

# Graphite



Methodology and price  
specifications – May 2026

## Mission statement

Fastmarkets Metals, Minerals And Mining is the leading global provider of pricing intelligence for the non-ferrous metal, steel, steelmaking raw materials, industrial minerals, ferrous and non-ferrous scrap markets, producing price assessments via Fastmarkets MB and Fastmarkets AMM since 1913 and 1882 respectively.

Fastmarkets Forest Products is the leading global provider of pricing intelligence for the global forest products industry, incorporating Fastmarkets RISI, Fastmarkets FOEX and Random Lengths.

And Fastmarkets Agriculture Products has delivered pricing transparency to opaque agriculture and energy markets in the form of market-moving reporting and commentary, trusted pricing and price forecasting since 1865.

Our mission is to meet our markets' data requirements honestly and independently, acting with integrity and care to ensure that the trust and confidence placed in the reliability of our pricing methodologies is maintained. We do not have a vested interest in the markets on which we report.

## Introduction

Fastmarkets' reporters are required to abide by a **code of conduct** and clear pricing procedures during their market reporting and pricing activities. Fastmarkets is completely independent and has no vested commercial interest in any of the markets it prices.

We are the world's largest dedicated price-reporting team for metals and minerals, agricultural products and forest products. We have hubs in London, New York, Boston, San Francisco, Eugene, Charlottesville, Atlanta, Pittsburgh, Memphis, Sao Paulo, Beijing, Shanghai, Hong Kong, Singapore, Malaysia, Melbourne, Mumbai, Istanbul, Brussels and Helsinki.

The aim of this document is to provide a clear overview of Fastmarkets' methodology and specifications for the prices it assesses. If you have any questions, please use the contacts portion of this guide to reach out to us directly.

# Price discovery and methodology

## Methodology rationale

Fastmarkets produces independent, fair and representative price assessments and indices of metals and forest products prices on a daily, bi-weekly, weekly, monthly or quarterly basis. Fastmarkets' rationale for adopting the price-discovery process described in this methodology document is to produce consistent and representative indicators of value for the graphite markets over defined trading periods.

## Assessment objective

The assessor's intended aim is to reflect Fastmarkets' assessment price definition:

'The prevailing level at which a commodity of stated specification has or could be expected to have transacted over a defined period of time.'

We summarize this for effective use as the prevailing 'tradeable level' of the market.

## Time window

The windows for Fastmarkets' graphite assessments were determined after considering the number of data points that Fastmarkets can reasonably expect to collect on a consistent basis over the selected period to support the price assessment process, ensuring that the assessments produced are reliable indicators for the physical markets they relate to.

Fastmarkets' graphite assessments are published by 4pm London time and the deadline for data submission is 3pm London time.

The data collection window runs from the time of the submission deadline of the last price assessment to 3pm on the day of the next assessment. Only data points communicated to Fastmarkets within the data collection window will be included in the price discovery process. The published prices are reflective of the levels seen during this stated collection period.

## Data contribution

Fastmarkets reporters aim to collect data from a broad sample of market participants involved in the physical graphite markets, with a good representation of both sides of the market, including producers and consumers, as well as traders and intermediaries.

Data is collected from industry participants directly

involved in the market primarily by telephone but also by email, digital messaging, face-to-face interaction or by direct submission. All data supplied to Fastmarkets is kept confidential and stored in our secure online pricing database system MInD (Market Information Database). Fastmarkets may sign a Data Submitter Agreement (DSA) with any data provider, if requested to do so, to maximize the number of data points collected for inclusion in the assessment process. Any data received subject to a DSA will be used in the pricing assessment but will not be commented on.

Market participants may contribute data following a review by Fastmarkets of their activities. The aim is to ensure that submitters have sufficient visibility and understanding of the market in question to be able to provide reliable price data. We expect that data submitters taking part in the pricing process are authorized to report market data on behalf of their organizations. Fastmarkets encourages organizations to submit all their pricing data, especially all the concluded transactions. Price reporters generally speak to, and collect data from, front office staff directly involved in the commercial activity of buying and selling. Fastmarkets also welcomes organizations to submit transaction data from authorized back-office functions. Fastmarkets' Data Submitter Policy provides guidelines to ensure the high level of data quality and integrity we expect from contributing organizations providing pricing data. The policy can be found on Fastmarkets' website, or is available on request.

