Potassium Bicarbonate

Crops

| Identification of Petitioned Substance | | | |
|--|--|--|--|
| Chemical Names: | 16 | Trade Names: | |
| CHKO3 (MW. 100.12), Potassium hydrogen | 17 18 | Purple K, Kaligreen | |
| carbonate, potassium acid carbonate, | 10 | CAS Numbers: | |
| potassium ion bicarbonate | | 298-14-6 | |
| Other Name: | | Other Codes: | |
| Other Maine. | 19 | SID 162102857, MDL Number | |
| Carbonic Acid, potassium salt, Carbonic | 20 | MFCD00011402, EINECS 206-059-0, | |
| acid, monopotassium salt, Carbonic acid, | 20 | PubChem Substance ID 24854226, Beilstein | |
| monopotassium salt bicarbonate | 21 | Registry Number 4535309 | |
| | | | |
| Summa | ry of C | Current Use | |
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| 1 2 0 | | the National Organic Standards Board has th ional List within five years of its adoption or | |
| 1 5 | | otassium bicarbonate was completed in July, | |
| 2002 and is available on the NOP website (N | - | 1 | |
| | | 1071 FOR THE ZULZ SUBSEL REVIEW, THE INUSD | |
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bicarbonate (Clayton, 2005). Following this, a proposed rule published March 6, 2007 reflected 50 51 NOSB's recommendation to allow the continued use of one hundred and sixty-six substances including use of potassium bicarbonate for plant pathogens (Day, 2007a; USDA NOP, 2005). In 52 the final rule published October 16, 2007, the use of potassium bicarbonate for plant disease was 53 renewed; however, a comment from a national body requested a justification for its use, citing 54 that the use of potassium bicarbonate and several other substances were not consistent with the 55 Codex Alimentarius guide for the production of organic food (Day, 2007b). A meeting notice 56 provided in 2009 indicated the NOSB's intention to review potassium bicarbonate for plant 57 disease control (Pegg, 2009). At the April 29, 2010 meeting of the NOSB, potassium bicarbonate 58 59 was recommended unanimously for relisting subsequent to its October, 2012 sunset date (Pegg, 2010; Shipman, 2010a; USDA NOP, 2010; Shipman, 2010b). Potassium hydrogen carbonate (i.e., 60 potassium bicarbonate) has since been added to the Codex Alimentarius Commission Guidelines 61 62 for the Production Processing Labelling and Marketing of Organically Produced Foods (CAC/GL 32-1999–FSIS, 2012).

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Evaluation Question #11: Describe all natural (non-synthetic) substances or products which 65 may be used in place of a petitioned substance (7 U.S.C. § 6517 (c) (1) (A) (ii)). Provide a list of 66 allowed substances that may be used in place of the petitioned substance (7 U.S.C. § 6518 (m) 67 68 (6)).

