



FOR A PREVENTIVE POLICY AGAINST THE RISKS OF ACCIDENTAL OIL POLLUTION OF THE TUNISIAN COAST

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The Mediterranean is a semi-enclosed sea that washes the shores of 21 countries. With its renowned significant ecological value, marine biodiversity and the abundance of the flora and fauna mutualisms it hosts, this sea is highly exposed to risks of accidental oil pollution.

“Accidental oil pollution” is defined as any act which results or is likely to result in the discharge of hydrocarbons (or other harmful substances derived therefrom) into the sea which causes, or may cause, damage to the marine environment, the coastline, or the waters under the sovereignty or national jurisdiction of a State.

Indeed, maritime transport is an important economic activity for the region: it accounts for about 30% of international maritime trade and 25% of maritime oil transport.

However, the risks of contamination of the sea due to the transport of dangerous cargo and oil spills linked to the transport of crude and refined petroleum, as well as residual products by tankers and oil pipelines are still poorly controlled.

The list of ecological disasters caused by ship accidents is actually long and keeps increasing. To quote only a few examples from neighboring countries, one can cite the explosion of the tanker *Haven* in 1991 off the coast of Genoa (Italy), which caused a spill of 180,000 liters of hydrocarbons in the Mediterranean. Another example is the oil spill caused by explosions on board the Iranian oil tanker, the *Khar Q-5*, on December 19, 1989, off the Moroccan Atlantic coast.

As far as Tunisia is concerned, it should be emphasized that part of a major route for maritime traffic between the Strait of Gibraltar and the Suez Canal is located off the coast of Tunisia. This situation gives rise to particular caution, all the more so as the two neighboring states of Tunisia are major oil exporters.

On the other hand, Tunisia itself has offshore exploitation activities off its coasts. Indeed, 23 wells were drilled as of 2009 in Tunisia and others are currently being drilled.

This situation raises the question of whether the drilling carried out by foreign companies off the coast of Tunisia is sufficiently secure. In addition to the risks of accidental pollution linked to maritime oil transport, there is also the risk of accidents linked to the exploitation of offshore oil fields. The oil spill caused by the sinking of a platform operated by British Petroleum (BP) in the Gulf of Mexico provides another worrying example.

For an economy dependent on seaside tourism such as Tunisia's, where, moreover, fishing feeds tens of thousands of families, and for a country that is not equipped with the technical means to face similar or even smaller disasters, no risk can be tolerated.

We therefore intend with the present paper to draw the attention of public decision-makers and in particular the Ministry of Local and Environmental Affairs and the Assembly of People's Representatives (ARP), each within its sphere of competence, to the problem of accidental pollution, which has not attracted the interest it deserves in environmental public policies. First of all, we consider that public environmental policy is unbalanced. Next, we consider that the April 3, 1996 law establishing a national emergency response plan to combat marine pollution incidents (hereinafter the 1996 Law), which is the basis of our policy in this area, is marked by a number of gaps and shortcomings. Indeed, this law does not provide for the necessary coordination mechanisms in the event of accidental pollution that would enable all stakeholders to play their role on a timely and efficient basis. On the other hand, to face a risk as prominent as the pollution of our coastline or our maritime zones, our policy must go beyond its reactive and curative aspect in order to acquire a truly anticipatory dimension.

I - Towards a Balanced Environmental Policy

We also think that the Tunisian environmental policy is unbalanced. Priority in Tunisia has always been given to environmental measures related to the control of land-based pollution, relating to toxic waste that is released directly by the industry into the sea, threatening the environment in general and the coastline in particular. Of course, heavy metals, persistent organic pollutants, sediments, solid waste and domestic wastewater create irreversible damage to health and marine life. Even though it is estimated that about 80% of the pollution load of the marine environment originates from land-based

activities, shipping and offshore installations pose a tangible threat to marine ecosystems.

The national environmental strategy that is still heavily focused on land-based pollution, while the risks go far beyond this.

The efforts made by the Tunisian State over the last 40 years in the field of environmental protection in general are undeniable. This finds evidence in the well-developed legislative and regulatory arsenal in the environmental field, the conventions ratified by the Tunisian State, the creation of various specialized institutions, the heavy investments, particularly in the field of water management, of pollution control and of energy management and the efforts to take into account the environmental aspects in the various sectors.

