)	Marks
i)	
1 Mark for a well discussed criteria (maximum 5 marks)	5
ii)	
1 Mark for a well discussed Processes not Conferring Origin (maximum 5 marks)	5
Total	**10**
b)	
i)	
CIF in USD	1
CIF in FRW	1
Import duty	1
Excise tax	2
Total	**5**
ii)	
Retail value	1
Excise tax	2
Total	**3**
iii)	
0.5 mark for Cleary stating each period (maximum 1.5 marks)	1,5
0.5 mark for Cleary stating the deadline	0,5
Total	**2**
Total Marks	**20**

Model answer

a) i) Goods shall be considered as originating in a Partner State if they are dispatched directly from a Partner State to a consignee in another Partner State and meet the following criteria:

ii) they are produced entirely in that Partner State, or

b) they are produced in a Partner State, wholly or partially, using materials imported from outside the Partner State or of undetermined origin, through a production process which substantially transforms these materials, and which meets the following conditions:

i. The C.I.F. value of these materials does not exceed sixty per cent of the total cost of the materials used in the production of the goods.

ii. The added value resulting from the production process represents at least thirty-five per cent of the ex-factory cost of the goods, as indicated in the first list.

iii. The goods are classified or reclassified under a tariff heading different from that under which they were originally imported, in accordance with the second Schedule.

ii) The following operations and procedures are considered insufficient to prove that goods originate in a Partner State:

(a) Basic packaging activities such as wrapping, bottling, placing in bottles, bags, cases, boxes, attaching to cards or boards, and other simple packaging operations;
(b) (i) Simple mixing of ingredients imported from outside a Partner State;
(ii) The elementary assembly of components and parts imported from outside a Partner State to form a complete product;
(iii) Basic mixing and assembly where the costs of ingredients, parts and components imported from outside a Partner State and used in any process exceed sixty percent of the total costs of the ingredients, parts and components used;
(c) actions to ensure the preservation of goods during transport and storage, such as ventilation, spreading, drying, freezing, placing in brine, sulphur dioxide or other aqueous solutions, removal of damaged parts and similar operations;
(d) Alterations to packaging and disassembly or assembly of consignments;
(e) Marking, labelling or affixing other distinctive signs on products or their packaging;
(f) Basic activities, such as dust removal, sifting, screening, sorting, classification, matching (including assembling sets of goods), washing, painting, and cutting;
(g) The combination of two or more operations mentioned in subparagraphs (a) to (f) of this rule;
(h) Animal slaughter.

b) (i) Computation of the applicable excise duties

CIF = FOB + I + F
CIF = 28,000 + 5,200 + 9,500
CIF = 42,700 USD

Exchange Rate = 1 USD = 1,100 FRW

CIF in FRW = CIF x Exchange Rate
CIF in FRW = 42,700 x 1,100
CIF in FRW = 46,970,000 FRW

Import duty = CIF x Rate
Import duty = 42,700 x 25%
Import duty = 10,675 USD

Excise tax = (CIF + Import duty) x Rate
Excise tax = (42,700 + 10,675) x 10%
Excise tax = 53,375 x 10%
Excise tax = 5,337.50 USD

ii) Calculation of the excise tax

The excise tax on Cigarette is calculated on the retail price.

Retail value = 3,500,000 x 1300 = 4,550,000,000

Excise tax = 4,550,000,000 x 36% + (3,500,000 x 150) = 1,638,000,000 + 525,000,000 = 2,163,000,000

iii) For domestic excise tax, the tax period is the calendar month divided into the following three periods:

1) from 1st date to 10th date of the month;
2) from 11th date to 20th date of every month;
3) from 21st date towards end of the month.

Within five (5) days following periods above mentioned, the taxpayer declares and pays the excise duty.

QUESTION TWO

Marking guide

a)	**Marks**
3 Marks for a good Discussion of information provided by the taxpayer	3
3 Marks for a good Discussion of information provided by the third party	3
Total	**6**
b)	
3 Marks for a good Discussion of Inadmissibility of documents	2
3 Marks for a good Discussion of the Time limit of the power to audit	2
Total	**4**
c)	
4 Marks for appeal to the commissioner general and its conditions	4
3 Marks for Decision on appeal and the request for amical settlement	3
3 Marks for discussion of how to file a court case	3
Total	**10**
Total Marks	**20**

Model answers

a) Information is provided by the taxpayer, and by the third party.

