

## GILCHRIST COUNTY TOBACCO PREVENTION NEWSLETTER

Volume 4, Issue 2

Apr—June, 2011

### INSIDE THIS ISSUE:

<i>Results of Point-of-Purchase Tobacco Advertising Placement Survey in Gilchrist County</i>	1
<i>Spotlight on Youth: Winners of the Local Youth Essay Contest</i>	3
<i>Spotlight on Florida: Florida Suit Challenges Financial Breaks For Cigarette Makers During Legal Appeals</i>	4
<i>Spotlight on Florida: Governor Scott Signs New Law Allowing Local School Districts to Regulate Smoking on School Campuses</i>	5
<i>National Tobacco News: CDC Predicts Smoking Bans in Every State by 2020</i>	6
<i>National Tobacco News: MLB, Players to Discuss Tobacco in Collective Bargaining Agreement</i>	7
<i>Opinion: Diamondbacks Owner: "Ban Smokeless Tobacco"</i>	8

## Results of Point-of-Purchase Tobacco Advertising Placement Survey in Gilchrist County

By Tracy DeCubellis, Gilchrist County Tobacco Prevention Specialist

Gilchrist County Students Working Against Tobacco (SWAT) youth and leaders surveyed local tobacco retailers to determine the level of tobacco advertisements being marketed toward children, the kinds of tobacco advertisements near schools, and the amount of self-service tobacco, or products available within reach to children in Gilchrist County stores that sell tobacco. The survey was completed using the StoreALERT form that reviews exterior and interior advertisements and tobacco placement. More information on the survey method is available at [www.storealert.org](http://www.storealert.org).

StoreALERT is an important SWAT project because tobacco companies spend about \$13 billion each year advertising their products at point of purchase – usually convenience stores. Florida is the most highly advertised state with a whopping \$880 million dollars being spent on store advertising and promotions yearly.

A recent study was published in the Archives of Pediatrics and Adolescent Medicine that indicates point-of-purchase advertising does impact youth smoking habits. The re-

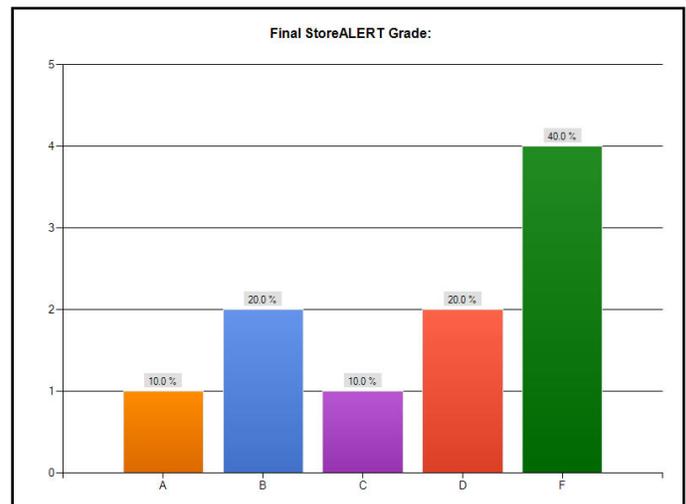
search states, “Results suggest point-of-sale advertising is associated with encouraging youth to try smoking, whereas cigarette promotions are associated with influencing those youth already experimenting with cigarettes to progress to regular smoking, with established smokers being most influenced by promotional offers” (Slater, Chaloupka, Wakefield, Johnston & O’Malley, 2007).

Our goal in Gilchrist County is to use the results of the StoreALERT survey to equip our youth to choose a tobacco-free lifestyle by understanding the local marketing tools used by

tobacco companies.

