Report under The Conservation of Habitats and Species Regulations 2017 (as amended), Regulation 9A

2019-2024

Conservation status assessment for the habitat:

H8240 - Limestone pavements

Wales

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JNCC

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This report was produced by JNCC in collaboration with Natural Resources Wales.

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Important note - Please read

- The information in this document represents Wales Report under The Conservation of Habitats and Species Regulations 2017 (as amended), Regulation 9A, for the period 2019-2024.
- It is based on supporting information provided by Natural Resources Wales, which is documented separately.
- The Habitats Regulations reporting 2019-2024 Approach Document provides details on how this supporting information contributed to the UK Report and the fields that were completed for each parameter.
- Maps showing the distribution and range of the habitat are included.
- Explanatory notes (where provided) are included at the end. These provide additional audit trail information to that included within the assessments. Further underpinning explanatory notes are available in the related country reports.
- Some of the reporting fields have been left blank because either: (i) there was insufficient information to complete the field; (ii) completion of the field was not obligatory; and/or (iii) the field was not relevant to this habitat (section 11 National Site Network coverage for Annex I habitats).

Further details on the approach to the Habitats Regulations Reporting 2019-2024 are available on the JNCC website.

Assessment Summary: Limestone pavements

Distribution Map

Range Map

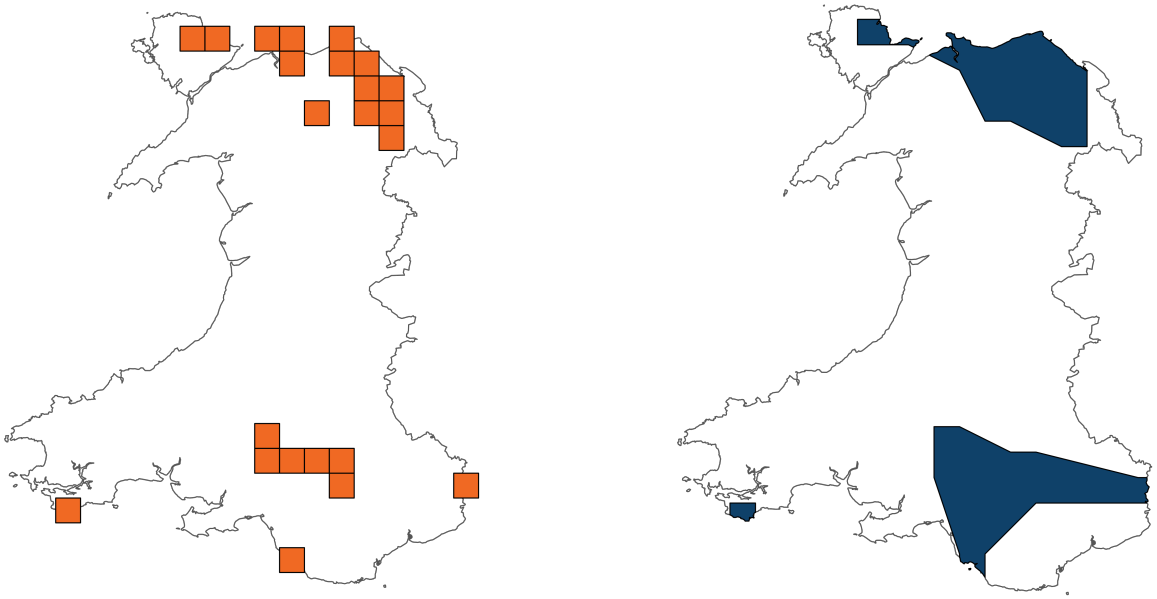

Figure 1: Wales distribution and range map for H8240 - Limestone pavements. Coastline boundary derived from the Oil and Gas Authority's OGA and Lloyd's Register SNS Regional Geological Maps (Open Source). Open Government Licence v3 (OGL). Contains data © 2017 Oil and Gas Authority. The 10km grid square distribution map is based on available habitat records within the current reporting period.

