



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**EXECUTIVE COMMITTEE OF THE CODEx ALIMENTARIUS COMMISSION**

**Eighty-eighth Session**  
**FAO headquarters, Rome, Italy**

**14–18 July 2025**

**CODEx WORK MANAGEMENT – CHALLENGES TO AND POSSIBLE SOLUTIONS TO IMPROVE  
TIMELY TRANSLATION OF WORKING DOCUMENTS FOR CODEx COMMITTEES**

*(Prepared by the Codex Secretariat in collaboration with FAO)*

**1. Introduction**

1.1 At CCEXEC87 (2024), Members agreed to discuss at CCEXEC88 (2025) work management challenges related to the timeliness and translation of working documents.<sup>1</sup>

1.2 Members had raised concerns at CCEXEC87<sup>2</sup> and earlier CCEXEC sessions on late availability of documents, particularly in different languages, which affected their ability to participate effectively in CCEXEC, develop positions, and provide informed comments. It was suggested that this issue be addressed in the Codex Strategic Plan 2026–2031 as it was part of a larger work management issue. Members also proposed allowing the Codex Secretariat flexibility to outsource translations to improve timeliness.

1.3 The Codex Secretariat acknowledged that delays in document availability and translation were longstanding and influenced by factors both within and beyond its control.<sup>3</sup> Reports on the implementation of the Codex Strategic Plan<sup>4</sup> have consistently highlighted challenges in meeting the two-month publication target. Timeliness of Codex working documents was also discussed at CCEXEC78.<sup>5</sup>

1.4 As noted in previous sessions of CCEXEC, after human resources, interpretation and translation represent the largest budget item for the Codex Alimentarius Commission.<sup>6</sup> In fact, the use of languages has evolved over the years in response to Member demands and FAO's efforts in multilingualism and has been linked to availability of resources.

1.5 Rule XIV of the *Codex Procedural Manual* states that the Commission must operate in no fewer than three working languages of FAO and WHO. In 1999, following discussions at the 116th Session of FAO Council, which indicated that essential normative activities such as the Codex Alimentarius needed to improve language balance, CAC23 agreed – subject to resources – that CAC, CCEXEC, and FAO/WHO Coordinating Committees (as appropriate) would operate in Arabic, Chinese, English, French, and Spanish. Working papers and reports for these sessions, the *Codex Procedural Manual*, information documents, and final Codex texts would also be made available in all five languages. CAC33 (2010) added Russian as an interpretation language, and at CAC35 (2012) confirmation of the allocation of dedicated resources supported the inclusion of Russian as the sixth working language. Today, CAC sessions are held in six languages, with all working documents and reports translated accordingly.

1.6 CCEXEC operates in five or six languages, depending on its membership. Final reports are translated into all six languages.

1.7 Subsidiary bodies typically use three languages (English, French and Spanish) with additional interpretation provided in some committees (e.g. Chinese at CCFA/CCPR, Arabic at CCSCH) according to resource availability. Host countries are responsible for interpretation and translation costs and sourcing of

<sup>1</sup> REP24/EXEC2, paragraph 23ii

<sup>2</sup> REP24/EXEC2, paragraphs 14–18

<sup>3</sup> REP24/EXEC2, paragraph 20

<sup>4</sup> CX/CAC 24/47/20 and CX/EXEC 19/77/4

<sup>5</sup> CX/EXEC 20/78/8 and REP20/EXEC1, paragraphs 102 – 109

<sup>6</sup> CX/CAC 24/47/19 Rev.1

services accordingly. These are guided by FAO standards, often working closely with the Codex Secretariat to ensure quality.

1.8 Coordinating committees work in up to four languages, depending on the region (i.e. one for CCNASWP, two for CCASIA and CCLAC, three for CCNE and CCAFRICA [Portuguese for interpretation only] or four for CCEURO). Translation and interpretation costs are covered by the budget of CAC.

1.9 This document provides an overview of interpretation and translation services for CAC, CCEXEC, and coordinating committees and related issues that have an impact in terms of timeliness and cost. While interpretation and translation are distinct, in-session translation needs can affect interpretation planning and costs. The analysis is based on cost data (standard rates and expenses incurred), translation timelines, and discussions with FAO service providers. As translation costs vary by meeting, the document focuses on trends, high-cost areas, and opportunities for potential savings.