69

Foliar application of potassium bicarbonate is useful in control and prevention of Alternaria in 70 71 cucurbits and cole crops; anthracnose in cucurbits, blueberries, grapes, spinach and strawberries; black dot root rot in potatoes; botrytis blossom and twig blight in blueberries and grapes; botrytis 72 73 bunch rot in grapes; downy mildew in cucurbits, cole crops, grapes, lettuce and spinach; early blight in potatoes; eutypa dieback in grapes; gray mold (Botrytis cinerea) in beans, lettuce and 74 strawberries; gummy stem blight and black rot in cucurbits; leaf blight in strawberries; leaf spot 75 in peas; mummy berry in blueberries; phomopsis cane and leaf spot and fruit rot in grapes; 76 phomopsis canker in blueberries; powdery mildew in cucurbits, apples, blueberries, grapes and 77 strawberries; septoria leaf spot in cucurbits; sooty blotch complex in apples; sour rot in grapes; 78 79 white mold in potatoes and others (Seaman, 2013, 2014 a, b, c, d, e, f; Carroll et al, 2014 a, b; Weigle and Carroll, 2014; Peck and Merwin, 2014). Potassium bicarbonate is best suited for many 80 of the powdery mildew diseases. Powdery mildews have a superficial nature on the plant surface 81 82 allowing more contact with the product. Many other diseases are not as affected by bicarbonate 83 products. This may be because they penetrate deeper into plant tissues. In some studies, however, the use of potassium bicarbonate resulted in good control of diseases such as black rot 84 85 and Phomopsis on grapes and strawberry leaf spot (Caldwell et al., 2013). Following is a description of non-synthetic or natural substances that could be substituted for potassium 86 87 bicarbonate. Bacillus amyliquifaciens strain D747 is a gram positive bio-fungicidal/bactericidal bacterium listed 88 89 by Organic Materials Review Institute (OMRI) under the names "Double Nickel LC Biofungicide," and "Amylo-X" (Highland et al., 2012). It is found naturally in soils including 90 agricultural settings and used commercially for control and prevention of a number of fungal and 91 bacterial infections including *Alternaria* in cucurbits and cole crops; anthracnose in cucurbits, 92 93 blueberries, grapes, spinach and strawberries; Botrytis in blueberries and grapes; downy mildew 94 in cucurbits, cole crops, grapes, lettuce and spinach; eutypa dieback in grapes; gray mold (Botrytis *cinerea*) in beans, lettuce and strawberries; gummy stem blight and black rot in cucurbits; 95 mummy berry in blueberries; *Phomopsis* cane and leaf spot and fruit rot in grapes; powdery 96 97 mildew in cucurbits, apples, blueberries, grapes and strawberries; sour rot in grapes, white mold 98 in potatoes and others (Seaman, 2013, 2014 a, b, d; Peck and Merwin, 2014; Carroll et al, 2014a, b;

- 99 Wiegle and Carroll, 2014). *Bacillus amyliquifaciens* strain D747 kills pathogenic organisms on
- 100 foliage and other plant parts by producing antibiotic compounds (iturins and surfactins) that
- disrupt pathogen cell wall production. *Bacillus amyliquifaciens* strain D747 also colonizes plant
- 102 root hairs, preventing establishment of disease-causing fungi and bacteria (Highland, 2012; EPA,
- 103 2011; Carroll et al., 2014).
- 104 Several isolates of the bacteria, *Bacillus subtilis* possess anti-fungal activity, e.g. QST 713 and
- 105 IAB/BS/03, overlapping the range of use for potassium bicarbonate in treatment of *Alternaria* in
- 106 cucurbits and cole crops; anthracnose in cucurbits, blueberries, grapes, spinach and strawberries;
- 107 *Botrytis* blossom and twig blight in blueberries and grapes; *Botrytis* bunch rot in grapes; downy
- mildew in cucurbits, cole crops, grapes, lettuce and spinach; early blight in potatoes; eutypa
 dieback in grapes; gray mold (*Botrytis cinerea*) in beans, lettuce and strawberries; gummy stem
- blight and black rot in cucurbits; mummy berry in blueberries; *Phomopsis* cane and leaf spot and
- fruit rot in grapes; powdery mildew in cucurbits, apples, blueberries, grapes and strawberries
- and sour rot in grapes and others (Seaman, 2013, 2014 a, d, e, f; Peck and Merwin, 2014; Carroll et
- al, 2014a, b; Wiegle and Carroll, 2014; Hinarejos, 2014). These bacteria produce bio-pesticides that
- 114 inhibit the growth of a wide variety of fungal species.
- 115 Bacillus pumilis is a rhizobacterium used for prevention and treatment of downy mildew in
- 116 cucurbits, cole crops, grapes, and lettuce, spinach; powdery mildew in cucurbits, apples,
- 117 blueberries, grapes and strawberries and white mold in potatoes and others (Seaman, 2013, 2014
- a, b, d, f; Carroll et al, 2014 a, b; Weigle and Carroll, 2014; Peck and Merwin, 2014). These
- 119 pathogenic molds and mildews produce an enzyme that degrades indole acetic acid (IAA), an
- 120 endogenous plant growth promoting hormone, stunting plant growth. *B. pumilis* secretes growth
- 121 promoting substances mimicking the effects of gibberellins (Gutierrez-Manero et al., 2001).
- 122 Production of gibberellins by *B. pumilis* reverses the stunting effect. It has been demonstrated that
- exogenously applied growth promoting auxins can overcome the degradative effect of these
- 124 molds on IAA (Benz and Spring, 1995).
- 125 Gibberellic acid is a naturally occurring growth regulator commercially prepared from *Gibberella*
- *fujikuroi* (NOP, 1996). It has been demonstrated that exogenously applied growth promoting
- auxins, like gibberellic acid can overcome stunting and the degradative effect of downy and
- 128 powdery mildew and *Botrytis* molds on endogenous plant growth promoting hormones (Benz
- 129 and Spring, 1995).
- 130 Streptomyces griseovirdis and Streptomyces lydicus are naturally occurring gram negative bacteria
- 131 useful in the treatment and prevention of *Alternaria* in cucurbits and cole crops; anthracnose in
- 132 cucurbits, blueberries, grapes, spinach and strawberries, *Botrytis* blossom and twig blight in
- 133 blueberries and grapes; *Botrytis* bunch rot in grapes; downy mildew in cucurbits, cole crops,
- 134 grapes, lettuce and spinach; *Eutypa* dieback in grapes; gray mold (*Botrytis cinerea*) in beans,
- 135 lettuce and strawberries; mummy berry in blueberries, powdery mildew in cucurbits, apples,
- 136 blueberries, grapes and strawberries and white mold in potatoes and others (Seaman, 2013, 2014
- a, b, d, e, f; Carroll et al, 2014 a, b; Weigle and Carroll, 2014; Peck and Merwin, 2014). These
- 138 *Streptomyces* species secrete a class of polyene antimycotics. Polyenes bind ergosterol in the
- fungal cell membrane causing leakage of potassium and sodium ions and ultimately fungal cell
- 140 death (Hamilton-Miller, 1973).
- 141 White mold is caused by *Sclerotina sclertiorum* (Wharton and Wood, 2013). *Coniothyrium minitans*
- is mycoparasite of the fungus *Sclerotina sclertiorum*, useful in the biocontrol of white mold also
- called *Sclerotina* stem rot in potatoes (Seaman, 2014d). Hyphal-hyphal interactions between *C*.
- 144 *minitans* and other fungi, competition or mycoparasitism between mycelium of *C. minitans* and
- 145 Sclerotinia on petals, pollen or infected plant tissues and the mycoparasitic attack of mycelium of