Information Given by the Taxpayer

Information demanded in writing by the Tax Administration should be provided within a period of seven (7) working days, from the time the taxpayer was informed, unless the taxpayer gives sufficient proof of difficulties faced in preparing and delivering the requested information.

Upon written request by the Tax Administration, a copy of or any part of the books of accounts kept or any other related document, including lists of clients and lists of suppliers has to be provided to the Tax Administration within seven (7) days, unless the taxpayer gives sufficient proof of difficulties in writing faced in preparing and delivering the requested information. The taxpayer has the right to request for a confirmation of receipt of the information.

Information from Third Parties

The Tax Administration has the right to obtain information from other persons in case they may possess information on a particular taxpayer.

During the audit by the Tax administration, the following must provide all requested information in relation with the taxpayer:

- All public or private institutions;
- Other persons in case the Tax administration needs to know the structure and use of taxpayer's property.

The institution or person requested to provide such information must do so within fifteen (15) days, from receipt of the request. This applies also to a person or an institution bound by secrecy.

b) A taxpayer is not allowed to provide at any stage of appeal, any additional document that was not produced during the audit, unless he or she proves that the document was not produced due to a valid reason.

The power to audit is limited to a period of five (5) years, starting from 1st January following the concerned tax period. However, if it is established that the taxpayer has concealed information with intent to evade tax, the power to audit lapses after ten (10) years.

c) Dispute settlement process

Appeal to the Commissioner General and the Conditions for admissibility of appeal

A taxpayer who is dissatisfied with the contents of the tax assessment notice or notification of administrative fine appeals to the Commissioner General within a period not exceeding thirty (30) days from the day of receipt of the tax assessment notice or notification of administrative fine.

To be admissible, the file of appeal must:

- Be in writing;
- Identify the taxpayer and the taxpayer identification number;
- Identify the tax period;
- Specify the tax assessment or administrative fine imposed and the object and the grounds for the appeal;
- Be signed by the taxpayer, his or her legal representative or a representative with powers of attorney;
- Contain proofs and legal arguments against the tax assessment

Decision on appeal and the Right to request for amicable settlement

The Commissioner General makes a decision on the appeal in a period not exceeding thirty (30) days from the date of receipt of the appeal and communicates it to the taxpayer in writing.
The Commissioner General or a competent staff of the Tax Administration designated by the Commissioner General may extend this period for other thirty (30) days and informs the taxpayer. In case no decision is made by the Commissioner General within this period, the appeal is assumed to be valid.
In case the appeal is fully or partially accepted, the Commissioner General discharges the taxpayer from the respective tax liability, interest and administrative fine.

A taxpayer who is dissatisfied with the decision of the Commissioner General, may request for an amicable settlement.
Rules of the Commissioner General determine the modalities for amicable settlement of tax related disputes.

Filing a case to the court

If the two parties cannot resolve the dispute amicably, the taxpayer may file a case to the court within a period not exceeding thirty (30) days from the date both parties fail to reach an amicable solution.
A taxpayer who is dissatisfied with the decision of the Commissioner General may also file a case to the competent court within thirty (30) days from the receipt of the decision of the Commissioner General.

During the period in which the claim is filed with the court, the obligation to pay tax remains. Prior to the final decision on the case, the Tax administration may recover the tax assessed, the penalties and late payment interests thereto. However, the Commissioner General may, upon request by the taxpayer, suspend the tax recovery.

QUESTION THREE

Marking guide

a)	**Marks**
Standard cash sales	1
Exports to Burundi	1
Standard Credit sales	1
Provision for bad debt	1
Imported environmental impact assessment	1
Purchase of taxable products	1
Legal fees	1
Purchase of fuel	1
rent for August	1
Purchase of electricity	1

Communication expense	1
purchase return	1
Company stationaries	1
Purchase of a computer	1
VAT Refundable	**1**
Total	**15**

b)	
Talking about 24 month period	3
Mentioning that the amount of the debt was previously taxed	1
Mentioning that the debt is written off in the books of accounts	1
Mentioning that the supplier had taken all possible steps	1
Total	**5**