## 2. Interpretation services

2.1 Interpretation is essential to Codex meetings and supports adherence to Codex core values. As a statutory body, interpretation for CAC and its subsidiary bodies<sup>7</sup> is provided by the official interpretation services of FAO and WHO. The FAO Interpretation Group as the primary service provider, plans, coordinates and contracts the services of freelance interpreters based in Rome and elsewhere on a rolling basis for Codex meetings. To facilitate this, the Codex Secretariat identifies its interpretation needs up to two years in advance. Timely scheduling of meetings facilitates such planning.

2.2 Interpretation is provided in line with the UN CEB-AIIC Agreement which regulates the working conditions for interpreters within the UN system. There are standard rates for interpretation services and costs vary according to:

- number of sessions and length of meeting;
- number of languages;
- meeting format (i.e. in-person or with virtual component exceeding 30 minutes); and
- meeting location and location of interpreters.

2.3 Interpretation for CAC and CCEXEC averages USD 300 000 annually (see Table 1). CAC sessions (hybrid) have been stable over the last three years. CCEXEC has returned to in-person meetings for recent sessions, with Table 1 showing cost differences across meeting formats.

2.4 Table 2 shows interpretation costs for coordinating committees (2022–2025). While multiple factors affect costs, the return to in-person meetings has generally reduced expenses, together with efforts to recruit interpreters locally.

**Table 1: Interpretation costs (in USD) for CCEXEC and CAC 2022-2024**

| Session                                     | 2022           | 2023           | 2024           |
|---------------------------------------------|----------------|----------------|----------------|
| CAC45 (Rome)                                | 161 500        |                |                |
| CAC46 (Rome)                                |                | 162 000        |                |
| CAC47 (Geneva)                              |                |                | 162 941        |
| CCEXEC82 (Virtual)                          | 84 000         |                |                |
| CCEXEC83 (in association with CAC45 Hybrid) | 86 000         |                |                |
| CCEXEC84 (Geneva)                           |                | 76 100         |                |
| CCEXEC85 (in association with CAC46 Rome)   |                | 55 000         |                |
| CCEXEC86 (Rome)                             |                |                | 59 000         |
| CCEXEC87 (in association with CAC47 Geneva) |                |                | 57 287         |
| <b>Total</b>                                | <b>331 500</b> | <b>293 100</b> | <b>279 228</b> |

<sup>7</sup> Except where other arrangements have been made through agreements with host countries.

**Table 2: Interpretation costs (in USD) for FAO/WHO Coordinating Committees 2022–2025**

| Sessions                                 | 2022           | 2023          | 2024          | 2025          |
|------------------------------------------|----------------|---------------|---------------|---------------|
| CCAFRICA24 (Virtual Uganda) <sup>a</sup> | 36 000         |               |               |               |
| CCAFRICA25 (Uganda) <sup>b</sup>         |                |               |               | 31 770        |
| CCASIA22 (Virtual) <sup>c</sup>          | 18 000         |               |               |               |
| CCEURO32 (Virtual) <sup>d</sup>          | 36 842         |               |               |               |
| CCEURO33 (Germany) <sup>e</sup>          |                |               | 26 000        |               |
| CCLAC22 (Virtual) <sup>f</sup>           | 20 000         |               |               |               |
| CCLAC23 (Virtual) <sup>g</sup>           |                |               | 11 050        |               |
| CCNE11 (Italy) <sup>h</sup>              |                | 37 500        |               |               |
| <b>Total</b>                             | <b>110 842</b> | <b>37 500</b> | <b>37 050</b> | <b>31 770</b> |

Notes:

<sup>a</sup> Three languages (EN, FR and Portuguese), hybrid, interpretation provided from FAO headquarters.

<sup>b</sup> Three languages (EN, FR and Portuguese), in-person, five interpreters were based in South Africa, and one recruited locally.

<sup>c</sup> Two languages (EN and CH), virtual, interpreters from Hongkong.

<sup>d</sup> Four languages (EN, FR, SP and RU), virtual, interpreters from FAO headquarters.

<sup>e</sup> Four languages (EN, FR, SP and RU), in-person, interpreters recruited in Germany.

<sup>f</sup> Two languages (EN and SP), virtual, interpreters were recruited in FAO headquarters.

