



Draft OHS 'officer' definition might mean more middle mgrs liable

The definition of "officer" – coupled with the use of the term "business or undertaking" under the draft model OHS laws – could cast the officer liability net much wider, Blake Dawson partner Vince Rogers has told *OHN*. It meant mgrs much lower down the organisational hierarchy were likely to be caught for potential OHS breaches under the proposed Safe Work Act, Rogers warned. The difference in definition is fine and may seem like legal hair-splitting, but it is on such subtle differences and definitions that judicial decisions often hinge. "The definition of 'officer' contained in s4 of the Safe Work Act 2009 extends to a much broader group of mgrs than what was intended by the national OHS review advisory panel (AP) and the recommendations made by the WRMC," Rogers said.

Why officer definition goes much further

The AP (*above*) had recommended the model OHS Act should define an officer by assigning it the same meaning as given by s9 of the Corporations Act 2001, Rogers said. Rejecting that recommendation in mid-May 2009, the WRMC instead suggested the OHS legislative definition be worded to include "persons who influence or make decisions that affect the whole, or a substantial part, of the *entity*", Rogers said. (*Cont'd p2*)

'Apathy' as OHS stakeholders fear concerns may go unheeded: lawyer

The Fed Govt's tight timeline for public comment on the draft model OHS laws is leading to a level of "apathy" and "apprehension" in some OHS quarters, says Deacons WR and OHS partner Michael Tooma. He told *OHN* stakeholders feared their concerns might fall on deaf ears. "It's an awfully short time for public consultation and some of the drafting detail needs to be thought through," Tooma said. "I'm sensing a level of apathy and apprehension." OHS stakeholders were reluctant to trouble themselves with a lot of work when their

views may not be taken into account, Tooma said. "The public comment period appears geared towards rushing it through to a pre-determined time frame," Tooma said. "Ultimately, we'll have to live with the laws for a long time, so we ought to be getting it right."

Meanwhile, Safe Work Aust (SWA) has reiterated it will not budge on the six-week public comment period (*OHN 847*). "The time period was decided by the WRMC to ensure the deadlines agreed by COAG are met," SWA chair Tom Phillips told *OHN*. "For this important reason," the SWA Council was "not in a position to extend the public comment period". Phillips said the public comment period had been widely advertised well in advance to help stakeholders make submissions within the time frame and the exposure draft had been "considered extensively for some time by the C'wealth, states and territories, the ACTU, ACCI and the Aust Industry Group". (*Cont'd p2*)

Workplaces 'harbour psychopaths'

Ten per cent of workplaces harbour psychopathically oriented workers capable of creating a "toxic work environment", a NZ study has found. The Auckland Uni business school's dept of mgmt found such people could trigger depression and anxiety in their colleagues, sometimes to the point of suicide. Mgmt lecturer Dr Giles Burch said most people with psychopathic tendencies functioned in normal society, achieved success and were respected by their employers, but were difficult, deceitful and "stirred up trouble". "Psychopaths are generally highly destructive, manipulative individuals with dark sides who have no remorse, which can result in serious issues for organisations and the people within them," Burch told *OHN*. However, he said there were varying degrees of psychopathic behaviour and people at the lower end of the scale "were actually quite useful". Burch said HR processes, such as monitoring staff and logging behaviour, had to be in place to deal with disruptive behaviour. "We need to work with them to modify some of their more undesirable behaviours, but extreme cases need to be removed from the workplace," he said.

Diary

Oct 27-29, Safety show 2009 and materials handling, Syd.
Details: www.thesafetyshow.com.

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Draft OHS 'officer' definition might mean more middle mgrs liable

(*Cont'd from p1*) The Corporations Act defined an officer as including a person who made, or participated in making, decisions that affected the whole or a substantial part of the business of the corporation, Rogers said. He emphasised that was viewed as only applying to the most senior levels within a corporation.

The draft Safe Work Act definition of officer was similar in that it included a person who made, or participated in making decisions that affected the whole or a substantial part of the business or undertaking of the *body*, Rogers said. But it was the coupling with the term "business or undertaking" that extended the section's reach. "The difficulty arises because of the use of the phrase 'business or undertaking' throughout the Safe Work Act," Rogers said. "A state regulator will have to consider how a relevant business or undertaking is categorised or described."

