Proposal for a European Climate Law – Suggestions for Amendments

On 4 March 2020, the European Commission proposed the European Climate Law (ECL), officially called the "Regulation for Establishing the Framework for Achieving Climate Neutrality". BirdLife Europe and Central Asia and its German partner NABU propose amendments to the proposal which aim to hasten action on climate change whilst protecting, and utilising the carbon sink potential of biodiversity. With the outbreak of the COVID-19 and unforeseen economic consequences, it will be even more important, to stick to the legislation proposed by the European Green Deal and steer the economy towards a just and environmental friendly recovery through the first European Climate Law.

Amendments (bold and italics), deletions ~~strike-through~~

Context of the proposal

5. OTHER ELEMENTS

- **Detailed explanation of the specific provisions of the proposal**

  Article 2 sets the EU 2050 climate-neutrality objective, covering all sectors and all greenhouse gases - not only CO_2 -, and to be achieved domestically within the Union. It reflects that in line with Article 4(4) of the Paris Agreement, developed country Parties should continue taking the lead by undertaking economy-wide absolute emission reduction targets. It recognises that while greenhouse gas emissions should be avoided at source as a priority, removals of greenhouse gases will be needed to compensate for remaining greenhouse gas from sectors where decarbonisation is the most challenging. ***Currently marine and terrestrial ecosystems are the sole sinks for anthropogenic carbon emissions, these*** ~~The~~ natural sinks of ***healthy and functioning*** forests, soils, ***wet- and peat***lands, ***regenerative*** agricultural land~~s,~~ ***and marine habitats, including sea grass and kelp forests,*** ~~and~~ should be ***restored, protected,*** maintained and further increased. ***C***arbon removal technologies, such as carbon capture and storage and carbon capture and utilisation, should ~~be made cost-effective~~ ***only be considered*** ~~deployed~~ ***for heavy industries if cost effective, while applying the precautionary principle for the environment.*** The Article also requires the European Parliament, the Council and the Commission and the Member States to take the necessary measures both at Union and national level to enable the collective achievement of this objective. Measures at Union level will constitute an important part of the measures needed to achieve the objective.

Explanation:

Marine and terrestrial ecosystems are the sole sinks for anthropogenic carbon emissions, with a gross sequestration of 5.6 gigatons of carbon per year (the equivalent of some 60 per cent of global anthropogenic emissions) [1].

[1] IPBES (2019): Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. S. Díaz, J. Settele, E. S. Brondízio E.S., H. T. Ngo, M. Guèze, J. Agard, A. Arneth, P. Balvanera, K. A. Brauman, S. H. M. Butchart, K. M. A. Chan, L. A. Garibaldi, K. Ichii, J. Liu, S. M. Subramanian, G. F. Midgley, P. Miloslavich, Z. Molnár, D. Obura, A. Pfaff, S. Polasky, A. Purvis, J. Razzaque, B. Reyers, R. Roy Chowdhury, Y. J. Shin, I. J. Visseren-Hamakers, K. J. Willis, and C. N. Zayas (eds.). IPBES secretariat, Bonn, Germany. 56 pages.

There are high concerns around the large-scale technical potential and market feasibility of Carbon Capture and Storage (CCS) and Carbon Capture and Utilisation (CCU), and the impact on the environment and food security when combined with bioenergy (BECCS) is well documented in literature[2]. BirdLife and NABU do not consider relying on such methods as a viable solution to achieve the 2050 climate neutrality goal, rather recommending a faster reduction of GHG-emissions reducing the need for CCS and the associated uncertainties. However, as the NABU-study by Wuppertal Institute[3] states, CCS can be considered for hard to decarbonize heavy industries. Relying on "other sinks" needs to be accompanied with an environmental impact assessment.