- 146 *C. minitans* on host sclerotia are the most common mode of action for *C. mintans* biocontrol
- 147 (Whipps et al., 2008; Whipps and Gerlagh, 1992).
- 148 *Gliocladium catenulatum* is a naturally occurring widespread parasitic fungus that can be used to
- 149 control various fungal diseases in food and non-food crops, indoors and outdoors. It does not
- 150 have any adverse effects on humans (EPA, 2002). *G. catenulatum* has been found effective against
- 151 *Alternaria* in cucurbits and cole crops, gummy stem blight and black rot in cucurbits and white
- mold in potatoes (Seaman, 2013, 2014 a,d). It is also useful for preventing damping-off in bedding
- plants (McQuilken et al., 2001). Like *Gliocatenulata, Trichoderma asperellum* and *Trichoderma gamsii* are parasitic fungi useful in the control of white mold in potatoes (Seaman, 2014d). Trichoderma
- species can inhibit plant pathogenic fungi by inducing resistance and plant defense,
- 156 mycoparacitism, antibiosis and parasiticism (Anees et al., 2010).
- 157 Aqueous and dried powder preparations of ethanol extracts from the giant knotweed, *Reynoutria*
- *sachalinensis* are effective in treatment and prevention of *Alternaria* in cucurbits and cole crops,
- 159 anthracnose in cucurbits, blueberries, grapes, spinach and strawberries, *Botrytis* blossom and
- 160 twig blight in blueberries and grapes, *Botrytis* bunch rot in grapes, downy mildew in cucurbits,
- 161 cole crops, grapes, lettuce and spinach, early blight in potatoes, *Eutypa* dieback in grapes, gray
- 162 mold (*Botrytis cinerea*) in beans, lettuce and strawberries, gummy stem blight and black rot in
- 163 cucurbits, leaf blight in strawberries, mummy berry in blueberries, *Phomopsis* cane and leaf spot
- 164 and fruit rot in grapes, *Phomopsis* canker in blueberries, powdery mildew in cucurbits, apples,
- 165 blueberries; grapes and strawberries, sour rot in grapes, white mold in potatoes and others
- 166 (Konstantinidou-Doltsinis and Schmitt, 1998, Seaman, 2013, 2014 a, b, d, e, f; Carroll et al, 2014 a,
- b; Weigle and Carroll, 2014; Peck and Merwin, 2014). *R. sachalinensis* appears to contain aglycones
- 168 that stimulate plant defense mechanisms inducing production of anti-fungal β -glycosidically
- 169 bound phenolic compounds (Daayf et al., 1995).
- 170 The Bordeaux mixture is a combination of calcium oxide (quicklime), copper sulfate and water
- originally developed in 1890 to prevent pilfering of wine grapes along French highways, but later
- 172 was found to prevent infection with downy mildew. Chemically, the combination produces
- cupric oxide, lime sulfur and copper hydrate (Butler, 1923). Copper application in the form of
- copper sulfate, copper hydroxide, copper oxychloride and copper octanoate is effective in
- treatment and prevention of *Alternaria* in cucurbits and cole crops; anthracnose in cucurbits,
 blueberries, grapes, spinach and strawberries; *Botrytis* blossom and twig blight in blueberries and
- grapes; downy mildew in cucurbits, cole crops, grapes, lettuce and spinach; early blight in
- potatoes; gray mold (*Botrytis cinerea*) in beans, lettuce and strawberries; gummy stem blight and
- black rot in cucurbits; leaf blight in strawberries; leaf spot in peas; *Phomopsis* cane and leaf spot
- and fruit rot in grapes; powdery mildew in cucurbits, apples, blueberries, grapes and
- 181 strawberries; *Septoria* leaf spot in cucurbits and white mold in potatoes and others (Seaman, 2013,
- 182 2014 a, b, c, d, e, f; Carroll et al, 2014 a, b; Weigle and Carroll, 2014; Peck and Merwin, 2014).
- 183 Intensive use of copper for mold and mildew control has raised concerns of phytotoxicity.
- 184 Copper compounds, e.g. copper hydroxide, copper oxide, copper oxychloride, and copper
- 185 sulfate, are products that may be exempted from EPA tolerance and synthetic substances allowed
- 186 for use in organic crop production. They are not to be used as herbicides and must be used in a
- 187 manner that minimizes accumulation of copper in the soil (205.601(i) (2) and (3)). In the case of
- Bordeaux mixture and grape horticulture, application results in changes in leaf and fruit
- 189 physiology including increased copper levels in grape berry tissues; changed leaf and fruit sugar
- 190 concentrations and a reduction in amino acid production and nitrogen metabolism (Martins et al,
- 2014). However, copper also appears to stimulate the plant's natural defenses against molds andmildews (Aziz et al., 2006).
- 193