For example, he asked, would an individual store or a national retail company's state divn be described as a relevant business or undertaking for the purposes of the Safe Work Act or should it be the firm's entire Aust operations? Likewise, he asked whether a company with a divn that manufactured plant needed to establish the divn as a separate business or undertaking for the purposes of s22 of the Act. S22 imposed duties on individuals who conducted businesses or undertakings that manufactured plant to be used at workplaces, Rogers said.

"A body's operations can potentially be divided into various businesses and undertakings, then it follows a much broader group of middle mgrs will fall within the definition of officer under the Safe Work Act and be required to demonstrate they have exercised due diligence to ensure compliance," Rogers said. That was reinforced by state regulators administering state Acts determining what the relevant business or undertaking was. "This goes beyond the recommendations of the AP and would appear to go beyond what was suggested by the WRMC." Rogers suggested the issue could be avoided if the definition of officer "includes a person who makes, or participates in making, decisions that affect the whole or a substantial part of the *body's operations*".

'Apathy' as OHS stakeholders fear concerns may go unheeded: lawyer

(*Cont'd from p1*) All of those had recommended WRMC release the exposure draft for comment, Phillips told *OHN*. "The public comment period provides a genuine opportunity for all stakeholders to actively participate and to voice their opinion[s] on the development of new model OHS laws," Phillips said. Last week, in an interview with *OHN*, Phillips assured OHS stakeholders all submissions would be duly considered. Submissions close on Nov 9.

Cold storage firm fined \$124k after forklift kills warehouse pedestrian

A Melb magistrate has convicted and fined a cold storage firm \$175k after a forklift struck and killed a 39-year-old male pedestrian at a Laverton North plant on April 13, 2005. The forklift driver was loading a truck at the time and, to do so, had to drive the vehicle across a walkway, which was the main pedestrian access to a dock office, staff amenities (lunch-room and toilets) and warehouse exits.

The court held the incident had resulted from unsafe plant and systems of work at AB Oxford Cold Storage Company Pty Ltd (AB Oxford). It had failed to ensure pallets of foodstuffs weren't stacked "more than one high" on a corner where the walkway and forklift aisle intersected. That had obscured vision, preventing the forklift driver and the pedestrian from seeing each other.

AB Oxford had also failed to provide traffic mgmt controls for pedestrians and forklifts at the intersection, such as a bollard system, signage and a protective guard rail, the magistrate found. Although a company related to AB Oxford employed the forklift driver, he was deemed to be an AB Oxford employee. Transport drivers and office staff employed by other firms who frequented the site were among almost 290 workers at the plant.

NSW Govt appeals to High Court

The State of NSW has secured a stay in the NSW Appeal Court after a former NSW undercover police officer, identified only as S, was awarded \$1.6m in Aug for a post-traumatic shock condition ([OHN 840](#)). On Sept 25, Justice Robert Macfarlan agreed to stay the Appeal Court's Aug 5 orders up to and including the date on which the state's application for special leave was dismissed or, if it were granted, the date on which the High Court determined the consequent appeal. (*NSWCA, S v State of NSW*, [308/2009](#), [236/2009](#), [164/2009](#))

Close scrutiny of model OHS reveals drafting shortcomings: lawyer

Further to senior lawyer concerns reported in [OHN](#) last week, Deacons WR and OHS partner Michael Tooma has highlighted potential drafting shortcomings in the draft model OHS law that was released for public comment on Sept 28 ([OHN 847](#)).

Scope of new duty of care has 'no limit'

The WRMC was at pains to try to limit the scope of the new duty to things that were not related to public safety or non-workplace matters, yet the drafting of the legislation didn't reflect that at all, Tooma said. "In fact, the draft legislation seems to have no limit to the scope of the new duty that a person conducting a business or undertaking has." That had the potential for the new duty to be broadly applied to everything from public safety matters that other existing legislation now dealt with. Eg, laws governing visitors and trespassers. Tooma claimed it opened up the possibility for the OHS laws to capture things like product safety issues and other matters well outside of what was now considered the norm of OHS laws. "That's because the new duty of care is drafted in a broad way to apply to persons conducting a business or undertaking and it imposes an obligation on them not to expose any person to risks to health and safety arising from their work." While that obligation was qualified by what was reasonably practicable, the scope of the obligation was extremely broad, he said.