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

establishing the framework for achieving climate neutrality and amending Regulation (EU) 2018/1999 (European Climate Law)

Whereas:

(2) The Intergovernmental Panel on Climate Change's (IPCC) Special Report on the impacts of global warming of 1.5 °C above preindustrial levels and related global greenhouse gas emission pathways provides a strong scientific basis for tackling climate change and illustrates the need to step up climate action. It confirms that greenhouse gas emissions need to be urgently reduced, and that climate change needs to be limited to 1.5 °C, in particular to reduce the likelihood of extreme weather events. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services' (IPBES) 2019 Global Assessment Report showed worldwide erosion of biodiversity. ***Habitat loss and degradation is the primary driver of biodiversity loss while representing 13% of total net anthropogenic emissions of GHGs*. The direct impact of*** ~~, with~~ climate change ~~a~~**is** the third most important driver of biodiversity loss ***in marine and terrestrial ecosystems which are the sole sinks for anthropogenic carbon emissions.***

(14) Adaptation is a key component of the long-term global response to climate change. Therefore, Member States and the Union should enhance their adaptive capacity, strengthen resilience and reduce vulnerability to climate change, as provided for in Article 7 of the Paris Agreement, as well as maximise the co-benefits with other environmental policies and legislation. ***In doing so, destructive activities that hinder ecosystem ability to adapt to climate change need to be removed to ensure the resilience of biodiversity and ecosystem services including carbon assimilation. Renewable energy installation, which is nature-compatible, should be prioritised.*** Member States should adopt comprehensive national adaptation strategies and plans.

* IPCC, 2019: Summary for Policymakers. In: *Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems* [P.R. Shukla, J. Skea, E. Calvo Buendia, V. Masson-Delmotte, H.- O. Pörtner, D. C. Roberts, P. Zhai, R. Slade, S. Connors, R. van Diemen, M. Ferrat, E. Haughey, S. Luz, S. Neogi, M. Pathak, J. Petzold, J. Portugal Pereira, P. Vyas, E. Huntley, K. Kissick, M. Belkacemi, J. Malley, (eds.)].

[2] Hasegawa, T., Fujimori, S., Havlík, P., Valin, H., Bodirsky, B., Doelman, J., Fellmann, T., Kyle, P., Koopman, J., Lotze-Campen, H., Mason-D'Croz, D., Ochi, Y., Pérez Domínguez, I., Stehfest, E., Sulser, T., Tabeau, A., Takahashi, K., Takakura, J., Meijl, H., Zeist, W., Wiebe, K., & Witzke, P. (2018). Risk of increased food insecurity under stringent global climate change mitigation policy. Nature Climate Change, 8(8), 699-703.

[3] Samadi, S., Kobiela, G., Lechtenböhmer, S., Wilts, H. (2018): Strategien für eine naturverträgliche Energiewende. Wuppertal Institut für Klima, Umwelt, Energie gGmbH

Explanation:

The current text ignores the key issue that land use and land use change is one of the leading contributors of GHG to the atmosphere, while also being the leading cause of biodiversity loss. It is narrow vision to talk about the impact of climate change on biodiversity when ignoring the human actions that are contributing to both. The proposal only quotes one part of the Global Assessment Report while ignoring the other side of the medal. It is crucial that the climate law highlights that the capacity of these sinks to function is hindered by biodiversity destructive and carbon releasing, fishing, agricultural and forest management practises.

Article 1

Subject matter and scope

This Regulation establishes a framework for the irreversible and ~~gradual~~ ***swift*** reduction of greenhouse gas emissions and enhancement of removals by natural ***sinks,*** or other sinks ***provided compliance with a climatic and environmental impact assessment, wit***hin the Union.

This Regulation sets out a binding objective of climate neutrality in the Union by 2050 in pursuit of the long-term temperature goal set out in Article 2 of the Paris Agreement, and provides a framework for achieving progress in pursuit of the global adaptation goal established in Article 7 of the Paris Agreement.

This Regulation applies to anthropogenic emissions and removals by natural or other sinks of the greenhouse gases listed in Part 2 of Annex V to Regulation (EU) 2018/1999.

Explanation:

The basis of the law should be a focus on swift decarbonisation and a preference for carbon absorption via nature based solutions, otherwise achieving 1.5°C or even 2°C will not be possible. Worldwide, nature-based solutions can provide 37% of the solution needed for a >66% chance of keeping warming well below 2°C. (Griscom et al., 2017[4]). A prioritization of nature-based solutions by restoring and protecting natural carbon sinks is cost-efficient and will path the way to carbon-neutrality in line with the EU long-term strategy. They are furthermore key in generating negative emissions after 2050. Additionally to Article 1, a clear definition of natural sinks must be provided.

