First BCP Network plenary meeting in Narva, Estonia

Sharing and implementation of best practices, evaluation of the BCPs performance, spreading CELBET recommendations, feedback from the source, support for senior management – this is what the Networks were made for. Meeting in Estonia fulfilled the network’s role.

From 3 to 5 of April, in Narva Estonia, members of the BCP Networks had their first plenary meeting.

Customs officers from all 11 CELBET countries and representatives of the European Commission discussed issues that are crucial for frontline customs officers and for customs administrations:
- cooperation between Border Guards and Customs
- conclusions from the monitoring checks
- results from Joint Intensified Activities
- new technologies and solutions for control at the border
- e-reservation system used by Estonian Customs
- review of the ASF situation and preventive actions done
- schedule of trainings
Monitoring checks are an examination of traveller, personal belongings and vehicle by random selection. The second stage of the monitoring checks were implemented in 45 BCPs at the Eastern and South-Eastern land border:
- 16 BCPs at border strips with Russia, Belarus
- 17 BCPs at border strips with Ukraine, Serbia, Moldova
- 12 BCPs at border strips with Abania, Bosnia and Herzegovina, Montenegro, North Macedonia, Turkey.

- The more you meet each other the more you talk with each other and the stronger the network becomes. – Ms Pille Jogisoo, Grant Coordinator said at the closing of the meeting. Members of the BCP Network agreed that BCP Network is a great tool which allows customs officers to exchange experiences and share good practices, especially when representatives from all BCP Network regions meet, starting from Finland and ending with Greece.

Take a look at what issues have been presented on the first BCP Network Plenary meeting.

Monitoring checks performed by BCP Management & Evaluation Team

Monitoring checks were an examination of traveller, personal belongings and vehicle by random selection. The second stage of the monitoring checks were implemented in 45 BCPs at the Eastern and South-Eastern land border:
- 16 BCPs at border strips with Russia, Belarus
- 17 BCPs at border strips with Ukraine, Serbia, Moldova
- 12 BCPs at border strips with Abania, Bosnia and Herzegovina, Montenegro, North Macedonia, Turkey.

Cigarettes were the most seized goods, followed by alcohol, fuel and tobacco. The hit rate varies between 1% to 28%. The high hit rate in some BCPs might indicate, that the control level is low and the impact on passenger’s law-abiding is low. The low hit rate might indicate, that the control level is high.
The BCPs with low hit rate listed some of the measures taken: modern infrastructure with sufficient human resources, use of all different equipment (endoscope, scanner, dogs), periodic analysis of results and use of tactics; regular evaluation of the impact of the controls, sanctions, etc; standard to detect small amounts of narcotics; regular post-control of quality by using CCTV; strict legislation for excise goods; efficient risk-analysis; high level of motivation and professionalism.

**Workshops: Diagnostic study**

BCP Networks members, taking part in workshops, had a chance to express their opinions and ideas about the newest product of BCP Management & Evaluation Team: diagnostic study. They were divided into two groups. The questions referred to challenges, benefits, key factors and proposals for changes of the diagnostic study.

**What is diagnostic study?**

The BCP Diagnostic study should give answer on the strengths and weaknesses of the BCP performance, what can be changed in short and long term, how and what are the possibilities. The team together with the representatives from OC and EQ team and the Head of CELBET tested the BCP Diagnostic study methodology during the site visit to Albita BCP in Romania in February 2019. The site visit gave valuable information, how to improve the preparation for the study, how to perform the interviews and reality check on spot and how to elaborate the BCP Diagnostic study tool.

The BCP Diagnostics study tool covers all areas of the BCP (infrastructure, equipment, management, etc.) and consists of key factors which characterise the BCP.

**New technologies and solutions performed by Equipment Team**

Many customs detection technology products are available on the market but we need to choose carefully. There are couples of new technical solutions, which are promising and can help practical work. Intensive cooperation is going on customs control equipment area out of CELBET as well therefore we need to be open for it and be ready to share field experiences.

Information on needs of final users (customs officers) can provide useful information for manufacturers in order to produce really user-friendly and effective devices. CELBET Equipment Team provides product information and technical specifications and BCP Network shares practical experience and provides proposals, comments.
Training platform implemented by Training Team

At the beginning of April Training platform launched. This is main tool of CELBET e-learning system for customs officers who are trainers. Platform allows them to have an access to tailored trainings, dedicated materials, webinars, pictures and data. You can get to the platform from CELBET website www.celbet.eu or from edu.celbet.eu. The aim of the training strategy is to use this training platform for all participants of Celbet Trainings.