Depending on market liquidity, Fastmarkets reserves the right to also base its prices on bids, offers, deals heard and market participant indications of prevailing tradeable values or other indications such as trigger prices that might prompt a sale or purchase.

## Price specifications and reference units

Fastmarkets has clear specifications for all the price points that it covers. All the reference units, such as currency and volume, are in line with the trading conventions used in the recognized metals and forest products markets.

Fastmarkets has defined clear specifications for its graphite assessments, as outlined below, to match the industry standard. These specifications have been determined in consultation with market participants and are regularly reviewed. All the reference units, such as currencies and volumes used in the assessments, are in line with recognized graphite market conventions and trading practices. The specifications also have a published minimum volume size accepted.

Fastmarkets aims to collect full details of each transaction, bid and offer, including brand, commercial terms and any other details relevant to value and pricing. Reporters ensure that the information they receive meet the specifications or can be normalized to them. Any data that does not fall within the stated quality ranges of the specification will not be eligible for consideration in the assessment.

## Data analysis and producing the price assessment

### **Establishing a data hierarchy**

Once data collection is complete, Fastmarkets reviews the data points applying its methodology and its expert judgment to set the price range to reflect the representative spread of prices at which business has been transacted, offered or bid, or indicated in the absence of business.

To produce the price assessment, a consideration hierarchy is established based on an evaluation of first, the reporter's confidence in the data's reliability, and second, the significance of the data.

The confidence level, or trustworthiness, of a data point is generally based on the transparency of the activity whether it was reported by a party directly involved or was 'heard' activity, corroboration by other market participants and the level of detail provided by the data submitter, although there may be other contributory factors.

For indications of tradeable levels or other indication of willingness to sell or purchase, confidence may be determined based on the justification provided by the submitter, their visibility and activity level in the market, and their prior reliability.

The significance of a data point is determined based on its effectiveness in identifying the tradeable level of the market under assessment. Transactions are considered highest in the significance hierarchy, 'tight' bids/offers are of secondary importance, followed by data sources' own indications of a tradeable level when they have no business to report. Tight bids/offers are typically defined as those being within the range of transaction and/or indication data points, thereby helping narrow our assessment of the tradeable range. More speculative bids/offers, outside of the range of other data, would typically be of lowest significance. In some circumstances, firm bids higher than transactions or offers lower than transactions may be considered of high significance if deemed to demonstrate a clear directional change in market floor or ceiling levels.

The published assessment will typically be reflective of the highest-confidence and highest-significance data collected in that pricing session.

In pricing sessions with little or no data of sufficient quality, extra caution will be applied and reporters may exercise their judgment to keep a price assessment unchanged as a fallback until activity can be confirmed with greater certainty.

All Fastmarkets price specifications define the minimum lot size accepted. When volume information is available, this is also taken into consideration in the assessment process. As a general rule, larger deals may typically be considered more significant, but Fastmarkets also tries to ascertain what sort of price differential different lot sizes might carry.

Fastmarkets will also compare the information received from a single source with the information provided by the same source in the previous pricing cycle. This way, if a source consistently gives lower or higher indications than the consensus, Fastmarkets can still use the data for directional context without it unduly influencing the assessment.

### **Normalization**

Where necessary in certain assessments, data that falls within the stated specification ranges for consideration may be normalized to determine the equivalent price for the respective base specification if one exists. This

may include, for instance, variances in material type or quality, delivery terms of location, payment terms or cargo size.

A typical example would be a price that is either netback or net-forward due to delivery terms different from Fastmarkets' specification.

Where prices cannot be normalized with sufficient confidence or precision, such data may be discarded from the assessment. Fastmarkets' aim is to balance the requirement to keep assessments reflective of their base specifications with the need to source a sufficiently robust data set for consideration.

#### **Minimum data threshold**

In order to provide a representative price for the market, the price reporter aims to collect as many representative data points as possible within the defined window. Since commodity markets differ in liquidity levels at different periods, the methodology does not set any minimum number, or threshold, of transactions to be gathered on which to base the assessment. A pricing session typically includes concluded transactions, bids and offers, contributors' market indications or deals heard.