S18 'catches two for one'

"What's also troubling is the way the primary duty to workers will operate," Tooma said. S18's paragraph 1 imposed a duty in relation to "workers" then paragraph 3 imposed it in relation to "other persons". The last time Tooma looked a worker was a person too. "The intention here was surely to capture non-workers, but what seems to have occurred is a doubling up of the duty," Tooma said. Further, the S28 provision dealing with other workers at a workplace tried to impose the duty on "other persons" at the workplace to "take reasonable care for his own health and safety" and "co-operate with any reasonable instruction given by the person" conducting the business or undertaking. This was broad enough to apply at a private home when a tradesperson was called to carry out work. Home occupants would be under the duty because their home became a "workplace" when a tradesperson was there. For the first time, there would now be a duty to take reasonable care in such situations, Tooma argued. "It potentially captures a

whole new class of people, goes well beyond the current laws, entering the private domain where it will be a criminal offence if one fails to take notice of the reasonable instructions of a tradesperson called to work in one's private home," Tooma said.

Overlapping duty could result in duty 'applying to no one'

Areas of overlap may lead to confusion on who was responsible for key OHS functions at a workplace, Tooma warned. In drafting the Act, the concept of "employer" had been replaced with "a person conducting a business or undertaking", he said. "Because this has been done on key issues such as consultation and incident notification, they've put the obligation on persons conducting a business or undertaking, which means there is now an overlapping duty on several people to do very basic things such as consultation and incident notification." Tooma argued the obligation could apply to several people simultaneously in relation to the same affected persons. "That obligation is not workable and the approach taken is counter intuitive," he said. "In effect, if you have a responsibility that applies to everybody with respect to everybody, in practice it will apply in such way that it applies to no one," according to Tooma. "By having the duty apply to the persons conducting a business or undertaking, which is intended to be a number of people at any given point in time, you potentially create confusion in relation to what is a very important function in terms of consultation and reporting of incidents," Tooma said. He instead proposed the approach should go the other way, ie to centralise the role so one central person on any given site had the responsibility to bring everyone together for consultation purposes and to take charge when incidents occurred and notify regulators of those events. Moreover, a person could be selected through co-ordination mechanisms or agreements, or alternatively the legislation could stipulate that a person of a certain category, eg the principal, the client on a site or the person engaging all others, or the site occupier or owner have that responsibility.

Heightened union role 'entrenched in model OHS and risks industrialising safety'

Tooma said unions' built-in right of entry in the draft legislation was another area of concern. The move was expected but ran the risk of industrialising the safety agenda, Tooma said. It included a right of entry to investigate safety breaches and consult in relation to OHS matters, which reflected WRMC's recommendations. (*Cont'd p4*)

Model OHS reveals shortcomings

'Heightened union role entrenched in model'

(Cont'd from p3) But the drafting appeared to go further. "What's interesting about the drafting is that there is now in the objects of the Act an object that the Act is intended to promote union involvement in relation to safety matters," Tooma said. "That wasn't expected ... it creates the potential for right-of-entry provisions to be given a broader interpretation than would otherwise have been given," Tooma said. That was due to courts referring to a legislation's purpose when there was "any ambiguity" in its language. The objective here, as stated in the draft, appeared to entrench union involvement in relation to safety matters, he said. "The courts will be now obliged to give those right-of-entry provisions much broader application than they would otherwise have given," Tooma said. "So, in a sense, this drafting legislation entrenches the role of unions in safety matters considerably and has the potential to industrialise the safety agenda going forward."