Other options for alternative carbon sinks can be considered if the technology is developed, is economically viable, and a climatic and environmental impact assessment is carried out. For example, if Carbon Capture and Storage (CCS) was considered, amongst other things, it would need to be proven that carbon is actually captured, that less energy goes into the capturing process than the equivalent greenhouse gas captured, and that the utilisation or storage of the gas was secure e.g. if put back into a coal seam, that it is not just going to leak back out. If the alternative sink choice was bioenergy crops, or afforestation, the assessment would need to show that the land conversion would not harm biodiversity, food production, and that during both the management and utilisation of the biomass there is actually a lifecycle reduction in carbon emissions.

[4] Griscom et. al (2017): Natural climate solutions. PNAS October 31. 225 (44). .

Article 2

Climate-neutrality objective

1. Union-wide emissions and removals of greenhouse gases regulated in Union law shall be balanced ***by 2040 and*** at the latest by 2050***. The Comission and Member States shall archieve this by 95 % emission reductions compared to 1990 and 5 % storage in natural sinks and by phasing out fossil fuels until 2040. Afterwards removals of greenhouse gases shall exceed emissions.***

2. The relevant Union institutions and the Member States shall take the necessary measures at Union and national level respectively to enable the collective achievement of the climate-neutrality objective set out in paragraph 1, taking into account the importance of promoting fairness and solidarity among Member States ***and the link between climate and biodiversity to restore carbon rich ecosystems.***
3. By September 2020, the Commission shall review the Union's 2030 target for climate referred to in Article 2(11) of Regulation (EU) 2018/1999 in light of the climate-neutrality objective set out in Article 2(1), and explore options for a new 2030 target of 50 to 55% ***and of 60 to 65 %*** emission emission reductions compared to 1990 without offsetting and for a 2040 target in line with latest science. Where the Commission considers that it is necessary to amend that target, it shall make proposals to the European Parliament and to the Council as appropriate.
4. 4. By 30 June 2021, the Commission shall assess how the Union legislation implementing the Union's 2030 target would need to be amended in order to enable the achievement of 50 to ***65 %*** emission reductions compared to 1990 and to achieve the climate-neutrality-objective set out in Article 2(1), and consider taking the necessary measures, including the adoption of legislative proposals, in accordance with the Treaties.
5. ***The Commission shall adopt a Delegated Act regarding the implementation of technical sinks to absorb greenhouse gas emissions as regulated by Union law. The Commission shall assess a Member States application to use technical sinks as a means of greenhouse gas absorption based on the following criteria:***

    i. Incapability of emissions reductions and enhancement of natural sinks in the first instance;
    ii. Cost effectiveness and economic efficiency;
    iii. An environmental impact assessment;
    iv. An impact assessment of the full lifecycle carbon flux;
    v. That sufficient management criteria are able to be put in place to ensure compliance with indicators identified in (ii) and (iii) above;
    vi. Impact on other sectors and the ability of those sectors to comply with this Regulation.

6. ***The Assessment should be carried out based on the best available and most recent scientific evidence.***

Explanation:

Science, such as the IPCC-Report, 2018 proves, that the EU must become climate neutral even before 2050, preferably 2040, to limit cumulative GHG-emissions and to increase the probability of limitting temperature increase to 1,5 °C. The EU long term strategy sets the objective to max. reduce emissions by 95 % in the context of necessary reductions. The rest must be stored to a large extend in natural sinks. However, the current proposal does not quantify reductions and removals. This is dangerous, as it might hint towards large amounts of removals without the necessary high reduction. Additionally, the EU must set a deadline for phasing out fossil fuels because in a nature-compatible world that preserves the natural foundations of life for both people and nature, there is no longer any place for the exploitation and combustion of fossil fuels. This can succeed through a fair transition, involving EU citizen in the climate justice principle. Right before the porposed Climate Law came, a proposed sentence on negative emissions after 2050 was deleted from the document. However, to stay in "safe" 1,5 °C global temperature rise, the world relies on negative emissions after 2050, according to IPCC.

