Union Learning
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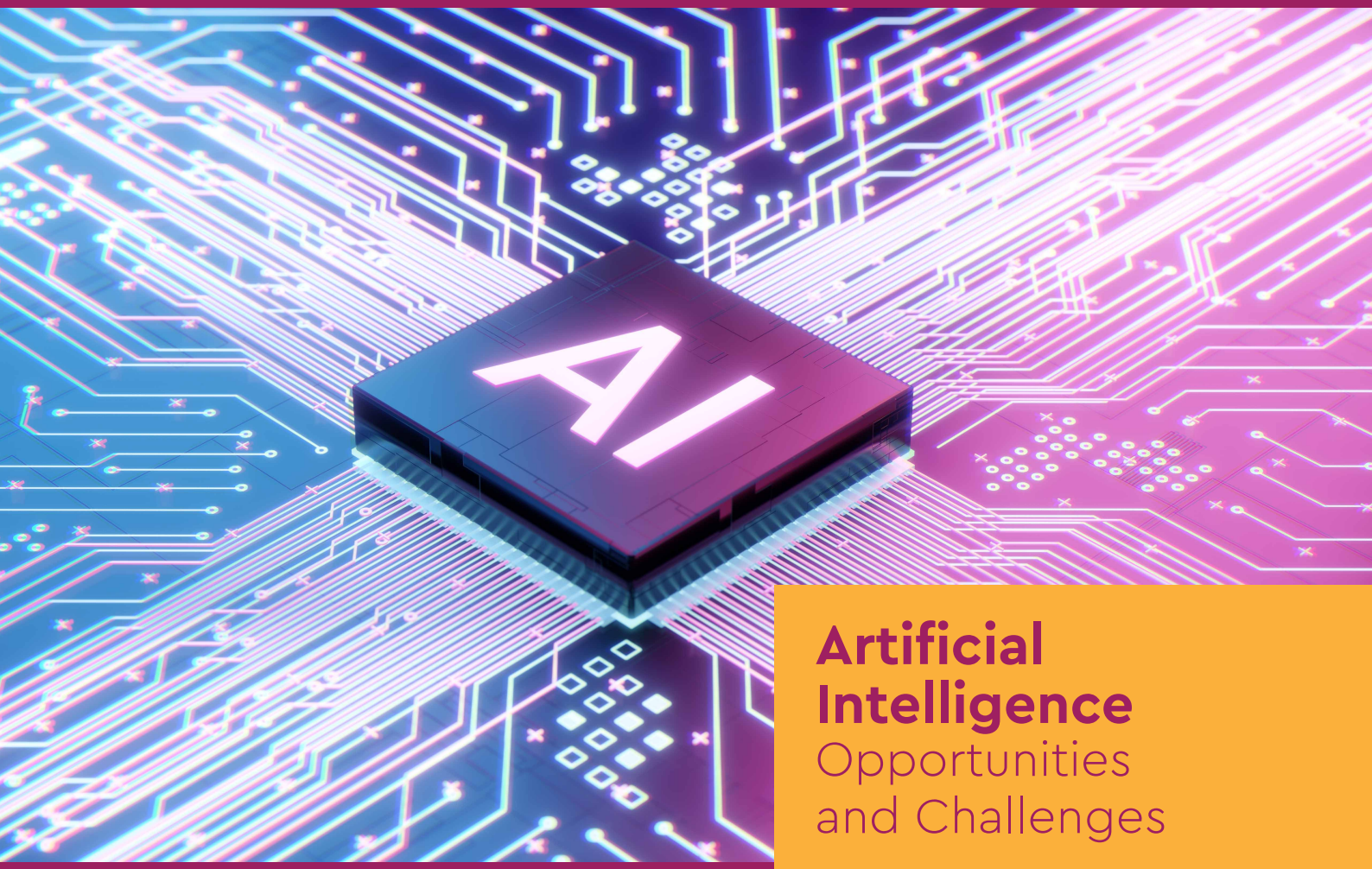
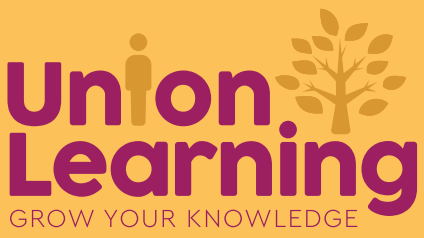