Total marks **20**

Model answers

a) Computation of the VAT Payable/Refundable

Output VAT

Date	**Description**	**Workings**	**VAT Amount (FRW)**
05/08/2022	Standard cash sales	350,000,000 * 18/118	53 389 831
09/08/2022	Exports to Burundi	Zero rated	-
11/08/2022	Standard Credit sales	50,000,000 * 18/118	7 627 119
29/08/2022	Provision for bad debt	35,000,000 * 18/118	**(5 338 983)**
31/08/2022	Imported environmental impact assessment	18,000,000 * 18/100	3 240 000
Total Output VAT			**58 917 966**

Input VAT

Date	**Description**	**Workings**	**VAT Amount (FRW)**
02/08/2022	Purchase of taxable products	400,000,000 * 18/118	61 016 949
14/08/2022	Legal fees	2,000,000*18/118	305 085
20/08/2022	Purchase of fuel	Exempted	-
18/18/2022	Rent for August	1,500,000*18/118	228 814
23/08/2022	Purchase of electricity	25,000 * 18/118	3 814
27/08/2022	Communication expense	500,000 * 18/118	76 271
28/08/2022	Purchase return	5,000,000*18/118	(762 712)
30/08/2022	Company stationaries	15,000,000 * 18/118	2 288 136
30/08/2022	Purchase of a computer	Exempted	-

Total Input VAT			**63 156 356**

VAT Payable/Refundable: 58,917,966 - 63,156,356 = 4,238,390 (Refundable)

b) Post-sale adjustment for unrecoverable debts

If a registered tax payer has supplied goods or services for consideration and paid all the tax on those goods and services to the Commissioner General, but has not within twenty (24) months after the delivery of such goods and services received payment in whole or in part from the recipient, the registered supplier is allowed a refund of the tax paid for which he/she did not receive upon fulfilling the following conditions:

- An amount equivalent to the debt previously included in the value of taxable goods or services;
- The debt is written off in the books of accounts of the supplier of goods or services;
- the supplier of goods or services who has taken all possible steps in pursuing payment and has shown convincing evidence that the debtor is insolvent.

QUESTION FOUR

Marking guide

a)	**Marks**
Residential building (exempted)	1
Apartment with three floors	1
Apartments with four floors	1
Commercial building	1
b)	
Year 1	1
Year 2	1
Year 3	1
Year 4	1
c)	
0,5 for a well discussed exemption (maximum 2)	2
d)	
Explanation of the trading license and the tax period	2
Good discussion on the turnover and the District council	2
Good discussion of the timeline and consequence for failure to declare the trading license	2
Good discussion of exemption and the refund of trading license tax	2
Computation of trading license tax	2
Total Marks	**20**

Model answers

a)

Particular	**Market Value**	**Working**	**Tax**
Residential building (occupied by owner and family)	220,000,000	Exempted	-
Apartment with three floors	550,000,000	0.25% x 550,000,000	1 375 000
Apartments with four floors	1,000,000,000	0.25% x 50% x 1,000,000,000	1 250 000
Commercial building	600,000,000	0.2% x 600,000,000	1 200 000
Total tax			**3 825 000**

b)

Year	**Market Value**	**Tax Rate**	**Tax Calculation**	**Tax Payable (FRW)**
1	100,000,000	0.2%	100,000,000 * 0.2% = 200,000	200000
2	100,000,000	0.3%	100,000,000 * 0.3% = 300,000	300000
3	100,000,000	0.4%	100,000,000 * 0.4% = 400,000	400000
4	100,000,000	0.5%	100,000,000 * 0.5% = 500,000	500000

c)The following immovable properties are exempted from the immovable property tax:

1. One building whose owner intends for occupancy for dwelling purposes and its annex buildings located in a residential plot for one family.
2. Immovable property determined by the District Council and donated to vulnerable groups;
3. Immovable property belonging to the State, Province, decentralized entities as well as public institutions except if they are used for profit-making activities or for leasing;
4. Immovable property belonging to foreign diplomatic missions in Rwanda if their countries do not levy tax on immovable property of Rwanda's diplomatic missions;
5. Land used for agricultural and livestock activities which area is equal to or less than two hectares (2ha);
6. Land reserved for construction of houses in rural areas but where no basic infrastructure has been erected;

d) Trading license

i)The law N° 75/2018 of 07/09/2018 determining the sources of revenue and property of decentralized entities establishes that the trading licence tax is the responsibility of any person operating a business within a District. The tax period spans from January 1st to December 31st. For businesses commencing after January, the taxpayer pays a prorated tax for the remaining months of the year, including the starting month. Seasonal or periodic trading activities are taxed annually.

