

cpet

Central Point of Expertise on Timber

Evaluation of Category A Evidence

Obsolète

Assessment Results
**Canadian Standards
Association (CSA)**

18 October 2004

CSA 2004

Executive Summary

Date of Current Assessment: October 2004

Anticipated Date of Next Assessment: 2006

Current Status

Meets requirements for legality.

Meets requirements for sustainability.

Changes from last assessment

N/A

Obsolete

1. Introduction

The UK Government's procurement policy on timber and timber products was announced in July 2000¹. This policy requires all Government departments and their agencies to actively seek to buy timber products from legal and sustainable sources. In 2003 the Government issued a model contract specification for the supply of timber and timber products that required timber to come from legal sources. The model contract also included a variant specification for timber from sustainable sources.

A key requirement of the contract and variant specification is that suppliers must be able to provide evidence to the Government that the wood or wood products they supply are from legal and, if promised by the supplier, sustainable sources. A number of ways were identified for achieving this. One of the most straightforward is to supply products from certified sources², provided that the certification scheme involved delivers the Government's requirements for legality or sustainability. As there are a number of different timber certification schemes available, the Government recognised that it needed a framework for assessing which ones deliver its timber policy, incorporating the requirements contained in the new contract and variant specifications.

Therefore, a study was carried out through the Central Point of Expertise in Timber (CPET) to review the contract and variant specifications and to assess the five certification schemes identified by procurement staff as the most commonly encountered in the UK wood supply chain to establish which of them deliver UK Government requirements for legal and sustainable timber. These five schemes were:

- The Canadian Standards Association scheme (CSA), which is applicable in Canada.
- The Forest Stewardship Council system (FSC), which is international in scope.
- The Malaysian Timber Certification Council scheme (MTCC), which is applicable in Malaysia.
- The Programme for the Endorsement of Forest Certification schemes (PEFC), which is international in scope.
- The Sustainable Forestry Initiative (SFI), which is applicable in the US and Canada.

These certification schemes are assessed annually to ensure they continue to meet the UK Government's criteria for "legal" and "sustainable".

¹ http://www.press.dtlr.gov.uk/pns/DisplayPN.cgi?pn_id=2000_0516

² It is important to note that the UK Government has no intention of requiring suppliers to supply only certified products. It is simply one of the ways in which evidence of legality or sustainability can be delivered. Any other adequate form of evidence will be equally acceptable.

2. The methodology for assessing schemes

2.1 Methodology

The annual re-assessment of each scheme is made based on publicly available documentation from each scheme. For each criterion, relevant scheme requirements were identified together with a note on whether these constituted inadequate, partial or full compliance with the criterion.

The draft assessments were sent to the respective scheme with an invitation to review the findings and, wherever appropriate, to provide further information or comment on the draft results.

Comments, together with additional information or documentation, were submitted by each scheme and discussions were held with some scheme personnel to discuss and clarify particular issues. The initial findings were reviewed on the basis of this additional input and proposed changes to the findings were drafted. These proposed changes, together with all of the comments submitted by the schemes, were sent for internal Government review and then discussed with the CPET Reference Board. Based on all the input received from this process, the findings were then finalised, and submitted to DEFRA. Following acceptance by DEFRA, the completed findings were sent to the respective schemes.

A more detailed version of the methodology can be found in the CPET Phase 1 Final Report, dated November 2004.

2.1.1. Information sources

As discussed above, the assessment for each scheme was carried out based on publicly available documentation from the scheme, together with direct discussions with some scheme personnel. ***No assessment of the actual outcome of certification in the forest was made***, as this was not part of the terms of reference for the assessment. Details on the sources are available in Appendix 1.

2.1.2. Scoring system used

For each scheme compliance with the requirements of each criterion was scored on a 3-point scale:

0: Inadequately addressed and not acceptable.

1: Partially addressed.

2: Fully addressed.

As a result of having only three possible scores, the score of 1 applied to a wide range of situations, but this was considered a better option than trying to divide partial compliance into a number of different levels which carries a significant risk of becoming subjective.