In each pricing session, reporters aim to source data from a suitably diverse set of participants from a cross section of the market (producers, consumers, traders). In the unlikely situation that more than half of the pricing data collected in a session is provided by a single source, the assessor may refer to data collected in the previous pricing session to avoid a dependency on a single entity providing an unacceptably significant (50% or more) proportion of data.

#### **Criteria for discarding pricing data and the removal of outliers**

Fastmarkets price assessments are intended to reflect the 'open and competitive' market level. Reporters therefore may apply expert judgment to exclude data deemed unrepresentative, questionable or unreliable prior to consideration in the final assessment. Data that falls outside of the respective assessment specifications, or which cannot be normalized to a base specification with sufficient confidence, is also discarded. Decisions to discard data points are recorded in the form of a written rationale in our internal pricing database, where they are reviewed and approved under the two-tier peer review process.

Data may be discarded as outliers based on the identification of external factors that may be distorting the price. Price-affecting side terms, inconsistencies

in information reported, or suspected motivation to unfairly influence the price discovery process would typically be grounds for removal of data, as would activity not considered to have taken place at 'arm's length'. Outliers will be investigated; more detail may be requested to determine possible reasons behind an anomalous price, and efforts will be made to identify the counterparty to cross-verify information. Suspected attempts to influence the assessment unfairly may result in the data provider being warned or excluded. Fastmarkets reserves the right to see contracts and signed paperwork before inclusion of the data in the assessment. If this is refused, the data supplied may be excluded from the assessment process.

## Data publication

#### **Peer review process**

All Fastmarkets' price assessments are set by a first reporter who covers that specific market, peer reviewed by a second reporter, and always signed-off by a senior reporter or editor prior to publication. This peer review process, which takes place in Fastmarkets' MInD system and is fully auditable, is in place to make sure that pricing procedures and methodologies are correctly and consistently applied and to ensure integrity and quality of the published prices. Relevant information, including all price inputs and editorial judgements, are securely retained in MInD for at least five years to maintain a full audit trail. Price reporters are formally trained in the price discovery process and must abide by a written Code of Conduct and Pricing Procedures.

For certain prices Fastmarkets also publishes pricing rationales to explain the assessment, describing why a particular price or range was determined based on the market information collected. These notes explain for instance whether any data has been excluded and why, information on the data collected and whether fallback procedures have been applied.

#### **Publication**

At the end of the peer review process, Fastmarkets MB and AMM publish their price assessments via MInD and on the Fastmarkets Dashboard and on product-specific websites and in the Price Book. Fastmarkets RISI, FOEX and Random Lengths publish their price assessments on the Intelligence Center, mobile app and in dedicated newsletters.

Fastmarkets' graphite prices are published on Thursday by 4pm London time. Graphite flake and spherical price

assessments are published weekly, electrodes monthly and amorphous graphite on the third Thursday of every month.

All price assessments, except Graphite flake FOB China, green petroleum coke and petroleum needle coke will be published in line with the UK holiday pricing schedule. Graphite flake exw China, green petroleum coke and petroleum needle coke exw China prices will adhere to the Chinese calendar.

Please refer to the pricing holiday schedule for this year's **public holidays**.

### **Corrections and delays**

If an assessment is published incorrectly, it will be rectified and republished as soon as possible. A pricing notice explaining the reasons for the correction will also be published promptly.

Fastmarkets uses several procedures and measures to avoid delays in the publication of its assessments. In the event of a delay, however, Fastmarkets will inform subscribers as soon as possible.

In the event of late publication, only data that has been received within the correct standard timeframe will be included in the assessment. No assessment will be amended due to the emergence of new data or market activity after the initial publication. Retrospective changes to the published values will only be made in cases of technical, administrative or interpretation error in line with Fastmarkets' Correction Policy.

## Methodology and price specification review process

### **Methodology review and pricing notices**

Fastmarkets aims to continually develop and periodically review its methodologies in consultation with industry participants, with the objective to adopt product specifications, trading terms and conditions that reflect and are representative of typical working practices in the industries it serves.