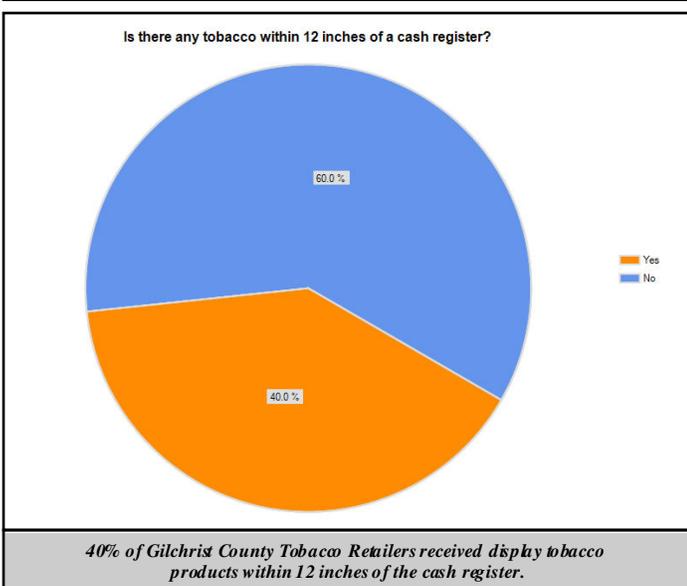
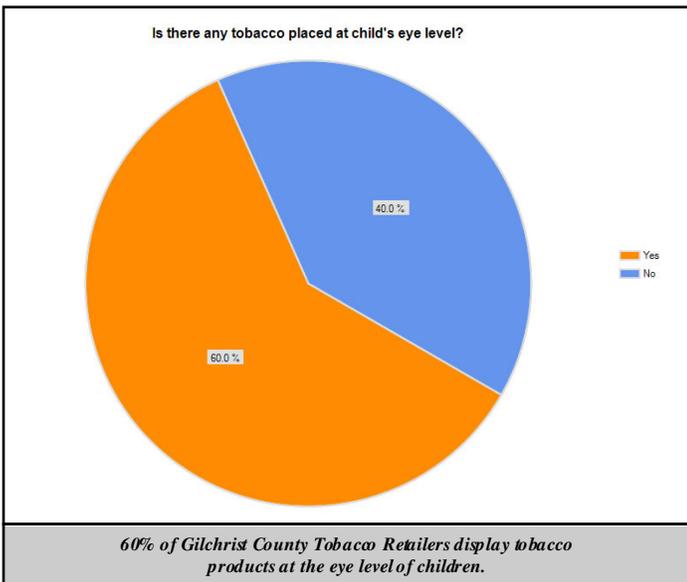
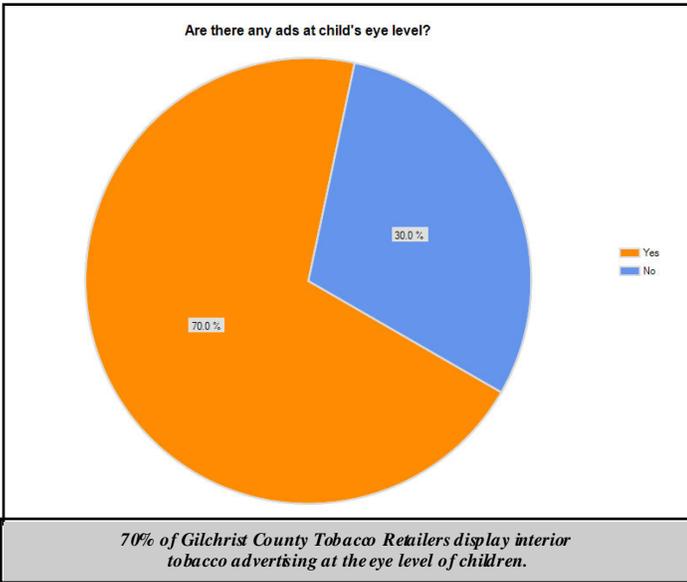
Overall StoreALERT grades reveal that 60% of retailers earned a D or an F which means they displayed a high level of tobacco advertising.

This year our results indicated that tobacco ads are being placed to attract the attention of children. Exterior and interior data showed that 70% of stores are placing tobacco ads at child eye level, and 60% of the stores also placed tobacco products at child eye level. StoreALERT defines “hip high” on an adult as child eye level which means these products and advertisements are intended to be seen by children.



60% of Gilchrist County Tobacco Retailers received a “D” or “F” Grade for significant tobacco advertising and product placement.

## Gilchrist County Tobacco Advertising Survey, continued



This becomes even more significant because 40% of the tobacco retailers surveyed were in line of sight of schools. This year only 20% of stores had self-service tobacco; however 40% of retailers displayed tobacco within 12" of register which is essentially self-service as it can be touched from in front of the counter. The tobacco near the registers was candy flavored cigars, which is usually displayed in brightly colored packages that appeal to children.