Artificial Intelligence
Opportunities and Challenges

Key Issues for Trade Unions

Report by the Union Learning Group of Seminar on AI

April 2024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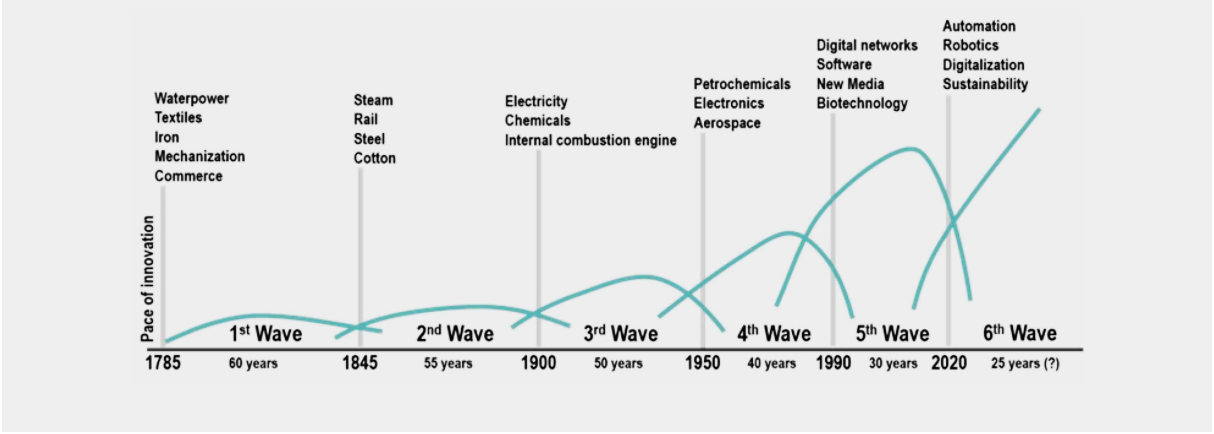
Report by Union Learning Group of AI Seminar and Workshop

Background

Artificial intelligence (AI) is at the core of the digital revolution we are currently undergoing and has established itself in almost all sectors, becoming an integral part of everyone's lives. Most people are familiar with the term AI but there are many different views as to what it is and how it will impact work and society in the future.

Emergence of AI

Artificial Intelligence has been around since the 1940s (and some would say earlier than this) when the science fiction writer Isaac Asimov set out the 'Three Laws of Robotics'.[1] John McCarthy, an American mathematician and computer scientist, was a pioneer in the field of artificial intelligence. He is regarded as the Father of AI and the coining of the term is attributed to him.



While AI has been with us for numerous decades, it is the arrival of generative AI that has brought the subject into the minds and onto the lips of people across the world. Generative AI refers to a category of AI algorithms that generate new outputs based on the data they have been trained on. It uses a type of deep learning called generative adversarial networks and has a wide range of applications, including creating images, text and audio.

The era of Deep Learning began around 2010 with major computer companies launching products such as Apple's SIRI, Google Duplex, Open AI, with the now famous ChatGPT arriving in 2022.

[1] I, Robot, Asimov, Isaac, Published by Gnome Press, New York, 1950

Irish government preparedness

The National AI Strategy was launched in July 2021. This Strategy sets out how Ireland can be an international leader in using AI to benefit our economy and society, through a people-centred, ethical approach to its development, adoption, and use. In recognition of the wide-ranging effect AI will have on our lives, this Strategy considers AI from a number of perspectives. These are:

Building public trust in AI

Strand 1: AI and society
Strand 2: A governance ecosystem that promotes trustworthy AI

Leveraging AI for economic and societal benefit

Strand 3: Driving adoption of AI in Irish enterprise
Strand 4: AI serving the public

Enablers for AI

Strand 5: A strong AI innovation ecosystem
Strand 6: AI education, skills and talent
Strand 7: A supportive and secure infrastructure for AI
Strand 8: Implementing the Strategy

In February 2022, Government published 'Harnessing Digital - The Digital Ireland Framework', with the objective of driving and enabling the digital transition across the Irish economy and society. In July 2023, the Artificial Intelligence (AI) Standards & Assurance Roadmap was launched. This roadmap is a key deliverable of Ireland's National AI Strategy to develop and utilise Artificial Intelligence for the benefit of Irish society and the economy.