To achieve recognition as delivering requirements for legality the scheme must achieve a score of at least 1 for each criterion applicable to legality.

To achieve recognition as delivering requirements for sustainability the scheme must achieve a score of at least 1 for each criterion applicable to sustainability as well as an overall score equal to 75% of the total possible.

Therefore, a score of zero for any criterion prevents a scheme from being recognised for the category.

2.1.3. Addressing products containing certified and uncertified material

All of the certification schemes examined allow mixing of certified and uncertified raw material in certified products. As a result, two types of certified product exist:

- 100% certified products: these products contain only material which originated in certified forests. For these products it is only necessary to assess the control of certified material.
- Mixed source products: these products contain material from a range of sources including certified forests, uncertified forests and recycled. Therefore, it is necessary to assess the control not only of certified material, but also of uncertified and recycled material to establish whether it meets the contract conditions and variant specification.

Therefore, although the bulk of the analysis deals with the control of certified material, it is also necessary to decide what is adequate control of the uncertified material in a mixed source product. This was determined as follows:

Legal compliance: the requirements of the certification scheme must be adequate to ensure that there is a verifiable system in place to check that all uncertified material is from a legal source. It is recognised that this is less rigorous than the requirements for the certified material and provides less of a guarantee that the material is from a legal source. However, it was considered that this was adequate to demonstrate due diligence provided the certification schemes included mechanisms to enforce the requirement.

Sustainable: the Government variant specifications and the criteria used to assess schemes set out rigorous requirements which must be met in the forest in order to ensure that forest management is sustainable. Therefore, if uncertified material is to be considered as coming from sustainable sources, it is necessary to have in place a system that ensures similarly rigorous requirements are met for the uncertified material. In practice, such requirements exist only for certified material and currently are not met by any scheme for uncertified raw material.

3. Results

The full findings, scores and results for the CSA assessment can be found in Appendix 1.

3.1. Legal

The assessment indicated that the CSA scheme is adequate to ensure that certified forests meet UK Government requirements for legal timber. In addition, the requirements for control of uncertified material in mixed source products are adequate to deliver legality. Therefore, all CSA-certified products deliver UK Government requirements for legality.

3.2. Sustainable

The assessment indicated that the CSA scheme is adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with all schemes, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, CSA-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability. In practice, the CSA scheme only allows up to 30% uncertified material in certified products so all CSA-certified products should meet UK Government requirements for sustainability.

Obsoleted

Appendix 1. Full results of the assessment for CSA

This appendix contains the full results of the assessment of the CSA forest certification scheme against the UK Government criteria.

The results are presented in the form of a table with five columns containing the following information:

- **Criteria:** This sets out the UK Government criteria for assessing forest certification schemes which a scheme must meet.
- **Findings:** This contains notes from the assessment process summarising the objective evidence compiled from the scheme documentation to justify the score given. *It should be noted that the text in this column is in the form of notes to summarise the information to be used in making an assessment and may in some cases be ambiguously or imperfectly worded. It was not designed to replace original scheme wording nor to be quoted in isolation.*
- **Score:** This sets out the score given for the degree of compliance with the scheme with each criterion. See Section 2.2.3 for notes on the scoring system used.
- **L:** A tick in this column indicates that the criterion relates to meeting UK Government requirements for legality.
- **S:** A tick in the column indicates that the criterion relates to meeting UK Government requirements for sustainability.

Source documents

Standards Council of Canada (SCC) CAN-P-1D: Accreditation of Standards Development Organisation

CAN/CSA-Z809-02 Sustainable Forest Management Requirements and Guidance

CSA PLUS 1133: General Audit Principles and Audit Procedures for SFM

CSA PLUS 1163: Chain of Custody

CSA International: Specifications for Use of the CSA SFM Mark

SCC CAN-P-14B (verbatim adoption of ISO/IEC Guide 66)

SCC CAN-P-1518: Conditions and Procedures for Accreditation of Organisations Registering Environmental Management Systems

