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Submission: To meet the Fit for Future requirements, it is necessary that the benchmarks are achieved in the 5th year based on a 3 year average.

The 3 year average means that you would need to achieve the benchmarks after approximately 2.5 years (ie achieve for 2018, 2019 and 2020).

It seems unreasonable to provide such a short timeframe due to the averaging methodology.

It would seem more reasonable to achieve the benchmarks by the 5th year.