Company profile

The SKF Group

SKF has its origin in the invention of the self-aligning ball bearing. Sven Wingqvist founded the company in 1907 as AB Svenska Kullagerfabriken (The Swedish Ball Bearing Company). Wingqvist was a maintenance foreman at a textile factory in Gothenburg and in his efforts to improve the transfer of power to the machines he invented the self-aligning ball bearing. The textile factory was built on clay ground and the building was not stable and movements in the building caused overheating of the fixed bearings. The rolling bearing became the solution of transfer of power in the factory. The company became international after a few years of operation and expanded rapidly. SKF is since many years a leading company in the world of rolling bearings, seals and spindles.

The company headquarters is still situated in Gothenburg on the same block of land where the company was founded. The company has 79 manufacturing sites in 20 countries and its own sales companies in 70 countries. SKF also has some 7000 authorised distributors and dealers worldwide.

SKF has from its very beginning focused on quality and technical development. From early years the company founded its own steel mill in order to get control of the steel quality for its products. The company has during recent years reduced its position in the market for standard bearings and concentrated more on specialised bearings and applications. SKF presents itself not just as a supplier of products but as a company helping its clients to solve friction problems. It means that SKF is a supplier of products, solutions and of services. The SKF Group provides technical support, maintenance service, condition monitoring and training. One recent example of new technological area is drive-by-wire solutions for the auto industry.

The SKF group’s efforts in the area of research and development have led to a growing number of innovations that created new standards and new products in bearings. In 2001, 171 patent applications were filed by SKF.

The company has gone through a number of structural changes over the years. The number of employees once was twice the size as it is today. But as competition in standard bearings got tougher, SKF has withdrawn from the less profitable markets and concentrated on the high technology segments of the business.

The company’s turn over and profit during the past couple of years is shown below (in MSKR):
SKF is organised in five divisions:

**Industrial**
Sales to industrial OEM (Original Equipment Manufacturers) customers, development and production of a wide range of bearings (spherical, cylindrical and angular contact bearings). The Division has specialised business areas for Railways, Linear Motors and Precision Technologies, Industrial Seals and Couplings.

**Automotive**
The Division is responsible for product development, production and sales to car, light truck, heavy truck, bus and vehicle component industries. The products include wheel hub bearing units, taper roller bearings, seals, special automotive products and complete repair kits for the vehicle service market.

**Electrical**
The Division is responsible for product development, production and sales to manufacturers of electrical motors, household appliances, and electrical components for the automotive industry, power tools, office machinery and two-wheelers as well as for all deep groove bearings and of all bearing seals within SKF.

**Service**
The Service Division is responsible for sales to the industrial after market mainly via a network of some 7,000 distributor locations. The Division also supports industrial customers with knowledge-based service solutions to optimise plant asset efficiency. The Division also offers mechanical service, predictive and preventive maintenance, conditioning monitoring, decision support systems and performance-based contracts.

**Aero and Steel**
SKF Aerospece is responsible for product development, production and sales of bearings, seals and components for aircraft engines, gearboxes and airframes, subsystems for fly-by-wire solutions and also for offering various services including the repair of bearings. Each division served a global market, focusing on its specific customer segments.

Ovako Steel is responsible for production and development of special steel and steel components to the bearing industry and also to other industries with demanding applications.

SKF Forgings and Rings are responsible for sales, product development and production of forgings and rings to the bearing industry.

At the SKF headquarter their area five staff units:
- Group Legal
- Group Communication
Group Finance, Group Purchasing and Group Business development  
Group Quality and Human Resources  
Group Technology Development.

The organisation in five divisions is not totally homogenous. In some countries there is a national centre for all SKF units in the country, in other countries each division report to the division manager.

The total number of employees is 38 600 of which 22.700 in the EU countries. The gender composition is 81 percent male and 19 percent female.

The number of employees in Europe is as follows (2001):
- Sweden 4 900
- France 3 900
- Italy 5 000
- Germany 5 700
- Austria 600
- Poland 800
- Denmark 20
- Norway 20
- Finland 20
- Portugal 5
- Hungary 30
- Holland 600
- Switzerland 350
- Great Britain 700
- Czech Republic 40

The level of union affiliation in the Swedish part of SKF is over 80 percent. The affiliation rate in the rest of SKF is not known.

Methodology

This report is based on interviews and on documents from the company such as the 2001 and 2002 Annual Reports, SKF webb site, SKF EWC agreement, and minutes from the SKF World Council and SKF EWC meetings.