Fastmarkets carries out a formal review and approval of its methodology and price specifications on an annual basis. The process is initiated by Fastmarkets publishing on its website an open consultation at least one month (or around 20 working days) before the annual methodology review is due, inviting market feedback over the duration of that period. The timeframe for the consultation and method of submission are both clearly stated.

Following a review of market participants' feedback, comments and suggestions, Fastmarkets concludes the consultation by publishing a notice stating whether or not any methodology changes are proposed. If suggested, changes are classified either as 'material' or 'immaterial'. Material changes are those that, once implemented, may result in fundamental changes to the published price. These include specification changes or structural changes to assessments. Immaterial changes are those that will not result in a different price level once they are implemented.

If a material change to the methodology is required, Fastmarkets includes in its pricing notice: the outline of the proposed change; the rationale or motivation for proposing such a change; and a proposed timetable for the date on which, if the change goes ahead, it would be implemented. If received feedback is considered insufficient to support a material change, Fastmarkets publishes a new notice extending the consultation and inviting comments on the new proposal.

A record of the methodology review is sent to the Risk & Compliance team. All comments received from the market are assumed to be confidential and are treated as such unless stated otherwise.

When Fastmarkets proposes a change to the methodology, it should be understood that no decision has yet been made and that the proposal to make a

change should not automatically be understood as confirmation that the change will happen.

For prices subject to EU Benchmark Regulation (BMR), any change to the methodology requires approval from the Managing Director of our benchmark administrator, Fastmarkets Benchmark Administration Oy.

Outside of the formal methodology review process, editors may from time to time suggest changes or additions to reflect market developments. As with the formal review, changes to the existing methodology will either be classed as 'material' or 'immaterial'. The process for implementing the change will be the same as outlined above for formal reviews. The minimum duration of one month (or around 20 working days) for the consultation process normally provides market participants sufficient opportunity to analyze and comment on the impact of the proposed change.

For more details on the formal review of the methodology and the consultation process to propose changes to the methodology, refer to Fastmarkets' [Methodology Review and Change Consultation Process](#) available on the Fastmarkets website.

## Queries and complaints

Fastmarkets encourages engagement from the market on its pricing principles and methodology. The company promotes understanding of its pricing procedures and is committed to responding to requests for further information and clarification on a timely basis.

There are multiple channels for interaction with the pricing team including email, telephone and instant messenger services.

If a subscriber has an issue with the published prices, then they may contact the pricing team. In the event that the response is not satisfactory the issue may be escalated to the internal compliance department. For more details refer to Fastmarkets' [Complaint Handling Policy](#) available on Fastmarkets' website.

Fastmarkets takes all queries and complaints seriously and will seek to provide an explanation of the prices wherever possible. It is important to note, however, that input data remain confidential and cannot be provided to third parties.

## Become a contributor to the price discovery process

Fastmarkets continually seeks to increase the number of market sources willing to take part in the price discovery process. The main condition Fastmarkets requires from contributors is for them to be active participants in the relevant market being priced.

Fastmarkets' Data Submitter Policy provides guidelines defining the high level of data quality and integrity that Fastmarkets expects from contributing organizations providing pricing data. Market participants that wish to provide pricing data and be part of the price discovery process should first read the Data Submitter Policy available on the Fastmarkets website. The Policy is communicated to all data submitters at least on an annual basis.

All data sources are subject to review before their data submitted is fully taken into account in the pricing process. Our Contributor Approval Policy (CAP) requires this review or probation period to last no more than three months. The aim is to make sure that submitters are trustworthy and have sufficient visibility and understanding of the market to be able to provide viable price data.

# Natural graphite

## Graphite spherical

### CHINA

**MB-GRA-0036 Graphite spherical 99.95% C, 15-17 microns, fob China, \$/tonne**

Quality: 99.95% C, 15-17 microns, uncoated  
 Quantity: Min 20 tonnes  
 Location: fob China  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

## Graphite flake

### EUROPE

**MB-GRA-0037 Graphite flake 94% C, +100 mesh, cif Europe, \$/tonne**

Quality: Flake 94% C, +100 Mesh  
 Quantity: Min 20 tonnes  
 Location: cif Europe, full container load (FCL)  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

**MB-GRA-0038 Graphite flake 94% C, +80 mesh, cif Europe, \$/tonne**

Quality: Flake 94% C, +80 Mesh  
 Quantity: Min 20 tonnes  
 Location: cif Europe, FCL  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