In May 2022, the then Minister of State for Trade Promotion, Digital and Company Regulation, Robert Troy, appointed Dr Patricia Scanlon as Ireland's first Artificial Intelligence (AI) Ambassador.

In January 2024, the AI Advisory Council, established by Minister of State with responsibility for Digital, Dara Calleary, to provide independent expert advice to Government on artificial intelligence policy, met for the first time. The Council is tasked with providing independent expert advice to Government on artificial intelligence policy, with a specific focus on building public trust and promoting the development of trustworthy, person-centred AI.

Trade union responses

The trade union response to developments in AI has been mixed. At European level, both the ETUI and the ETUC have been proactive in undertaking research and providing guidance for unions on how to approach negotiating at workplace level on the introduction of AI.

The ETUC negotiated a Framework Agreement on Digitalisation which was signed in June 2020. ICTU and IBEC are parties to the agreement. In 2021, a small working group of ICTU and IBEC representatives was established to review progress on the implementation of the Framework Agreement. The ICTU representatives were Mr Ger Gibbons, Mr Gerry McCormack and Mr Brian McGann. A joint report was submitted annually to a steering committee which was attended by Mr Gibbons on behalf of ICTU.

Amongst the many research papers produced by the ETUI, one paper, produced by Aida Ponce Del Castillo, provides a framework guide to help map AI, strengthen critical thinking and support those in negotiating the deployment of AI systems.[2]

[2] AI: discovering the many faces of a faceless technology, Aida Ponce Del Castillo, ETUI, 2023.

The ETUI has been very active in putting forward the views of workers in light of the development of the EU AI Act. Implementation of the EU AI Act will serve as a signpost for Government, employers and unions. The AI Act's formal adoption is expected after parliamentary committees' approval on 13 February and the whole Parliament's vote on 10-11 April.

In the Irish context, there has been little evidence of activity by individual trade unions in dealing with the deployment of AI in the workplace. The NUJ put forward a motion to the ICTU BDC on AI and its General Secretary, Seamus Dooley, addressed the challenges posed by AI in his delivery of the annual Constance Markievicz Memorial lecture at Liberty Hall, Dublin, as part of the Irish Labour History Society 50th Anniversary conference, "Visons of Labour and Class" in Ireland.

The Teachers' Union of Ireland (TUI) has developed a policy on Artificial Intelligence (AI) and its impact on education. SIPTU has established a sub-committee of its National Executive Committee to address the challenges and opportunities posed by AI.

There has been some activity on AI at the level of the Irish Congress of Trade Unions. In June 2023, Dr Laura Bambrick made a presentation on AI in the workplace to the Joint Oireachtas Committee on Enterprise, Trade and Employment.

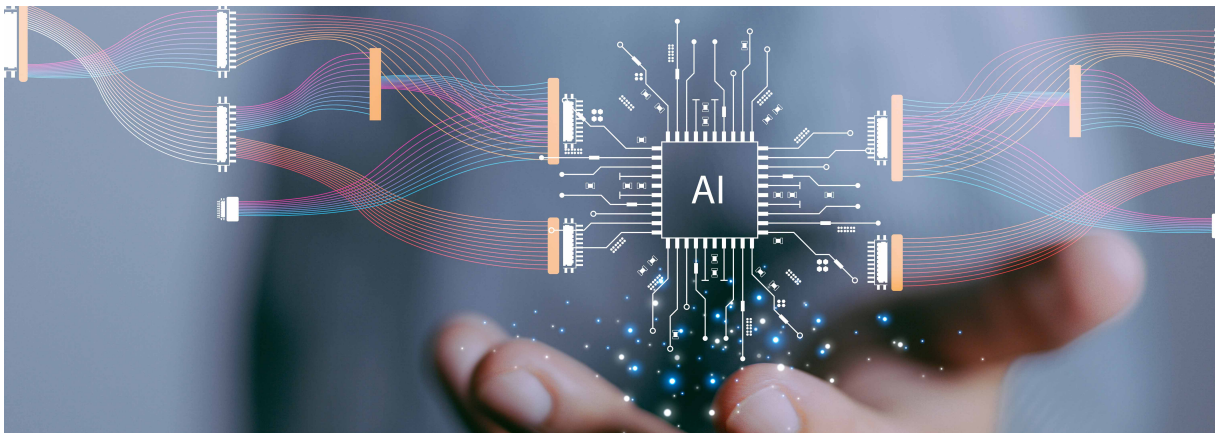
Need for proactive engagement

There is an urgent need for the trade union movement to engage on the issue of AI and digitalisation. There needs to be a discussion and agreement on how the movement will position itself on the impact of implementation of AI in the workplace and in society generally. A raising of awareness amongst workers, together with appropriate education and training, will be important in developing digital literacy. Employment sectors need to be mapped and negotiating approaches and strategies will need to be developed. ICTU will be a key component in coordinating and leading the movement in dealing with AI.