Only 10% of stores surveyed displayed the exact age of sale wording required by Florida Statute 569.14 which reads: **"THE SALE OF TOBACCO PRODUCTS TO PERSONS UNDER THE AGE OF 18 IS AGAINST FLORIDA LAW. PROOF OF AGE IS REQUIRED FOR PURCHASE."** That means 90% of stores only displayed "We Card" signs on the doors and interior of the store at the time the survey was conducted. Age of sale signs are intended to not only enforce the law, but also send a message to youth that tobacco use by minors is unacceptable.

We found some good news to share as well. This year 100% of tobacco retailers were abiding by the new FDA guidelines restricting free gifts with purchase of tobacco products. We are encouraged to see compliance with the new rules in this area. Additionally, we noted that 80% of retailers are only advertising tobacco around the tobacco products, and not around the candy or other areas of the store. Outdoor advertising showed

improvement over last year's results with 60% of retailers either having no outdoor tobacco ads, or a discreet level of advertising compared to 12.5% in 2010. This year 40% of stores displayed moderate or in-your-face levels of outdoor advertising, while last year 87% of retailers fell into this category.

It is clear from these results that children and youth in Gilchrist County are being exposed to a large amount of tobacco advertising. Research is indicating that our young people are being influenced and encouraged to try tobacco products through point-of-purchase advertising. If we want our youth to be tobacco-free, this is an area that should be addressed. At the time of this writing, the Gilchrist County Board of County Commissioners is considering a candy flavored tobacco placement ordinance that would place all candy flavored tobacco products behind the counter. The Tobacco Free Partnership of Gilchrist County and Gilchrist County SWAT support this ordinance as an important step in helping Gilchrist County youth to be tobacco-free.

Reference:  
 Slater, S., Chaloupka, F., Wakefield, M., Johnston, L., O'Malley, P. (2007, May). "Impact of retail cigarette marketing practices on youth uptake." *Archives of Pediatrics and Adolescent Medicine*, 161, 440-445. Retrieved June 3, 2011, from <http://archpedi.ama-assn.org/cgi/reprint/161/5/440>

# Winners of the Local Youth Tobacco Prevention Essay Contest

## The Marketing of Candy Flavored Tobacco to Youth

By Spencer Hewitt

Just imagine walking into a candy store and seeing all the different kinds of candy. The bright shiny colorful wrappers grab your attention to the candy of your choice. People of all ages, yes, even teenagers love the way it draws you to buy that candy bar or gum or whatever kinds of candy you enjoy. That is why the manufacturers design the tobacco products to look like candy.

Another way that attracts them is to see a famous celebrity or a cool kid smoking or using snuff. They believe it makes them look cool or powerful and makes them feel older. It attracts them to use the tobacco because that famous person uses it; so I can be cool like them if I smoke it or use it. The only thing is that it is not cool to have black lungs, yellow teeth, shortness of breath, bad breath, and your clothes smell like an ashtray.

Third, the sellers place their candy- flavored tobacco right near the candy. They

hope that kids would be drawn to steal it so they could get hook on it. Even though kids can't buy tobacco until they are 18; somehow they are able to get some through their parents, or older friends. There is a great need for us to get the companies to keep their tobacco away from the candy. Maybe we can give them prizes or awards to encourage them to do this and reminding them they are doing this for the kid's health. We need to voice it-tell them that not to sell it because we are the future of this world and they need to keep it clean and bright for the future generation ahead.

My point is that we need to get the point out to kids that the companies are trying to sell their candy flavor tobacco to draw them to try and use them. These companies don't care that it harms and could kill you. We need to get the message out there; "Keep it real and not smoke."



## Marketing Strategies & Tobacco

By Benjamin Avila

Convenience store displays of candy flavored tobacco are a form of marketing in many ways. One way they display tobacco as a form of marketing is that they color the packages according to the "flavor" of the tobacco. Another way they display tobacco as a form of marketing is that they give the package a specific scent. This essay will explain how convenience stores display candy flavored tobacco as a form of marketing.