Table 1: Table summarising the conservation status for H8240 - Limestone pavements. Overall conservation status for habitat is based on assessments of range, area covered by habitat, structure and functions, and future prospects.

Overall Conservation Status (see section 10)

Unfavourable-inadequate (U1)

Breakdown of Overall Conservation Status

Range (see section 4)	**Favourable (FV)**
Area covered by habitat (see section 5)	**Favourable (FV)**
Structure and functions (see section 6)	**Unknown (XX)**
Future prospects (see section 9)	**Unfavourable-inadequate (U1)**

List of Sections

National Level

1. General information

1.1 Country	Wales
1.2 Habitat code	H8240 - Limestone pavements

2. Maps

2.1 Year or period	1979-2024
2.2 Distribution map	Yes
2.3 Distribution map; Method used	Complete survey or a statistically robust estimate

2.4 Additional information

No additional information

Biogeographical Level

3. Biogeographical and marine regions

3.1 Biogeographical or marine region where the habitat occurs	ATL

3.2 Sources of information

See section 13 References

4. Range

4.1 Surface area (km²)	3,987.32
4.2 Short-term trend; Period	1991-2024
4.3 Short-term trend; Direction	Stable
4.4 Short-term trend; Magnitude	

a) Estimated minimum

b) Estimated maximum	
c) Pre-defined range	
d) Unknown	
e) Type of estimate	
f) Rate of decrease	
4.5 Short-term trend; Method used	Complete survey or a statistically robust estimate
4.6 Long-term trend; Period	1975-2024
4.7 Long-term trend; Direction	Stable
4.8 Long-term trend; Magnitude	
a) Minimum	
b) Maximum	
c) Rate of decrease	
4.9 Long-term trend; Method used	Based mainly on extrapolation from a limited amount of data

4.10 Favourable Reference Range (FRR)

a) Area (km²)	
b) Pre-defined increment	Current range is less than 2% smaller than the FRR
c) Unknown	No
d) Method used	Reference-based approach
e) Quality of information	moderate

4.11 Change and reason for change in surface area of range

a) Change	No
b) Genuine change	
c) Improved knowledge or more accurate data	

d) Different method	
e) No information	
f) Other reason	
g) Main reason	

4.12 Additional information

No additional information

5. Area covered by habitat

5.1 Year or period	1979-2024
5.2 Surface area (km²)	
a) Minimum	
b) Maximum	
c) Best single value	0.7773
5.3 Type of estimate	Best estimate
5.4 Surface area; Method used	Complete survey or a statistically robust estimate
5.5 Short-term trend; Period	2001-2024
5.6 Short-term trend; Direction	Stable
5.7 Short-term trend; Magnitude	
a) Estimated minimum	
b) Estimated maximum	
c) Pre-defined range	
d) Unknown	
e) Type of estimate	
f) Rate of decrease	
5.8 Short-term trend; Method used	Based mainly on expert opinion with very limited data
5.9 Long-term trend; Period	1989-2012

5.10 Long-term trend; Direction	Decreasing
5.11 Long-term trend; Magnitude	
a) Minimum	
b) Maximum	
c) Confidence interval	
d) Rate of decrease	Decreasing <=1% (one percent or less) per year on average
5.12 Long-term trend; Method used	Based mainly on expert opinion with very limited data

5.13 Favourable Reference Area (FRA)	
a) Area (km²)	
b) Pre-defined increment	Current area is less than 2% smaller than the FRA
c) Unknown	No
d) Method used	Reference-based approach
e) Quality of information	moderate

5.14 Change and reason for change in surface area of range

a) Change	Yes
b) Genuine change	No
c) Improved knowledge or more accurate data	Yes
d) Different method	No
e) No information	No
f) Other reason	No
g) Main reason	Improved knowledge/more accurate data