Some people regard the development of AI as simply another part of the 'just transition' concept. This is not the case. Artificial Intelligence will change everything. We may know today the impact of Climate Change, but we cannot see how, and precisely in what way, AI will change society, the economy, the political system, and the labour environment.

Event Description

The Workshop/Seminar was organised by the Union Learning Group (ULG). ULG is a collaboration between major Congress affiliates inc. Connect, CWU, Fórsa, FSU, Mandate, and SIPTU. ULG's objective is to foster cooperation between unions in the provision of education and training relevant to their members and to collaborate on developing capacity to design and deliver such training. The AI event was held on September 20th and was hosted by Fórsa in its offices in Nerney's Court.



Key Messages from Presentations

Introductory remarks

The Seminar was chaired by Mr Kevin O'Kelly. Kevin was an Associate Researcher with the European Trade Union Institute (ETUI), Brussels, 2002-2014. He worked with the European Foundation for the Improvement of Living and Working Conditions (Eurofound), Dublin, from 1989 to 2002, where he had responsibility for a range of research projects on employment, work organisation, social dialogue and industrial relations.

The General Secretary of ICTU, Owen Reidy, opened the seminar/workshop. He highlighted the commitment of the union movement in getting to grips with the implications of AI and its deployment across all employment sectors and society generally. Mr Reidy acknowledged the work of the Union Learning Group in organising what he described as an important contribution to the conversation that was needed within the union movement on AI.

Presentations

A presentation was made by **Aidan Connolly, CEO of IDIRO Analytics**. Mr Connolly dealt with the opportunities and challenges presented by developments in AI. While providing a brief outline of the historical development of AI, Mr Connolly gave examples of systems such as ChatGPT and DALL-E.

Mr Connolly concluded by outlining what, in his view, needs to be the approach to staying in control of AI, including:

1. *We cannot, and should not, shun AI*
2. *EU AI Act could go further - should regulate pernicious use of AI (echo chambers, polarization, automated content generation, deepfakes etc)*
3. *Insist on transparency/explainability(why, what data – can't leave this in the hands of technologists)*
4. *AI auditing needs to become common-place and frequent – regulated and certified*
5. *National legal frameworks needed for each EU member*
6. *We need better sharing of, and access to, data esp. government/state data*
7. *Need to focus educational efforts on leveraging and understanding AI*
8. *AI literacy needed at governmental, academic and business levels*
9. *Invest in advanced AI research AND regulatory innovation*

The seminar heard a presentation from **Dr. Aude Cefaliello, Senior Researcher at the European Union Trade Union Institute** (ETUI, Brussels). Ms Cefaliello's presentation entitled 'Artificial Intelligence: How should we respond?', dealt with the evolution of EU policy on AI and advanced robotic systems. Ms Cefaliello outlined details of the proposed regulation on Artificial Intelligence and the overlap between the EU AI Act and other legislation, such as the OSH legal framework.

In terms of AI at work, Ms Cefaliello outlined the key concepts that should be developed further (EU OSHA, 2022), including:

- *"Adaptive, socially and emotionally intelligent robotics": Adaptive automation uses software to monitor people working with robots to adapt the speed of the process and to prevent overloading*
- *"Ethical framework for digitalisation"*
- *"Prevention through design": integrated a use/worker-centred design approach, the involvement of workers in the implementation of any digitalisation strategies to identify the tasks best suited to automate and to structure work processes from the point of view of workers being assisted by digital technologies (rather than the other way around).*

