UNRECORDED ALCOHOL

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FORUT
CAMPAIGN FOR DEVELOPMENT AND SOLIDARITY
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FORUT’s vision is a world in peace and without poverty, where all are secured human rights and social justice, and where alcohol and drugs do not prevent people’s well being and fulfilment of human potential.

Unrecorded Alcohol
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Unrecorded alcohol consumption is by nature not included in official statistics of production and distribution in a country. It is outside the reach of governmental control whether for imposition of fiscal levies or public health based policies. In most countries in the world such alcohol is consumed in smaller or larger quantities. The illicit products may be beer or spirits, unbranded or counterfeit, produced at home or in covert semi-industrial production units. The products may be for immediate consumption or distributed across longer distances, even smuggled across borders.

The very fact that these beverages are unrecorded makes it obviously difficult to assess the size of this consumption, compared to legally sold alcohol. We therefore have to rely on estimates to get a picture of the size and scope of this problem.

The Global Status Report on Alcohol and Health (WHO, 2011) presents estimates of recorded and unrecorded alcohol in different regions of the world. This study indicates that the proportion of unrecorded beverages varies greatly across the globe. While it is estimated that around 20 per cent of the alcohol consumed in Europe is unrecorded, the corresponding figures are 31 per cent for Sub-Saharan Africa and as high as 69 per cent for South-East Asia.

In regions where the unrecorded alcohol consumption is high, this fact necessarily has to be taken into account when planning strategies and interventions to reduce alcohol-related harm.

The need for evidence-based interventions to control the availability of alcohol (taxes, licences, hours of sale etc) is not reduced. On the contrary; such interventions directed to the formal, legal production and sale have to be combined with actions to control the unrecorded market. It is in the interests of government from both a fiscal and a policy perspective to move towards eliminating illicit production and sale and to bringing informal supply under the taxation system.

The present paper by Professor Diyanath Samarasinghe at the University of Colombo, Sri Lanka, gives an introduction to how the problem can be understood and how it can be addressed; by communities, governments and NGOs.

FORUT, a development agency with poverty reduction as a priority, takes special interest in this issue. The poorest people of the poorest countries tend to consume illicit liquor as their main source of alcohol. Such beverages are often cheaper than legal alcohol, also because they are not taxed. For FORUT it is imperative to have a knowledge-based, case-specific and comprehensive approach to alcohol prevention, and addressing the unrecorded consumption is a key part of such an approach.

Morten Lønstad
FORUT Secretary General
Introduction

National alcohol policies do not seriously address the production and use of alcohol that happens outside the reach of official enforcement authorities. The kinds of production and use of alcoholic beverages that are not subject to official notice, whether for imposition of fiscal levies or other formal controls, cover a wide range. The use of such alcohol is commonly referred to as ‘unrecorded alcohol consumption’ (WHO 2004a), while the alcohol so traded is generally called ‘illicit alcohol’ or ‘illegal alcohol’.

A good part of unrecorded consumption is of illicitly produced alcohol products. Policies to address alcohol problems concentrate on the licit or legal market and the officially recorded consumption (WHO 2004b). They regard consideration of illicit alcohol to a footnote or a passing reference. The effectiveness of alcohol policies is not im-
paired by this occurrence, where illicit alcohol use is low – as is the case in most rich countries. But illicit alcohol constitutes the larger part of alcohol consumption in many of the poorer countries. When these countries wake up to the need for alcohol policies and look for recommended or evidence based policies in operation elsewhere, they discover those that are already in operation in the richer world. Rich countries tend to have more comprehensive alcohol policies in place.

Types and varieties

The nomenclature includes individuals brewing quantities at home for their own consumption, travellers importing or bringing alcohol across borders, small scale or organized smuggling, diversion from industrial sources, local small-farmers producing ‘moonshine’ for a known clientele, large-scale organised production and distribution facilities operating completely outside the law and in some countries far exceeding the volumes produced legally (WHO 2004a). Because these volumes are not recorded in official statistics the term ‘unrecorded alcohol consumption’ is some-
times used for all of these combined. This is a meaningful aggregation particularly for agencies interested in the health impact of alcohol use – which is linked to total alcohol consumption. But the term does not quite reflect the fact that most of this trade breaks some law or regulation.