5.15 Additional information

No additional information

6. Structure and functions

6.1 Condition of habitat (km²)	
Area in good condition	
ai) Minimum	0
aii) Maximum	0
Area not in good condition	
bi) Minimum	0
bii) Maximum	0
Area where condition is unknown	
ci) Minimum	0.7773
cii) Maximum	0.7773
6.2 Condition of habitat; Method used	Insufficient or no data available
6.3 Short-term trend of habitat area in good condition; Period	
6.4 Short-term trend of habitat area in good condition; Direction	Unknown
6.5 Short-term trend of habitat area in good condition; Method used	Insufficient or no data available
6.6 Typical species	
Has the list of typical species changed in comparison to the previous reporting period?	No
6.7 Typical species; Method used	

6.8 Additional information

Typical species were not used directly in the assessment of conservation status for habitat structure and function as a comprehensive list of typical species for each habitat was not available. However, the status of typical species was considered when the

condition of individual sites was assessed using Common Standards Monitoring Guidance. Common Standards Monitoring (CSM) data was used to assess the area of habitat in ‘good’ and ‘not good’ condition (field 6.1). Species were a component of the attributes assessed under CSM. Therefore, an assessment of species is considered to have formed part of the reporting under field 6.1 which supported the Habitats Structure and Function assessment (field 10.3).

7. Main pressures

7.1 Characterisation of pressures

Table 2: Pressures affecting the habitat, including timing and importance/impact ranking. Pressures are defined as factors acting currently and/or during the reporting period (2019–2024). Rankings are: High (direct/immediate influence and/or large spatial extent) and Medium (moderate direct/immediate influence, mainly indirect and/or regional extent).

Pressure	Timing	Ranking
PA01: Conversion into agricultural land (excluding drainage and burning)	Ongoing and likely to be in the future	Medium (M)
PA07: Intensive grazing or overgrazing by livestock	Ongoing and likely to be in the future	High (H)
PA13: Application of natural or synthetic fertilisers on agricultural land	Ongoing and likely to be in the future	Medium (M)
PC01: Extraction of minerals (e.g. rock, metal ores, gravel, sand, shell)	Ongoing and likely to be in the future	Medium (M)
PK03: Mixed source air pollution, air-borne pollutants	Ongoing and likely to be in the future	High (H)
PM07: Natural processes without direct or indirect influence from human activities or climate change	Ongoing and likely to be in the future	High (H)

7.2 Sources of information

See section 13 References

7.3 Additional information

No additional information

8. Conservation measures

8.1: Status of measures

a) Are measures needed?	Yes
b) Indicate the status of measures	Measures identified and taken
8.2 Main purpose of the measures taken	Maintain the current range, surface area or structure and functions of the habitat type
8.3 Location of the measures taken	Both inside and outside National Site Network
8.4 Response to measures	Medium-term results (within the next two reporting periods, 2025–2036)

8.5 List of main conservation measures

Table 3: Key conservation measures addressing current pressures and/or anticipated threats during the next two reporting periods (2025–2036). Measures are ranked by importance/impact: High (direct/immediate influence and/or large spatial extent) and Medium (moderate direct/immediate influence, mainly indirect and/or regional extent).

Conservation measure	Ranking
MA04: Reinstate appropriate agricultural practices to address abandonment, including mowing, grazing, burning or equivalent measures	Medium (M)
MA05: Adapt mowing, grazing and other equivalent agricultural activities (e.g. burning)	High (H)
MA09: Manage the use of natural and synthetic fertilisers as well as chemicals in agricultural for plant and animal production	Medium (M)
MC01: Adapt/manage extraction of non-energy resources	Medium (M)
MI03: Management, control or eradication of other invasive alien species	Medium (M)

8.6 Additional information

Only part of the measures identified have been taken.

9. Future prospects

9.1a Future trends of parameters

ai) Range	Overall stable
bi) Area	Overall stable
ci) Structure and functions	Negative - slight/moderate deterioration

9.1b Future prospects of parameters

aii) Range	Good
bii) Area	Good
cii) Structure and functions	Poor

9.2 Additional information

No additional information

10. Conclusions

10.1 Range	Favourable (FV)
10.2 Area	Favourable (FV)
10.3 Specific structure and functions (incl. typical species)	Unknown (XX)
10.4 Future prospects	Unfavourable-inadequate (U1)
10.5 Overall assessment of Conservation Status	Unfavourable-inadequate (U1)
10.6 Overall trend in Conservation Status	Stable

10.7 Change and reason for change in conservation status

This field is not reported as the period 2019-2024 marks the first instance in which conservation status has been assessed at the national level, meaning no comparisons to previous reports can be drawn.