1. Forest Standards

1.1. Content of standards for legal compliance

| Criteria | Findings | Score | L ³ | S |
|---|---|-------|----------------|---|
| 1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest | Fully addressed by Z809, sections 7.3.1, 7.3.2, 7.3.4, which require that all requirements relating to ownership and tenures are complied with. | 2 | ✓ | |
| 1.1.2 The standard requires compliance from both the forest management organisation and any contractors with local and national laws and codes of practice including those relevant to: <ul style="list-style-type: none"> • Forest management • Environment • Labour and welfare • Health & safety | Fully addressed by Z809, sections 4.1 (compliance with relevant legislation), 7.2 (policy commitment to meet or exceed all legal requirements), 7.3.4 (rights and regulations). | 2 | ✓ | |
| 1.1.3 The standard requires payment of all relevant royalties and taxes | Fully addressed by Z809, CCFM Criterion 5 (Multiple Benefits to Society), requirements c) iii and iv for payment of taxes & stumpages. | 2 | ✓ | |
| 1.1.4 The standard requires compliance with the requirements of CITES. | Implicit in the content of Z809, sections 4.1 and 7.3.4 for legal compliance. Canada is a signatory to CITES. | 2 | ✓ | |

1.2. Content of standards for sustainable variant

| Criteria | Findings | Score | L | S |
|--|---|-------|---|---|
| 1.2.1 Certification standards must be based on a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level, such as: <ul style="list-style-type: none"> • Intergovernmental processes designed for | The Z809 requirements for SFM are based on an FMU level interpretation of the Helsinki and Montreal intergovernmental processes. This interpretation was undertaken by the Canadian Council of Forest Ministers (CCFM), an inter-provincial governmental body, for application only in Canada. There is no international interpretation of the Montreal process requirements for use at the FMU level, analogous to the Pan European Operational Level Guidelines. | 2 | | ✓ |

³ L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

| Criteria | Findings | Score | L | S |
|--|--|-------|---|---|
| <p>use at FMU level</p> <ul style="list-style-type: none"> ITTO Criteria FSC P&C | Z809 incorporates the CCFM SFM criteria. CSA SFM elements for compliance are defined under each CCFM criterion. | | | |
| 1.2.2 The standard should be performance-based. | Z809 section 6 acts as a performance framework, defining the range of performance parameters that must be addressed. Specific performance thresholds for each element in section 6 must be defined as a result of the required public consultation process (section 5). | 2 | | ✓ |
| <p>1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard should include requirements for:</p> <p>i) Appropriate assessment of impacts and planning to minimise impacts;</p> <p>ii) Protection of soil, water and biodiversity;</p> <p>iii) Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible.</p> <p>iv) Proper disposal of wastes to minimise any negative impacts.</p> | <p>i) Z809 contains no explicit reference to overall assessment of environmental impacts. However, the legal framework relating to forest management includes requirements for forest plans to adequately assess and minimise environmental impacts.</p> <p>ii) Addressed by Z809 requirements to minimise impacts on soil, water and biodiversity (see also criterion 1.2.6), in section 6, elements 1.1, 1.2, 1.3, 3.1. 3.2.</p> <p>iii/iv) There are no explicit references to chemicals and waste disposal. However, the legal framework relating to forest management includes requirements for forest plans to adequately assess and minimise environmental impacts, which includes chemical and waste issues.</p> | 2 | | ✓ |
| <p>1.2.4 The standard must ensure that productivity of the forest is maintained. In order to do this the standard should include requirements for:</p> <p>i) Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.</p> <p>ii) Monitoring which is adequate to check</p> | <p>i) Addressed by Z809 requirements for an SFM plan (section 7.3.7), and control of implementation & operations (section 7.4).</p> <p>ii) Monitoring is addressed by Z809 requirements for checking & corrective actions (section 7.5).</p> <p>iii) Z809 addresses control of operations to meet SFM requirements (section 7.4.6).</p> <p>iv) Z809 contains requirements for training, awareness, qualifications and knowledge (section 7.4.2).</p> <p>v) Z809 does not include specific requirements for control of harvest levels,</p> | 1 | | ✓ |