1) The European Environment Agency has shown that European biodiversity is in decline (SOER, 2020).In order to face the climate crisis a change is urgently needed. Europe will not achieve its climate-targets without adressing increasing biodiversity loss, and the degradation of ecosystems. The climate and biodiversity crisis are two sides of the same coins.
2) A 50 - 55 per cent reduction, as proposed, will not be enough to fill the large emission gap of 15 TgCO2 in order to meet the Paris Agreement target and keep global warming at 1,5°C (UNEP, 2019). Furthermore, modelling by the European Climate Foundation (2019) has shown that addressing demand-side drivers of climate change will allow a 65% reduction to be achieved whilst reducing pressure on biodiversity. Therefore extending the assessment of increasing the 2030 EU GHG reductions target to 60 – 65 % below 1990 levels without offsetting is essential.Europe is one of the top greenhouse gas emitters worldwide, and with historical responsibility needs to act faster than other countries in the world. However, Europe cannot save the world alone. It needs to ensure increasing its efforts well before the next COP26, even though it is postponed, to encourage third countries to step up efforts, too.
3) See for point 3. It will be essential to enable higher ambition rising of the 2030-target, in order to meet the Paris Agreement.
4) Net zero through emissions reductions and natural sinks is a clear definition based on today's technology. With impact assessment of other sinks meaning that technology is not ignored, it just needs to be invented and actual do for the climate and environment what it claims. This proposed amendment provides clear incentives for MS to restore biodiversity if the marginal cost of doing so (i.e. of losing the production of that land), is less than the marginal cost of a corresponding emissions reduction from industry. The assessment of alternative sinks: If the alternative sink choice was bioenergy crops, or afforestation, the assessment would need to show that the land conversion would not harm biodiversity, food production, and that during both the management and utilisation of the biomass there is actually a lifecycle reduction in carbon emissions. If the alternative sink was Carbon Capture and Storage (CCS) it would need to be proven that carbon is actually captured, that less energy goes into the capturing process than the equivalent greenhouse gas captured, and

that the utilisation or storage of the gas was secure e.g. if put back into a coal seam, that it is not just going to leak back out.

Article 3

Trajectory for achieving climate neutrality

1. The Commission is empowered to adopt delegated acts in accordance with Article 9 to supplement this Regulation by setting out a trajectory at Union level to achieve the climate-neutrality objective set out in Article 2(1) until 2050. At the latest within six months after each global stocktake referred to in Article 14 of the Paris Agreement, the Commission shall review the trajectory.

2. The trajectory shall start from ***2021 following the global stocktake and revision of the Climate Action Regulation, incorporating*** the Union's 2030 target for climate referred to in Article 2(3).

3. When setting a trajectory in accordance with paragraph 1, the Commission shall consider the following:

a) cost-effectiveness and economic efficiency;
b) competiveness of the Union's economy;
c) best available technology;
d) energy efficiency ***first principle***, energy affordability and security of supply;
e) fairness and solidarity between and within Member States;
f) the need to ***restore degraded ecosystems, ensure biodiversity goals in line with the biodiversity strategy and*** ~~ensure~~ environmental ~~effectiveness and~~ ***health*** progression over time;
g) investment needs and opportunities;
h) the need to ensure a just and socially fair transition;
i) international developments and efforts undertaken to achieve the long-term objectives of the Paris Agreement and the ultimate objective of the United Nations Framework Convention on Climate Change;
j) the best available and most recent scientific evidence, including the latest reports of the IPCC ***and IPBES.***
k) ***The cost of inaction***

Explanation:

2) The EU is on track to significantly overshoot its 2020 greenhouse gas emission reduction target, possible even reaching -30% by 2020. According to IPCC the next 5 to 10 years are crucial in emission reduction and climate action. 2020 needs to be the turning point to deliver on emission reductions and to keep global warming limited to 1,5°C.
3)
d)Energy efficiency is a strategic priority for the Energy Union, and the EU promotes the principle of 'energy efficiency first'. The legal basis is Article 194 of the Treaty on the Functioning of the European Union (TFEU).

f) In order to fight the climate and biodiversity crisis, the European Union needs to ensure that the climate law is linked to policy processes on biodiversity, such as the upcoming biodiversity-strategy and to the biodiversity goals.
j) The IPCC report is mentioned, without quoting scientific evidence that link the climate and biodiversity crisis.
k) The compared costs of damages caused by increased temperatures (3000 – 4000 billion EUR yearly) to required costs for enhancing ambition level (2,410 TECH / 1,910 Shared Effort Scenario in ECF, 2019) show that costs of inaction are higher, than actual costs of combatting the climate crises. These costs will decrease even more with demand side reduction in the upcoming years.