ii) The trading license tax is calculated on the basis of the following table:

Turnover	**Tax due**

From 1 to FRW 40,000,000	FRW 60,000
From 40,000,001 to FRW 60,000,000	FRW 90,000
From 60,000,001 to FRW 150,000,000	FRW 150,000
Above FRW 150,000,000	FRW 250,000

Taxpayers selling exempted goods or services but with turnovers equal to or exceeding FRW 20,000,000 follow the same taxation method as those registered for value-added tax. The tax is based on the previous year's turnover. Additionally, the District Council annually designates rural or urban areas and small-scale activities.

iii) Taxpayers must file a trading license tax declaration by January 31st of the corresponding year. The declaration details taxable business activities, including self-assessed tax. The taxpayer or a legally authorized representative signs the declaration. Failure to pay by January 31st leads to restrictions on business activities, deemed illegal until the tax is settled.

iv) Non-commercial State organs, as well as small and medium enterprises during the first two (2) years following their establishment, are exempted from trading licence tax. The law allows taxpayers terminating or changing businesses during a tax year to be refunded the paid trading licence tax, subject to an audit.

v) Computation of the trading license payable

Market Value: FRW 30,000,000

Given the Market Value of FRW 30,000,000 falls within the first turnover bracket (From 1 to FRW 40,000,000), the applicable tax rate is FRW 60,000.

Therefore, the trading licence tax payable by the taxpayer for the year 2023 is FRW 60,000.

QUESTION FIVE

Marking guide

a)	**Marks**
2 Marks for a well computed WHT (maximum 18)	18
b)	
1 Mark for a good discussion on persons exempted from the Withholding tax (maximum 2)	2
Total marks	20

Model answers

a) Computation of WH T

S N	Income	Working	(WHT)
1	Dividend Income (Private Company - STU Ltd)	(3,000,000 x 100/95): 3,157,895 WHT =3,157,895 – 3,000,000	157,895
2	Interest Income (Government Securities)	(4,000,000 x 100/85): 4,705,882 WHT=4,705,882 *15/100=705,882 Maturity below 3 years (WHT is 15%)	705,882
3	Interest Income (Fixed Deposit - XYZ Bank)	Interest Income: 2,500,000 Exempted (maturity above 1 year)	Exempted
4	Gaming income	Amount placed: FRW 500,000 Winning: FRW1,500,000 Taxable income: 1,000,000 – 500,000 = FRW 500,000 Withholding = (500,000 -30,000)15% = 70,500	**70,500**
5	Capital Gain	Proceeds: 5000*300=1,500,000 Cost: 500*200=1,000,000 Capital Gain: 500,000 Capital gain tax: 500,000*5/100=25,000	25,000
6	Interest income	6000,000 x 100/95 = 6,315,789 6,315,790 x 5% = 315,789	25,000 315,789
7	Dividend Income (Listed Company)	150 x 70,000 = 10,500,000 WHT =10,500,000 *5/100	525,000
8	Royalty Income (Copyright Sale)	10,000,000 x 15%: 1,500,000	1,500,000
9	Capital Gain (Listed Company - PQR Ltd)	Capital Gain on sales of shares: Exempted	Exempted

b) The following taxpayers are exempted from withholding taxes on sitting allowance, , on payment and on public tenders.

- Those whose business profit is exempted from taxation;
- Those who have tax clearance certificate issued by the tax administration.

QUESTION SIX

Marking Guide.

