

CMSI Consultation Response

Respondent Details

NAME

Ana Carballo

COUNTRY

Australia

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Non-governmental organisation (NGO) / civil society organization (CSO)

ORGANISATION

Transparency International Australia

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

General comment

COMMENT:

We welcome the consideration of the proposed governance model of the standard and the proposed multi-stakeholder body. However, given existing international standards that have demonstrated effective engagement and ownership by all stakeholders -companies, countries, and civil society -like the Extractive Industries Transparency Initiative (EITI), we believe there is a real risk of duplication of efforts. Further, as the CMS is an initiative created and spearheaded by industry, we are concerned by risks of co-optation, lack of diversity and representation that may emerge in its efforts to engage with multi-stakeholder group, in favour of the industry constituency. Finally, any governance model, board or committee structures must have equal or greater numbers of women representatives.

Document:
Standard

General comment on Performance Area

COMMENT:

First, adopting a multistakeholder governance model is essential. The standard's credibility depends on a process where Indigenous Peoples, workers, NGOs, and affected communities have equal decision-making power alongside industry representatives. Without addressing the current power asymmetries, trust in the process will remain limited.

COMMENT:

Second, the standard must unequivocally protect Indigenous Peoples' rights, particularly the right to Free, Prior, and Informed Consent (FPIC) as outlined in various international frameworks including the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the International Labour Organisation Convention 169 and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, among others. With vast minerals reserves necessary for the energy transition located on Indigenous lands, FPIC must be at the heart of the standard to ensure self-determination and prevent harm.

COMMENT:

Third, the standard must ensure robust accountability mechanisms. Independent, on-the-ground audits must be free from mining companies' financial and organisational influence. Auditors must engage directly with rights holders, ensuring their experiences inform the process. To uphold transparency, audit findings—including time-bound corrective action plans—must be publicly disclosed.

COMMENT:

Fourth, the standard must establish accessible and independent grievance mechanisms that are accessible to communities as well as workers. Mechanisms must align with the eight effectiveness criteria of the UN Guiding Principles on Business and Human Rights (Principle 31). Communities and workers need safe, effective channels to report harm and seek remedies. Without this, the standard risks losing its credibility as a tool for meaningful accountability.

COMMENT:

We also urge the standard to mandate public reporting on social and environmental impacts. Companies must be held accountable for their actions, including impacts on water, ecosystems, biodiversity, and community health. Financial guarantees must be in place to ensure responsible mine closure and rehabilitation.

COMMENT:

Finally, the standard must drive continuous improvement. Static compliance is not enough. Companies must demonstrate ongoing progress in protecting human rights, ensuring worker safety, and safeguarding environmental integrity.

COMMENT:

This draft offers a valuable opportunity to establish more robust requirements for companies to identify, prevent, and manage corruption risks effectively. Referencing international anticorruption frameworks, such as the UN Convention Against Corruption and the Extractive Industries Transparency Initiative (EITI) Standards, the Global Reporting Initiative (GRI) significantly enhances the credibility and impact of the Consolidated Mining Standard. Greater alignment with these standards, including sector specific standards for coal, oil and gas, would further increase the impact of the Consolidated Mining Standard.

COMMENT:

The framework should emphasise the importance of meaningful consultation processes and offer clear, actionable guidelines. Meaningful engagement must involve timely, accessible, and culturally relevant information sharing and structured opportunities for ongoing community input throughout the project lifecycle and across the value chain. There should be ample time for deliberation. Companies should be encouraged to demonstrate inclusive and participatory processes, mainly to ensure the involvement of marginalised and vulnerable communities. These processes should occur at the project level and must be accessible to marginalised groups such as Indigenous Peoples, people with disabilities and women and girls.

COMMENT:

To tackle the mining industry's unequal impacts on women and marginalised groups, it is essential to incorporate a comprehensive gender approach into the framework. Companies must actively address gender-specific risks and opportunities while implementing policies that promote equity and empowerment. These initiatives should start at the corporate level and facilitate positive relationships at the facility or project level.

COMMENT:

Strengthening responsibilities related to supply chains is crucial. Companies should not only disclose information but also actively demonstrate the sustainability risks present within their operations. Furthermore, they must show the measures to mitigate these risks, particularly concerning human rights and environmental impacts.

COMMENT:

The framework should clarify the relationship between corporate responsibilities and climate risks. This involves incorporating science-based targets for emissions reductions into corporate strategies and requiring disclosures regarding climate risks, impacts, and mitigation strategies throughout project lifecycles.