Interviews have been conducted with:
Parent company representatives (Sweden)
Management representatives:
- Head of SKF Group Communications
- Head of SKF Group Quality and Human Resources

Union insiders
- Secretary, Metall Club, SKF Gothenburg
- International Secretary, Swedish Metal Workers Union

Union outsider
- Shop steward, member of the Metal Club executive committee at SKF Gothenburg

Daughter company representatives from Italy
The EWC

SKF started a World Works Council in 1974. When EWC became a requirement it was logical for the parities in SKF to build on the experiences of the SKF World Works Council. The EWC in SKF is like most EWCs in Sweden a union only forum. Management is not formally represented in the council and takes part only to provide information and answer questions.

The EWC is set up under article 13 of the Directive. The EWC is a forum for information and consultation in matters relating to the whole of SKF or two or more countries. The SKF EWC covers all SKF activities in the EU countries, EES countries and in EU-associated countries where SKF has manufacturing activities.

The agreement was signed in September 1996 and has not been revised since.

The EWC covers all SKF production units in the designated area wholly owned by SKF and where SKF has a dominating influence.

The EWC is made up of 18 delegates from 8 EU countries and from Poland.

Three of the delegates are female which means 17 percent compared to 19 percent female employees in the whole SKF work force. Members of the SKF EWC must be employees of SKF. All delegates are union nominated.

The procedure for electing members to the EWC is regulated in each country in line with local rules and traditions. Term of office is decided nationally but is generally three to four years. As the SKF World Works Council was based on unions affiliated to the IMF (International Metal Workers Federation), those unions also got a strong position in the SKF EWC.

The SKF management has undertaken to provide information to the EWC regarding the performance and development of the company. The information should be provided orally and in writing and include:

- The SKF structure
- Economic and financial performance
- Future development of operation, productions and sales
- Employment and development of employment
- Investments and changes of the organisation
- Introduction of new production methods and procedures
- Transfer of production
- Mergers, downsizing and closing of production
- Collective dismissals
Information and consultation with the EWC must be provided in a way that allows the SKF EWC to work out a standpoint that can be taken into account at the management’s decision.

The EWC has also the right to nominate outside experts. An official from IMF regularly takes part in the EWC meeting and forms the select committee together with the chairperson and deputy chairperson. An official from the Swedish Metal Workers Union act as secretary for the EWC and takes the minutes.

Three EU countries are not represented in the EWC, Denmark, Finland and Portugal. In these countries SKF have no production facilities but just small sales offices.

The company covers all costs for the operation of the EWC. The EWC delegates can use the company’s facilities for communication. All EWC delegates have email addresses.

There has been no major controversy relating to the cost of the EWC. There has however been some confusion over the representation in the SKF World Works Council and the SKF EWC respectively. There are different rules for the appointment of delegates to the two bodies and different rules as to the compensation for the cost for participation in the meetings. Normally the two councils meet at the same time, but there have been an extra meeting for the SKF EWC when the World Works Council did not participate.

The delegates of the EWC have undertaken not to give information outside of the EWC of information that the management has explicitly labelled as confidential. The information may however be given to union representatives that are bound be confidentiality in their role as union representative in each country.

Simultaneous translation of provided to five languages at the EWC meetings. The delegates have the right to education as part of their duty as EWC delegate. This applies in particular to education in language, labour law in the EU and business administration. So far only a limited number of delegates have used this right.

The EWC has its residence in Gothenburg and so far the EWC have elected the chairperson of the local Metal Workers Union in Gothenburg as chair of the EWC. The EWC chair has also held the position as union representative of the company board and chair of the SKF World Works Council. This means that he meets regularly with the SKF top management and gets information from several sources independent of his position as president of the EWC.

The EWC chair uses about 10 weeks per year in his capacity as joint chair of the EWC and World Works Council and travels almost every month in that capacity. He states that he gets all the information and all the co-operation from the SKF management that his asks for. The EWC chair functions partly as a kind of mediator and trouble shorter in industrial relations matters. Much of his activities are of a preventive nature. When there is a conflict under way somewhere in SKF organisation the union side may contacts the EWC chair and lodges their complaints. This can initiate a visit from the EWC chair and informal contacts with management and union representatives that may help solve the problem.