Article 4

Adaptation to climate change

1. The relevant Union institutions and the Member States shall ensure continuous progress in enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change in accordance with Article 7 of the Paris Agreement.

2. Member States shall develop and implement adaptation strategies and plans that include comprehensive risk management frameworks, based on robust climate and vulnerability baselines and progress assessments.

3. ***The relevant Union institutions and Member States shall build resilience of ecosystems to adapt to climate change by removing subsidies to activities which reduce the sequestration potential of an ecosystem or land use type, and integrate adaption into relevant socioeconomic and environmental policies and actions."***

4. ***Member States should set plans to restore priority habitats by end of 2023 and complete the delivery by 2030. The relevant Union institutions and Member States shall ensure a legal instrument to include a binding target (in hectares) for the Member States to restore 15 % of their territories and of their sea areas. In the marine sector 30% of the Union's sea area shall primarily be managed for nature and biodiversity.***

Explanation:

3. Increasing natural carbon sinks is a joint solution to promote biodiversity and mitigate climate change. However, it is also important to address ecosystem destructive practises that damage ecosystem functioning leaving ecosystems less resilient to adapt to climatic changes resulting in potential ecosystem collapse, the loss of ecosystem services and carbon sinks turning into sources. For example, 1.) Overfishing causes the fish population to become fragile to changes in the ecosystem, but allowing population recovery increases resilience to climate driven changes in ocean temperature or salinity. 2.) Forests are widely promoted as carbon sinks; however, intensive management and harvesting practices have seen some areas of forest turning into carbon sources, as ground carbon and carbon stored in standing stocks are released. These forests have also proven to be more vulnerable to temperature changes, fires, and pest outbreaks throughout central Europe.

4. The restoration and protection of natural greenhouse gas sinks can only be assured through legally binding targets and appropriate funding. The target is inspired by Target 2 of the EU biodiversity Strategy, which was initially set out for 2020. This proposed amendment will even prolong the period

to reach the targets for each and every Member State. The target can be seen as a collective effort for remove CO^2 from the atmosphere. The required harmonization of the EU Climate Law with the EU Biodiversity Strategy and, will also require money to go to restoration, protection and enforcement of the nature legislations, including the Birds Directive, Habitats Directive and the Marine Strategy Framework Directive.

Article 5

Assessment of Union progress and measures

1. By 30 September 2023, and every 5 years thereafter, the Commission shall assess, together with the assessment foreseen under Article 29(5) of Regulation (EU) 2018/1999:
   (a) the collective progress made by all Member States towards the achievement of the climate-neutrality objective set out in Article 2(1) as expressed by the trajectory referred to in Article 3(1), ***and biodiversity goals as referred to in Article 3(3)***;
   (b) the collective progress made by all Member States on adaptation as referred to in Article 4. The Commission shall submit the conclusions of that assessment, together with the State of the Energy Union Report prepared in the respective calendar year in accordance with Article 35 of Regulation (EU) 2018/1999, to the European Parliament and to the Council.

2. By 30 September 2023, and every 5 years thereafter, the Commission shall review:
   (a) the consistency of Union measures with the climate-neutrality objective set out in Article 2(1) as expressed by the trajectory referred to in Article 3(1);
   (b) the adequacy of Union measures to ensure progress on adaptation as referred to in Article 4.

3. Where, based on the assessment referred to in paragraphs 1 and 2, the Commission finds that Union measures are inconsistent with the climate-neutrality objective set out in Article 2(1) or inadequate to ensure progress on adaptation as referred to in Article 4, or that the progress towards either the climate-neutrality objective or on adaptation as referred to in Article 4 is insufficient, it shall take the necessary measures in accordance with the Treaties, at the same time as the review of the trajectory referred to in Article 3(1).