Joint Intensified Activity - product of Operational Control Team

The aim of the JIA was to:
- demonstrate the commitment and engagement of the management of CELBET customs administrations for fighting cigarettes and drugs’ smuggling;
- enhance cooperation between CELBET customs administrations
- “work as one” customs administrations
- enhanced harmonization of customs control practice
- better protection of financial interests of MS and EU
- to find synergies in cooperation of customs with border guards/ border police.

Control activities were organized on 29 border crossing points. Customs mobile units, performed controls on the roads near green border. The biggest success of JIA4 was 488 460 cigarettes seized by customs mobile units (HU-UA). During this CELBET activity 16,7 million pieces of cigarettes were seized in one case in BCP Silene(LV - BY) and 64.000 € not declared cash in BCP Medininkai (LT - BY).

What are the conclusions?
- threat of big smuggling in cargo traffic
- more focus at the border strip with Belarus
- more focus on control in the BCP leads to more smuggling pressure at the green border (also increase of illegal production in EU)
- involving of mobile units demonstrate the added value –flexible controls
- explore new approach of planning customs controls: coordinate/alternate
- synergy of working together with border guards resulted in two big seizures in Hungary
- lack of luggage scanner in big BCPs
- significant amount of undeclared cash
- more use of sniffer dogs for drugs might be at the border strip with Serbia
- situational awareness is developing.
Cooperation between Customs and Border Guards

Introduction to the topic on cooperation between Customs and BGs has been delivered by Mr Paul Brennan from DG TAXUD. He provided information on the most important EU policy instrument in the area: Guidelines on further development of the cooperation between Border Guard and Customs. - *Customs defined role in security* – he said at opening the presentation.

**CELBET achievements and plans in enhancing cooperation between Customs and BGs presented by Inter –agency and 3rd Country Cooperation Team:**

- contingency planning at national or regional/local level to increase the response capacity for border control
- development of the Customs/BGs Synchronised checks at the BCPs
- balanced development of the both sides BCPs in cooperation between Customs and BGs of the MS and neighbouring country
- updated list of recommended activities for shift leaders working at the EU external land border crossing points to enhance cooperation between BG/CA.

In direct execution of the CELBET2 Implementation Plan a workshop to define obstacles for implementation of the recommendations on enhancement of operational cooperation between CA and BG at the national and BCPs level has been arranged.

**How does customs fight with African Swine Fever (ASF) ?**

Representative of Finnish Customs, Mr Petri Kukkonen shared experiences in fighting with ASF. Finnish Customs has Detection Dog For Products of Animal Origin. Golden Retriever named Aino had training that was coordinated by the Finnish Customs Dog Training Centre with the same procedure with all Customs Dogs.
Aino detects all kinds of raw, processed, frozen, dried, canned, vacuum packed meat and milk products and her role is to work with Finnish Customs officers and stop food stuffs which have tried to import illegally to the EU

From June to December in 2018, Aino discovered nearly 600 kilos of restricted meat and dairy products. On January 2019 Aino have found about 70 kg different kind of products of animal origin. Most common products which Aino detects are sausages, raw meat, fat, canned meat and some milk products

Detection dogs are part of the wider effort to fight against African swine fever in Finland
•Veterinary border inspection
•Disinfection of animal transport vehicles
•Inspection of goods which might transmit animal disease
•Control of passenger restrictions
•Collaborative efforts by the public authorities

Authorities intensified efforts to combat against animal diseases along the Russian border since 2018
•Information through media
•Information boards in the Border Crossing Points
•Food waste containers for foodstuffs of animal origin
•The food sniffer dog Aino
•On going process
•Plenty of prohibited food products are brought to the border by people who are not aware of the regulations

How will the Finnish Customs continue?
•Tested actions will be extended to all BCP with third country traffic
•Customs second food sniffer dog will be located to the Airport Customs
•Food waste containers and information boards
•Funding have been provided for the implementation of the measures
•Modification of the Animal Disease Act
Cooperation from North to South

BCP Networks meetings started in Lithuania, ended in Greece.