<sup>g</sup> Two languages (EN and SP), virtual, interpreters were recruited locally in Ecuador.

<sup>h</sup> Three languages (EN, FR and AR), virtual, interpreters recruited in FAO headquarters.

2.5 In recognition of the need to provide quality interpretation services in a cost-effective manner, the Codex Secretariat met with the FAO Interpretation services to identify possible opportunities for cost reduction:

- **Meeting agenda:** The number of interpretation teams required is determined by the number of sessions, with each team supporting a maximum of five sessions in three days, seven sessions in four days or eight sessions in five days. Exceeding these limits warrants the recruitment of additional interpreters. For instance, reducing CCEXEC88 plenary sessions from six to five could save ~USD 7 000.
- **Number of languages:** The number and combination of languages directly impacts cost. A team of 14 interpreters is required to support an in-person meeting in six languages. CAC46 (hybrid with night sessions) needed 20 interpreters.
- **Meeting format:** A standard, physical session length is 3 hours per single interpretation team. For sessions with more than 30 minutes remote interventions, the session length is reduced to 2.5 hours. Therefore, the session time needs to be planned based on the nature of the meeting, as was the case for CCLAC23 which was held virtually with 2.5-hour sessions which resulted in a reduction of expenses (together with the availability of local interpreters).
- **Session structure:** The current structure of Codex meetings, whereby a day is allocated for report writing impacts costs of interpretation, as the one-day break between sessions leads to separate contractual arrangements. Reducing time between plenary and report adoption could lower costs but would require significant changes to draft report preparation, report structure and report adoption.
- **Meeting location and location of interpreters:** Local recruitment of interpreters (i.e. interpreters that are recruited in the same place where the meeting is taking place) reduces costs. This has been applied in recent coordinating committee sessions. For some meeting locations, qualified interpreters may not be available in the area, thus increasing costs. Therefore, the choice of venue will have a significant impact on the cost of interpretation. Remote meeting locations will inevitably be a cost driver.
- **Night sessions:** Standby interpretation for night sessions in six languages is costly, especially if unused.

2.6 Moving forward, incremental savings can be achieved by optimizing session timing, avoiding night sessions, adjusting session length to format, and continuing to recruit interpreters locally – without reducing language coverage. However, meeting agendas and interpretation support must still support inclusive, effective discussions and decision-making. The Codex Secretariat as well as FAO are committed to working together to identify cost-effective solutions on a case-by-case basis.

2.7 Significant cost reductions would require reducing the number of languages – contrary to Codex’s long-standing policy of expanding language access and its commitment to inclusiveness.

### 3. Translation services

3.1 CAC and its subsidiary bodies are recognized as statutory bodies of FAO.<sup>8</sup> As such translation must be undertaken by FAO translation services.<sup>9</sup> If unavailable, WHO services are used. In exceptional cases, external providers from FAO’s approved roster may be engaged, provided they meet FAO’s quality standards. Interpretation and translation for subsidiary bodies hosted by Member countries follow separate arrangements.

3.2 FAO translation costs reflect a comprehensive service package, including proofreading, formatting, query resolution, and document referencing – ensuring high-quality, FAO-compliant outputs. While FAO rates are typically higher than freelance market rates, FAO translation services have indicated that their rates have decreased by about 18 percent since 2010. FAO also ensures neutrality in terminology and collaborates on harmonization, as seen in the Arabic translation of camel milk post-CAC47. Specifically, time-sensitive rates are charged to encourage compliance with delivery deadlines and to facilitate workflow planning within translation services. Surcharges are applied to documents submitted late (Table 3), without affecting in-session documents (e.g. draft reports). For less time-sensitive documents like standards, a reduced rate applies.

**Table 3: FAO translation rates for meeting documents (USD/1 000 words)**

| Submission time before meeting | Rate type |
|--------------------------------|-----------|
| ≥ 11 weeks                     | Base -25% |
| 8–10 weeks                     | Base      |
| ≤7 weeks                       | Base +25% |

3.3 Translation costs depend on word count, lead time, and number of languages. FAO translation services, which also service FAO governing bodies and other subsidiary bodies, face peak demand during certain periods, affecting delivery. Key considerations for improving timeliness include:

- **Guaranteed timelines:** Documents submitted ≥11 weeks before a meeting are translated no later than six weeks prior to meetings. Later submissions are prioritized on a case-by-case basis.
- **Turnaround time:** This relates to word count and the experience of the Codex Secretariat to date is turnaround times of approximately 1 week for 1 500–2 000 words; and 2 weeks for 4 000 words. Longer documents require more time and translation turnaround times are less predictable, also if other more urgent requests are sent to FAO translation services. Wordcount caps would improve planning and delivery.
- **Seasonal demand:** Towards the year-end is a particularly busy time in the FAO Governing Body calendar, challenging delivery time. Currently mid-year is lighter, but there will still be other demands such as the FAO Conference and FAO regional conferences on alternate years.
- **Scheduling discipline:** Each meeting has a translation schedule. Delays in submitting original documents directly impact translation timelines. Adhering to schedules is essential for all preparing or contributing to working document development, if translation schedules are to be met, considering the required submission and dispatch dates for documents, and the scaled rates applied.

### 4. Translation costs, challenges and opportunities related to CAC

4.1 Table 4 outlines CAC’s total translation costs across six languages over 2022–2024. Cost variations are primarily due to differences in word counts and the timing of document submissions for translation.

<sup>8</sup> [GSB: Statutory Bodies by subject matter](#)

<sup>9</sup> See <https://openknowledge.fao.org/server/api/core/bitstreams/c9a3719c-8e1a-4fd7-ac3f-8c18d3cd8f97/content>

**Table 4: Translation costs (in USD) for CAC**

| CAC session                              | USD            |
|------------------------------------------|----------------|
| <b>CAC45 (Rome) translation (2022)</b>   |                |
| Draft report                             | 43 168         |
| Final report                             | 20 304         |
| Working documents                        | 157 640        |
| <b>Total</b>                             | <b>221 112</b> |
| <b>CAC46 (Rome) translation (2023)</b>   |                |
| Draft report                             | 41 346         |
| Final report                             | 27 839         |
| Working documents                        | 157 083        |
| <b>Total</b>                             | <b>226 268</b> |
| <b>CAC47 (Geneva) translation (2024)</b> |                |
| Draft report                             | 55 775         |
| Final report                             | 29 343         |
| Working documents                        | 202 171        |
| <b>Total</b>                             | <b>287 289</b> |

4.2 Document word count significantly affects translation timelines. While many CAC documents are under 4 000 words, others – such as those on budget, strategic planning, and FAO/WHO matters – often range from 6 000 to 12 000 words. These require three to six weeks for translation, and when submitted close to the meeting date, increases both delays and costs. For example, for CAC47, having submitted all documents at least eight weeks in advance could have saved over USD 20 000. However, since subsidiary body meetings occur up to a month before CAC, consistently meeting this deadline remains a challenge – though it should remain a target.

4.3 To improve the timeliness and cost-efficiency of CAC document translation, the following solutions are proposed:

- **Early submission:** Aim to submit documents, together with useful reference materials, at least eight weeks before the start of the session. While this may limit the recency of data (e.g. financial reports), it supports timely translation. However, consistently achieving this presents challenges for the Codex Secretariat who must also balance CAC preparation with support to ongoing subsidiary bodies, as noted in CCEXEC78. Late documents for one committee can also have an indirect knock-on effect to the preparation of documents for other committees and CAC. Hence, it is important to focus on ensuring timely submission of documents across all committees.
- **Document length limits:** Shorter documents reduce translation time and cost. Establishing word caps, such as a maximum of 4 000 words, can encourage more concise drafting.
- **Alternative formats for information documents:** Information documents often exceed 10 000 words. If a word limit of 4000 words can't be met, providing an executive summary in all languages, with the full document in the original language only could be a more cost-effective option.
- **Reducing meeting report costs:** Options include:
  - Adopting the draft report in English only, with full translation post-session.
  - Translating only conclusions from the session for the draft report, with full summaries included in the final report.
  - Reviewing report structure and content to reduce overall length.

## **5. Translation costs, challenges and opportunities related to CCEXEC**

5.1 For CCEXEC, translation costs, over 2022-2024, (see Table 5) have reached up to USD 250 000 annually. The same areas for improvement identified for CAC also apply to CCEXEC.

5.2 The critical review documents are usually the largest translation expense, accounting for up to 50 percent of CCEXEC's translation costs for some meetings over the past five years. Publishing these in installments, as recommended by CCEXEC78, has improved timeliness. However, due to the Codex meeting schedule, some translations will still be late, and proximity to the start of CCEXEC increases costs.