'Harmonisation' model risks nine different laws, regulators and courts

A concern that has troubled Tooma for some time is "the end result" of nine different court systems interpreting nine different OHS laws being enforced by nine different regulators. Any financial benefits should be measured against what had been achieved, "which could have been greater had we gone down a uniform laws model path; that is, one federal Act regulating this space and covering the field rather than harmonisation of state-based laws, which is the model we have adopted", Tooma said. "There is the risk, especially given what seems to be WA declaring it will not sign up to these laws, that similar positions may be taken on changes of govts in various jurisdictions, so you would end up with less than a complete harmonisation of OHS laws," Tooma said. "At best, what we are doing is entrenching the status quo across the country as the laws that serve us as the laws that will serve for the next 30 years. We kill on average one person every business day, an unacceptable rate for a developed country," Tooma said. "We had an opportunity through this review process to rethink the way we regulate workplace safety to try to shift that rate of workplace fatalities. We should be perhaps rethinking our approach." In that sense, "the review continues to be an opportunity lost", Tooma said. "We could have sat down with a blank sheet of paper and attempted something more complex than an escalation of penalties." The draft would make for a "telling debate over the next six weeks," Tooma said.

BlueScope refused special leave

The High Court last Friday refused to grant special leave to appeal to BlueScope Steel (AIS) Pty Ltd in a long legal battle with Dr Angus Mackinnon ([OHN 839, 829, 820](#)). BlueScope, formerly BHP Steel (AIS) Pty Ltd, was seeking to appeal against a NSW Appeal Court verdict that found the NSW Supreme Court should rehear Mackinnon's damages claim. Mackinnon allegedly suffered psychological injuries during a work-organised leadership training course. In Sept 1996, Mackinnon, then 35, had attended the course in Vic, which BlueScope (formerly BHP Steel) had endorsed. He later sued the company, claiming he sustained psychiatric injuries after being verbally and emotionally abused during "encounter group" training. In July 2007, Acting Justice David Patten had found no causative link between the training and Mackinnon's illness. But in a unanimous judgement, the Appeal Court last May ruled BlueScope had a case to answer. Justice Clifton Hoeben said AJ Patten had made a "fundamentally flawed" ruling in finding Mackinnon had failed to establish BlueScope could have "reasonably foreseen" his psychiatric injury. (NSWCA, *Mackinnon v BlueScope Steel (AIS) Pty Ltd & Ors*, [94/2009](#); NSWSC, [1250/2007](#))

Chicken farm cuts injuries

A Vic chicken farm has reportedly reduced workplace injuries by introducing an on-site, movement-based therapy known as active release technique (ART). Many of Hazeldene's Chicken Farm's 500 employees were susceptible to muscle strains because much of their work was repetitive, *OHN* has been told. Mgmt called in the Soft Tissue Centre (STC), which had experience in reducing workplace injuries at abattoirs. A trial was launched in 2005, bringing STC consultants on-site three days a week. The consultants were qualified osteopaths, chiropractors and physiotherapists who had received an additional two years' ART training. "Employees are encouraged to report any discomfort to their supervisor, which begins the early-intervention process," workplace injury mgr Sandra Whitlock told the *GB Advantage*. (Gallagher Bassett is Hazeldene's Vic w/comp agent.) ART stemmed potential problems early, reducing the severity of injuries. When STC first visited Hazeldene's, there were 28 outstanding w/comp claims. Last month there were five. STC MD Dr James Murray said ART got to the source of the problem, breaking down adhesions and scar tissues. "This restores joints and tissues to full function and mobility faster. Eg, in 90% of cases, STC consultants can resolve carpal tunnel syndrome three times faster than the average for other treatment alternatives," Murray said.

Bland war rations 'fuelled fatty diet'