10.7 Change and reason for change in conservation status trend

This field is not reported as the period 2019-2024 marks the first instance in which conservation status has been assessed at the national level, meaning no comparisons to previous reports can be drawn.

10.8 Additional information

No additional information

11. UK National Site Network (pSCIs, SCIs, SACs) coverage for Annex I habitat types

11.1 Surface area of the habitat type inside the pSCIs, SCIs and SACs network (km^2)

a) Minimum	
b) Maximum	
c) Best single value	0.0313
11.2 Type of estimate	Best estimate
11.3 Habitat area inside the network; Method used	Complete survey or a statistically robust estimate
11.4 Short-term trend of habitat area within the network; Direction	Stable
11.5 Short-term trend of habitat area within the network; Method used	Based mainly on extrapolation from a limited amount of data
11.6 Short-term trend of habitat area in good condition within the network; Direction	Uncertain
11.7 Short-term trend of habitat area in good condition within the network; Method used	Insufficient or no data available

11.8 Additional information

No additional information

12. Complementary information

12.1 Justification of percentage thresholds for trends

No justification information

12.2 Other relevant information

No other relevant information

13. References

Biogeographical and marine regions

3.2 Sources of information

Blackstock T. H., Howe E. A., Stevens J. P., Burrows C. R. & Jones P. S. 2010. Habitats of Wales. A comprehensive field survey 1979–1997. University of Wales Press, Cardiff.

Conway J. & Onslow E. 1999. The impact of grazing management on limestone pavements in Wales. CCW Science report 346.

Deacon J. 1997. Identification of Limestone pavements in Wales and their Flora. CCW Science report 159.

Ellis G. 2007. Brecon Beacons Limestone Pavement Survey. Brecon Beacons National Park Authority.

Guest D. 2012. Assessing pressures and threats for article 17 reporting based on information in CCW's Actions Database. CCW HQ internal document.

Jones P.J., Stevens D.P., Blackstock T.H., Burrows C.R. and Howe E.A. 2003 Priority Habitats of Wales: a technical guide. CCW.

Natural Resources Wales. 2024. SAFLE: NRW statutory sites actions database. Internal data source.

Rothwell J. & Smith S. 2024. H8420 Limestone Pavements: Wales GIS inventory. NRW HQ dataset.

Smith, S. 2024. Limestone pavement site visit: Moelfre SH514868. Unpublished NRW file note.

Stevens, C. 2025. Large changes in vegetation composition seen over the last 50 years in British limestone pavements. Functional Ecology. 39: 128-139.

Stevens D. P. Smith S. L. N. Blackstock T. H. Bosanquet S. D. S. & Stevens J. P. 2010. Grasslands of Wales. A survey of lowland species-rich grasslands, 1987–2004. University of Wales Press, Cardiff.

Stevens J. & Smith S. 2012. H8420 Limestone pavements: Wales GIS inventory. NRW HQ dataset.

Ward, S.D. & Evans, D.F. 1975. A botanical survey and conservation assessment of British limestone pavements (9 volumes). Institute of Terrestrial Ecology, Bangor.