Illicit alcohol has more than just a narrow health impact. It leads to loss of government revenue and is sometimes part of organised crime. ‘Diver-
sion’ of ethyl alcohol from industrial sources, which attract different rates of taxation or fiscal levies, has similar associations.

The term ‘illicit alcohol’ refers in some circles specifically to legally produced alcohol diverted out of its legitimate trading path and sold without payment of proper taxes. Alcohol produced in sites that are not lawfully licensed to produce it for human consumption is called ‘illegal alcohol’, in this nomenclature.

These fine distinctions are not particularly relevant or useful for the purposes of this paper. The interest here is to see how all such forms of alcohol use – not regulated, recorded or taxed – collectively impact on policies to reduce harm.

Issues of concern

It is probably true that the poorer a country or community is, the greater is the consumption of illicit alcohol, as a proportion of its total alcohol use. By region, unrecorded alcohol consumption is estimated to be about two thirds of the total in the Indian subcontinent, half in Africa and a third in Latin America (WHO 2004). By region, un-
recorded alcohol consumption is estimated to be about two thirds of the total in South-East Asia and around one third in Sub-Saharan Africa. To rely heavily on policies that are recommended from studies where unrecorded consumption is low (for example those excellently summarised in Babir et al, 2003 and Edwards et al, 1994) for countries where it constitutes even a third of consumption is unwise.

Money matters

Alcohol use has complex impacts on poverty and poverty alleviation efforts (Bakken and Samaran-
inghe, 2003), and efforts to reduce poverty must address alcohol use in a nuanced manner. There is the further complication that the poorest people in poor countries generally consume illicit liquor as their main source of alcohol.

Quite apart from the effect on individual families, a large segment of alcohol use being in the illicit or informal sector has significant impact on state revenue in non-industrialized countries.
Criminality

Illegal trade in alcohol is among the most pervasive of criminal activities in a good part of the world. Because the stereotype is of a poor woman in a rural community selling home made brew to raise money to feed her family, the organised criminal activity that lies beneath much illicit alcohol production and sale is not quite noticed. Reference to this segment of the market as ‘home brewed’ alcohol under the inoffensive heading ‘unrecorded consumption’ (e.g., WHO 2004a) also helps to sanitize the trade and make it appear rather an innocuous activity.

The criminal element needs more emphasis. The legal tobacco trade has been accused of colluding in large-scale tax evasion by smuggling and other operations, which charge has not been made so far about the legal alcohol trade. The potential is quite strong for a large part of possible national revenue from alcohol being lost through other means of bypassing the tax structures. More study is needed of what proportion of the alcohol production of large scale legal manufacturers is declared to the authorities for purposes of tax, and how money derived from any undeclared production is laundered.

Significant loss of state revenue results from organised illegal or illicit alcohol producers and dealers. This is more widely accepted to be a criminal activity. The negative impact here too is not only from lost revenue but also from the association with criminal elements and what happens to the illegal profits that result.

Where does undeclared money go?

An ignored aspect of the substantial organised illicit trade is where the proceeds go. How does the trade launder the illicit alcohol profits? Such hidden profits are easily diverted into further criminal activity, bribes, and other forms of corruption and various ‘underworld’ expenditures. Governments rarely pursue this so-called ‘black money’ diligently, to see where it is spent. Some of it may well be coming back to various individuals in government.

The presence of a sizeable illicit alcohol market invariably contributes to the siphoning off of money from the poorest segment of society. It also leads to the undermining of good governance, which again have a disproportionate detrimental impact on the poor and on efforts to promote their development.

Safety

The perception is widespread that illicit alcohol is generally unsafe because it is not ‘wholesome’. Instances where consumption of an illegal brew leads to death readily reach news headlines. The natural conclusion from such accounts is that ethyl alcohol in properly sold legal brews is perfectly safe while adulterants and impurities in illicitly produced beverages are the problem. These impressions are strengthened by the fact that impurities are not always accidental. Some illicit producers add various strange ingredients in a bid to make their beverage more ‘potent’, and even advertise the fact. Others supplement their brews and distillates with industrial alcohol, with its own added toxins. Agents that cause more chronic harm have been suspected in Eastern Europe (Szcz et al., 2005).