4. The Commission shall assess any draft measure or legislative proposal in light of the climate-neutrality objective set out in Article 2(1) as expressed by the trajectory referred to in Article 3(1) ***and in the light of the Paris Agreement and biodiversity goals as referred to in Article 3 (3)*** before adoption, and include this analysis in any impact assessment accompanying these measures or proposals, and make the result of that assessment public at the time of adoption.

Explanation:

The proposed European Climate Law falls short to recognize the importance intact nature can play in reducing greenhouse gases. The large-scale absorption of CO2 from the atmosphere can be ensured by the restoration and protection of natural ecosystems such as healthy forests, oceans and wet- and peatlands. At the same time, ecosystems suffer from warming and can lose their resilience. Natural and diverse ecosystems buffer the effects better. A smart first European climate law can create a framework which brings decarbonization into harmony with nature. So far, the proposed European Climate Law lacks necessary references to biodiversity impact and goals, which are essential for

combating the joined climate and biodiversity crisis. When assessing the Union`s progress and measures, biodiversity goals need to be taken into consideration.

Article 6

Assessment of national measures

1. By 30 September 2023, and every 5 years, thereafter the Commission shall assess:
    a. the consistency of national measures identified, on the basis of the National Energy and Climate Plans or the Biennial Progress Reports submitted in accordance with Regulation (EU) 2018/1999, as relevant for the achievement of the climate-neutrality objective set out in Article 2(1) with that objective as expressed by the trajectory referred to in Article 3(1);
    b. the adequacy of relevant national measures to ensure progress on adaptation as referred to in Article 4. The Commission shall submit the conclusions of that assessment, together with the State of the Energy Union Report prepared in the respective calendar year in accordance with Article 35 of Regulation (EU) 2018/1999, to the European Parliament and to the Council.
    c. the adequency and sufficiency of measures implemented to ensure compliance of technical sinks as described in Artcile 2(4).

2. Where the Commission finds, under due consideration of the collective progress assessed in accordance with Article 5(1), that a Member State's measures are inconsistent with that objective as expressed by the trajectory referred to in Article 3(1) or inadequate to ensure progress on adaptation as referred to in Article 4, it may issue recommendations to that Member State. The Commission shall make such recommendations publicly available.

3. Where a recommendation is issued in accordance with paragraph 2, the following principles shall apply:
    a. the Member State concerned shall take due account of the recommendation in a spirit of solidarity between Member States and the Union and between Member States;
    b. the Member State concerned shall set out, in its first progress report submitted in accordance with Article 17 of Regulation (EU) 2018/1999, in the year following the year in which the recommendation was issued, how it has taken due account of the recommendation. If the Member State concerned decides not to address a recommendation or a substantial part thereof, that Member State shall provide the Commission its reasoning;
    c. the recommendations should be complementary to the latest country-specific recommendations issued in the context of the European Semester.

Explanation:

The Commission shall assess that technical sinks that the Member States employ are not having an impact on climate ambition itself (e.g. through leakage from storage of carbon, or intensive management of forests), biodiversity and other sectors, and that measures are being taken to ensure compliance

Article 7

Common provisions on Commission assessment

1. In addition to the national measures referred to in Article 6(1)(a), the Commission shall base its assessment referred to in Articles 5 and 6 on at least the following:

a) information submitted and reported under Regulation (EU) 2018/1999;
b) reports of the European Environment Agency (EEA) ***and an independent scientific body***;
c) European statistics and data, including data on losses from adverse climate impacts, where available; and
d) best available scientific evidence, including the latest reports of the IPCC; and
e) any supplementary information on environmentally sustainable investment, by the Union and Member States, including, when available, investment consistent with Regulation (EU) 2020/… [Taxonomy Regulation].

2. The EEA shall assist the Commission in the preparation of the assessment referred to in Articles 5 and 6, in accordance with its annual work programme.

Explanation:

An independent scientific body should be deployed to prevent backsliding and to advice EU policies based on science. The establishment of an independent Council of Experts on Climate Policy at EU-level, which annually monitors the progress of the Union and provides technical advice to the EU institutions, will ensure that the EU keeps on track to achieve its goals. Experiences from different Member States and national Climate Laws show that independent scientific bodies can support consistency between long-term goals and short-term actions.

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