However, the issue of accidental pollution by oil or dangerous cargo does not seem to alarm public policy makers.

It is true that Tunisia has signed and ratified, since its independence, and in particular since the 1980s, dozens of international and regional agreements and treaties relating to the environment, with particular reference to the issue of accidental oil pollution¹. These conventions have influenced the direction and content of national policy and programs. Taking into account the conventions ratified by Tunisia has always been accompanied by the strengthening of the institutional and legislative framework of the country.

Two regional conventions of particular importance to Tunisia deserve to be highlighted. These are the Convention for the Protection of the Mediterranean Sea against Pollution (the Barcelona Convention) and the Agreement between the Government of The Republic of Tunisia, the Government of the People's Democratic Republic of Algeria and the Government of the Kingdom of Morocco, to prepare a sub-regional contingency plan for the preparation and control of accidental marine pollution in the South-West Mediterranean area, concluded in Algiers on June 20, 2005.

Concerning the Barcelona Convention, it should be recalled that in 1975 the European Community

and 16 Mediterranean countries adopted the Mediterranean Action Plan (MAP), which is the first plan to be adopted within the framework of the Seas Program Under the auspices of the United Nations Environment Program (UNEP).

In 1976, the same countries adopted the Convention for the Protection of the Mediterranean Sea against Pollution (the Barcelona Convention). Seven Additional Protocols on specific aspects of Mediterranean environmental conservation will later complement the MAP legal framework: • The Dumping Protocol (by ships and aircraft) • The Prevention and Emergency Protocol (Pollution from ships and critical situations) • The LBS Protocol • The Specially Protected Areas and Biodiversity Protocol • The Offshore Protocol (pollution resulting from exploration and operation) • The Hazardous Waste Protocol • The Protocol on Integrated Coastal Zone Management.

In 1995, the Contracting Parties adopted the Action Plan for the Protection of the Marine Environment and the Sustainable Development of the Coastal Areas of the Mediterranean (MAP Phase II), which replaced the 1975 MAP. In turn, the 1976 Barcelona Convention was replaced by an amended version, called the Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean (1995).

As for the sub-regional agreement concluded in 2005 in Algiers by the three North African countries, Tunisia ratified the latter by Decree No. 2006-555 of 23 February 2006. This agreement reflects the importance for these three countries, which are already parties to the Barcelona Convention and its additional protocols, of the sub-regional agreements covering the operational provisions, administrative arrangements and financial conditions for cooperation in the event of emergencies, to enable rapid and effective response to pollution events at a sub-regional level.

These international conventions ratified by Tunisia largely influenced the legislative and regulatory arsenal relating to environmental issues. Among the multitude of legal acts related to the protection of the environment and the fight against marine

pollution, we might draw only on the relevant legislation relating to the littoral sectors and island sites, namely Law No. 95-73 of 24 July 1995 on the maritime public domain, Law No. 95-72 of 24 July 1995 on the establishment of the Agency for the Protection and Development of the Coastal Region (APAL), and Law No. 49-2009 of 20 July 2009 on marine and coastal protected areas.

As important as it may be, this legislative and regulatory framework is not sufficient on its own to address the imbalance that still characterizes our environmental policy. Financial and technical resources are still overwhelmingly directed towards the control of land-based pollution, to the detriment of the fight against accidental oil pollution.

II - Towards the Creation of a Permanent and Transversal Coordination Structure between the Stakeholders in the Fight against Accidental Oil Pollution

The 1996 Law had the relevance of involving several stakeholders in the issue of the control of accidental oil pollution. Indeed, this law created a National Commission for the Prevention and Control of Marine Pollution Events, responsible for monitoring the preparation of the different stakeholders in the struggle and implementation of the National Contingency Plan.

This Commission is composed of representatives of the various relevant departments in the Ministries of the Environment, the Interior, Foreign Affairs, Finance, Industry, Agriculture, Equipment and Housing, Transport, Tourism and Handicrafts, Communications and Public Health (Article 4 of the Law).

The National Commission for the Prevention and Control of Marine Pollution Events is chaired by the Minister for the Environment or his/her representative.