Descriptions	**Marks**
A	
Loss before tax	0.5
Add back non-allowable expenses	
Salary to housekeeper	0.5
Bad debt provision	0.5
Repair	0.5
WHT recorded	1
Training fees	1
Communication allowance	1
Interest expenses	0.5
WHT Duplicated	1
Donation	1
Total additions	
Less:	
VAT recognized on sales	1
Capital allowance	1
Nontaxable income	
Local dividend	1
Foreign dividend received net	1
Agriculture income	1
Add:	
Foreign dividend grossed	1
Total Deductions	
Adjusted taxable income	
Corporate income tax payable @ 30%	0.5
Less Tax paid at source	
WHT on importation	0.5
WHT on foreign dividend	0.5
Total Credit	
Sub Total	**15**
B.	
Award 0.5 mark for IQP computation and 0.5 Mark for each deadline	2
C	
Award 2 marks for a good explanation provided	2
D	
Award 1 mark for a good explanation provided	1
Total Marks	**20**

Model Answer

Loss before tax			(158,676,540)
Add back non allowable expenses			
Salary to house keeper	W3	322,000	
Bad debt provision	W4	5,800,000	
Repair	W5	20,000,000	
WHT recorded	W6	154,867,000	
Training fees	W7	6,890,000	
Communication allowance	W8	5,200,000	
Interest expenses	W9	16,000,000	
WHT Duplicated	**W10**	10,552,000	
Donation	W12	88,334,591	
Total additions			**307,965,591**
Less:			
VAT recognized on sales	W2	(130,099,805)	
Capital allowance	W13	(9,589,050)	
Nontaxable income			
Local dividend	W11	(25,678,000)	
Foreign dividend received net	W11	(124,000,000)	
Agriculture income	W1	(12,000,000)	
Add:			
Foreign dividend grossed		137,777,778	
Total Deductions			**(163,589,077)**
Adjusted taxable income			**(14,300,026)**
Corporate income tax payable @ 30%			-
Less Tax paid at source			
WHT on importation		154,867,000	
WHT on foreign dividend	W11	13,777,778	
Total Credit			**(168,644,778)**
Tax credit			**(168,644,778)**

Workings

1	Descriptions	Amount	Comments
	Agriculture revenue	38,543,000	
	Exempted income	12,000,000	Deduct back
	Income Variance	26,543,000	
2	Revenue adjustment		
	EBM Sales VAT inclusive	852,876,500	
	EBM Sales VAT exclusive	722,776,695	
	VAT incl	130,099,805	Deduct back
3	Salary to housekeeper	322,000	Add back
4	Bad debt provision	5,800,000	Add back

5	Repair	20,000,000	Add back
6	WHT recorded	154,867,000	Add back
7	Training fees	56,890,000	Add back
8	Communication allowance	5,200,000	Add back
9	Interest expenses	16,000,000	Add back
10	WHT Duplicated	10,552,000	Add back
11	Dividend received		
	Foreign dividends	124,000,000	Deduct Back
	Gross Dividend	137,777,778	Add back
	WHT paid	13,777,778	
	Local dividends	25,678,000	Deduct back
	Gross Dividend	30,209,412	
	WHT paid	4,531,412	
12	Donation Given	95,562,358	
	Turnover	722,776,695	
	1% of the turnover	7,227,767	
	Excess donation	88,334,591	Add back
13	Capital Allowance		
	Software Acquisition cost	89,000,500	
	Training cost	6,890,000	
	Total Costs	95,890,500	
	Depreciation	9,589,050	Deduct back

B.

The company will not pay income quarterly prepayment as it was in a loss position.
Income quarterly prepayment deadline is as follows:

- **Not later than 30th June of the following year**
- **Not later than 30th September of the following year**
- **Not later than 31st December of the following year**

C. Taxation of long-term contract is as follows:

- Business profits relating to a long-term contract are computed on the basis of the percentage of activities completed during any tax period.
- The percentage of activities completed during any tax period is determined by comparing the total expenses allocated to the contract and incurred before the end of the tax period with the estimated total contract expenses including any variations of fluctuations.
- A loss in a tax period in which a long-term contract is completed may be carried back and offset against previously taxed business profit from that contract to the extent it cannot be absorbed by business profit in the tax period of completion.

D. Taxation of the income from agriculture products is defined as follows:

- Income earned by an agriculturalist or a pastoralist on agricultural or livestock activities is exempt if the turnover from agricultural or livestock activities do not exceed twelve million Rwanda francs (FRW 12,000,000) in a tax period.
- In case the turnover exceeds twelve million Rwandan francs (FRW 12,000,000), the latter amount is excluded from the taxable income.

QUESTION SEVEN

Making Guide.