Main pressures

7.2 Sources of information

No sources of information

14. Explanatory Notes

Field label	Note
2.3: Distribution map; Method used	The distribution (and extent) of H8240 has been calculated from seven different data sources, four of which provide extent data. The two main sources were (1) the Phase 1 Habitat Survey of Wales (Blackstock et al., 2010), a comprehensive field-by-field survey of the region, and (2) the Phase 2 Lowland Grassland Survey of Wales (Stevens et al., 2010; plus updates), which focussed on lowland grasslands of conservation interest. Examples mapped by these surveys generally have a well-defined clint-grike structure. (3) A survey, focussed specifically on the habitat within the Brecon Beacons National Park (Ellis, 2007), was more inclusive, mapping degraded/broken and largely soil-infilled areas of pavement in addition to more typical examples. Ellis mapped the habitat at eight sites where limestone pavement had been previously recorded by the Phase 1 habitat survey between 1988 and 1993 and re-found the habitat at each one. (4) Smith (2024) remapped one limestone pavement Regionally Important Geological Site (RIGS) in 2024 to provide data more accurately fitting the H8240 definition. Three further data sources, providing point records, are: - (5) Eight sites mapped as RIGS. These comprise mapped polygons but encompass larger areas than the H8240 definition, so would require more refined mapping before being included in the polygon layer. - (6) The Priority Habitats of Wales (Jones et al., 2003). - (7) NRW sites database SAFLE record for Arfordir Gogleddol Penmon SSSI (NRW, 2024).

	Records from the seven sources were incorporated into a GIS inventory for H8240 (Rothwell & Smith, 2024; based on Stevens & Smith, 2012), with separate layers for mapped polygons and points. Only the mapped habitat polygons provide the extent data given in 5.2. Point records for the habitat were checked against records in Deacon (1997), which also provides point locations, and CCW SSSI records. Point records were also checked against Stevens (2025), who revisited 23 examples of the habitat mapped by Ward and Evans (1975) and refound it at 22 of them. The distribution data sources together offer complete coverage of the region. There is, however, a likelihood of small areas of the habitat, especially examples within a dense woodland setting, having been overlooked, although it is unclear whether these would affect 10 km distribution.
4.3: Short-term trend; Direction	Although most of the data on which range assessment is based is over 20 years old (see 2.3), more recent site visits (e.g. Ellis, 2007; Stevens, 2023; Smith, 2024) largely confirm the continued presence of the habitat at former locations and there is no indication of any actual recent change in range. Site visits by Ellis in 2007 confirmed the presence of the habitat in a total of six 10km squares in BBNP, and Stuart Smith confirmed (during site visits) the presence of limestone pavement in six 10km squares in north Wales in the previous reporting round; these visits together confirm the presence of the habitat in 52% of the Welsh squares between 2007 and 2012. In 2023, Stevens visited 23 examples of the habitat mapped by Ward and Evans (1975) and refound it at 22 of them (Stevens, 2025).
4.7: Long-term trend; Direction	Deacon noted loss at two sites to quarry expansion in the mid 1990's (Deacon, 1997) and one further probable loss of

	the habitat is noted in CCW files. Stevens (2025) noted loss of one site, occurring sometime between 1975 and 2000. These losses suggest a long-term negative trend locally, but none has affected 10 km square distribution which is thus tentatively considered stable over the long term.
4.11: Change and reason for change in surface area of range	No new data since the 2007-2012 reporting period.
5.1: Year or period	Most of the data for assessing H8240 area are more than 20 years old (see 2.3), there is some more recent data from Ellis (2007), Stevens (2025) and Smith (2024), as well as some small updates to the Lowland Grassland Survey of Wales dataset. Together these cover a fair subset of the resource and fail to detect any recent change in the habitat's area.
5.4: Surface area; Method used	The given total surface area is considered to be a fairly good reflection of the habitat's presence in the region. The habitat extent is derived from comprehensive survey coverage, although, as discussed in section 2.3, there may be some small unmapped areas of the habitat, so it may be a slight underestimate. In addition, a number of known localities are currently represented in the distribution (Rothwell & Smith, 2024) only by point data, so currently add nothing to the area figure. Overall, it is thought that the great majority of the habitat has been accurately mapped and included in the extent figure (5.2).
5.5: Short-term trend; Period	Revisits to sites in the 2007-24 period (see 2.3) have confirmed continued presence of the habitat, although actual remapping is very limited. However, no actual losses in area of the habitat have been noted in the period, which is therefore tentatively considered as stable.
5.6: Short-term trend; Direction	See text under 5.5
5.10: Long-term trend; Direction	There are no comprehensive data on change in the 1989-2012 period, but Deacon noted loss at two sites to quarry expansion in the mid 1990's (Deacon, 1997) and one further probable loss of the habitat is noted in NRW