Coordination mechanisms at national and regional levels have been foreseen, with a general command post, a command post at sea and, where appropriate, a shore-based command post.

It should be borne in mind that the multiplicity and diversity of stakeholders require a massive coordination effort to delineate the responsibilities of all stakeholders and establish procedures that allow all stakeholders “to contribute in a coordinated manner and to mobilize resources rapidly and efficiently.” However, this Commission can only meet at the call of its President in at least two ordinary sessions a year, in order to study the state of readiness of the various stakeholders and to update the documents of the plan. It may also meet immediately in extraordinary session in the event of massive pollution or threat of massive pollution.

However, the seriousness of the threat of oil pollution entails the creation of a permanent and holistic coordination structure between the various stakeholders. This refers to the problem of the absence of environmental policies in which the different components are interrelated and interconnected. These policies are often implemented on a sector-based level and in a relatively uncoordinated manner. Institutional separation and environmental actions which are often fragmented and isolated persist and reduce the effectiveness and performance of interventions.

Coordination between the different actors therefore deserves to be more institutionalized and perpetuated through, inter alia, the creation of operational intra-institutional consultation frameworks.

III - From a Remedial Policy to an anticipatory Policy

The priority given in Tunisia to costly urban environmental remedial measures has been made to the detriment of preventive measures for the protection of the marine environment.

It is true that Tunisia, with the 1996 Law, has adopted a national contingency plan to deal with marine ecological disasters.

Article 2 of this Law stipulates that “*a National Contingency Action Plan shall be established laying*

down the framework and the mechanisms for rapid, effective and coordinated action enabling public authorities to implement protection measures and to fight under the best conditions massive marine pollution by hydrocarbons and other harmful products threatening the marine environment and the national coastline”.

This national contingency plan can only be implemented in accordance with Article 3 of the same Law “*in case of an event of massive pollution affecting or liable to affect marine waters subject to national sovereignty or jurisdiction and any area of the high seas affected by a pollution event constituting a definite threat of pollution to the marine environment and the national coastline*”. Article 4, which established a National Commission for the Prevention and Control of Marine Pollution Events, instructed it to monitor the preparation of the various parties involved in the struggle and implementation of the national emergency plan. To this end, it is empowered to decide on the appropriate methods and measures to be taken to combat pollution.

The 1996 Law also gives reason to hope that the adopted approach is that of anticipation as it has defined in its first article the preparation for the fight against oil pollution as “*Any action taken by the concerned parties aimed at ensuring the permanence and update of the national plan to combat marine pollution incidents, educating and training personnel, and establishing check lists of control measures, to ensure the availability and maintenance of a minimum equipment*”.

Based on this article, it is clear that preparations for pollution control are essentially based on three pillars: preparation of logistical means, training of personnel, updating of the National Contingency Action Plan, in addition to the need for strengthening international cooperation in this area.

Indeed, the development of national capacities to respond to pollution events in national contingency plans, including the availability of control equipment and skilled personnel, is a prerequisite, without which international mutual assistance would be ineffective.

1 - Preparation of Logistical Resources

In addition to the aforementioned Article 1 of the 1996 Law, which mentions the need to draw up inventory lists of means of control, to keep a minimum equipment available and to ensure its maintenance, Article 6 of the same law was more explicit when it stressed that the Commission shall draw up and update an inventory of the means of control and ensure the availability of such means in appropriate storage places which are distributed as widely as possible, according to the risks while giving priority to the most sensitive areas. This commission develops and updates the documents of the National Contingency Action Plan, the list of which is annexed to this law. This commission develops and updates the logistical resources necessary for the implementation of the National Contingency Action Plan.

These logistical resources were listed in a document which was annexed to the 1996 Law².

2 - Personnel Training

Preparation for combating oil pollution is also based upon educating and training personnel (Article 1). In this context, the Commission is required to prepare and implement, in collaboration with regional authorities, training programs for personnel in techniques for combating marine pollution, as well as training programs and simulation exercises (Article 6).

For personnel training, Tunisia should benefit from the projects undertaken with the European Union. These include the SafeMed II, which is a European Union project to develop Euro-Mediterranean cooperation in maritime safety and the prevention of pollution from ships. This project is being implemented by the Mediterranean Regional Center for Emergency Response to Accidental Marine Pollution (Rempec), which is a center of the Mediterranean Action Plan of the United Nations Environment Program (UNEP) managed by the IMO.