Silica from aluminum silicate (kaolin) and potassium silicate contributes to the formation of 194 195 phytoliths, strengthening cell walls and reinforcing plant disease resistance in plants (Guntzer et al., 2012). Both substances are useful in the prevention and control of downy mildew. 196 Respectively, soil and foliar application of kaolin and potassium silicate to plants under stress 197 from disease or parasites grown under otherwise silica depleted conditions are effective for 198 199 restoring plant defenses and improving plant health (Menzies et al., 1992; Nofal and Haggag, 2006). In "Humus and the Farmer", Friend Sykes provides that the "well-being of mankind is 200 interdependent with that of the animal, the plant and the living soil" and a fertile soil is one rich 201 in humus (Sykes, 1949). Humus maintains silica in soil. Its components, compost and manure are 202 203 rich sources of plant derived silica. Silica in compost is maintained by phytolith recycling. Silica in manure is increased as a result of the effect silica has on plant tissue digestion of specific forage 204 grass species. Thus, maintenance and addition of humus through careful recycling of compost 205 and manure will maintain silica in the soil. 206 207 Lime sulfur and sulfur are effective in the control and prevention of leaf spot in peas; *Phomopsis* 208 209 cane and leaf spot and fruit rot in grapes; and powdery mildew in cucurbits, apples, blueberries, grapes and strawberries (Seaman, 2013, 2014c; Peck and Merwin, 2014; Carroll et al, 2014a, b; 210 Wiegle and Carroll, 2014, Gadoury et al., 1994). Balanced plant nutrition is critical for disease 211 resistance. A nutrient starved plant is more vulnerable to disease (Singh et al., 2014). 212 213 214 Hydrogen dioxide, also known as hydrogen peroxide, and peroxyacetic acid are surface disinfectants used to control molds and mildew. These substances have a wide application in the 215 control and prevention of Alternaria in cucurbits and cole crops; anthracnose in cucurbits, 216 blueberries, grapes, spinach and strawberries; blueberry leaf rust in blueberries; Botrytis blossom 217 and twig blight in blueberries and grapes; Botrytis bunch rot in grapes; downy mildew in 218 cucurbits, cole crops, grapes, lettuce and spinach; early blight in potatoes; gray mold (Botrytis 219 cinerea) in beans, lettuce and strawberries, leaf blight in strawberries; leaf spot in peas; mummy 220 berry in blueberries, powdery mildew in cucurbits, apples, blueberries, grapes and strawberries; 221 sour rot in grapes, white mold in potatoes and others (Seaman, 2013, 2014 d; Peck and Merwin, 222 223 2014; Carroll et al, 2014a, b; Wiegle and Carroll, 2014). 224 Seeds from the Neem tree (Azadirachta indica) contain natural fungicides (Schultz et al., 1992). 225 Extracts from these seeds are effective in prevention and control of Alternaria in cucurbits and cole 226 crops, anthracnose in cucurbits, blueberries, grapes, spinach and strawberries, black dot root rot 227 in potatoes, blueberry leaf rust in blueberries, Botrytis blossom and twig blight in blueberries and 228 grapes, Botrytis bunch rot in grapes, downy mildew in cucurbits, cole crops, grapes, lettuce and 229 230 spinach, early blight in potatoes, gray mold (Botrytis cinerea) in beans, lettuce and strawberries, gummy stem blight and black rot in cucurbits, leaf blight in strawberries, leaf spot in peas, 231 powdery mildew in cucurbits, apples, blueberries, grapes and strawberries, Septoria leaf spot in 232 cucurbits, sour rot in grapes, white mold in potatoes and others (Seaman, 2013, 2014 a, b, c, d, e, f; 233 Peck and Merwin, 2014; Carroll et al, 2014a, b; Wiegle and Carroll, 2014). Essential plant oils such 234 as cottonseed, corn, garlic, sesame, sesame oil, rosemary, thyme, and clove are also effective in 235 236 control or prevention of many of the same infections as Neem extracts. These are generally pressed from leaves, stems, or flowers, rather than seeds, and then separated by distillation. They 237 238 may be formulated with mineral oil in products labeled for disease control. Some are exempt