One way convenience store displays of candy flavored tobacco is a form of marketing is that they color the packages according to the "flavor" of the tobacco product. They do this in cases like a red package for cherry chewing dip, blue package for blueberry cigars, or purple packaging for grape flavored cigarettes. They do this to make it look more attractive to youth. But as we all know, just because something may look good, it doesn't mean that it taste good or is healthy for you to consume.

Another way convenience store displays of candy flavored tobacco is a form of marketing is that along with coloring the package, they give it a specific scent. They do this because they want the customer to think that it looks good, and that they are buying something good to eat. Do you remember sitting in your bedroom as a child and then smelling your



mom's fresh pot of chili. The scent quickly comes to you, and it stimulates your mind, and you think, "Man! That smells good!" Well, candy flavored tobacco is just like that, except instead of being a good source of protein and warmth, its cancerous and poisonous.

Convenience stores surreptitiously display candy flavored tobacco products. They do this by changing the coloring of the package to the "flavor" of the candy flavored tobacco product. They do it by giving the candy flavored tobacco product a specific scent to match the "flavor". These types of marketing strategies confuse and attract youth by appealing to their senses, but could lead them to their death.

# Florida Suit Challenges Financial Breaks For Cigarette Makers During Legal Appeals

By Barry Hummel, Jr., MD, Quit Doc Research and Education Foundation

**"In sum, this is an extremely important constitutional issue ... that is already arising in many appeals of multimillion-dollar judgments and will potentially arise in literally thousands of cases."**

*John S. Mills*  
Florida Appellate Attorney

TALLAHASSEE — Florida lawmakers last month quietly extended a financial break for tobacco companies facing a wave of lawsuits because of smoking-related illnesses.

However, the move was made despite a legal challenge that argues the break is unconstitutional because it gives special treatment to one particular industry, in this case cigarette makers.

The issue involves a state law that specifically allows the major tobacco companies to post smaller-than-usual bonds when they appeal judgments against them. The law directly saves money for cigarette makers, which have recently been hit with a series of multimillion-dollar verdicts in an initial wave of cases by smokers with serious tobacco-related illnesses.

A key part of this law was scheduled to expire Dec. 31, 2012. On the final day of the 2011 legislative session, lawmakers approved a Medicaid-budget bill that eliminated the expiration date. The bill was then signed by Gov. Rick Scott. By doing this, the Florida Legislature and the Governor have provided indefinite financial breaks to the tobacco industry unless additional action is taken.

The legislature suggested that the extension was needed because the state relies on money from a 1997 settlement agreement with major tobacco companies which helps fund tobacco prevention and cessation programs throughout Florida. House Health Care Appropriations Chairman Matt Hudson ( R,

Naples) said the main concern is that lawsuits could drive these tobacco companies into bankruptcy if the bond relief goes away. He said that would leave the state in a "no man's land" in continuing to get money from the multibillion-dollar settlement.

"From my standpoint, there are thousands of these cases, and we're nowhere near being done," Hudson said on May 29, 2011.

But John S. Mills, an appellate attorney who is representing families in cases against tobacco companies, contends the smaller-than-usual bonds are unconstitutional.

Mills argues, in part, that the Florida Constitution bars special laws that benefit certain private companies. A three-judge panel of the 1st District Court of Appeal ruled against Mills in April, but he has asked for a rehearing or a hearing before the full appeals court.

"In sum, this is an extremely important constitutional issue ... that is already arising in many appeals of multimillion-dollar judgments and will potentially arise in literally thousands of cases," Mills wrote in a brief.

The onslaught of cases -- and much of the debate about the bond amounts -- stems from a 2006 Florida Supreme Court ruling in a class-action lawsuit against the tobacco industry.

That ruling ended a class action lawsuit by smokers suffering from tobacco-related illnesses, instead requiring that cases by smokers against the tobacco

industry to be heard individually. The ruling also established critical findings about the health dangers of smoking and past misrepresentations by cigarette makers, making it easier for individual cases to proceed by removing the burden of proof surrounding key elements of the cases.

While the individual cases are taking time, tobacco companies are already getting hit with large verdicts. As an example, the 1st District Court of Appeal last month upheld a \$15.75 million judgment against R.J. Reynolds in case from Alachua County, Florida.