Even a cursory examination of stories about deaths that result from the consumption of contaminated illicit alcohol will show that such instances attract wide publicity. The death of even one or two persons from contaminated alcohol use in a remote corner of the world somehow attracts worldwide media attention. This attention is puzzling. But it reinforces the impression that illicit alcohol is extremely ‘unwholesome’ while the licit product is ‘wholesome’. Connected to this is the immediate response to any measure to restrict the sale of legal alcohols being opposed on the ground that it will lead to increased illicit alcohol production with horrendous health consequences. The argument is then further extended to make legal alcohols more freely available on the alleged ground that it will reduce harm from illegal brews and its validity appears to be gaining acceptance in some African nations (Guardian, 2007). A study of illicit alcohol in Sri Lanka (Abeyasinghe 2002) did not find any significant toxic contaminants. There are however undoubted instances where toxic substances in illicit alcoholic beverages cause serious damage. But given the apparent media attention to poisoning from illicit alcohol use, the instances that are reported seem remarkably few when viewed in relation to the vast number of people consuming illicit alcohol on a daily basis.

A study of illicit alcohol in Sri Lanka (Abeyasinghe 2002) did not find any significant toxic contaminants. There are however undoubted instances where toxic substances in illicit alcoholic beverages cause serious damage. But given the apparent media attention to poisoning from illicit alcohol use, the instances that are reported seem remarkably few when viewed in relation to the vast number of people consuming illicit alcohol on a daily basis.

Harm from illicit alcohol is in many countries much more through its large contribution to total alcohol consumption than from impurities and toxins that may be found in it. (Rehm & Lachenmeier 2009). This fact is generally underplayed, possibly because the idea that alcohol consumption, whether licit or illicit, is in total related to the level of harm is not popular with some powerful vested interests.
Factors operative at different levels

Local level
Illegal production and sale of alcohol is in many communities most widespread criminal activity. The damaging consequences of it extends well beyond, through the associated bribery, protection and political patronage needed for it to continue. And it is generally allowed to operate more openly than any other unlawful behaviour, including the allied trade in other illicit substances such as heroin or cocaine. Despite its visibility and the common knowledge of where it operates, the trade in illicit alcohol is routinely classed as a problem that the enforcement authorities cannot arrest or control.

One reason for its resiliency may be the lack of real interest in suppressing the illegitimate business. The local illicit alcohol trader in a small village is generally not considered a serious social problem that the enforcement authorities cannot act on. The local level illicit alcohol business is part of a wider organized crime, because of other considerations. The argument that a policy measure may lead to increases in the consumption of illicit alcohol is potent because of the widespread perception that illegal brews are vastly more dangerous than the licit. This argument is a powerful deterrent to policymakers who want to put in place the known effective policies. It is also a convenient argument for those who may want to obstruct effective policies because of other considerations.

National level
National alcohol policies are often directed at how to find the optimal balance between the harm from (legal or licit) alcohol and the economic and other perceived benefits from it (WHO 2004b, Barbour et al 2004). Unrecorded alcohol is treated only as a side issue, not worthy of official attention, as far as national policies are concerned. If illicit alcohol is ever referred to, it is in the course of arguments that policies should not be too restrictive on the legal alcohol segment, as this will lead inevitably to more illicit consumption.

As a result, the main impact that illicit alcohol presently has on policy is to serve as a brake on all measures that are designed to reduce the availability and consumption of alcohol. Where the level of illicit consumption is high the fact that they are not entirely unreasonable.

It is true that the current policies, for instance to increase the real price through taxation, can apply only to products within the formal sector. But this fact can be over-emphasised by those who want to prevent the imposition of effective alcohol policies. The argument that a policy measure may lead to increases in the consumption of illicit alcohol is potent because of the widespread perception that illegal brews are vastly more dangerous than the licit. This argument is a powerful deterrent to policymakers who want to put in place the known effective policies. It is also a convenient argument for those who may want to obstruct effective policies because of other considerations.

International level
Policy formulation is not an individual country business any more. A good part of policies enacted now are 'to fall in line' or to meet obligations arising from international treaties and agreements. The prevailing mood or culture in the international milieu has considerable influence on policies that countries decide to adopt, including those on alcohol.