The deputy chairperson is presently from Germany. The two chairpersons and an official from the IMF form the select committee. The select committee meets four to five times per year. During those meeting they plan the EWC meetings and consult with the SKF management.
The Group CEO and Human Resources Manager participate. The discussions are open and management are receptive to the views put forward by the union delegates. Minutes are kept and distributed after the meetings. The impression is that the union side have more influence via the select committee than at the EWC meeting.

Influences

The SKF EWC builds on the experience of the SKF World Works Council that was set up in 1974 on the initiative of the Metal Workers Club at SKF in Gothenburg. It is made up of union representatives from all countries where SKF had manufacturing units. It is a union-only forum where management attended to inform and answer questions. It was set up in collaboration with The International Metal Workers Federation (IMF), and only IMF affiliated unions where allowed to participate. Officials from IMF and from the Swedish Metal Workers Union were active in the setting up of the Council and still attend all meetings. The SKF Company covers the costs for an agreed number of delegates in the World Works Council. Additional delegates may take part on the unions account.

The World Works Council was part of a long-term strategy of the Metal Workers Club at SKF. The union leaders foresaw extensive structural changes in the industry and wanted to build up strong links between the unions in all the countries where SKF had operations and improve the competens of the union delegates. The initiative can also be seen as a good example of the Scandinavian industrial relations as it was conducted in the 1970’s. During that decade industrial democracy was at the forefront of the political debate in Sweden and a number of reforms were introduced on the Swedish labour market. New laws where introduced regarding co-determination, employment security, trade union rights and health and safety. A logical step to transfer this policy to the international level was to start the World Works Council.

The World Works Council was proposed by the Metal workers and accepted by the management of the time. The Management tradition at SKF is to work closely with the union representative and to build industrial relations on trust and mutual respect. Management has not found any reason the challenge or modify the design of the World Works Council. When the EU directive came into force, both sides saw it as a natural step to agree on a EWC build on the traditions from the World Works Council.

Industrial relations background

The union affiliation among all SKF employees is not known, but in the Sweden it is around 85 percent. The Swedish Metal Workers Union is organising the blue collar workers and SIF (the Swedish Union of Clerical and Technical Employees) and CF (Professional Engineers Union) dominate among the office staff.

SKF has always been a stronghold for the Metal Workers Union in the Gothenburg area. Gothenburg is situated on the west coast and is the second largest city in Sweden. Gothenburg has a large engineering sector with SKF, Volvo Cars, Volvo Trucks, Ericsson, and shipyards as the industrial backbone. It may be worth mentioning that Volvo has its origin in SKF. In the 1920th two executives in SKF decided to start a car production in order to expand the market for ball bearings. These initiatives became Volvo as we know it.
The Metal Workers Union at SKF has a long tradition of co-operative relations with management in the Swedish post war tradition. The attitude is that the union should get involved not just in wages and condition for the members but should also play a role in the strategic development of the company. To able to do that the union must be well informed and have the ability to make constructive contributions in the dialogue with management. If the union succeed in establishing them self as a competent and constructive part in the company, management can not afford to take conflicts with the union and the union stand a better chance to influence strategic decisions and to improve wages and conditions.

Within SKF Italy there are four different unions. The main confederations CGIL, CISL and UIL are represented with their metalworkers’ trade unions. In addition, there is FALI, Italian Autonomous Workers Association. Only the metalworkers’ trade unions linked to CGIL, CISL and UIL have delegates in the SKF EWC.

At the last union election FALI got the majority of the votes. The three unions represented in the EWC together got 38 percent of the votes. They however refused to give up any of their seats in the EWC so the largest union remain outside of the EWC. But it also remains outside because it is not affiliated to the European Metalworkers’ Federation.

The industrial relations tradition in the Italian SKF is described as participative by the union representatives. The management representatives describe the relation as participative with 70 – 80 percent of the unions and as conflictual with 20 – 30 percent. There are two information meetings per year in which all unions participate.

*The union view*

From a union point of view the EWC is an instrument for union information and co-ordination. The union view is that if the union is to have any influence on the running of the company they must be well informed about how management think and act and what arguments are likely to have an impact. Therefor it is important that all union delegates share the same information and get a chans discuss and exchange views.

The union however want to keep the traditional roles for the management and the unions. The management runs the company and takes full responsibility for the operation. The union side represent their members interest and put forward there arguments to the management. They do not aspire to take any responsibility for the operation of the company.

The Swedish unions see the EWC primarily as a forum for information and co-ordination between union representatives from different countries. The information given by management at the EWC meetings is however available much quicker to the Swedish unions through other sources. It is obvious from the interviews that the EWC is less important as a source of information to the Swedish and German delegates than to delegates from many other countries where local industrial relations is less developed.