	files. These losses suggest a small negative long-term trend.
6.2: Condition of habitat; Method used	H8240 is listed as a qualifying feature on four SSSI in Wales, but is not a feature on any SAC; however, there has been no recent monitoring of the habitat on SSSI in Wales. Some indications of condition of the wider resource are given by Stevens (2025) re visited 23 H8240 sites mapped in the early 1970's (Ward & Evans, 1975) and noted increased cover of grasses (notably Festuca ovina and Holcus lanatus), suggesting overgrazing and/or enrichment; and Ellis (2007), who related widespread poor pavement condition in Bannau Brycheiniog to overgrazing and associated enrichment (including widespread nettles and thistles in grikes) and physical damage by stock. However, in the absence of better quality and more recent information, current condition for all of the habitat is listed a unknown.
6.5: Short-term trend of habitat area in good condition; Method used	See 6.2
7.1: Characterisation of pressures	(see method below) PA07 – intensive grazing (HIGH). Recorded as an issue for 61% of SSSI management units with the habitat. Overgrazing by sheep is prevalent in the Brecon Beacons (Ellis, 2007). PK03 - air pollution, air-borne pollutants (HIGH). On a GIS system, the area of the habitat was overlaid onto Nitrogen exceedance data at 5 km resolution (2009 data): exceedance of the provisional Critical Load of 15kg N/ha/yr was then calculated as being across 96% of the habitat. PM07 – natural succession (HIGH). Recorded as an issue for 61% of SSSI management units with the habitat. Stevens (2025) recorded decline in species richness following expansion of scrub/trees on pavements.

PA13 – fertilisation (MEDIUM). Enrichment remains a threat to the habitat (Ellis, 2007) and fertilisation could result in a permanent loss of characteristic species. This could include 'nutrient transfer' where fertilised pastures are grazed alongside semi-natural grassland and pavement. Mainly non-SSSI.

PC01 – extraction of minerals (MEDIUM). Two examples of loss to quarry expansion in the mid 1990's (Deacon, 1997) and one probable loss around 2000 (CCW files). Apparently now much less of an issue (e.g. Ellis, 2007), but potential to cause complete loss of the habitat.

PA01 – conversion into agricultural land (LOW). Agricultural intensification appears not to be a major pressure at present and H8240 will receive some protection from EIA (Agri) Regulations, but small unprotected lowland examples could be vulnerable.

PA10 – stock feeding (LOW). Farmers may view the habitat as providing good hard-standing for stock during winter.

PF05 – recreation damage (LOW). Highlighted for 16% of units, although effect localised and may not be on the H8240 habitat.

PK05 – waste dumping (LOW). Highlighted for 6% of units.

PI02 – invasive non- native species (LOW). Includes Cotoneaster spp and conifers. Mentioned as an issue for 13% of SSSI management units with the habitat, but mainly on associated areas of calcareous grassland.

PI03 – problematic native species (LOW). Bracken encroachment an issue on about 20% of SSSI management units, but mainly on deeper soils not

associated with the habitat. Also mentioned as an occasional issue by Ellis (2007).

PJ10 – change in habitat quality due to climate change (LOW). Limestone pavements are considered 'relatively resilient' to the effects of climate change, although vulnerability is increased when poorly managed (Staddon et al., 2023).

Method:

Data held in CCW's Special Sites ”Actions Database', which provided information on ”issues' affecting habitats and species within the protected sites series in Wales, were used to provide a basis for quantifying pressures/threats relating to the habitat within protected sites during the previous reporting round. No updated data were available for the current round.

Data were provided at a ”feature' level; examples of H8240 habitat fall within the ”natural inland rock exposures, screes & upland ledges' feature type, which also includes other rock formations such as scree.