COMMENT:

Grievance mechanisms should meet the effectiveness criteria outlined in the UN Guiding Principles (UNGP), ensuring transparency, accessibility, and responsiveness. The framework should specify detailed expectations for companies concerning the establishment, maintenance, and disclosure of grievance systems and remedies.

COMMENT:

To ensure alignment with current governance best practice, the CMS standard must include beneficial ownership transparency requirements. Beneficial ownership transparency requirements assist in addressing one of the key corruption risks and often linked to environmental and social harms in the mining sector, is a glaring omission and should be included in the relevant performance areas.

SECTION: Overarching Glossary

COMMENT:

The term "Facilities" lacks a clear definition. Does it refer to industrial facilities, sites, or operational fields? Adding a precise definition or clarification would enhance understanding. Furthermore, it is essential to clarify the corporation's role in outlining how the facilities will implement the recommendations and to define the Company's role in guiding this process.

Introduction

SECTION: Introduction

COMMENT:

This is in response to Section 4a of the introduction regarding which Performance Areas are applicable at different stages of the mining life cycle. To enhance clarity, the Standard should explicitly specify which Performance Areas apply to each stage of the value chain. Furthermore, we recommend that Business Integrity be included as an example in the pre-operational phase of a mine's life cycle.

Performance Area 1: Corporate Requirements

SECTION: 1.3 Transparency of Mineral Revenues, Good Practice, 2

COMMENT:

Specify that non-EITI countries must adopt comparable requirements to EITI standards for revenue transparency and the mandatory payment to government disclosure laws currently implemented by companies housed in the 27 EU nations, UK, Canada, Switzerland, and Norway.

SECTION: 1.3 Transparency of Mineral Revenues, Good Practice, 3

COMMENT:

Expand revenue transparency requirements to include payments to subnational governments at project or facility level.

COMMENT:

Publicly disclose all material payments to governments, including SOEs, at the project or facility level.

SECTION: 1.4 Risk Assessment, Foundational Practice, 2

COMMENT:

Provide more details on the specific type of risk assessment needed and distinguishing between risks at the corporate level and those at the facility level.

COMMENT:

Ensure the risk assessment includes considerations related to corruption, bribery and moneylaundering

SECTION: 1.4 Risk Assessment, Good Practice

COMMENT:

Introduce third-party validation of risk registers at the Good Practice level to enhance credibility.

SECTION: 1.4 Risk Assessment, Leading Practice, 1

COMMENT:

Include stakeholder consultations at all levels of risk assessment to ensure risks are comprehensively identified and prioritised.

SECTION: 1.5 Crisis Management and Communications, Foundational Practice

COMMENT:

Ensure that all communications are conducted in the facility's local languages.

Performance Area 12: Stakeholder Engagement

SECTION: 12.1 Stakeholder Identification and Engagement, Foundational Practice, 2

COMMENT:

It is recommended that a stakeholder engagement strategy be developed on the "foundational practices stage" to identify and map the stakeholders. This allows us to understand which engagement strategy aligns with the company and project objectives and establish criteria for prioritising the stakeholders based on their relevance and influence on the facility.

COMMENT:

Develop structured methodologies to identify and map stakeholders and rights-holders comprehensively. This process should consider intersectional vulnerabilities, including overlapping factors such as gender, ethnicity, and economic status.

SECTION: 12.1 Stakeholder Identification and Engagement, Good Practice, 8

COMMENT:

Require that engagement summaries include the facility's outcomes and responses to stakeholder feedback. Clear explanations should be provided to illustrate how stakeholder input has influenced decision-making.

SECTION: 12.1 Stakeholder Identification and Engagement, Leading Practice, 1

COMMENT:

Mandate the implementation of continuous feedback mechanisms that enable stakeholders to express their concerns and receive timely responses. This approach aims to foster trust and accountability within the community.

SECTION: 12.1 Stakeholder Identification and Engagement, Leading Practice

COMMENT:

Mandate that Facility management formally document and publicly report how stakeholder feedback is incorporated into governance or operational changes. This transparency is crucial for accountability.

SECTION: 12.1 Stakeholder Identification and Engagement

COMMENT:

Offer detailed guidance on training workers who interact with stakeholders. Training should encompass essential topics such as conflict resolution and practices for inclusive dialogue.

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Identify and Address Community Impacts, Foundational Practice

COMMENT:

Require engagement with stakeholders and rights-holders in identifying, prioritising, and mitigating adverse impacts.

COMMENT:

To ensure inclusivity, mandate the inclusion of differential impact assessments for women, vulnerable, and underrepresented groups, such as Indigenous people.