CELBET created 3 BCP Networks: Nordic, Central and Southern. The BCP Network meetings give valuable feedback on the CELBET activities, new ideas and information for improvement of the draft of the deliverables or for changing the methods how to move forward. First Nordic Network meeting took place in October in Vilnius.

Almost 30 representatives of customs service met in Vilnius: Lithuania, Finland, Latvia, Poland, Estonia, Slovakia, Romania. The first BCP Network meeting was opened by the Head of CELBET Jyrki Linna. He highlighted main objectives of the meeting: new ideas, place of interest, filling the needs, getting feedback and connecting officers working at the BCPs.

- We need you to connect you with your colleagues, with your national customs administrations. Sometimes you do less with less. Maybe because you have better tools. Maybe you do not do more, but do better. We would like to share this CELBET toolbox with you, in 11 times more. Because it is like Jonny Rotten was singing: I do not know what I want, but I know how to get it – said Head of CELBET. He also stressed the meaning of the workshops and visit on the BCP which are crucial for the BCP Network members. Deputy of DG of Lithuanian Customs Mr Vygantas Paigozinas welcomed all the participants and expressed he was honoured to host first BCP Network Nordic region meeting.
He was also impressed by the results, deliverables and implementation of the recommendations of CELBET expert teams – Tasks of the BCP Network are impressed: to reach sustainable results, there are some challenges, language barriers, etc. BCP Network is very dedicated, commitment shows the relevance. BCP evaluation, risk management, cooperation - great significant areas. Do more with less- this is the reality. I believe that the network and project will help to achieve these goals. Learn even from mistakes and from best practice-expressed Mr Paigozinias.

After the presentations participants took part in workshops and were divided into 4 groups. Each group had to prepare the list of advantages, disadvantages and suggestions for different topics: i.a. harmonising traing system, sharing equipment and technical support, risk data circulation, JIA, monitoring checks, border crossing time.

On second day, network members visited Salcininkai BCP on Lithuanian and Belorussian border. Thanks to the visit, participants could see the infrastructure of the BCP, customs control procedures and systems used during the control.

**Central BCP Network meeting**

Central BCP Network was held at the end of October in Vysne Nemecke, Slovakia. Part of CELBET management and representatives of Customs from Poland, Hungary, Romania, Slovakia discuss a.i. risk analysis, border crossing time and sharing equipment issues. CELBET BCP Networks are for sharing all the things that make customs cooperation stronger.
Southern BCP Network met in Greece

Representatives of BCP from southern countries of Network: Bulgaria, Croatia, Greece and Romania have met in Alexandroupolis on 13-14 of November. The meeting was opened by Head of CELBET, Mr. Jyrki Linna who underlined - *Even if BCP has modern, expensive and very effective equipment, without people who know how to use it – the equipment is useless.* Director of Customs Office of Kipi, Mr. Grigoriou Athanasios also attended the meeting.

Leaders’ presentations and workshops on areas related to BCP management and customs control issues took place on the first day of the network meeting. Border crossing point in Kipi, located at the border between Greece and Turkey, was visited on second day. Participants could see the BCP infrastructure and observe the customs control procedures.
Kipi BCP is quite small but the traffic appears to be higher than the crossing border flow for this size of BCP. How many people work in Kipi?

In BCP of Kipi are working 46 people (41 in working schedule) and traffic (commercial and passenger) and demands are increasing year by year.

You have been working at the Kipi BCP for 10 years. But what have You been doing before you have joined customs service?

Before I start working for Customs, I was working for several years for University of Athens mainly in working positions related to my university degree (MEng in Electronics with Communications). I graduated from University of Wales in Swansea in 2001.

Why did You decide to apply for customs?

I applied for Customs because I believe that it is an important public, cutting-edge service. It is a service that in order to fulfil its role uses people with different skills and abilities and gives you the possibility to cooperate with people all around EU and the chance to improve yourself through training programs and courses. Especially working in borders is something special because is particular demanding as it involves many challenges and requires particular capabilities.

- Well trained and educated people with high ethical values is the most valuable asset for every service – says Georgios Kansizoglou, Greek customs officer from Department of Smuggling Enforcement on Greek – Turkish Border Crossing Point in Kipi

by Anna Hatala-Wanat, PR expert

How many people, in Your opinon, should be on the shift to ensure smooth border flow and not to overload officers with work?