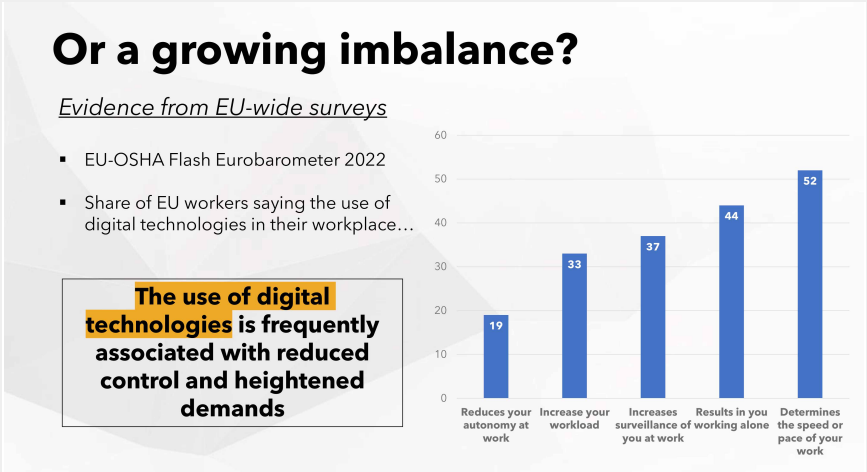
Concluding her presentation, Ms Cefaliello set out a number of remarks for consideration by the seminar participants as follows:

- The way we will decide to regulate AI and its impact on the world of work is a choice.
- The race for economic opportunity and innovation cannot be a justification to leave workers unprotected.
- There is a need to respect the existing Social acquis and EU Labour Law framework, but also to grant specific rights.
- We need to match the technical regulation of AI with "social regulation" at the workplace (with employers' duties & workers' rights).
- We need to act now, before foreseeable problems materialise.

The final presentation to the seminar was made by Mr. Pierre Berastegui, Researcher - Health, Safety & Working Conditions with the European Trade Union Institute (ETUI). Mr Berastegui addressed in detail the issue of Artificial Intelligence & OSH.

Mr Berastegui presented two case studies, one on Amazon and one on a banking company in terms of OSH. Mr Berastegui provided statistics which indicated that incident rates tend to be higher in countries with a higher use of advanced robots.[3]

In terms of how AI is often presented, Mr Berastegui posed the question as to whether AI deployment was a 'win/win' or situation or whether there was a growing imbalance in the impact on workers. He illustrated this through the following pictorials:



[3] Source: ETUI Benchmarking Working Europe 2023

Workshop Structure and Questions

Following the presentations, designed to convey key information on AI developments, the participants were assigned into a number of Working Groups. Each of the groups was tasked with addressing two key questions:

1 What are the top three key threats/challenges for the union movement posed by AI?
2 What are three critical actions that the movement needs to take now?

The groups were assisted in their work by a facilitator, who also took on the role of recording the main outcomes of the discussions. Each group also appointed a rapporteur from their number who gave a brief report back to the plenary session conducted after the group-work.

Workshop Feedback

Job Losses

Potential job losses emerged as an issue in all of the groups. A number of points were raised under this heading, including:

- The situation facing workers in the older age brackets, who may not have the capacity or capabilities to avail of retraining opportunities if their current position is affected by the introduction of AI. These job losses also have implications for union membership. The greater number of losses will be among older workers, who are more likely to be members.
- There may also be a tendency for AI to contribute to the creation of a gender imbalance particularly in clerical jobs and call centres.
- It is beginning to feel like 'back to the future' where AI is taking control of the decision making process.
- The propensity for a growth in inequality in the quality of jobs open to lower skilled workers is a real risk; not all workers will have the academic ability or qualifications to pursue a job in the 'high tech' sector of the economy.
- Some members of the groups were sceptical about the potential 'win-win' scenario outlined by one of the speakers. Automation will tip the scales too much in favour of AI and physical/manual labour will suffer, resulting in less workers.
- Groups were concerned that the growth of AI will exacerbate the existing existential crisis around union membership and density levels.
- There is a gap in the vision/ response to the growth of AI. The age differential of union membership represents 2 visions – that of younger workers and that of the older generation(s).

Security and monitoring

There was considerable concern in all of the groups about the loss of the human factor in decision-making about important elements of work. This already starts from pre-screening in the recruitment process, through performance management, worker profiling, and selection processes for appointments and promotion.

Automated warnings to workers issued by a system make it harder to take into account personal circumstances that might impact performance that a human manager could take into account – i.e. mitigating circumstances (illness, bereavement etc.). There is no human element or human oversight. This can lead to significant increases in stress.