**MB-GRA-0039 Graphite flake 94% C, -100 mesh, cif Europe, \$/tonne**

Quality: Flake 94% C, -100 Mesh  
 Quantity: Min 20 tonnes  
 Location: cif Europe, FCL  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

### CHINA

**MB-GRA-0040 Graphite flake 94% C, +100 mesh, fob China, \$/tonne**

Quality: Flake 94% C, +100 Mesh, -80 Mesh  
 Quantity: Min 20 tonnes  
 Location: fob Qingdao, FCL  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

**MB-GRA-0041 Graphite flake 94% C, +80 mesh, fob China, \$/tonne**

Quality: Flake 94% C, +80 Mesh  
 Quantity: Min 20 tonnes  
 Location: fob China, FCL  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

**MB-GRA-0042 Graphite flake 94% C, -100 mesh, fob China, \$/tonne**

Quality: Flake 94% C, -100 Mesh  
 Quantity: Min 20 tonnes  
 Location: fob China, FCL  
 Unit: US\$ per tonne  
 Publication: Weekly, Thursday by 4pm, London time

**MB-GRA-0051 Graphite flake 94% C, -100 mesh, exw China, yuan/tonne**

Quality: Flake 94% C, -100 Mesh  
 Quantity: Min 20 tonnes  
 Location: Ex-works China  
 Timing: Spot  
 Unit: CNY per tonne  
 Payment terms: Cash, other terms normalized  
 Publication: Weekly, Thursday 5-6pm Shanghai time

**MB-GRA-0052 Graphite flake 94% C, +80 mesh, exw China, yuan/tonne**

Quality: Flake 94% C, +80 Mesh  
 Quantity: Min 20 tonnes  
 Location: Ex-works China  
 Timing: Spot  
 Unit: CNY per tonne  
 Payment terms: Cash, other terms normalized  
 Publication: Weekly, Thursday 5-6pm Shanghai time

---

**UNITED STATES**

<b>MB-GRA-0048</b>	<b>Graphite flake 94% C, -100 mesh, cif US ports, \$/tonne</b>
Quality:	Flake 94% C, -100 mesh
Quantity:	Min 20 tonnes
Location:	CIF US ports, excluding Pacific states (Washington, Oregon, California, Alaska and Hawaii) as defined by the US Census Bureau, full container load.
Unit:	US\$ per tonne
Publication:	Monthly, first Thursday of the month, 10-11am NY time

## Amorphous graphite

---

**EUROPE**

<b>MB-GRA-0016</b>	<b>Graphite amorphous 80% C, -200 mesh, FCL, cif Europe, \$/tonne</b>
Quality:	80% C, -200 Mesh
Quantity:	Min 20 tonnes
Location:	cif Europe, FCL
Unit:	US\$ per tonne
Publication:	Monthly, Thursday by 4pm, London time

---

**CHINA**

<b>MB-GRA-0035</b>	<b>Graphite amorphous 80% C, -200 mesh, fob China, \$/tonne</b>
Quality:	80% C, -200 Mesh
Quantity:	Min 20 tonnes
Location:	fob China
Unit:	US\$ per tonne
Publication:	Monthly, Thursday by 4pm, London time

## Synthetic graphite Graphite electrode

---

**CHINA**

<b>MB-GRA-0043</b>	<b>Graphite electrodes, high power, fob China, \$ per tonne</b>
Quality:	350-450mm diameter
Quantity:	Minimum 20 tonnes
Location:	fob China
Timing:	Spot
Publication:	Monthly. First Wednesday of the month, 4pm London time

<b>MB-GRA-0044</b>	<b>Graphite electrodes, ultra high power, fob China, \$ per tonne</b>
Quality:	450-650mm diameter
Quantity:	Minimum 20 tonnes
Location:	fob China
Timing:	Spot
Publication:	Monthly. First Wednesday of the month, 4pm London time

# Graphite anode feedstock

---

**CHINA**

**MB-GRA-0046 Petroleum needle coke 0.5% S, exw China, yuan/tonne**

Quality: Sulfur: 0.5% max, volatile matter: 5-8%, moisture: 5% max, ash: 0.2% max, nitrogen: 0.7% max, pre-calcinated