Within the framework of this project, several regional training courses have been provided, which are open to all project partners and generally of a short duration (2 to 5 days). A number of

training courses have dealt with the topics of the Marpol Convention, port State control, the implementation of IMO conventions, the maritime accident investigation process, etc.

In this context, Tunisia has either participated in or organized itself a number of short-term training sessions aimed at implementing the sub-regional plan of the South West of the Mediterranean linking the three Maghreb states³.

It should also be noted that in order to develop oil spill response capacities, a mock event was organized on May 26, 2016 on the STIR oil terminal at the port of Bizerte. These mock operations require that all necessary human and logistical means be mobilized to be carried out in the smallest details.

In this context, we can draw on the experience of Algeria, which in 2007 organized a mock operation at Arzew Bay with seven foreign countries: Portugal, Spain, France, Italy, Morocco, Tunisia and Libya. It is therefore preferable to organize operations with the participation of foreign countries which allows for a real exchange of expertise and know-how.

3 - Revision and Update of the National Contingency Plan

Having a national contingency plan is not enough. Indeed, for each specific marine pollution event there are a large number of questions to be answered “on the spot” and many unpredictable factors to be taken into account when making operational decisions so that the intervention is carried out in a complete and orderly manner and to obtain the best possible results.

Each geographic or administrative region, which is exposed to the potential risk of accidental marine pollution, presents a number of elements that must be considered in advance when planning the response. In this respect, a number of parameters should be taken into account, namely:

- The characteristics of hydrocarbons;
- The volume of the spill;
- The topography of the site affected by pollution;

- The movements of the sea surface: waves, currents, tide.

The proximity of the spill to the coast and to personnel and equipment bases can determine the speed of the intervention. Weather conditions may delay the implementation of measures.

The method of cleaning the shoreline will then be determined by another set of factors including:

- The type and quantity of stranded hydrocarbons;
- The type of polluted coast;
- The time of the year;
- The weather conditions;
- The accessibility from land or sea and the bearing capacity of the polluted area;
- The availability of personnel and equipment.

However, we are once again faced with the same concern about dysfunctions. In this connection, it should be reminded once more that this Commission can only meet if convened by its President in two ordinary sessions a year, in order to study at least the state of readiness of the various actors and to update the documents of the plan. It will meet immediately in extraordinary session in the event of massive pollution or threat of massive pollution.

The periodicity of the sessions reflects the absence of a truly preventive approach. It is difficult to see how a committee that meets twice a year can implement any action taken by the concerned parties to ensure the continuity and update of the national plan to combat marine pollution incidents, education and training as well as the establishment of inventory lists of the response means and ensure the availability and maintenance of a minimum equipment.

Tunisian environmental policy in this area must therefore go beyond the reactive phase linked to simply repairing damage towards an anticipation-oriented policy.

4 - Towards Strengthening International Cooperation

In order to guard against the risks of accidental oil pollution, additional efforts must be made

by Tunisia to train the personnel and to acquire sufficient logistical resources.

In its preventive aspect, international cooperation is an opportunity for our country to improve its performance and benefit from technological advances, especially since the high costs of these technologies are often cited as a major obstacle to their acquisition.

In this respect, Tunisia seek to benefit more from its cooperation with the European Union. The technical and multilateral cooperation projects financed by the latter, such as the SafeMed project, allow for the exchange of experience and knowledge through regional training or by sending experts from beneficiary countries to other countries whenever possible. This type of cooperation proves to be very beneficial in that it strengthens the expertise of our institutions and directs our environmental policy towards increased operational efficiency and performance.

Multilateral, regional or sub-regional agreements shall not prevent Contracting Parties from seeking assistance from other States or international organizations in the event where the marine environment is affected or likely to be affected by an incident of marine pollution. In this respect, Tunisia can intensify its bilateral cooperation with France to benefit from its experience, in particular its «Polmar Plan», which is a French intervention plan triggered in the event of accidental marine pollution. Tunisia can also benefit from the expertise of the Agence Française d'Expertise Technique Internationale.