5.3 As the critical review document length significantly affects both cost and timeliness, the Codex Secretariat will reduce word counts in critical review documents by simplifying appendix structures, minimizing duplicative comments, and focusing on key information. This approach will be piloted for CCEXEC89.

5.4 FAO also hosts the International Plant Protection Convention (IPPC), which conducts its Commission meetings in six languages. However, its bureau – similar to CCEXEC, but with fewer members – only provides documents in English.

5.5 In terms of cost reduction, consideration could be given to adopting the draft session report in English only or with only the conclusions translated for the draft report, as already done in 2018 for CCEXEC76.<sup>10</sup> This would eliminate the need for a report-writing day, shortening the session by one day and reducing both interpretation and participation costs. The final report would still be translated into all working languages.

## **6. Translation costs, challenges and opportunities related to FAO/WHO Coordinating Committees**

6.1 Translation costs for coordinating committee meetings (see Table 6) vary based on several factors: the number of languages used, the volume and length of working documents, the timeliness of their preparation, and the translation of meeting reports. All reports are translated into English, French, and Spanish, along with the specific working language of the region (e.g. Russian for CCEURO). Timely preparation of original documents and adherence to word limits can help improve efficiency and reduce costs.

## **7. Use of technology**

7.1 With rapid advancements in technology, particularly translation tools, Codex Members – especially within CCEXEC – have highlighted their potential to reduce costs and improve timeliness. While these tools are valuable for informal use, several challenges remain. The broader use of artificial intelligence (AI), including Neural Machine Translation (NMT), is under active consideration across the UN system, recognizing its potential in multilingual settings.

7.2 A key challenge lies in how AI is defined and applied. Current tools replicate human work without fully understanding context. While they may accelerate document processing, human oversight remains essential to ensure accuracy and relevance – especially in the complex UN environment.

7.3 The use of public or cloud-based AI translation tools also raises significant data security and privacy concerns. Although Codex texts are freely available online, sensitive documents could be exposed if not handled within secure environments, especially during training processes, as AI tools that do not have the requisite protections in place may use or share this information in ways that are not compliant with UN's policies.

7.4 Noting the interest expressed by some CCEXEC Members in the past in the use of AI translation tools, this has been raised with FAO translation services. They have reviewed the results of several UN pilots which have yielded inconclusive results to date with regard to supporting the efforts of human translators/revisors to produce results of a defined quality. They will continue to monitor the situation, with a view to exploring and testing AI translation tools that may lead to promising results.

## **8. Conclusion**

8.1 The factors affecting the cost and timeliness of Codex documents, and also cost of interpretation services, are complex. There is no single solution, but two main pathways can help address these challenges.

8.2 The first pathway involves greater discipline in document preparation for the Codex Secretariat, and all others contributing to the documents (FAO and WHO, coordinators, chairs of working groups, etc.) – producing concise documents within established deadlines, noting that failure to meet deadlines can have impact on document preparation for other committees also. This could lead to incremental improvements and make more documents available at least one month before meetings. However, due to tight meeting schedules and translation timelines, consistently meeting a two-month deadline for most documents remains unlikely.

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<sup>10</sup> REP19/EXEC1

8.3 The second pathway calls for more transformative changes, such as revised report structures and/or language policies – areas that require Member input – and availability of tried and tested translation tools. It is also important to reconsider how timeliness is defined and whether Members are open to more modest but consistently achievable targets. The demanding Codex meeting schedule and often increasing agendas of those meetings will continue to strain resources, especially as the reactivation of commodity committees adds further pressure on the Secretariat and Members alike. In this context other areas of discussion such as work prioritization and planning, and meeting scheduling become relevant.

8.4 These changes are challenging, which may explain why discussions on document timeliness – across languages – have persisted for decades. Nonetheless, continuous improvement is essential. This is a shared responsibility, influenced by many variables that can shift from meeting to meeting. The Codex Secretariat will continue to pursue improvements in areas within its control. Members and Committees are encouraged to consider how they can support these efforts, including establishing realistic work programmes and commitment to timely and concise working documents.

## 9. Recommendations

9.1 CCEXEC88 is invited to consider the document, discuss the solutions identified and others as relevant and advise on the pathways proposed.