A list of all of the SSSI management units with ”natural inland rock exposures, screes & upland ledges' listed as a ”key habitat' or ”compatible feature' was obtained, and then abridged to include only those units where limestone pavement is known to occur (using Stevens and Smith, 2012). A list of all the issues affecting these units was then compiled and counts made of how frequently each issue was highlighted. Issues were considered for their relevance to the habitat, with reference to summary information held in the Database (see Guest (2012a) for more details). The ”special sites' (SSSI/SAC) account for 53% of the H8240 resource in Wales by area (where regarded as a ”feature').

To supplement information from the Actions Database, a range of other sources were checked, including Ellis

	(2007), Jones et al., (2003), Conway and Onslow (1999) and Stevens (2025). Air pollution (N deposition) is assessed separately using the agreed approach. No critical load level has been assigned to this habitat and so a provisional load of 15kg N/ha/yr was adopted. Related habitats include H6210, which has a given load of 15kg N/ha/yr, H6230, which has a given load of 10kg N/ha/yr, and woodland habitats, which have loads ranging from 5 to 15kg N/ha/yr. The N depositions results for H8240 should therefore be considered a conservative estimate of pressure/threat. No new assessment was undertaken in the current reporting round.
8.5: List of main conservation measures	Management actions recorded in NRW's Actions Database were assessed during the last reporting round to provide information on conservation measures. 4% of the habitat is on SAC, but none is a SAC feature. 53% of the habitat resource by area is contained within SSSI. Notes specific to conservation measures: Overgrazing, with associated enrichment, and spread of scrub/trees (including non-native Cotoneaster and conifer species) appear to be the main issues needing addressing. Most sites are maintained by grazing management, which helps to limit successional change. Scrub/tree control has been undertaken on some sites. Tree clearance is undertaken on some woodland sites to maintain an open canopy. SSSI legislation, listing as Regionally Important Geological and Geomorphological Sites (RIGS), and implementation of EIA (Agri) Regulations help to protect the habitat from complete destruction by rock removal. However, no Limestone Pavement Orders are present in Wales so

	examples outside statutory sites remain vulnerable to rock removal.
10.1: Range	Conclusion on Range reached because: (i) the short-term trend direction in Range surface area is stable; and (ii) the current Range surface area is approximately equal to the Favourable Reference Range.
10.2: Area	Conclusion on Area reached because:(i) the short-term trend direction in Area is stable; (ii) the current Area is approximately equal to the Favourable Reference Area; and iii) there is no evidence for a significant change in distribution pattern within range
10.3: Specific structure and functions	Conclusion on Structure and function reached because the condition of the habitat is unknown as 100% of the habitat has 'unknown' condition.
10.4: Future prospects	Conclusion on Future prospects reached because: (i) the Future prospects for Range are good; (ii) the Future prospects for Area covered by habitat are good; and (iii) the Future prospects for Structure and function are poor.
10.5: Overall assessment of Conservation Status	Overall assessment of Conservation Status is Unfavourable-inadequate because one of the conclusions is Unfavourable-inadequate.
11.3: Surface area of the habitat type inside the network; Method used	The area figure given in 11.1 was produced by overlaying the H8240 GIS inventory (Stevens & Smith, 2012) with SAC boundaries.
5.13: Favourable Reference Area (FRA)	The UK-level FRV for surface area was developed by JNCC using an audit trail based on the year the FRV was first established and any changes made in subsequent reporting rounds. The audit may draw from any combination of the 2007, 2013, or 2019 Habitats Directive reports and reflects the full rationale used for the 2019 Article 17 reporting. This FRV was reviewed by Welsh experts and considered appropriate for use in Wales based on current habitat extent and trends.

4.10: Favourable Reference Range (FRR)	The UK-level FRV for range was developed by JNCC using an audit trail based on the year the FRV was first established and any changes made in subsequent reporting rounds. The audit may draw from any combination of the 2007, 2013, or 2019 Habitats Directive reports and reflects the full rationale used for the 2019 Article 17 reporting. This FRV was reviewed by Welsh experts and considered appropriate for use in Wales based on current distribution and trends.