Quantity: Minimum 35 tonnes

Location: Ex-works China

Timing: Spot

Unit: CNY/tonne

Publication: Weekly, Wednesday by 4pm London time

**MB-GRA-0047 Green petroleum coke 0.5% S, exw China, yuan/tonne**

Quality: Sulfur: 0.5% max, volatile matter: 12% max, moisture: 3% max, ash 0.5% max, vanadium: 100µg/g max, pre-calcinated

Quantity: Minimum 35 tonnes

Location: Ex-works China

Timing: Spot

Unit: CNY/tonne

Publication: Weekly, Wednesdays by 4pm London time

---

**EUROPE**

**MB-GRA-0050 Green petroleum coke, 1.5% S, in-whs ARA, \$/tonne**

Quality: Sulfur 1.5% max, nitrogen 2% max, moisture 8% max, ash 0.6% max, volatiles 12% max, V 250ppm max, Fe 250ppm max, Si 250ppm max

Location: In-warehouse Amsterdam-Rotterdam-Antwerp

Timing: Spot

Unit: \$/tonne

Publication: Monthly, last Thursday of the month, 4pm London time

---

**INDIA**

**MB-GRA-0049 Green petroleum coke, 1.5% sulphur, CIF India, \$/tonne**

Quality: Sulfur 1.5% max, nitrogen 2% max, moisture 8% max, ash 0.6% max, volatiles 12% max, V 250ppm max, Fe 250ppm max, Si 250ppm max

Location: CIF India

Timing: Spot

Unit: \$/tonne

Publication: Monthly, last Thursday of the month, 4pm London time

## Contacts

**Industrial Minerals Team**

[industrialminerals@fastmarkets.com](mailto:industrialminerals@fastmarkets.com)

**Risk & Compliance Team**

T: +44 20 7827 5264 or

T: +44 20 7779 8519

[riskandcompliance@fastmarkets.com](mailto:riskandcompliance@fastmarkets.com)

**DISCLAIMER - IMPORTANT PLEASE READ CAREFULLY**

This Disclaimer is in addition to our Terms and Conditions as available on our website and shall not supersede or otherwise affect these Terms and Conditions. Prices and other information contained in this publication have been obtained by us from various sources believed to be reliable. This information has not been independently verified by us. Those prices and price indices that are evaluated or calculated by us represent an approximate evaluation of current levels based upon dealings (if any) that may have been disclosed prior to publication to us. Such prices are collated through regular contact with producers, traders, dealers, brokers and purchasers although not all market segments may be contacted prior to the evaluation, calculation, or publication of any specific price or index. Actual transaction prices will reflect quantities, grades and qualities, credit terms, and many other parameters. The prices are in no sense comparable to the quoted prices of commodities in which a formal futures market exists.

Evaluations or calculations of prices and price indices by us are based upon certain market assumptions and evaluation methodologies, and may not conform to prices or information available from third parties. There may be errors or defects in such assumptions or methodologies that cause resultant evaluations to be inappropriate for use.

Your use or reliance on any prices or other information published by us is at your sole risk. Neither we nor any of our providers of information make any representations or warranties, express or implied as to the accuracy, completeness or reliability of any advice, opinion, statement or other information forming any part of the published information or its fitness or suitability for a particular purpose or use. Neither we, nor any of our officers, employees or representatives shall be liable to any person for any losses or damages incurred, suffered or arising as a result of use or reliance on the prices or other information contained in this publication, howsoever arising, including but not limited to any direct, indirect, consequential, punitive, incidental, special or similar damage, losses or expenses.

We are not an investment adviser, a financial advisor or a securities broker. The information published has been prepared solely for informational and educational purposes and is not intended for trading purposes or to address your particular requirements. The information provided is not an offer to buy or sell or a solicitation of an offer to buy or sell any security, commodity, financial product, instrument or other investment or to participate in any particular trading strategy. Such information is intended to be available for your general information and is not intended to be relied upon by users in making (or refraining from making) any specific investment or other decisions.

Your investment actions should be solely based upon your own decisions and research and appropriate independent advice should be obtained from a suitably qualified independent adviser before any such decision is made.