Descriptions	**Marks**
A	
Award 1 Mark for each definition	2
B	
i) Award 2 Marks for each point defined	8
ii) Award 2 Marks for each canon explained max 4	8
iv) Award 2 Marks for a well definition given	2
Total	**20**

Model Answers

a)

Tax avoidance is the legal minimization of tax liabilities while the tax evasion is illegal.
Tax evasion Tax evasion consists of seeking to pay too little tax by deliberately misleading RRA by either:
(a) suppressing information to which they are entitled (e.g. failing to notify RRA that you are liable to tax, understating income or gains or omitting to disclose a relevant fact, e.g. that business expenditure had a dual motive), or

(b) Providing them with deliberately false information (eg deducting expenses which have not been incurred or claiming capital allowances on plant that has not been purchased).

b).
i.
The taxable capacity of a country is determined by a number of factors. the main factors are:

(i) **Size of income and wealth:** generally, the larger wealth and income of the country, greater is its taxable capacity. Hence rich nations have a higher taxable capacity than poor nations.

(ii) **Stability and Growth of income:** basically, if the economy operates smoothly and progresses well, and ensures a stable and growing income, the taxable capacity of the community will be higher.

But it here is fluctuations with serious ups and downs, and especially during a depression, taxable capacity will obviously be lower.

(iii) **Standard of living of the people the standard of living determines the consumption pattern and habit of the community.** A community accustomed to greater needs as satisfaction on account of living, cannot bear great sacrifice in paying taxes, hence its taxable capacity will be less. But if the standard of living is low, there is a greater surplus available for taxation, so that taxable capacity will be high.

(iv) **Price level:** if the price level is reasonably low and stable, a high income means greater taxable capacity. But, if prices are rising fast, a very high income may also pose a low capacity in real terms.

(v) **Characteristics of the tax system:** a multiple tax system has a greater advantage of enlarging the overall taxable capacity than a single tax system.

(vi) **Nature and purpose public expenditure**: public expenditure is largely for developmental schemes the productivity power of the country improves and order is very essential for improving taxable capacity enlarges. Further taxation intended for financing capital formation is therefore quite justified as it raises the taxable capacity in effect.

(vii)**Political condition:** Generally, when people appreciate the government, they will be willing to undergo many hardships and bear heavier taxes to in order to enable the government to undertake welfare measures beneficial to the common people, hence the taxable potential automatically expands.

ii.

The following are some of the principles of taxation:

The Principle of Legality

The principle of legality in tax matters provides the basis for the safeguarding of taxpayer's rights because it means that the public authorities cannot act in an arbitrary fashion. This principle is enshrined in the constitutions of many countries. "No taxation can be imposed, modified or removed except by law ". In a similar way the second subparagraph states that: "No exemption from or reduction of tax may be granted unless authorized by law.

The Principle of Equality

All human beings are equal before the law. They shall enjoy, without any discrimination, equal protection of the law". The principle of equality as far as tax is concerned has a role to play in the essential characteristics of the law and, in particular, defines that taxation must be applied impersonally to all individuals regardless of their status or background.

Principle of certainty

The certainty principle is very important in tax affairs. Taxpayers should be able to anticipate the possible amount of their tax obligations and plan for payment of them in due course. For this reason, tax rates should be relatively stable from year to year and should not be subject to sudden fluctuations. This allows people to undertake their own financial planning knowing the basic tax liabilities they are likely face in the coming year.

Principle of Adequacy

Taxes should be just enough to generate the revenue required for the provision of essential public services.

iii.

The tax incidence differentiates between those who have the liability to pay a particular tax and those who suffer the economic incidence or burden of the tax.

In determining tax incidence, it depends on a good understanding of how various markets operate in a given economy, particularly the ability of different kinds of taxpayers to shift the cost of the tax to other economic actors.

The person who bears taxes depends on the relative supply and demand elasticity of consumers and suppliers. In many cases, the tax burdens fall on individuals in their role as consumers, producers and factor suppliers, not on companies or other institutions.

For example, although the VAT law requires firms to pay VAT to the government, in practice the real economic incidence of VAT falls on the consumer. Companies will be required by law to add on VAT to their selling prices.

END OF THE MARKING GUIDE AND MODEL ANSWERS