**Table 5: Translation costs (in USD) for CCEXEC 2022-2024**

| CCEXEC session                   | USD            |
|----------------------------------|----------------|
| <b>CCEXEC82 (2022) (Virtual)</b> |                |
| Report (draft and final)         | 25 369         |
| Working documents                | 89 106         |
| <b>Total</b>                     | <b>114 475</b> |
| <b>CCEXEC83 (2022) (Hybrid)</b>  |                |
| Report (draft and final)         | 21 487         |
| Working documents                | 112 155        |
| <b>Total</b>                     | <b>133 642</b> |
| <b>CCEXEC84 (2023) (Geneva)</b>  |                |
| Report (draft and final)         | 59 079         |
| Working documents                | 107 468        |
| <b>Total</b>                     | <b>166 547</b> |
| <b>CCEXEC85 (2023) (Rome)</b>    |                |
| Report (draft and final)         | 38 340         |
| Working documents                | 60 242         |
| <b>Total</b>                     | <b>98 582</b>  |
| <b>CCEXEC86 (2024) (Rome)</b>    |                |
| Report (draft and final)         | 30 525         |
| Working documents                | 71 057         |
| <b>Total</b>                     | <b>101 582</b> |
| <b>CCEXEC87 (2024) (Geneva)</b>  |                |
| Report (draft and final)         | 28 689         |
| Working documents                | 35 952         |
| <b>Total</b>                     | <b>64 641</b>  |



Table 6: Cost of translations associated with FAO/WHO coordinating committees 2022-2025

| Session and translation needs       | 2022          | 2023          | 2024          | 2025          |
|-------------------------------------|---------------|---------------|---------------|---------------|
| <b>CCAFRICA24 (Virtual, Uganda)</b> |               |               |               |               |
| Report                              | 10 512        |               |               |               |
| Working documents                   | 7 894         |               |               |               |
| <b>Total</b>                        | <b>18 407</b> |               |               |               |
| <b>CCAFRICA25 (Uganda)</b>          |               |               |               |               |
| Report                              |               |               |               | 14 629        |
| Working documents                   |               |               |               | 10 536        |
| <b>Total</b>                        |               |               |               | <b>25 164</b> |
| <b>CCASIA22 (Virtual)</b>           |               |               |               |               |
| Report                              | 15 846        |               |               |               |
| Working documents                   | 15 313        |               |               |               |
| <b>Total</b>                        | <b>31 159</b> |               |               |               |
| <b>CCEURO32 (Virtual)</b>           |               |               |               |               |
| Report                              | 8 528         |               |               |               |
| Working documents                   | 18 383        |               |               |               |
| <b>Total</b>                        | <b>26 911</b> |               |               |               |
| <b>CCEURO33 (Germany)</b>           |               |               |               |               |
| Report                              |               |               | 12 149        |               |
| Working documents                   |               |               | 30 398        |               |
| <b>Total</b>                        |               |               | <b>42 547</b> |               |
| <b>CCLAC22 (Virtual)</b>            |               |               |               |               |
| Report                              | 10 512        |               |               |               |
| Working documents                   | 6 584         |               |               |               |
| <b>Total</b>                        | <b>17 096</b> |               |               |               |
| <b>CCLAC23 (Virtual)</b>            |               |               |               |               |
| Report                              |               |               | 17 040        |               |
| Working documents                   |               |               | 12 496        |               |
| <b>Total</b>                        |               |               | <b>29 537</b> |               |
| <b>CCNASWP16 (Fiji)</b>             |               |               |               |               |
| Report                              |               | 6 665         |               |               |
| <b>Total</b>                        |               | <b>6 665</b>  |               |               |
| <b>CCNASWP17 (Fiji)</b>             |               |               |               |               |
| Report                              |               |               |               | 12 683        |
| <b>Total</b>                        |               |               |               | <b>12 683</b> |
| <b>CCNE11 (Italy)</b>               |               |               |               |               |
| Report                              |               | 17 230        |               |               |
| Working documents                   |               | 24 520        |               |               |
| <b>Total</b>                        |               | <b>41 749</b> |               |               |
| <b>Grand total</b>                  | <b>93 573</b> | <b>48 414</b> | <b>72 084</b> | <b>37 847</b> |