Similarly, Mills raised the constitutional issues about bond amounts in an Escambia County case with total damages topping \$20 million.

Bonds are important because they help ensure that judgments ultimately get paid when lawsuits are appealed. That is relevant in the smoking cases, because tobacco companies commonly appeal large judgments.

The state law applies to five companies that were part of the 1997 settlement agreement and caps the total amount of bonds that could be posted at \$200 million. Also, it places a \$5 million maximum bond amount on any individual judgment.

Ordinarily, Mills said parties appealing judgments have to post bonds that cover the full amounts plus interest.

# Governor Scott Signs New Law Allowing Local School Districts to Regulate Smoking on School Campuses

By Barry Hummel, Jr., Quit Doc Research and Education Foundation

On June 2, 2011, Florida Governor Rick Scott signed into law a bill that gives local school districts the ability to regulate all smoking on public school campuses. This law is the first revision of the Florida Clean Indoor Air Act (FCIAA) since its passage in 2003, and the first change in the Preemption Clause contained in the FCIAA since the original 1985 legislation.

The issue of smoking on public school campuses rose in prominence in December, 2010. At that time, the Florida Attorney General's office issued an opinion that the rules regarding smoking on public school campuses were regulated by the preemption clause, which "expressly preempts regulation of smoking to the state and supersedes any municipal or county ordinance on the subject." While local school districts argued that these rules did not involve "ordinances", many were forced to stop working on rules to prohibit adult smoking on school campuses.

The Attorney General's opinion added a new dimension to the issue of local control over smoking rules. As a



result, both the Florida House and Senate filed bills filed during the 2011 Florida Legislative Session which would return control of outdoor smoking regulations to local governments, paving the way for local municipalities to create smoke-free parks, beaches, and school campuses throughout the state.

Early in the 2011 Florida legislative session, Representative Kathleen Passidomo (R, Florida House District 76) filed HB 211, which would have inserted the word

"indoor" into the preemption clause, returning control of all *outdoor smoking* to local governments. In support, Florida Senator D. Alan Hays (R, Florida Senate District 20) filed the identical bill, SB 1070, in the Florida Senate.

Resistance to altering the Preemption Clause stalled these two bills in committee hearings. However, there was obvious support for changing the rules regarding the regulation of smoking on public school campuses.

As a result, Representative Bill Hager (R, Florida House District 87) filed HB 891, *Regulation of Smoking*, specifically designed to exempt school districts from the Preemption Clause contained in the FCIAA. Senator Thad Altman (R, Florida Senate District 24) joined the cause by filing the companion bill, SB 1430.

These two bills easily cruised through their respective committee hearings, passing unanimously in each committee.

On May 3, 2011, the full Senate passed SB 1430 by a vote of 38-1. The only dis-

senting vote was cast by Senator Evelyn Lynn (R, Senate District 7). One day later, on May 4, 2011, the Florida House unanimously passed HB 891 by a vote of 117-0.

The final language of the bill alters the preemption clause to state that Florida Statute "expressly preempts regulation of smoking to the state and supersedes any municipal or county ordinance on the subject; **however school districts may further restrict smoking by persons on school district property.**"

The new law will now allow school districts to strengthen their existing rules on tobacco use on all school property, including driveways and athletic fields.

For additional information on strengthening the rules on tobacco use and possession on school property, please contact the Tobacco Free Partnership of Gilchrist County at 352-463-7006, or contact Tracy DeCubellis, the Tobacco Prevention Specialist for Gilchrist County, at [tracyd@quitdoc.com](mailto:tracyd@quitdoc.com).



Rep. Bill Hager (left) and Sen. Thad Altman (right) sponsored the bills that would allow school districts to further restrict smoking on school campus-

# CDC Predicts Smoking Bans in Every State by 2020

By Mike Stobbe, Associate Press Medical Writer

ATLANTA – By 2020, every state may have bans on smoking in restaurants, bars and the workplace, federal health officials predicted on April 21, 2011. This estimate was based on the current pace of adopting anti-smoking laws.

The number of states with comprehensive indoor smoking bans went from zero in 2000 to 25 in 2010.

"It is by no means a foregone conclusion that we'll get there by 2020," said Dr. Tim McAfee, director of the Center for Disease Control and Prevention's (CDC) Office on Smoking and Health.