The number of people that are working in a BCP is totally dependent to the following factors:
1) The amount and the type of traffic (Commercial and passenger)
2) The persisting means of enforcement that exist in the BCP (X-ray scanners, sniffer dogs, gates that detect radioactive materials)
3) The infrastructure (old or new, if are suitable for the traffic and the procedures)
4) The procedures that are taking place according to the comptencies
5) The use of emerging technologies (IT systems) and techniques in decision making (risk analysis). In any case the number of customs officers should be increased.
What is the main reason of these human resources problems?

The lack of human resources is not a Greek problem only. The last almost ten years all around EU there is a trend for cutting public expences and this has as a effect the reduction of staff. In my opinion, the Customs services should have been excluded from such reductions because of its importance. Customs service of a country does not protect only the interests and the security of the country, but the interests and the security of all member states of the EU.

What kind od goods do Kipi officers usually seize?

Usually officers in Kipi seize tobacco products, counterfeit goods, spare parts for vehicles, clothing items for commercial use, melted gold and jewelry and sometimes pharmaceutical material.

Do You remember what was the highest penalty fee that smuggler paid?

The highest penalty fee that has been paid it was about 140.000,00€ plus the duties and taxes, so came up to almost 210.000,00€. It was a case with a very big amount of gold jewelry about 13,5 Kg in weight.

I know that according to the Greek legislation drugs are not handled as smuggling, it is criminal procedure. Do You remember any interesting seizures worth mentioning?

There is a long tradition of seizure of drugs in BCP of Kipi. Last 10 years we have a lot of seizures. We have seized about 200 kg of pure heroin, 50 kg of Cannabis and about 20 Kg of synthetic drugs. Every seizure of drugs is special and each has an interesting story to tell. The sad thing is that in most cases the carriers were young unemployed people and I think this is that we should mention and have in mind.

Let’s talk about vehicles traffic. How many trucks and cars are crossing the Kipi bcp every year? Do You notice some changing trends every year?

About 72.000 loaded trucks are entering and about 65.000 loaded trucks are exiting every year. The trend is upward! Also the trend is upward for the passenger traffic too.

I know that You are dog handler. I guess it is very demanding position...

Sniffer dog is a very flexible and effective mean of enforcement. With the peculiarity that like a human being it is a living organism. In order to keep the effectiveness and the reliability of the sniffer dog you need to spend a lot of hours in training. The good binary relationship between the handler and the dog is also very important factor for the effectiveness of the dog as mean of enforcement, and this relationship can be improved only when you spend a lot of qualitative time with the dog.
Extraversality is a very important factor, a very good opportunity to move towards the positive direction the Greek customs service. By participating in CELBET new ideas and new way of looking at ways of working and good practices from other participating MS can be used and improve our effectiveness as customs service. The exchange of ideas and efficient working methods and good cooperation between Member States at customs level is also an important factor in the development and security of the EU.

What in Your opinion are the biggest problems customs, not only in Greece, is facing nowadays?

Lack of staff and resources. Well trained and educated people with high ethical values is the most valuable asset for every service.

Do You have some solutions, ideas of coping with it?

First of all I believe that we should realize the importance of the human factor in everything we plan. We need to train and educate people in the appropriate way and and to instill in them the importance of cooperation and the respect of human rights too. An integrated management strategy with clear objectives must be adopted. There is no magical solutions, just hard effective work.

You are member of CELBET Southern BCP Network, and You participate in group meetings. Do You see it as a chance to provide tangible results and new chances for Greek customs?

Extraversality is a very important factor, a very good opportunity to move towards the positive direction the Greek customs service. By participating in CELBET new ideas and new way of looking at ways of working and good practices from other participating MS can be used and improve our effectiveness as customs service. The exchange of ideas and efficient working methods and good cooperation between Member States at customs level is also an important factor in the development and security of the EU.

How does the cooperation with Turkish side look like? What are the goals and perspectives of this cooperation?

The cooperation exists in national, regional and local level through various committees. Locally(BCP level) there are a lot of meetings between the heads of the customs in order to cope with everyday problems. The objectives of this cooperation are the smooth flow of commercial traffic, and cooperation in combating cross-border crime.

If You could imagine BCP of Your dreams, how it would look like?