In its curative dimension, international cooperation makes it possible to implement bilateral or multilateral agreements providing for the exchange of information, harmonization of legal procedures and mutual assistance in the event of an accident.

Furthermore, the 1996 Law stipulates that *«In the event of a serious and imminent danger which threatens massive pollution of the marine environment and the coastal zone or which involves the risk of harming coastal installations and activities due to the presence of large quantities*

of hydrocarbons or other harmful products off the national coasts or coasts of neighboring countries, the National Commission for the Prevention and Control of Marine Pollution Events shall take all necessary measures to facilitate operations of support and mutual assistance between States Parties to international and regional conventions relating to the subject-matter.” Similar provisions are also included in the sub-regional emergency plan agreement for the preparation and control of accidental marine pollution, concluded by the three Maghreb states in Algiers in 2005.

Recommendations:

An evaluation of the national strategy for the prevention of accidental oil pollution and of the national emergency plan established by the 1996 Law, leads us to propose the following recommendations to the Assembly of People’s Representatives and the Ministry of Local Affairs and the Environment, each in its respective spheres of competence:

- Revising the 1996 National Contingency Plan Law to remedy its deficiencies.
- Strengthening international cooperation through ratification or accession to the conventions on accidental oil pollution prevention.
- Rebalancing Tunisian environmental policy in favor of the control of accidental oil pollution by directing financial and technical support towards this aspect.
- Ensuring the perpetuation of a crosscutting structure for coordination between the various stakeholders in the field of accidental oil pollution.
- Establishing operational interdepartmental consultation committees.
- Achieving a satisfactory level of communication between the staff of the various stakeholders, in particular between the intervention teams likely to take part in joint response operations.
- Intensifying cooperation with the Regional Marine Pollution Emergency Response Center

(REMPEC) within the framework of its missions for the prevention of accidental pollution.

- Providing intensive training of personnel to acquire technical knowledge on the management of oil pollution waste and experience in the use of materials, products and other means that can be used in joint operations.
- Intensifying the organization of mock operations to test the structure of the command plan established by the 1996 Law.
- Facilitating the participation of civil society in environmental issues.

- 1 Treaty on the Prohibition of the Disposal of Nuclear Weapons and Other Weapons of Mass Destruction on the Seabed and Oceans and their Subsoil, adopted at Washington, London, Moscow on 11 February 1971 (ratified by Law No. 71-31 Of 28 July 1971). • International Convention on Civil Liability for Oil Pollution Damage, 1969, adopted in Brussels on 29 November 1969 (accession by Law No. 76-13 of 21 January 1976). • International Convention on Intervention on the High Seas in Accidents Causing or Likely to Cause Oil Pollution, adopted in Brussels on 29 November 1969 (accession by Law No. 76-14 of 21 January 1976). • Protocol Relating to Intervention on the High Seas in Cases of Pollution by Substances other than Oil, adopted in London on 2 November 1973 (accession by Law No. 76-14 of 21 January 1976). • International Convention for the Prevention of Pollution from Ships, 1973, adopted in London on 2 November 1973 (accession by Law No. 76-15 of 21 January 1976). • International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage, adopted in Brussels on 18 December 1971 (accession by Law No. 76-16 of 21 January 1976). • Convention on the Prevention of Marine Pollution by Dumping of Wastes, adopted in London, Moscow, Mexico and Washington on 29 December 1972 (accession by Law No. 76-17 of 21 January 1976). • Barcelona Convention for the Protection of the Mediterranean Sea against Pollution, adopted in Barcelona on 16 February 1976 (ratified by Law No. 77-29 of 25 May 1977 and amended by Law No. 98-15 of 23 February 1998). • Protocol for the Prevention of Pollution of the Mediterranean Sea by Dumping Operations by Ships and Aircraft, adopted at Barcelona on 16 February 1976 (ratified by Law No. 77-29 of 25 May 1977). • Protocol on Cooperation in Combating Pollution of the Mediterranean Sea by oil and other Harmful Substances in Cases of Emergency adopted in Barcelona on 16 February 1976 (ratified by Law No. 77-29 of 25 May 1977). • Protocol for the Protection of the Mediterranean Sea against Pollution from Land-Based Sources adopted at Syracuse and • Protocol Concerning Specially Protected Areas and Biological Diversity in the Mediterranean adopted in Barcelona and signed by the Republic of Tunisia on 10 June 1995 (Ratified by Law No. 98-15 of 23 February 1998). • Annexes to the Protocol concerning Specially Protected Areas and Biological Diversity in the Mediterranean adopted in Monaco and signed by the Republic of Tunisia on 24 November 1996 (ratified by Law