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| Criteria | Findings | Score | L | S |
|--|---|-------|---|---|
| <p>compliance with all requirements, together with review and feedback into planning.</p> <p>iii) Operations and operational procedures which minimise impacts on the range of forest resources and services.</p> <p>iv) Adequate training of all personnel, both employees and contractors.</p> <p>v) Harvest levels that do not exceed the long-term production capacity of the forest, based on adequate inventory and growth and yield data.</p> | <p>based on the production capacity of the defined forest area. Although Z809 section 6 includes forest ecosystem productivity (element 2.2), there are no specific references to harvest levels. Element 5.1 requires the forest to be sustainably managed for an 'acceptable and feasible mix' of timber and non-timber benefits.</p> | | | |
| <p>1.2.5 The standard must ensure that forest ecosystem health and vitality is maintained. In order to do this the standard should include requirements for:</p> <p>i) Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>ii) Management of natural processes, fires, pests and diseases.</p> <p>iii) Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p> | <p>i) Addressed by Z809 requirements for an SFM plan (section 7.3.7).</p> <p>ii) Addressed by Z809 requirements relating to maintenance of ecosystem processes, in terms of species diversity (element 1.2), genetic diversity (element 1.3), forest ecosystem resilience (element 2.1), forest ecosystem productivity (element 2.2), carbon uptake and storage (element 4.1) and forest land conversion (element 4.2). Z809 does not include specific references to fire, pests and diseases (apart from the general requirements for legal compliance), although this is adequate in the Canadian context.</p> <p>iii) Z809 requirements concerning protection from unauthorised activities are implicit, although this is considered to be adequately addressed by the legal framework and interpretation of SFM elements during the public participation process.</p> | 2 | | ✓ |
| <p>1.2.6 The standard must ensure that biodiversity is maintained. In order to do this the standard should include requirements for:</p> <p>i) Implementation of safeguards to protect rare,</p> | <p>i) Z809 requirements address the conservation of species diversity (element 1.2). However, the protection of rare, threatened and endangered species is not explicit, and this depends on local values set by the public participation process. Although there are legal controls, these would not fully amount to the</p> | 1 | | ✓ |

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| Criteria | Findings | Score | L | S |
|---|--|-------|---|---|
| <p>threatened and endangered species.</p> <p>ii) The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>iii) The protection of features and species of outstanding or exceptional value.</p> | <p>implementation of safeguards.</p> <p>ii) Z809 requirements adequately address the conservation of ecosystem diversity (element 1.1).</p> <p>iii) Z809 contains requirements for conservation of protected areas and sites of special biological significance (element 1.4). However, the protection of species of exceptional value is not explicit, and depends on local values set by the public participation process.</p> | | | |

1.3. Standard-setting process

| Criteria | Findings | Score | L | S |
|--|--|-------|---|---|
| 1.3.1 The standard-setting process should meet the requirements of <i>ISO Guide 59: Code of Good Practice for Standardisation</i> , the <i>ISEAL Code of Good Practice for Setting Social and Environmental Standards</i> or equivalent. | CSA is accredited by SCC against the requirements of CAN-P-1D for standard setting. This incorporates ISO Guide 59 requirements. | 2 | ✓ | ✓ |
| 1.3.2 The standard-setting body must include balanced representation of economic, environmental and social interest categories. | <p>The standard development process was managed by CSA, with considerable public consultation. The standard-setting forum is the CSA SFM Technical Committee (TC). CSA acted to strengthen the 'conservation representation' on the TC for the review of the standard that commenced in 2000 (Z809 section 0.2).</p> <p>The TC membership is organised as four interest categories: professional, general interest/environmental, government and business, and CSA directives require that the actual membership in any category is not larger than the sum of the members in the two smallest categories. However, this does not fully amount to balanced representation of economic, environmental and social interest categories.</p> | 1 | | ✓ |
| 1.3.3 The decision-making process adopted by the standard-setting body should ensure: | The decision-making process is outlined by the Z809 Preface, Note (3), which states that the standard was developed by consensus, defined as substantial agreement but not | 1 | | ✓ |