But the success of the smoking ban movement has been astounding, and

seems to be accelerating, he added. "I'm relatively bullish we'll at least get close to that number."

Nearly half of U.S. residents are covered by comprehensive state or local indoor smoking bans, the CDC estimated, in a new report.

Another 10 states have laws that ban smoking in workplaces, bars or restaurants, but not in all three venues.

Some other states have less restrictive laws, like requiring smoking areas with separate ventilation.

Only seven states have no indoor smoking restrictions, although some of their cities do: Indiana, Kentucky, Mississippi, South Carolina, Texas,

West Virginia and Wyoming.

Gary Nolan, director of a smokers' rights group, said he wouldn't be surprised if the CDC's prediction came true. Public health officials and others have been putting tremendous pressure on bars and businesses to ban smoking, he added.

"It wouldn't surprise me if they prevailed," said Nolan, of the Smoker's Club. "It's just a little bit more liberty slipping away at the hands of big government."

Tobacco smoke is an established cause of lung cancer, heart disease and other maladies, and smoking has been called one of the nation's leading causes of death.

The science on the im-

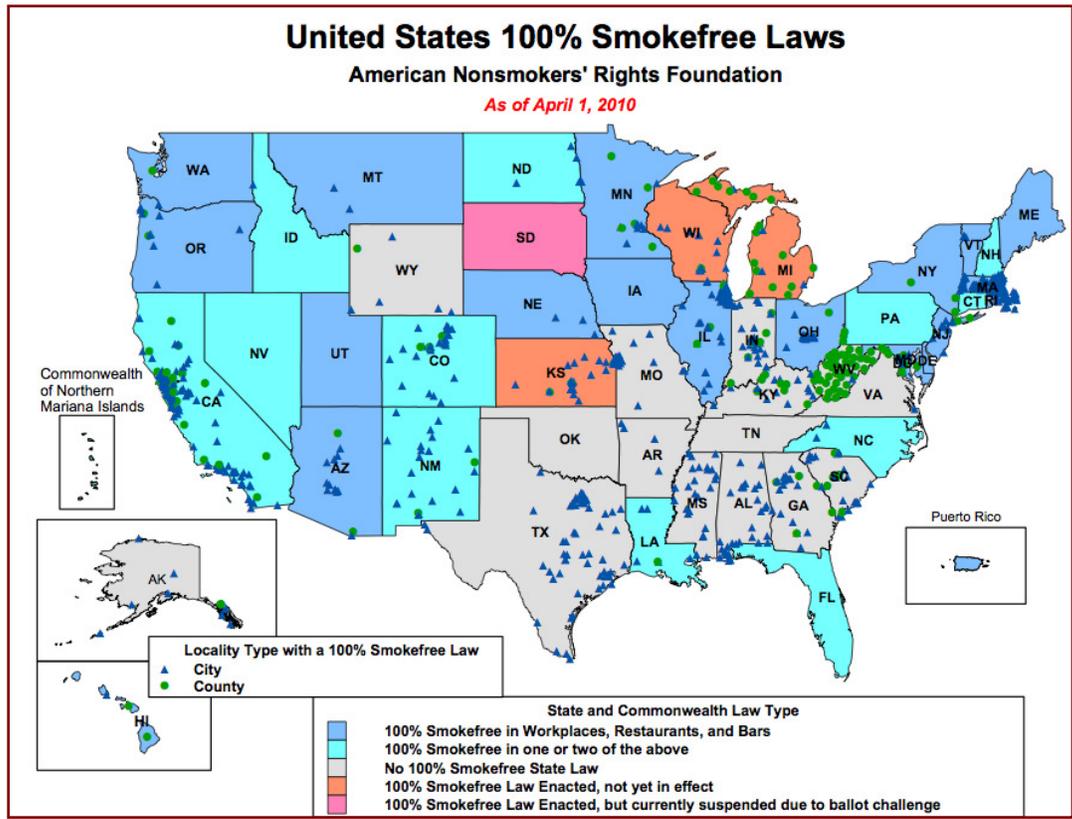
pact of smoking bans is younger. Because it takes years or even decades for cancers to develop, there's little information on the impact of bans on cancer rates. But studies have already charted declines in adult heart attack rates and in childhood asthma attacks after smoking bans were adopted in some communities.