Apart from selection and assessment criteria, numerous sectoral examples were given of the loss of worker autonomy in doing their jobs. CWU members gave examples of mail centres being automated with optimised delivery routes where no diversion is tolerated. There is a loss of pride in 'knowing best route'. In retail, self-service checkouts have displaced workers, while delivery drivers are questioned when their vehicles are found to be stationery for any period of time. Indeed, this constant monitoring of every minute of working time (and often leisure time) was identified as stressor, alongside the loss of autonomy in using skill and experience to decide how a job might best be done.

Regulation

The third area of concern was about how AI in the workplace might be regulated.

While it was acknowledged that regulation was part of the broad political/business discussion, there were a number of concerns expressed.

The implementation of AI in so many spheres of our working lives suggests that the genie may already be out of the bottle and that any proposed regulation will always be in catch-up mode, particularly given the fantastically rapid pace of AI development and roll-out. The development of any regulatory framework inevitably takes time, particularly given the need for widespread consultation. By the time solutions are deployed, they may already be redundant in the context of how AI may have developed in the interim.

Aside from this consideration there were also concerns about how effective the regulation of AI will be and how robust any legislation will be in practice. Successful regulation relies on enforcement and penalties; systems relying on voluntary compliance without these are worthless.

There are serious questions about where the power will lie. In Ireland, much of our regulatory framework often seems to be designed to defend the interest of business. Given the presence in our economy of so many of the major players in AI, there is a fear that the political will may not exist to have truly effective regulation. Financial penalties may make little impact in the context of the huge turnovers and massive wealth of the companies and individuals involved. Alongside this, some in the groups expressed fears that a weakened trade union movement, in terms of membership and density (and especially in the tech sector itself) may not have the resources and influence to mitigate the risks posed by inadequate regulation. How robust will the legislation be?

Critical Actions for Trade unions

There was a widespread view that Congress needs to take a lead role in developing a coherent and convincing trade union response to AI. Again there was lots of discussion around the actions that the movement needs to take now, summarised in three areas of action.

Build Union Density

- Building union density is the key action to ensure the voice of workers is heard in the AI debate. The potential impact of AI may in itself become an important part of our organising campaigns.
- Developing our own narrative around the form industrial relations will take in the future is crucial. Unions need to take the lead in promoting dialogue and explaining to their membership the impact of AI in their own sector.
- Unions need to look at how AI tools may be used to aid organising, recruitment, and campaigning.

Education

- Educate our members and activists to not only the threats posed by the growth of AI, but also to the opportunities for advancement that AI brings.
- Conduct a SWOT analysis of the technology and who is controlling the growth of AI, and conduct a mapping exercise to ensure we understand the ethical standpoint of those in control.

Regulation

- Advocate for regulations on AI use and ethical inputs into algorithms.
- Understand who controls the regulation of AI.
- Build a lobbying campaign to ensure the law-makers deliver robust legislation and strong compliance mechanisms that will protect workers and society.
- Debunk the novelty factor of AI!
- Ensure cooperation – not elimination!

Campaigning

- Ensure that corporate profits should fund universal basic income and have a shorter working week on foot of AI.
- Create a strategy to prevent redundancies and support workers better in the redundancy process.
- Ensure that corporate and public funding is utilised properly. We need to create an AI dividend in that the distribution of corporate profit from AI is used towards developing a four day working week.

Legal tools

European Union AI Act

The EU's 27 member states have unanimously endorsed the AI Act, affirming the political agreement reached in December 2023. The Act faced technical refinement for over a month due to its complexity. Initially, reservations lingered among member states but these concerns were resolved upon the adoption of the AI Act by the Committee of Permanent Representatives on 2 February.

France, Germany and Italy, advocated for a lighter regulatory approach for powerful AI models like OpenAI's GPT-4 to support select European startups that might challenge American companies. The European Parliament insisted on stringent rules for such models to prevent regulatory burden on smaller actors. The compromise entails a tiered approach, with general transparency requirements for all models and additional obligations for models with systemic risk.

The EU member states can still further shape the implementation of the law through approximately 20 secondary legislative acts. The AI Act's formal adoption is expected after parliamentary committees' approval on 13 February and the whole Parliament's vote on 10-11 April.

Under the Act, there will be a definition of an AI system, which is a *machine-based system designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as content, predictions, recommendations, or decisions that can influence physical or virtual environments.*

The AI Act marks a significant shift in the regulatory environment for organisations involved in AI and IP law, particularly within the Irish and EU contexts. The AI Act necessitates a proactive approach from organisations to ensure ethical compliance, especially in light of prohibitions on certain AI practices like manipulative methods and exploiting vulnerabilities. The careful assessment of high-risk AI systems and general-purpose AI models is essential, not only for compliance but also for shaping product development strategies and managing systemic risks.