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| Criteria | Findings | Score | L | S |
|--|--|-------|---|---|
| <ul style="list-style-type: none"> no individual person or organisation can veto the process; no single interest can dominate the process; no decision can be made in the absence of agreement from the majority of an interest category. | <p>necessarily unanimity. The CSA SFM Program Overview for PEFC Application notes that the TC unanimously approved the standard.</p> <p>CSA directives ensure that no single organisation can veto the process, and that no single interest can dominate the process. Specifically, this is effected through the four-chamber system, and the requirement that the number of affirmative votes must be at least 50% of the total number of voting members and 2/3 of the votes cast. However, this decision-making rule does not ensure that the CSA TC would require agreement from a majority of each interest category.</p> | | | |

2. Certification

| Criteria | Findings | Score | L | S |
|--|--|-------|---|---|
| <p>2.1 Certification is undertaken by an individual or body whose organisation, systems and procedures conform to appropriate ISO guidance, or publicly available equivalent. ISO guidance includes:</p> <ul style="list-style-type: none"> ISO Guide 62:1996 General requirements for bodies operating assessment and certification/registration of quality systems ISO Guide 65: 1996 General Requirements for bodies operating product certification systems ISO Guide 66: 1999 General requirements for bodies operating assessment and certification/registration of environmental management systems (EMS). | <p>Certification bodies that undertake CSA SFM assessments are accredited by SCC, against SCC CAN-P-1518.</p> <p>Certification bodies are required to comply with CAN-P-14B, which equates to ISO Guide 66 for certification of EMS.</p> | 2 | ✓ | ✓ |

| Criteria | Findings | Score | L | S |
|---|--|-------|---|---|
| 2.2 Certification is undertaken by an individual or body which is accredited to evaluate against forest management standards. | SCC operates an SFM industry sector programme for accreditation of certification bodies to assess against Z809. Accreditation for EMS certification under CAN-P-1518 is a prerequisite. SFM is then added as a specific scope of accreditation. | 2 | ✓ | ✓ |
| 2.3 The certification audit must include assessment of systems and documentation together with verification of outcomes in the forest adequate to ensure that both system and performance requirements in the standard are being met. | ISO Guide 66 includes requirements that the certification body checks both the systems in place and their implementation (section 5.2.5). Additional guidance is provided by CSA PLUS 1133. Z809 Annex A (although not a mandatory part of the standard) states that 'a high proportion of the audit time' is spent in the field checking outcomes (section A.2.3). | 2 | ✓ | ✓ |
| 2.4 The certification audit must include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard. | ISO Guide 66 does not include any requirements for stakeholder consultation during the certification audit. CSA PLUS 1133 states that the certification body must verify that SFM requirements have been 'properly implemented' (section 6.1), but does not specifically require consultation during the certification audit. In practice, it is understood that certification bodies have to date invariably included consultation, and that the SCC ensure that consultation takes place as an integral part of the assessment process. In addition, the Z809 requirements do include extensive public participation as a component of achieving compliance with the standard (Z809 section 5), which must be checked during the certification audit. | 1 | | ✓ |
| 2.5 A summary of the results of the certification audit (excluding confidential information) is publicly available to interested parties. | ISO Guide 66 does not include any requirements for public availability of the certification audit results, apart from a directory of certified organisations (section 4.1.7.1 g) However, Z809 does require that the results of certification audits are publicly available (section 7.4.3.1 e). This is combined with requirements for public availability of the forest manager's SFM plan (section 7.4.3.1 c) and of an annual report on SFM | 2 | | ✓ |

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| Criteria | Findings | Score | L | S |
|--|---|-------|---|---|
| | implementation (section 7.4.3.1 d). | | | |
| 2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any interested party. | <p>ISO Guide 66 includes requirements for procedures relating to complaints and disputes (sections 4.1.2 p and 4.4), which are open to any interested party.</p> <p>Z809 Annex A (although not a mandatory part of the standard) specifically confirms the requirement for appropriate dispute resolution mechanisms (section A.2.8).</p> | 2 | ✓ | ✓ |