The American Heart Association's chief executive, Nancy Brown, said the CDC report brings good news. But she said advocates have a lot of work ahead of them to make the 2020 prediction come true.

"It's too soon to rest on our laurels," she said, in a prepared statement.

*Over half of all States now have some form of indoor workplace smoking restrictions.*

*Only twelve states still prohibit local jurisdictions from passing additional smoking restrictions.*



## Selig Says MLB Wants to Ban Smokeless Tobacco

By Jon Krawczynski, AP Baseball Writer

MINNEAPOLIS (AP)—Much to Commissioner Bud Selig's chagrin, chewing tobacco has been almost as much a part of Major League Baseball (MLB) over the years as "Play Ball!" and the seventh-inning stretch.

It's ingrained in the culture of the game and is evident anytime a player steps on the sticky floor of a big-league dugout.

As owners and the players' union begin negotiations on a new collective bargaining agreement, Selig hopes the time has finally come to rid the game of the unhealthy habit.

In a letter to the Campaign for Tobacco Free Kids on March 31, 2011, Selig told the group's president he believes "smokeless tobacco should be banned at the Major League level."

In order to make that happen, the owners have to negotiate with the players' union and have the ban added to the next collective bargaining agreement.

"In the current round of bargaining with the Major League Baseball Players Association (MLBPA), MLB will propose restrictions on the use of smokeless tobacco at the Major League level comparable to the restrictions in place at the Minor League level," Selig wrote.

Smokeless tobacco, including dip and chew, is banned in minor league ballparks.

Union chief Michael Weiner said in February that he expected the subject to be broached in the upcoming talks.

"I'm not going to make any predictions about where we're going to go with it, but I do expect it to be an issue," Weiner said then.

Selig's letter was in response to one sent to the commissioner's office this winter from public health officials in 15 MLB cities that urged baseball to ban tobacco use by all personnel in the ballpark.

The officials cited smokeless tobacco's links to oral cancers, gum disease and other health problems and recent statistics released by the Centers for Disease Control and Prevention stating that use of the products among high school boys is up 36 percent since 2003 as reasons to ban it. The group also launched an online campaign—[www.tobaccofreebaseball.org](http://www.tobaccofreebaseball.org)—to raise awareness.

"Baseball players are role models for our children, making impressions that last a lifetime," Dr. David Fleming, Director and Health Officer for Public Health in Seattle and King County, Washington, said in a statement. "It's time for major leaguers to step up to the plate like the rest of professional baseball and go tobacco-free."

Baseball banned tobacco use in the minor leagues in 1993, but it is still common in the majors. In February 2011, Sens. Frank R. Lautenberg of New Jersey and Dick Durbin of Illinois sent a letter to Selig and Weiner calling on them to ban smokeless tobacco.

The current collective bargaining agreement expires in December.

## MLB, Players to Discuss Tobacco in Collective Bargaining Agreement

By Alden Gonzalez / MLB.com

Congress is urging Major League Baseball to ban smokeless tobacco, and both MLB and the Major League Baseball Players Association (MLBPA) say they will consider it.

At a hearing in Washington, D.C., on April 13, 2011, House Energy and Commerce Committee chairman Henry Waxman – a California Democrat – and Health Subcommittee chairman Frank Pallone – a New Jersey Democrat – called on MLB and its players to stop using chew, dip or similar products during games.

In response, MLB executive vice president Robert Manfred and MLBPA chief labor counsel David Prouty told lawmakers that while they agree that smokeless tobacco is harmful, any ban would have to be agreed upon through collective bargaining and they're willing to talk about it during future negotiations, The Associated Press reported.

Baseball's labor contract expires in December 2011. Smokeless tobacco is currently banned in the Minor Leagues, but not in the Majors.

"While an outright ban on the use of smokeless tobacco in the Major Leagues is a laudable

goal, it will have to be pursued against the backdrop of these legal realities," Manfred told the committee.