- No. 98-15 of 23 February 1998). • Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil adopted in Madrid and signed by the Republic of Tunisia on 14 October 1994 (ratified by Law No. 98-15 of 23 February 1998). • Protocol for the Prevention of Pollution of the Mediterranean Sea by Transboundary Movements of Hazardous Wastes adopted in Izmir and signed by the Republic of Tunisia on 1 October 1996 (ratified by Law No. 98-15 of 23 February 1998). • 1978 Protocol relating to the International Convention for the Prevention of Pollution from Ships, 1973, adopted in London on 17 February 1978 (ratified by Law No. 80-56 of 1 August 1980). • United Nations Convention on the Law of the Sea, adopted at Montego Bay on 10 December 1982 (ratified by Law No. 85-6 of 22 February 1985). • 1990 International Convention on Oil Pollution Preparedness, Response and Cooperation dated 30 November 1990 (accession by Law No. 95-51 of 19 June 1995). • Protocol of 1992 to amend the International Convention on Civil Liability for Oil Pollution Damage, 1969, adopted in London on 27 November 1992 (Accession Law No. 96-97 of 18 November 1996). • Protocol of 1992 to amend the 1971 International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage, adopted in London on 27 November 1992 (accession by Law No. 96-98 of 18 November 1996). • Agreement on the Conservation of Cetaceans of the Black Sea, the Mediterranean and the adjacent Atlantic area, adopted in Monaco on 24 November 1996 and ratified by Law No. 2001-68 of 11 July 2001.
- 2 List of documents in the national contingency response plan:
 - 1- Distribution of the responsibilities and tasks between the various stakeholders;
 - 2- List of anti-pollution equipment and products;
 - 3- List of means of action on land;
 - 4- Storage facilities for equipment and products;
 - 5- List of naval resources;
 - 6- Lists of airborne resources;
 - 7- Communication network and frequency to be used for the alert;
 - 8- Model of the alert message;
 - 9- List of coast stations;
 - 10- Contact details of control authorities;
 - 11- Lists of experts;
 - 12- Meteorological services;
 - 13- List of analytical laboratories;
 - 14- Towing companies;
 - 15- Storage facilities;
 - 16 - Treatment facilities;
 - 17- Facilities for the disposal of contaminated products;
 - 18- Characteristics of petroleum products and other harmful substances;
 - 19- References to national law;
 - 20- International law including bilateral and multilateral conventions;
 - 21 - List of priority sites to be protected;
 - 22- List of national coastal parks;
 - 23 - List of companies selling response means;
 - 24- Lists and contact details of the members of the National Commission for the Prevention and Control of Accidental Marine Pollution;
 - 25- Directory of useful addresses and focal points;
 - 26- Coastal maps with delimitation of the governorates and priority sites to be protected;
 - 27- Any other document deemed necessary by the Commission.
 - 3 On One example is the 1st Meeting of the Competent Authorities Responsible for the Implementation of the Sub-regional Plan for the South West of the Mediterranean, Algiers, 20-21 June 2005; The 2nd Meeting of the Competent Authorities Responsible for the Implementation of the Sub-regional Plan for the South West of the Mediterranean, Rabat, 23-24 January 2007; The 3rd Tunis, Meeting of the Competent Authorities Responsible for the Implementation of the Sub-Regional Plan for the South West of the Mediterranean, Tunisia, 21-22 April 2008; The 4th Meeting of the Competent Authorities Responsible for the Implementation of the Sub-Regional Plan for the South West of the Mediterranean, Tunisia, 11 October 2010; Sub-regional Training (Algeria, Morocco, Tunisia) Bizerte, Tunisia, 29 May to 1 June 2002; Sub-regional Course on Preparedness for Combating and Controlling Accidental Marine Pollution; The National Workshop on the Management of Wastes from Oil Pollution held in Tunis, from 8 to 10 May 2012..