3. Accreditation

| Criteria | Findings | Score | L | S |
|--|---|-------|---|---|
| 3.1 Accreditation must be undertaken by a national or international body whose organisation, systems and procedures conform to ISO Guide 61: 1996 General Requirements for Assessment and Accreditation of Certification Bodies or equivalent. | <p>Accreditation is undertaken by SCC.</p> <p>SCC is a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Agreement (MLA), under which ISO 9000 certificates are mutually recognised. This provides international recognition that SCC's accreditation systems are Guide 61 compliant.</p> | 2 | ✓ | ✓ |

4. Chain of custody

4.1. Criteria for all products

| Criteria | Findings | Score | L | S |
|---|---|-------|---|---|
| 4.1.1 Assessment of chain of custody must be undertaken by a certification body or auditor operating in accordance with ISO Guide 65 or equivalent and accredited by an accreditation body operating in accordance with ISO Guide 61 or equivalent. | <p>CSA International's Specifications for the Use of the CSA SFM Mark state that QMI is the only certification body 'recognised by CSA International's Forest Products Group' for COC auditing and control of claims (section 3.0).</p> <p>CSA International is an accredited certification and testing body accredited to the requirements of Guide 65 by the Standards Council of Canada. QMI is an accredited certification body for SFM certification, which requires Guide 66 compliance. CSA state that the COC programme 'was established to be Guide 65 conformant'.</p> <p>However, the programme does not yet involve</p> | 1 | ✓ | ✓ |

| Criteria | Findings | Score | L | S |
|--|---|-------|---|---|
| | accreditation of certification bodies, and there is currently no accreditation for chain of custody certification against CSA PLUS 1163. The CSA application to PEFC states that accreditation for the scheme is currently being applied for. | | | |
| 4.1.2 There must be a certified chain of custody in place from the forest of origin to the final product. | Fully addressed by CSA PLUS 1163 (section 0.1). | 2 | ✓ | ✓ |
| 4.1.3 There is a clearly defined mechanism for controlling all claims made about the certified nature of products which ensures that claims are clear and accurate and that action is taken to prevent any false or misleading claims. | Fully addressed by CSA International's Specifications for the Use of the CSA SFM Mark. | 2 | ✓ | ✓ |

4.2. Criteria for certified and non-certified mixed products

| Criteria | Findings | Score | L | S |
|--|--|-------|---|---|
| 4.2.1 If recycled material is used there must be a verifiable system in place to ensure that recycled material is from the following categories: <ul style="list-style-type: none"> • Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products • Post-consumer recycled wood and wood fibre • Drift wood | <p>CSA International's Specifications for the Use of the CSA SFM Mark state that 'recycled wood or fibre is excluded from the determination of certification percentage' (section 12.0).</p> <p>CSA state that 'recycled material has not been specifically addressed in the CSA SFM Program because to date there has not been a demand from this sector to enter into CoC and product marking.' Required systems are therefore not explicitly defined.</p> | n/a | ✓ | ✓ |

| | | | | |
|--|--|---|---|--|
| <p>4.2.2 If mixing of certified and uncertified material is permitted then there must be a verifiable system in place which ensures that all uncertified material used is from legal sources to meet the contract requirements for legal timber.</p> | <p>CSA PLUS 1163 states that the organisation must have a system for verifying the origin of all material entering the certified supply chain, and that all material must either be certified or 'verifiable and legitimate' (section 4.4).</p> <p>In addition, for use of the CSA SFM mark, the specifications state that labelled products must not include any raw material from 'controversial' or illegal sources. This must be based at least on self-declarations by suppliers (sections 4.0 and 14.0).</p> | 2 | ✓ | |
| <p>4.2.3 If mixing of certified and uncertified material is permitted then there must be a system in place which ensures that all uncertified material used is from sustainable sources to meet the variant specification requirements for sustainable timber.</p> | <p>There is no requirement for a system to ensure that the forests of origin of all uncertified material meet the variant specification requirements for sustainable timber.</p> <p>CSA PLUS 1163 does not include any requirements for the uncertified portion of products beyond 'verifiable and legitimate' (see criterion 4.2.2).</p> | 0 | ✓ | |