OSH and Related Legislation

There are a number of existing legal tools at EU level which give workers rights that are relevant in the context of AI. Chief among these is Occupational Safety & Health legislation based on the 1989 Framework Directive (transposed as the Safety, Health and Welfare at Work Act 2005 in Ireland). There are a number of additional OSH-related pieces of legislation that are also of interest, while the proposed Directive on Platform Working also has specific measures arising from the advent of AI and Algorithmic Management.

- Framework Directive/ Directive 89/391/EEC: "The employer shall have a duty to ensure the safety and health of workers in every aspect related to the work" (art 5. Dir 89/391/EEC). This Directive was transposed into Irish law as the Safety, Health & Welfare at Work Act 2005, Section 8 of which details these employers' obligations.

- Platform Work Directive proposes
  "Without prejudice to Council Directive 89/391/EEC and related directives in the field of safety and health at work, digital labour platforms shall:
    (a) evaluate the risks of automated monitoring and decision-making systems to the safety and health of platform workers, in particular as regards possible risks of work-related accidents, psychosocial and ergonomic risks;
    (b) assess whether the safeguards of those systems are appropriate for the risks identified in view of the specific characteristics of the work environment;
    (c) introduce appropriate preventive and protective measures. They shall not use automated monitoring and decision-making systems in any manner that puts undue pressure on platform workers or otherwise puts at risk the physical and mental health of platform workers"

  Art 9(1) of the proposed directive should ensure information and consultation of platform workers' representatives, or the platform workers concerned by digital labour platforms, on decisions likely to lead to the introduction of or substantial changes in the use of automated monitoring and decision-making systems.
- European Framework Agreement on Telework (2002): The employer is responsible for the protection of the occupational health and safety of the teleworker in accordance with Directive 89/391 and relevant daughter directives, national legislation and collective agreements.
- Framework Agreement on Work-Related Stress (2004)
- Framework Agreement on workplace bullying and violence at work (2007)
- Framework Agreement on Digitalisation (2020)

GDPR

While the General Data Protection Regulation (GDPR) does not in itself provide any comprehensive protection against the potential hazards of AI (and hence the need for the AI Act), it remains an important legal tool in its regulation. GDPR provides data subjects with a number of important rights including information, access, consent, and the right to object in relation to the collection and retention of personal data. In addition to these general rights under the regulation, there are a number of specific elements of GDPR that are relevant to AI. These include:

- The processing of data concerning health is prohibited, although there are some exceptions
- Date Processing Impact Assessments must be conducted if data processing "is likely to result in a high risk to the rights and freedom of natural persons"
- There is an obligation to notify data subjects and grant them access when involved in "automated decision-making, including profiling". "Meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject" must be provided.

[4]A black swan event is unexpected and therefore difficult to prepare for but is often rationalized with the benefit of hindsight as having been unavoidable. The term black swan was popularized by Nassim Nicholas Taleb, a professor, economist, and writer.
[5]The impact of the General Data Protection Regulation (GDPR) on artificial intelligence, EPRS | European Parliamentary Research Service Scientific Foresight Unit (STOA) PE 641.530 – June 2020.

Conclusions and Recommendations

Challenges and Concerns

A number of challenges and concerns emerged from the workshops. These included the following:

- Impact on employment and job losses with consequent loss of union membership.
- Creation of a gender imbalance.
- Loss of control of decision-making process for workers.
- Impact on lower skilled workers and their ability to retrain/reskill.
- Older age profile of union members may inhibit ability to respond to challenges of growth in AI.

Loss of Human Element in Decision-making

- Loss of decision-making in recruitment, performance management, worker profiling, etc.
- Increased stress levels if AI assessing performance and making decisions (e.g. automated warnings).
- Work process automation leading to loss of autonomy for workers (impact on workplace democracy).
- Control of workers and increased stress due to work intensification as a result of constant monitoring.

Regulation

- Regulation always in catch-up mode – regulatory framework obsolete before it is implemented.
- Will regulation be enforced? Will penalties be effective? Voluntary compliance will be worthless.
- Will regulation favour the interest of business at the expense of workers?
- Will there be a political will to deliver effective regulation?
- If the union movement is weakened (e.g. through job losses) will it have the resources to influence and mitigate the risks posed by AI?