SECTION: 13.1 Identify and Address Community Impacts, Good Practice

COMMENT:

Incorporate independent reviews of mitigation effectiveness to enhance accountability and credibility.

SECTION: 13.2 Community Development and Benefits, Foundational Practice

COMMENT:

Ensure transparency requirements are included regarding the scope, objectives, funding, and outcomes of community development programs and partnerships.

SECTION: 13.2 Community Development and Benefits, Good Practice

COMMENT:

Include requirements to support local businesses' access to procurement opportunities at the Good Practice level, not just the Leading Practice level.

SECTION: 13.2 Community Development and Benefits

COMMENT:

Introduce specific, measurable targets for local employment and procurement at all compliance levels, with progress tracking and public disclosures.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice, 1

COMMENT:

While the framework references Free, Prior, and Informed Consent (FPIC), it does not provide transparent methodologies or minimum standards for obtaining and demonstrating consent in alignment with UNDRIP.

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice, 2

COMMENT:

It is recommended that early engagement with Indigenous Peoples be incorporated to enhance the effectiveness of project design and planning.

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice, 4

COMMENT:

Cultural awareness training is included in Foundational Practice but lacks specificity on frequency, scope, and inclusion of Indigenous-led design and delivery at all compliance levels.

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice

COMMENT:

Access to grievance mechanisms tailored for Indigenous Peoples is only included in Good Practice, leaving a gap in the Foundational Practice for early-stage facilities.

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Good Practice, 8

COMMENT:

Good Practice mentions benefit-sharing but lacks detailed requirements for transparent agreements, equitable distribution, or monitoring mechanisms.

Performance Area 16: Artisanal and Small-Scale Mining

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Foundational Practice, 1

COMMENT:

Develop detailed criteria and guidance to help differentiate between legitimate ASM operations and illegal activities.

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Foundational Practice

COMMENT:

Mandate direct engagement with ASM operators and communities during the risk assessment phase.

Ensure that ASM operators have access to culturally appropriate grievance mechanisms early in the engagement process.

COMMENT:

Include specific measures to address the needs of vulnerable and underrepresented ASM groups, such as women and child labourers, in risk assessments and engagement processes.

Revise the framework to emphasise inclusivity and ensure that it considers the diverse experiences and perspectives of all stakeholders involved in ASM.

COMMENT:

Implement a system for continuous monitoring and feedback, allowing for adjustments based on the evolving landscape of ASM and its impact on affected communities.

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting

COMMENT:

It is recommended that performance area 6, Child Labour and Modern Slavery, be included in "Other Relevant Performance Areas."

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders

COMMENT:

Define clear accessibility standards for grievance mechanisms, such as multilingual support, anonymous reporting options, and outreach to marginalised groups.

COMMENT:

Establish basic feedback mechanisms to gather user insights on the grievance system's effectiveness and usability.

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Good Practice

COMMENT:

Expand engagement requirements to include regular stakeholder updates on grievance outcomes, lessons learned, and preventive measures implemented.

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Good Practice

COMMENT:

Require periodic independent audits or third-party validation of grievance mechanisms to assess their effectiveness and alignment with best practices.

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Foundational Practice

COMMENT:

Introduce a proactive legal risk management approach that anticipates emerging regulations and evolving standards.

SECTION: 2.1 Legal Compliance, Leading Practice

COMMENT:

Mandate independent third-party audits for legal compliance as part of the Leading Practice requirements.

SECTION: 2.1 Legal Compliance

COMMENT:

Integrate legal compliance with broader governance frameworks, linking it to social and environmental risks.

SECTION: 2.2 Business Ethics and Accountability, Foundational Practice, 1

COMMENT:

Mandate the disclosure of beneficial ownership at a company level and encourage facilities to request suppliers to disclose their beneficial owners. This information should form part of the Know Your Customer check and inform facility and corporate level risk assessments.

COMMENT:

Publicly disclose a policy that outlines ethical and integrity-based business practices.

SECTION: 2.2 Business Ethics and Accountability, Foundational Practice, 2

COMMENT:

Identify and address key ethical and integrity risks in the Code of Conduct including bribery, corruption, fraud, insider trading, facilitation payments, privacy, gifts, conflict of interest and engagement with government officials and Politically Exposed Persons (PEPs).

COMMENT:

Develop a Code of Conduct that communicates the ethical and integrity standards expected from employees.

SECTION: 2.2 Business Ethics and Accountability, Foundational Practice, 4

COMMENT:

Establish an internal procedure for employees to report ethical and integrity-related concerns

SECTION: 2.2 Business Ethics and Accountability, Good Practice, 1

COMMENT:

Expand the ethical risks addressed in the framework to include lobbying practices, shell companies, and supply chain abuses.