After the hearing, Prouty told the AP, "I can tell you, anecdotally, there are plenty of players who are against [the use of tobacco], who think, 'Of course it should be banned.' There are plenty of players who use it. Do they think it should be banned? I don't know. We can go back to the players and say, 'Congress feels strongly about this. You ought to think about it. Look what's happened on other issues Congress felt strongly about.'"

Manfred cited the efforts MLB has made for years, including the 1993 ban of tobacco use by team personnel, both players and staff, at Minor League ballparks and during team travel.

Also, clubs may not permit the distribution of tobacco products in team clubhouses. However, use of smokeless tobacco remains prevalent in the Majors.

No current Major Leaguers were in attendance during the hearing, but former catcher Joe Garagiola was there and spoke against the use of tobacco, the Associate Press added.



U.S. Senators Dick Durbin (center) and Frank R. Lautenberg (left) are leading the charge against smokeless tobacco in the MLB. (Alex Wong/Getty Images)

# Diamondbacks Owner: "Ban Smokeless Tobacco"

By Ken Kendrick, Managing General Partner of the Arizona Diamondbacks

Baseball and tobacco have an enduring, unfortunate relationship.

Babe Ruth famously said he started chewing tobacco when he was five. In 1909 – back when American Tobacco Company was producing baseball cards and packaging them with cigarettes – the great Honus Wagner demanded that his card be pulled from the packs. Many say Wagner objected to using his image to sell tobacco; others say the tobacco company just hadn't paid him enough.

Whatever the reason, Wagner's break with tobacco made that series of cards rare and valuable. I'm proud to own one of them, and I'm pleased that the card represents a player who took action against tobacco.

Now today's players and owners must make a gutsy call and ban smokeless tobacco use at games. For too long, Major League Baseball players have used tobacco on the field, in the dugout, the bullpen and of course, before millions of fans who watch on TV. I know that many players are addicted, and that's part of the problem.

All players aren't indulging a harmless habit when they use smokeless tobacco. They're damaging their health with a product that causes cancer and other serious diseases. And they're endangering the well-being of countless kids who look



up to them, and who copy everything big leaguers do.

Each spring, I speak to the Diamondbacks players about the privilege of being in baseball. I tell them we're a family-oriented game. Young people come with their parents. They idolize you, I say. How you conduct yourself and how you live your life is very important to our success – and your success.

This is what Major League Baseball and the players union must consider as we enter another round of contract talks in which a possible prohibition on the use of smokeless tobacco is on the table. Commissioner Bud Selig has said that the league will propose a smokeless tobacco prohibition like the one that's been in place in the minor leagues since 1993. I hope owners and players will seize this opportunity and do what's right.

With cigarette sales down and smoke-free laws restricting where smokers can light up, the tobacco industry has

been spending record sums to market smokeless products, promoting them as a substitute for smoking. It's having an effect: Smokeless tobacco use by high school boys is spiking – there has been a 36% increase since 2003. Every time a kid sees a big league player using smokeless tobacco, baseball is contributing free promotion.

Everyone in baseball has seen the debilitating illnesses that smokeless tobacco use can cause. Hall of Famer Tony Gwynn's recent cancer diagnosis and his public statements blaming his cancer on years of chewing tobacco is a vivid example. Washington Nationals pitching ace Stephen Strasburg, who is struggling to quit, has said he started chewing as a young player trying to imitate big leaguers.

The Diamondbacks have worked closely with health officials in Arizona to help educate our own players about tobacco and spread the word to school children. I'm proud of these efforts. But unfortunately, until Major League Baseball prohibits smokeless tobacco use, big league players will still use it – and kids will still copy them.

We need to break this cycle to protect players and provide positive role models for kids. We must finally make the link between baseball and tobacco nothing more than an historic curiosity.



Research and Education Foundation

219 N. Main Street., PO Box 75  
Trenton, FL 32693  
Phone: (352) 463-7006  
Fax: (877) 803-2694  
tracyd@quitdoc.com



Health Access and Tobacco  
4052 Bald Cypress Way, Bin C#23  
Tallahassee, FL 32399-1744  
Phone: 850-245-4144  
Fax: 850-414-6470



Let us know what you think!

Please call us at 866-355-7848, or via e-mail at

[bhummel@quitdoc.com](mailto:bhummel@quitdoc.com)

with your comments and suggestions, or to volunteer for one of our many projects.