Critical Actions for Trade Unions

- Organising and building union density are crucial to ensure that the voice of workers is heard.
- Union movement must develop its own narrative around the future forms of industrial relations and lead in promoting dialogue by explaining to their members the impact of AI.
- Education and training will be critical to develop AI literacy and to help members identify not just the risks, but the opportunities that AI will present (e.g. 4 day working week with no loss of pay, greater levels of remote working, etc.).
- Organising members to conduct mapping in their workplace of how AI has been/may be implemented.
- Campaigning and lobbying activity is needed to ensure that:
    - Redundancies are mitigated with increased supports for workers who are affected by job losses due to AI.
    - Regulation is effective in protecting workers and society with ethical implementation of AI.
    - That where AI is implemented, a four day working week becomes a minimum demand to mitigate the impact of job losses.

Recommendations

We recommend that:

1 Congress establish a committee to begin to address the opportunities and challenges posed by AI including how unions can ethically utilise AI to further the aims of the movement.
2 A greater level of engagement with the union movement at European level be considered.
3 An awareness programme be developed to increase AI literacy amongst union members to include an understanding of the concepts of AI together with the opportunities and risks that AI brings.
4 Congress should engage with government and employers to build a joint approach to dealing with AI (perhaps this could be done under the guidance of the LEEF group).
5 The Framework Agreement on Digitalisation be promoted within workplaces with particular emphasis on the partnership process between employers and workers representatives as follows:

Stages in the Process

- The first stage. 'Joint exploration/preparation/underpinning.' is about exploring, raising awareness and creating the right support base and climate of trust to be able to openly discuss the opportunities and challenges/risks of digitalisation, their impact at the workplace and about the possible actions and solutions.

- The second stage. 'Joint mapping/regular assessment/analysis.' is a mapping exercise looking into the topic areas in terms of benefits and opportunities (how successful integration of digital technology can benefit the workers and the enterprise) and in terms of challenges/risks. Possible measures and actions are also identified at this stage. SMEs may need external advice/support.

- The third stage. 'Joint overview of situation and adoption of strategies for digital transformation.' is the result of the above steps. It is about having a basic understanding of the opportunities and challenges/risks, the different elements and their interrelationships, as well as agreeing on digital strategies setting goals for the enterprise going forward.

- The fourth stage.'Adoption of appropriate measures/actions.' is based on the joint overview of the situation. It includes: the possibility for a testing / piloting of the envisaged solutions; priority setting; timing, implementation in sequential time-bound phases; clarifying/defining the roles and responsibilities of management and workers and their representatives; resources; accompanying measures such as (expert) support, monitoring, etc.

- The fifth stage .'Regular joint monitoring / follow-up, learning, evaluation.' is where we come full circle to a joint assessment of the effectiveness of the actions and discussion on whether further analysis, awareness-raising, underpinning or actions are necessary.

  Workers.' representatives will be provided with such facilities and information as necessary to effectively engage in the different stages of the process.

6 A strategy and policy be developed for unions to guide them in dealing with the impact of the implementation of AI in the workplace.
7 Congress should ensure that its concerns regarding AI are communicated to the National Advisory Council.
8 Congress should develop guidance as to how unions can ethically utilise AI to further the aims of the movement.

Useful Links

https://www.etui.org/publications/foresight-briefs/artificial-intelligence-a-game-changer-for-the-world-of-work

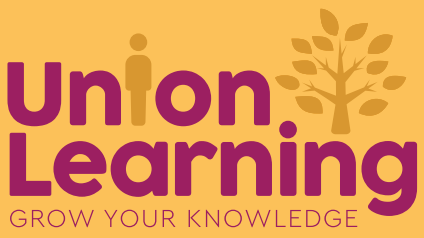
https://www.uni-europa.org/topics/ai/

https://uniglobalunion.org/wp-content/uploads/uni_pm_algorithmic_management_guide_en.pdf

https://www.uni-europa.org/news/artificial-intelligence-a-blueprint-for-unions-and-telecom-companies-joint-declaration/

UE-ETNO declaration AI.pdf

https://www.etui.org/publications/foresight-briefs/labour-in-the-age-of-ai-why-regulation-is-needed-to-protect-workers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