The Repat Cmn is considering how an AAT verdict that found a former veteran's war service with the Army in 1943-46 caused his prostate cancer will apply "to the [cmn's] overall decision-making process". Two AAT members last Friday set aside a cmn decision that rejected a widow's claim her husband's cancer was war-caused. On Oct 2, AAT Senior Member Narelle Bell and Member Dr John Campbell granted a war widow's pension to Catherine Glanville after she claimed her (now late) husband would not change to a diet with less butter, cream and other fatty foods. SM Bell quoted consultant dietician Dr Volker as saying Keith Glanville would have eaten Army rations comprising cold, bland and boring tinned food. Volker considered Glanville would have wanted flavoursome food on his return home. It was reasonable for someone who ate cold, canned food under frightening conditions to not eat such food again after the theatre of war, Volker said. She said she was aware of "how much work has been done on the food since those days". SM Bell and Member Campbell said they could not be satisfied, beyond reasonable doubt, that Glanville's prostate cancer was not war-caused. It seemed to them that Volker's opinion and the widow's evidence raised a hypothesis that Glanville's Army service was linked to his increased animal fat consumption. Volker was an experienced dietician with a history of work in the veterans' entitlements area, the AAT members said. There was no other material before them to "contradict" Volker's opinion. Asked whether the cmn was considering an appeal against the AAT decision, a Dept of Veterans' Affairs spokesperson today told *OHN* the cmn was "still considering" the Oct 2 verdict. He said there'd been "a number of AAT cases in which a high animal fat diet had been linked to the circumstances of a veteran's service". ([AAT, Glanville v Repat Cmn, 759/2009](#))

\$1.2m awarded after trailer incident

The NSW Supreme Court has ordered two companies to pay \$1.2m to a man injured in a workplace incident. Acting Justice David Patten found Andrew Goodman's employer and the manufacturer of a road signage trailer were equally responsible for injuries he sustained in Dec 2003. Goodman sued his former employer, Impact Hire Aust Pty Ltd, and Inasmuch Pty Ltd, which made the trailer, for injuries he sustained while working on a site next to Sydney's Warringah Expressway. AJ Patten said the task Goodman was directed to undertake was "inherently extremely hazardous". He had to manoeuvre a sign attached to a 1,500kg trailer. The sign was to be placed on a traffic island

between an on-ramp and the expressway. There was an "obvious danger" the trailer might roll into traffic, AJ Patten said. "A reasonable employer would have identified the danger and taken steps to provide a [safe] system of work." AJ Patten said there was a direct correlation between Impact's breach of duty to devise and implement a safe system of work and Goodman's injury. Had he relied on the handbrake or failed to deploy stabilising legs before disconnecting the trailer, "it was likely to roll away, creating a situation of extreme danger". It was "inappropriate" for Goodman to use a jockey wheel to remove the trailer from the towing vehicle as he did, before deploying the stabilising legs. AJ Patten said the trailer was dangerous and its handbrake was "misleading" because potential users could think it could be relied on to restrain the trailer. The trailer should have had a sign warning against using the handbrake to "restrain the trailer on a sloping surface and against disconnecting the trailer from the towing vehicle until all four stabilising legs had been employed". The expense to do so would have been "insignificant".

The case returned to court last month to resolve outstanding issues on costs and interest. AJ Patten ordered Impact to pay Goodman \$843,952 and Inasmuch to pay \$1,196,255. But the orders were not cumulative and the companies needed to agree on sharing the higher payment. Impact and Inasmuch were ordered to pay Goodman's costs. A spokesperson for Impact's law firm, Moray & Agnew Solicitors, said he was unaware if an appeal was planned. Inasmuch's lawyers did not return calls before press time. (*NSWSC, Goodman v Impact Hire Aust Pty Ltd & Anor*, [2009/941](#); [2009/868](#))

Research to improve site safety

A Melb academic has won a \$700,000 grant to improve construction industry OHS. RMIT Uni's Prof Helen Lingard has been named one of 200 Future Fellows by fed industry minister Kim Carr. Lingard intends to use the funding to get clients, designers and builders working together to maximise safety. "The industry has been characterised by a culture of trying to shift responsibility for OHS to other stakeholders," Lingard said. She said she would assess the OHS value of advances in materials and methods, such as modular construction, and what difference attitudes and commitment made to OHS. Lingard has argued for collaboration from early in a project's life, with OHS a high priority. "It can make a world of difference to [the industry's] OHS performance," she said. "But with the way the industry is organised, there is little incentive to do so and it has not been part of the culture." Her study is over four years.