SECTION: 2.2 Business Ethics and Accountability, Good Practice, 3

COMMENT:

Expand training on the ethical policy to include contractors, suppliers, and other third parties.

SECTION: 2.2 Business Ethics and Accountability, Good Practice, 6

COMMENT:

Include an indicator on corporate political engagement activities, namely political contributions and lobbying, aligned with the World Benchmarking Alliance's Social Transformation Framework CS18: Responsible lobbying and political engagement fundamentals indicator.

Require political contributions to align with ethical principles and risk assessments to prevent undue influence or conflicts of interest.

SECTION: 2.2 Business Ethics and Accountability, Good Practice, 7

COMMENT:

Strengthen whistle-blower mechanisms by mandating anonymity guarantees and independent oversight to increase trust and effectiveness.

Add a requirement to conduct regular evaluations of the Code of Conduct and whistle-blower systems, including external audits where feasible.

Ensure transparency on whistle-blower complaints by requiring companies to disclose trends and systemic issues while maintaining confidentiality.

SECTION: 2.2 Business Ethics and Accountability

COMMENT:

Create an anti-bribery and anti-corruption compliance program. We suggest referencing explicit regulations, such as the UK and Australia Anti-Bribery legislation and the need for corporates to adequate procedures in place to combat foreign bribery. We note that TI UK and TI Australia have developed guidance for corporates to establish adequate procedures, and we have included references that may be useful below.

COMMENT:

We recommend including as part of the references the TI Australia's Adequate Procedures Under Australia's Foreign Bribery Regime: Guidance on Good Practice Procedures for Corporate AntiBribery and AntiCorruption Programs, TI UK's antibribery risk assessment guidance, World Benchmarking Alliance's Social Transformation framework, 2021, OECD Recommendation on Transparency and Integrity in lobbying and influence, 2024.

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Good Practice

COMMENT:

Incorporate the development of a credible Transition Plan aligned with the IFRS Transition Plan Disclosure Framework that outlines specific, credible and immediate-term steps for progress towards net-zero emissions.

SECTION: References

COMMENT:

References:

It is recommended to revise the following:

• Transition Plan Taskforce, 2023, Transition Plan Disclosure Framework. <https://www.ifrs.org/sustainability/knowledge-hub/transition-plan-taskforce-resources>

Performance Area 3: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chains (applicable to all facilities), Foundational Practice, 1

COMMENT:

Publicly disclose a responsible supply chain policy.

SECTION: 3.1 Responsible Supply Chains (applicable to all facilities), Foundational Practice, 2

COMMENT:

Design a system to assess and prioritise risks associated with the facility's business relationships and align with corporate policies on Business Integrity.

SECTION: 3.1 Responsible Supply Chains (applicable to all facilities), Foundational Practice, 3

COMMENT:

Create a mechanism to respond to customer enquiries related to the Facility's performance against the Performance Areas of this Standard. (Grievance mechanism)

Respond to customer enquiries related to the Facility's performance against the Performance Areas of this Standard.

SECTION: 3.1 Responsible Supply Chains (applicable to all facilities)

COMMENT:

Engage in consultations with external stakeholders and rights holders at every level to effectively identify and prioritise supply chain risks

COMMENT:

Implement support for capacity building in business relationships, adhering to reasonable procedures and standards to improve compliance and proactively address sustainability risks

SECTION: 3.2 Responsible Mineral Sourcing

COMMENT:

Mandate facilities to publicly share the key findings from independent audits and the corrective actions taken. This will foster accountability and allow stakeholders to monitor progress.

COMMENT:

Implement requirements for facilities to actively involve affected communities in the due diligence process, particularly in regions with prevalent social or environmental risks. This involvement ensures that local perspectives and concerns are addressed

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Foundational Practice, 1

COMMENT:

Develop comprehensive guidelines on baseline data methodologies that specify the requirements for systematically integrating gender and intersectional analyses.

Ensure stakeholder engagement during the baseline data collection and risk assessments at the Foundational Practice level.

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Good Practice

COMMENT:

Require periodic independent validation of monitoring processes and outcomes to enhance accountability and transparency.

SECTION: 4.2 Land Acquisition and Resettlement, Good Practice, 1

COMMENT:

Develop specific requirements for engaging with vulnerable groups to ensure their participation in all phases of resettlement planning and implementation. Engagement with communities and vulnerable groups must occur early and throughout the lifecycle of a project, with ample time for meaningful engagement to occur.