Prevailing international wisdom appears to indicate that illicit alcohol is not a matter of interest in policy formulation. This is unfortunate for countries in which a large part (say over a third or more) of alcohol consumed is in the illicit category. And they likely contain well over half the world’s population.

The most recent global report (WHO 2011) does not emphasise ‘licit alcohol’ under the broad heading ‘unrecorded alcohol’ although this is by far the largest component in many countries, especially in Asia and Africa. ‘Home brewing’ is what is highlighted. This is likely due to the fact that in richer countries, illicit production is indeed mostly home-brewed or small-scale local manufacturing. The United Nations Office on Drugs and Crime pays no attention to illicit alcohol, which constitutes a noteworthy arena of organized crime in many countries. International deliberations on crime or on alcohol do not have illicit alcohol on the agenda and its size globally is unknown.

Predictably, attention to the informal or unrecorded consumption is still mostly in the richer countries (Nordlund and Osterberg, 2000; Stockwell et al 2004), where it is in fact relatively small compared to poor countries. And here again most of the unrecorded component is not usually derived from large scale illicit production.
What more should be done?

We must start by recognising that illicit alcohol can and should be dealt with effectively. This segment of consumption cannot forever be left out of consideration when responses to reduce alcohol problems are considered. It is presently seen too much as an ‘interference’ with logical policy actions, instead of being recognised for what it is – in many countries a large and significant part of the whole that alcohol policies must address, and in some countries the largest. Responses have to address this segment in all its forms – uncontrolled, unrecorded, home-brewed, informal, diverted, untaxed and the like.

Local action

The trade of these forms of alcohol is outside the law and there is scope for public action and responses from enforcement agencies directed at the trade.

a. Community responses

In fact, most reported ‘community responses’ to alcohol problems take the form of an uprising against the local illicit alcohol dealers. Such action is effective if it mobilizes popular support, which usually comes from women in communities where a large proportion of men are heavy and regular consumers of illicit alcohol. The tendency is for such mass movements to subside after a time and for things to return to the previous state because the intervention is purely a call up of mass support with no attempt to address the wider determinants that should be addressed. Mobilizing public crusades against the illicit alcohol trade is not an efficient means for creating a sustained improvement in community wellbeing. Such movements may sometimes stimulate law enforcers to act and this may produce a slightly longer benefit.

There are other local interventions that go further and try to arrange substitute means of income generation for the illicit traders – who are mostly poor and attracted to this trade for want of an easy alternative to earn a living. The finding in such cases is that the void is soon filled by other suppliers when the existing traders stop selling, after being found some other means of livelihood. Finding alternative employment avenues for illicit traders is not a powerful means to address the trade, unless combined with other measures.

A broader based approach is needed for community efforts to succeed. This must address the local illicit sale as part of a wider community move which encompasses the demand for alcohol as well as the supply. And in addressing issues of supply and availability should look collectively at licit and illicit alcohol. The principles are described elsewhere (Samarasinghe, 2005) as are the means of applying them in real life (WHO, 2006).

Action should include a persistent community wide dialogue about the presumed gains and losses from alcohol – both its sale and its consumption. Where the strategy succeeds, there is an improvement of community understanding and people begin to question previous assumptions. This includes their being able to question the presumed gains from drinking alcohol as well as from trading in alcohol. Very often the community begins to recognize that the local illicit dealer’s family loses in several ways that are not immediately seen – such as family wellbeing and harmony, education of children and so on. Then there is also the discussion of the influence of the dealer’s actions on the general wellbeing of the community. The illicit traders feel like weaning themselves away from the business as a result of this shift in the community perception as well. The dialogue extends also to the legal alcohol suppliers, who are not whitewashed as providers of wholesome beverages while just singling out the illegal dealers as the only bad influence.