- from EPA labeling requirements (Caldwell et al., 2013). Thyme, clove bud and origanum oils
- provide broad-spectrum and dose-dependent inhibitory and/or biocidal activity against
 mycelium of a number soilborne pathogens. In pots, thyme, clove bud and origanum oils applied
- pre-planting as 5 % aqueous emulsions controlled *Rhizoctonia solani* AG2.1 infection on broccoli
- 242 pre-planting as 5 % aqueous emuisions controlled *Knizoctonia solani* AG2.1 infection on broccoli
 243 seedlings. Clove bud and origanum oils are phytotoxic at 10 % in soil (McMaster et al., 2013).

244 245

<u>Evaluation Question #12:</u> Describe any alternative practices that would make the use of the petitioned substance unnecessary (7 U.S.C. § 6518 (m) (6)).

247

248 Potassium bicarbonate is slightly basic in solution, fungistatic and effective as a foliar spray for

the control and prevention of a number of important fungal pathogens, including *Alternaria*,

anthracnose and gray mold (Armand, 2014; Ivanovic et al., 2002). Specifically, potassium

- bicarbonate has been shown to inhibit *in vitro* mycelial growth, spore germination and germ tube elongation in *Botrytis cinera* and *Alternaria alternata*. As a result, fungal hyphae produce fewer
- elongation in *Botrytis cinera* and *Alternaria alternata*. As a result, fungal hyphae produce fewer
 spores, and both spores and conidiophores appear shriveled and collapsed in photomicrographs

after treatment with potassium bicarbonate (Fallik et al., 1997). Bicarbonate is physiologically

involved in fungal morphology, branching and senescence with gradients of this salt naturally

256 forming between branching peripheral hyphae and dormant centrally located fused syncytia

(Rodriguez-Urra et al., 2009). Addition of exogenous bicarbonate appears to disrupt a natural

concentration gradient. Potassium bicarbonate is an effective treatment for damping off fungi.