SECTION: 4.2 Land Acquisition and Resettlement, Good Practice

COMMENT:

Incorporate detailed requirements to safeguard cultural and social integrity during the resettlement planning, focusing on community interest.

SECTION: 4.2 Land Acquisition and Resettlement

COMMENT:

Include a recommendation around corporates ensuring communities have Free, Prior, and Informed Consent (FPIC) when deciding to have a new project commence on their land

COMMENT:

It is recommended to include in other relevant performance areas:

- 8. Diversity, equity and inclusion*
 - 9. Safe, healthy and respectful workplaces*
 - 10. emergency preparedness and response*
 - 19. Biodiversity, ecosystem service and nature*
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Performance Area 5: Human Rights

SECTION: 5.1 Human Rights, Foundational Practice, 4

COMMENT:

Specify training content for risk identification, mitigation, and remediation topics. Tailor training to roles and responsibilities and mandate periodic updates.

SECTION: 5.1 Human Rights, Good Practice, 4

COMMENT:

Independent oversight of grievance mechanisms is required, and periodic evaluations are mandated to ensure compliance with UNGP criteria

SECTION: 5.1 Human Rights, Good Practice

COMMENT:

Create explicit protections and engagement protocols for human rights defenders, especially in countries with high human rights violations and restricted civil space. These protocols should include mechanisms to address any potential retaliation or threats.

COMMENT:

Mandate direct engagement with supply chain stakeholders to collaboratively identify and mitigate human rights risks.

COMMENT:

Independent reviews must follow defined methodologies, involve qualified reviewers, and include stakeholder input for credibility and comprehensiveness.

COMMENT:

Establish structured mechanisms for regular engagement with human rights defenders, ensuring their insights directly inform risk assessments and due diligence processes

Performance Area 6: Child Labour and Modern Slavery

COMMENT:

It is recommended to include in "Other Relevant Performance Areas" the performance area 16. Artisanal and small-scale mining.

Performance Area 7: Rights of Workers

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Foundational Practice, 1

COMMENT:

To enhance relevance and accessibility, consultation with workers or their representatives is recommended during the grievance mechanisms' design phase.

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Foundational Practice

COMMENT:

Mandate Facilities to publicly disclose anonymised and aggregated data on grievance patterns and systemic issues, ensuring transparency and trust.

COMMENT:

Corporate-level monitoring and oversight of grievance mechanisms at the facility level are required to ensure consistency and effectiveness across all operations.

COMMENT:

Include independent evaluations of grievance mechanisms at regular intervals to ensure impartiality and compliance with global standards.

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Leading Practice, 4

COMMENT:

Require accessible escalation processes to external grievance mechanisms or legal remedies at all compliance levels, not just Leading Practice.

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers)

COMMENT:

Reference:

It is recommended to include

- *Making Australian Whistleblowing Laws Work Draft Design Principles for a Whistle-blower*

Protection Authority <https://transparency.org.au/wp-content/uploads/2024/02/MakingAustralian-Whistleblowing-Laws-Work.pdf>

- *Whistleblowing <https://www.transparency.org/en/our-priorities/whistleblowing>*

Performance Area 8: Diversity, Equity, and Inclusion

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Foundational Practice, 1

COMMENT:

Foundational Practices commit to fostering DEI but lack measurable objectives or minimum standards for accountability, such as baseline targets for representation or retention.

Foundational Practices require baseline data but do not mandate comprehensive data collection on key DEI indicators (e.g., pay equity, workplace satisfaction, retention rates for underrepresented groups)

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Foundational Practice, 2

COMMENT:

The framework does not specify how DEI commitments should be integrated into core governance structures or decision-making processes beyond essential management accountability.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice, 1

COMMENT:

While Leading Practice includes independent reviews, the framework lacks specific guidance on review methodologies, reviewer qualifications, and how worker perspectives should inform the review process.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice

COMMENT:

Mandate integration of DEI into all business functions, particularly the facilities, including recruitment, performance reviews, leadership evaluations, and investment decisions.

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Good Practice, 4

COMMENT:

Require suppliers and contractors to demonstrate DEI commitments and provide evidence of compliance with DEI standards.

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level)

COMMENT:

References:

It is recommended to revise the following:

- *ISO 30415:2021. Human resource management –Diversity and inclusion <https://www.iso.org/standard/71164.html>*
 - *Diversity, Equity and Inclusion (DEI) United Nations, Global Compact. <https://unglobalcompact.org/take-action/action/dei>*
 - *Toolkit Unlocking Opportunities for Women and Business-IFC <https://www.ifc.org/en/insightsreports/2018/unlocking-opportunities-for-women-and-business>*
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