The recommended community responses are therefore interventions to engage the illicit alcohol trade as part of a broader community-wide action that includes the licit supply as well as factors that sustain a demand for alcohol in general. The illicit trader should become part of the whole community’s process of questioning various assumptions, in the move towards greater shared wellbeing.
The inducement to curtail the sale has to be supported by a significant number of consumers too and not driven entirely by an opposing force that attacks both the consumers and the illicit providers.

b. Enforcement agency responses

The sale of illicit alcohol is against the law but often able to continue in well-known locations. There is hardly any other criminal activity that is allowed to take place with as much visibility as the trade in illicit alcohol. Why this illegal activity is so widely accepted needs to be examined as part of the search for solutions. Probably the largest contributor is widespread acceptance of the illicit alcohol trade as a ‘natural’ part of the local landscape. Another could be the perception that any efforts to curtail it are futile. Previous attempts that have led nowhere, or indeed led to trouble for those who tried, may reinforce this perception.

More active enforcement action may have been expected from the police or excise authorities or other official agencies. But here too, the general official response is lukewarm. It is worthwhile exploring the reasons for the inertia. A frequent response from such authorities is that the illicit alcohol trade is too embedded in the community life for as far back as people can remember there is no pressure on the authorities to stop it, as long as it stays low-key. A less openly stated reason is corruption.

Inertia, corruption and inefficiency are all impediments to good enforcement action. Administrative pressure from higher authorities is one means of overcoming these obstacles. A second is sustained pressure from the communities concerned. This is difficult to organize. People can more easily be activated to invest great energy to rise as a group demanding an immediate response than to invest much less effort for a steady and sustained dialogue with enforcement authorities. Beneficial fallout on the illicit alcohol situation can result from interventions that are intended primarily to combat corruption.

If higher authorities in the police could be induced to change their criteria for assessing the performance of local police posts or stations, much good can be achieved. The tendency is for the local police to be judged by their number of arrests, raids or convictions. A better indicator of police work in arresting illicit alcohol sales will be the degree of readiness and easy availability of illicit alcohol or the openness of the trade. It is easy for the police to conduct cosmetic activities or even to convict small-timers. The real criterion of effectiveness of enforcement efforts is whether illicit alcohol is becoming less or more freely available.

National action

The aspects that national action has to deal with are many. On the one hand there is the problem caused by unrecorded alcohol disrupting the assessment and monitoring of the extent and trends of alcohol consumption and problems. This has the added consequence of complicating the evaluation of policies. At the same time, the presence of significant unrecorded alcohol use has direct health consequences – by adding to the population’s total alcohol consumption, with its usual attendant problems, as well as through specific harms associated with illegal or illicit alcoholic brews.

In addition to adverse health effects there are also large impacts on law enforcement and corruption. The existence of a large trade in illicit alcohol is so widely accepted needs to be examined as part of the search for solutions. Inertia, corruption and inefficiency are all impediments to good enforcement action. Administrative pressure from higher authorities is one means of overcoming these obstacles. A second is sustained pressure from the communities concerned. This is difficult to organize. People can more easily be activated to invest great energy to rise as a group demanding an immediate response than to invest much less effort for a steady and sustained dialogue with enforcement authorities. Beneficial fallout on the illicit alcohol situation can result from interventions that are intended primarily to combat corruption.

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The most important response required at national level, especially in countries where the consumption of illicit alcohol is significant, is to include it as an essential item within the substance of deliberations in policy formulation. There will need to be specific consideration of illicit alcohol as part of the body of all proposals. Not mentioning the subject allows even the formulators of the policy later to deviate their own policies.

In settings where the illicit trade is of significant proportions, specific mention should be made of the potential impact of each proposed policy response on the totality of problems, including any skew or unintended harm that may arise from its impact on the illicit market. This will allow more objective consideration of real and imaginary harm.

Ideally, there should be specific measures to address the varied forms of unrecorded alcohol consumption. This can begin even as experimental approaches for application in only some locations, to allow a comparative assessment of impact.

Records of a nation’s total alcohol consumption should contain a separate entry for estimated illicit and other forms of unrecorded alcohol consumption. This must be provided in figures with an accompanying note of how the estimate was made to indicate openly the degree of confidence that can be placed on the numbers shown. Such a move will tend to increasing accuracy of the estimates over time. New sources of data that are incorporated into the estimates as the years pass are best shown separately, rather than aggregated into one composite total, so as to permit valid temporal comparisons to be extracted.

Finally, national action can include suggested responses directed specifically at control of the illicit sector. The higher profiling of illicit alcohol as a result will lead to better enforcement, if nothing else. It should also increasingly sensitive authorities to the possibility contribution from previously unnoticed diversion, avoiding payment of taxes, from the legal production facilities.