'Make do' culture won't do as court awards \$1.847m for crush injuries

WA District Court Judge Anette Schoombe has accepted there was a "making do" culture at a Barmingo Investments Pty Ltd workshop near a Wiluna mine site in late 2003 but nevertheless awarded \$1.847m damages for negligence. The damages included \$1,148,625 for lost past and future earning capacity, \$130,000 in general damages and an agreed \$166,200 in special damages. On Sept 16, Judge Schoombe said she accepted evidence from injured mechanical workshop leading hand Franciszy Jezy Burgiel, a former foreman and two co-workers' evidence on the culture. She said the culture contributed to the "likelihood" that Burgiel "would employ an inappropriate method ... to make do with what was available and at hand, rather than go out of his way to obtain the appropriate equipment". At the time of the incident, Burgiel was "on the books" as an independent contractor for Byers Labour Hire. Byers Labour Hire had provided Burgiel's services to Barmingo, which supplied loading and hauling services to Newmont Mines at a site near Wiluna and ran a workshop nearby. Burgiel operated via a company, Mine Site Services and Maintenance Pty Ltd. Byers Labour Hire paid it weekly. Judge Schoombe said Burgiel was working as a leading hand during night shift on Dec 1, 2003, and helped three mechanical fitters take the differential from a Toro 50D trucks front section. To free the differential, the fitters had to remove the whole front oscillating cradle and axle with the differential fixed on top. When Burgiel tried to dislodge the rear pivot pin, which connected the oscillating cradle to the truck's chassis or frame, the cradle with the differential on top (weighing about 4.2 tonnes) collapsed onto his right foot and lower left leg. Ultimately, she found Barmingo had breached its duty to provide suitable equipment and a safe system of work by failing to provide adequate lighting from above over the area where the removal of the front axle assembly was to take place; provide suitable portable lighting at the workshop and ensure that it was properly maintained; provide a pit that allowed Burgiel to stand behind the rear end of the rear pin without having to cram himself into a position where some of his body parts might extend under the cradle; provide a spreader bar to be used with the mobile crane and slings; ensure that one of the fitters on duty had a crane driver's licence; provide hydraulic jacks, height adjustable mechanical stands or sufficient wooden blocks to provide support under the cradle until it was to be

lowered to the ground; prepare a job safety analysis or step-by-step written procedure to Burgiel with easy-to-follow diagrams on how to remove the front axle assembly; and provide adequate supervision for the particular task in light of the fact that none of the fitters on duty had previously done it. ([WADC, Burgiel v Barmingo Investments Pty Ltd, 145/2009](#))

Judges' 'surprise' green lights John Holland prosecution

Three Fed Full Court judges have expressed "surprise" that w/comp self-insurer John Holland Pty Ltd sought leave to appeal against being joined as a second defendant in a Comcare OHS prosecution. "Having regard to the strong body of authority opposed to John Holland's case, we are surprised it was thought provident to seek leave," Justices Ross Sundberg, Richard Edmonds and Richard Tracey said. "This is especially so when the authorities stress the tight rein that should be kept on appeals dealing with common interlocutory decisions on matters of practice." They held Fed Court Justice Christophe Jessup's June 19 [decision](#) was "not attended with sufficient doubt to warrant reconsideration by a Full Court". John Holland's failed application means Comcare can now join the construction giant as a second defendant with its subsidiary John Holland Rail Pty Ltd (Rail). Comcare launched a prosecution against Rail after a Skilled labour hire worker was injured while working on a light railway in Melb. In April 2007, John Holland contracted Rail to perform the work. Comcare alleged Rail had breached the C'wealth OHS Act 1991. But Rail denied it was the occupier of the premises, saying John Holland was the legal occupier. The Full Court judges noted Justice Jessup had ruled Rail would succeed in the proceeding generally if it succeeded in its denial. "In that eventuality, [Comcare] would be obliged to commence fresh proceedings against John Holland," Justice Jessup said. In the Full Court, Justices Sundberg, Edmonds and Tracey rejected John Holland's contention that Justice Jessup failed to understand the structure and interaction of the relevant provisions of the Act. In particular, they did not accept John Holland's contention that Justice Jessup had said Comcare's failure to prove its case against Rail would establish the case against John Holland. "As appears from the passage we have quoted, his Honour's observation that ... liability will be determined according to which [John Holland or Rail] was the occupier of the premises." ([FCAFC, John Holland Pty Ltd v Comcare, 127/2009](#))

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