I could write pages and pages about this but I will use only some words to describe how I imagine BCP of my dreams. Sufficient, well trained and educated staff with high ethical values, which are adequately remunerated, appropriate building infrastructures and properly selected, appropriate means of enforcement and use of emerging IT systems.
What was happening last months – review

Steering Committee meeting in Warsaw

- I am impressed by CELBET work, how many data is collected how many things can be done with some people. That means that if you want - you can do it. CELBET is like: tell me what to do and I will bring you the results – said Mrs Ilze Kuniga from TAXUD at the Steering Committee meeting in November.

On 28 of November in the Ministry of Finance in Warsaw, the CELBET 2 Steering Committee was held. All 11 Member States involved in the project were present together with the representatives of the European Commission.

Representatives of Frontex and OLAF also took part in the meeting. The meeting was opened by Mr Marian Banaś, Secretary of State and Head of the National Revenue Administration of Poland, who reminded that working out standards which help to achieve effective and balanced external EU border protection level are most important. This general goal of CELBET expert team is becoming more important, regarding the traditional and new challenges, like potential threats that are connected with the conflict in Ukraine.

During the meeting, the results of six month’s work of the CELBET Group were presented, as well as the prospects for further development of the project. The Secretary of State and Head of the National Revenue Administration underlined that achieving expected results depends on the activity of CELBET, which was highly evaluated not only by participating countries but also by the European Commission. Mrs Ilze Kuniga from TAXUD, highlighted tangible results of CELBET and raised their importance.

Mr Jyrki Linna, Head of CELBET, presented the idea of missions and the benefits from officer exchange. Next Steering Committee will be held in Rzeszow, Poland, close to border with Ukraine.
First CELBET Assistance Mission completed

The mission was devoted to development of the Synchronised Checks in Lithuania. CELBET experts provided significant support for Lithuanian Customs and Border Guard in preparations of the pilot on the solution. The mission consisted of 3 components:
1. Fact finding visit at the Lavoriskes Border Crossing Point
2. Two working meetings with middle and high level management of the Customs Administration and Border Guards on which experts presented worked out recommendations and discussed solutions to implement.
3. Workshop on Customs Service and Border Guards cooperation

Thanks to the mission CELBET experts delivered precise recommendations and practical solutions that matter and make the cooperation happen.

Site visit on Polish – Ukrainian border

BCP Management & Evaluation team visited on 22-24.01 Revenue Administration Regional Office in Lublin, Poland and Polish-Ukrainian border crossing point Dorohusk-Jagodzin. Team experts were presented the whole infrastructure of BCP in order to elaborate the peer review/ diagnostic of visited border crossing point. This activity helps experts to find strong and weak sides of the BCP and share solutions that can improve the efficiency of the BCP performance.

CELBET Procurement Expert Network is established

A meeting of the Network where the members could collaborate with the experts from the EQ team on various matters, took place in January 2019 in Warsaw. The Netwok is operational and members are sharing valuable information on customs detection technology.

This network is engaged in the following activities:
- collaborate with the experts from the EQ team on matters related with preparing technical specifications for procurements of customs control and detection equipment;
- disseminate all information relevant for implementation of EQ task and for achieving tangible results;
- give feedback on feasibility of EQ deliverable taking into account the particularities of the national procurement legislation;
- ensure the communication between the experts from their organization and EQ team experts, when/if needed;

disseminate the EQ team deliverables on their organization

The goal is balanced border crossing points development.

Following conclusions of the EU-Belorussian Project Group on Customs Dialog Celbet Inter-agency and 3rd Country Co-operation Team continues the implementation of the project on the balanced development of the both sides BCPs at the EU border strips with Belarus (LV, LT, PL).

On the 26.02 the Team facilitated a meeting among Latvian and Belorussian authorities to finalize the consultation process of the procedure and BCPs capacity review. In order to make this procedure work in real life – the procedure is going to be tested now at the Western Balkans border strips. Furthermore, the concept of synchronization of the Customs and Border Guards checks and joint management of the emergencies and peak time at the BCPs have been promoted.
CELBET Diagnostic Tool will improve efficiency of border crossing points. New product was tested in BCP Albita, Romania.