259 Molds and mildews differ in their biology and their pattern of infestation in various crops, but

there are some similarities in their life histories that permit development of effective management

strategies with the common principles of avoidance/exclusion, eradication, and protection.

262 Avoidance/exclusion focuses on preventing pathogen introduction and minimizing factors that

favor their establishment like selecting sites with good soil drainage, promoting good air

circulation, removing diseased, dead or senescent plant material, reducing weeds, planting

265 disease free stock, applying a thick mulch layer or ground cover and managing insects.

266 Eradication includes sanitizing artificial surfaces, sterilizing growth medium, sanitary planting

267 practices and destruction or removal of litter and plants at season's end. Protection includes

planting resistant or less susceptible varieties, avoiding excessive use of soil amendments,
 avoiding excessive humidity in the canopy, keeping fruit cool and off the ground and prompt

270 harvesting (Carrol et al., 2014a; Pappas, 2000).

271 Close plant spacing and a dense canopy favor disease development. Canopy manipulation as a

272 means to prevent or delay disease epidemics, and minimize the need and amount of synthetic

and non-synthetic substances used in organic crops, while maintaining economically viable

274 production is sufficient to manage disease in some cases; however in other instances, canopy

275 modification can increase the efficacy of fungicide application and further reduce disease

276 severity. Whereas, canopy control through trimming or cultivar choice is beneficial for control of

277 powdery mildew (*Sclerotina spp.*) in carrot, soybean, field pea and chickpea, other fungal diseases

such as *Alternaria* may require additional treatment for control (McDonald et al., 2013).

279 In orchards, rotary mowing the orchard floor after leaf drop reduces overwintering scab

inoculum and promotes earthworm activity. Light manure applications after harvest provide

nitrogen for decomposers promoting leaf decomposition. Pruning out mildew-infested shoots

will also reduce the infection potential (Darwin, C., 1881; Peck and Merwin, 2014).

283 Sooty blotch and flyspeck are common diseases of pome fruits particularly in moist temperate

regions. Cultural control practices include site selection where trees receive good air circulation

and sunshine, pruning trees to ensure good air circulation and choosing resistant cultivars

- 286 (Williamson and Sutton, 2000).
- 287 Mixed-species hay cropping and annual compost applications for 3 years can enhance soil
- suppressiveness to damping-off in farmland transitioning to certified organic vegetable
- 289 production. Mixed-hay treatment consists of a combination of eight hay species in equal
- 290 proportions, including: festulolium (or rye fescue) undersown with alfalfa, red and white clover,
- timothy, chicory, orchard grass and plantain, cut two or three times per year by mowing off

- foliage, allowed to dry on the ground, and removed from the plots. Compost amendments
- applied during transition can improve crop vigor by significantly enhancing soil fertility (Baysalet al., 2008).
- 295 Composting is an agricultural practice that improves soil health, nutrient levels, organic matter,
- 296 plant growth and suppresses diseases caused by soilborne pathogens. Compost teas and humus
- resulting from the composting process contains a variety of organisms (bacteria, fungi,
- nematodes, actinomyces) that remove pathogens through competition, induction of systemic
- 299 plant defenses, physicochemical activity, antagonism and hyperparasitism (Mehta et al., 2014).
- Hairy vetch is known to activate defense genes in tomato plants. Hairy vetch, grown with rye as
- a winter cover crop and compost teas are useful in fungi control for tomato crops (McGrath,
- 302 2009).
- 303 Genes conferring resistance to powdery mildew have been identified in melons, although the
- 304 mechanism of resistance is not completely understood. The ability to develop resistant varieties
- in melon through marker assisted breeding is under study (Ning et al., 2014).
- 306 For crops susceptible to a particular fungal pathogen, rotations to a non-susceptible crop allow
- 307 germination of spores, but without a host the fungus life cycle is terminated. This is particularly
- true with white mold infection of potatoes, where the longer a field is out of potatoes the lower
- 309 white mold counts become (Wharton and Wood, 2013).

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