International action

The World Health Assembly in 2010 adopted the WHO Global Strategy to Reduce the Harmful Use of Alcohol. One of the ten defined areas of action is “Reducing the public health impact of illicit alcohol and informally produced alcohol”. It is recommended that governments should aim at bringing the sale of informally produced alcohol under control and subject to taxation. Furthermore, the strategy recommends national and international cooperation and exchange of relevant information to combat illicit alcohol.

International action can start by looking at ways of documenting more accurately the size of the traffic to combat illicit alcohol - whether with payment of duties or without. Once better documentation in place there can be suggestions for reducing the size of this transfer at least for a proper accounting of it in specific figures, to assist the purpose of monitoring of national consumption and related impacts.

Then there are the possibilities for joint interna- tional action to curtail or control the size of the traffic where it is found to be extreme. Given the size of the illicit trade in some countries and the alliance with organized crime there is an argument for enlisting the international agencies dealing with organized crime, money laundering, corruption, smuggling, corporate fraud and other such matters. The United Nations Office on Drugs and Crime has at present no responses to deal with illicit alcohol. The manner in which illicit alco- hol money is moved around or laundered receives none of the attention that illegal drug money gets.
Conclusions

Illicit alcohol is a large and particularly damaging component of unrecorded alcohol consumption. Unrecorded alcohol use constitutes in many poorer countries a large, and in some instances the largest, share of all alcohol consumption. The well-recognized harm from illicit alcohol use is readily and widely attributed to toxic constituents and impurities but not to that resulting from its contribution to total alcohol consumption of the population. This tendency prevails even in settings where unrecorded consumption exceeds that of legal brands. Policies effective in wealthier countries are often less so in poorer countries with large proportions of alcohol consumed being of the ‘unrecorded’ category. Some measures may even have unwanted consequences.

Interested parties can also use the presence of a sizeable market in unrecorded alcohol as an argument to block the adoption of effective policies – by highlighting or exaggerating possible increases in illicit alcohol use from illicit alcohol use and should also address the demand side.

Addressing barriers to effective enforcement at local level are likely to bear fruit. Using pressure from higher administrative authorities of the enforcement agencies is one means. Another is to maintain sustained demand from the public, asking for effective policing.

An estimate of unrecorded alcohol use should be included in national records, with its basis clearly set out.

National alcohol policy formulation should, in countries with relatively high unrecorded consumption, specifically mention and deal with this segment. The policy measures considered should be placed in the context of the country’s total consumption and not be directed only at the illicit segment.

Specific measures to deal with illicit or unrecorded alcohol should be added to the policy mix now popular. Ways of testing these out in experimental locations can easily be worked out. Attention should be paid, in countries where the illicit alcohol sector is ‘organised’ and large scale, to how the proceed are laundered and to the criminal networks and associated corruption. Potential covert connection with the legal alcohol trade should also be examined.

International action should include attention to better estimation and documentation of cross border trade and smuggling. Discussions on alcohol policy in international parleys should include unrecorded alcohol as a specific agenda.

Relevant agencies dealing with organised crime, money-laundering, political corruption and large scale smuggling and the like should pay attention to the substantial contribution of illicit alcohol to these.

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India
In all societies a portion of the alcohol consumed is produced, distributed and sold outside formal channels, beyond the reach of government regulations and taxation. The exact size of this unrecorded consumption is for obvious reasons hard to establish. Nevertheless, estimates have been made and these indicate large differences between countries and cultures. The Global Status Report on Alcohol and Health (WHO, 2011) estimates that around 20 per cent of the alcohol consumed in Europe is unrecorded, the corresponding figures are 31 per cent for Sub-Saharan Africa and as high as 69 per cent for South-East Asia.

In regions where the unrecorded alcohol consumption is high, this fact necessarily has to be taken into account when planning strategies and interventions to reduce alcohol-related harm. Interventions directed to the formal, legal production and sale have to be combined with actions to control the unrecorded market. It is in the interests of government from both a fiscal and a policy perspective to move towards eliminating illicit production and sale and to bringing informal supply under the taxation system.

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