CELBET BCP Management and Evaluation team is developing a BCP Diagnostic Tool, which could help to understand the situation at the BCP in different areas, including infrastructure, equipment, controls, cooperation with border agencies, training and management. The first testing of the tool was performed in BCP Albita together with representatives from CELBET Operational Controls and Equipment team. The good cooperation between Customs and the Border Police was noticed. Needs to update BCP infrastructure and equipment were discussed. The participants of the visit agreed, that the tool is very helpful, not just for CELBET but for national administrations, in order to get the information on the strengths and on the areas of improvement at the BCP and it was decided to develop the BCP Diagnostic tool further. Also the benefits for closer cooperation between BCPs with similarities was acknowledged.

Finnish officers trained the trainers – first Celbet car search training.

From 25 to 29 March in Vaalimaa, Finland on Finnish and Russian border crossing point, first CELBET car search training was organized. Thanks to CELBET Training Team activity and Finnish Customs support, customs officers from Bulgaria, Slovakia, Estonia, Croatia, Romania, Lithuania, Latvia, Poland and Hungary had chance to participate in this special training for trainers. During the meeting CELBET Training Team presented the concept of Centre of Expertise which will be very useful and effective tool for the customs service trainers and officers from CELBET Member States. Additionally, Training Team organized workshop on the issue of the national implementation possibilities of the car search training, which gave an opportunity to discuss the way of winning with smugglers and share the experiences. Next training for trainers will be held in X-ray Centre in May in Gdansk, Poland.

Special visits in Latvia, Greece and Croatia

- *We do things that matter, practical things that can be exploited in Member States, but we also want to know what are their expectations* – says Jyrki Linna about issues and aims of the visits. From the beginnig of April Head of CELBET Jyrki Linna and Grant Coordinator Pille Jogisoo visited Customs Administrations of Latvia, Greece and Croatia. First meeting was held in Latvia with Mrs. Ingrida Gulbe-Otanke –Director General of Latvian Customs Board who highlighted meaning of the project as a valuable activity for Latvia and experts involved. Cooperation, trainings and missions were considered during the meeting in Athens with Mr Konstantinos Mourtidis, Director General of Greek Customs Directorate General and Excise duties. Last visit was paid in Croatia. Mr Mario Demirovic, deputy Director General of Croatian Customs pointed out that Croatian Customs clearly benefits from data and material received from CELBET. One of the main products of CELBET is monitoring checks. This unique tool made by BCP Management & Evaluation Team gave valuable information about the situation at the EU Eastern and South-Eastern land border.
We are busy and we do a lot of practical things that matter… sometimes is good to show what we have made but also what new ideas we have. Because like Vince Lombardi said: “The achievements of an organization are the results of the combined effort of each individual.”
Operational Controls Team

Results of Joint Intensified Activity 4

- 13,839 vehicles (buses, passenger cars and trucks) and 17,192 passengers had been controlled at BCPs and by Customs Mobile Units.
- 16,239,880 pcs of cigarettes had been seized
- 831,200 pcs of cigarettes had been seized by Customs Mobile Units.

Next steps

- develop instructions for CELBET Missions
- common Frontex workshop on planned Joint CELBET Activities and Joint Action Days (JAD) in rail
- develop vulnerability analysis of BCPs.

INTER-Agency AND 3rd Country Co-Operation Team

HAS SUCCESSFULLY PROVIDED

ASSISTANCE IN IMPLEMENTATION OF THE CUSTOMS AND BGS SYNCHRONIZED CHECKS AT ESTONIAN AND LITHUANIAN BCPs
IMPLEMENTATION OF THE PROCEDURE OF THE BALANCED BCPs DEVELOPMENT AT BELORUSSIAN BORDER STRIP
DESIGNING AND DELIVERY OF THE JOINT CELBET-FRONTEX TRAINING COURSE ON ENHANCED COOPERATION BETWEEN CUSTOMS AND BGS (TOGETHER WITH TR AND OC)

NEXT STEPS

CUSTOMS AND BORDER GUARDS SHIFT LEADERS ACTIVITIES CHECK-LIST - MORE EFFECTIVE BCPs SHIFT MANAGEMENT AND ENHANCED CUSTOMS AND BGS COOPERATION
JOINT CUSTOMS AND BGS CONTINGENCY PROCEDURE TO REACT IN EMERGENCY AT BCPs INTENSIFICATION OF ACTIVITIES IN WESTERN BALKANS REGION
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