The EWC is also a useful forum to present common views from all unions within the company. The ambition is however not to try to take majority decisions in matters that are controversial between union delegates from different countries. When the Council has discussed corporate management’s propositions to close factories or to transfer production from one country to another, the tradition is to avoid trying to reach a common standpoint. It is usually not possible to reach a unanimous vote as all delegates try to defend the interest of
their members at home. Each union use the information from the EWC meting and fight for their interest at national level.

**The Management view**

The management sees the EWC as a good instrument to share information and to get the views of the representatives of the employees. The attitude of the SKF management follows the main stream of the employer’s attitude in Sweden which means that they see the union as a natural part of the industrial relations scene and that it is in their best interest to foster a co-operative and constructive climate. Management sees it as advantageous to have a strong, competent and well-informed union to deal with.

The management does not see any conflicts between management interests and the existence of a EWC. Officially management does not see the EWC and World Works Council as an instrument to spread and foster Swedish style industrial relations throughout the company. But when analysing the EWC and World Works Council it is obvious that that is precisely what is happening. The Swedish Metal Workers dominate the EWC and they actively try to get acceptance for their way of looking at union-management relations. This is obvious in particular in relation to the traditions from France and Italy where the unions see confrontation as a more effective way of exercising influence.

The production manager from Italy expresses the same view on industrial relations, but see it as good management and an SKF tradition rather than something related to the EWC. He does not perceive any influence from the EWC on human resource policy and industrial relations in the company.

The personal manager from Italy expresses the view that management should be represented at the EWC to allow for a broader and more active role for the management.

**Process**

**Interaction between the union representatives and the group management.**

Meetings of the SKF EWC are held jointly with the SKF World Works Council. The meeting is normally a three-day event. Day one is an internal meeting for the EWC and the World Works Council. Day two is a meeting with the corporate management for information and consultation. Day three is an internal summing up meeting and a study visit to the SKF unit where the meeting takes place.

The interaction between the union representatives and the management in the EWC is usually constructive and friendly. The Management representative’s turns up when requested, provide information and answer questions.

There may be critical questions raised and critical comments made by the union delegates. But this is not seen as a problem by the management. The Management presents their arguments and listens to the union view but there is no need to reach a common standpoint at the meeting. Consequently, the fact that the two sides may have different views and standpoints does not constitute a problem at the meeting. The differing views may later be raised at national level and possible conflicts may become more acute at that stage.
There has been criticism from some union delegates that information is primarily provided at the meetings which do not give the EWC delegates time to analyse and digest the information. Management has therefore agreed to provide information in written prior to the meetings in order to give the delegates a better chance to prepare questions and comments.

The Italian EWC delegate has the view that the delegates from Sweden and Germany are more influential in relation to management than other delegates.

*Interaction at the employee side of the EWC*

The chairperson dominates the EWC. The present chairperson is the second that have served in the position. The present one as well as his predecessor is also chair of the local Metal Worker Union in Gothenburg and the Metal Workers representative on the SKF Company board. It means that the chair has access to qualified company information and meets regularly with the top managers and board members. This gives the chairperson a strong platform to work from and gives him strong position in relation to other union leaders as well as managerial persons in SKF.

There are examples of tensions between the union delegates from the countries where SKF has its main operation, Sweden, Germany, Italy and France. These tensions can primarily be seen as reflecting different union traditions and the various countries. But it seems to have developed an SKF industrial relations culture that has been accepted in all SKF operations.

The study has not indicated any major criticism from the unions in the daughter companies towards the union’s representatives at SKF Sweden. The leaders from Sweden seem to have conducted their office in a way that has been acceptable to the other delegates. The union outsider from Italy confirms the dominating position of the Swedish and German delegates but claim that this does not mean that the Italian delegates cannot make their voice heard.

The work in the SKF World Works Council and the SKF EWC is dominated by the union for the blue collar workers, the Swedish Metal Workers. The other two unions in SKF in Sweden, SIF (clerical and technical staff) and CF (Graduate Engineers) representing the white collar employees take part in the meetings, but do not challenge the leading role of the Metal Workers.

The minutes from the EWC meeting is accepted by the chairperson and than distributed to all delegates. The wider distribution in each country is up to the respective delegate.

In the case of Sweden the minutes are distributed to all chairpersons of local unions. Sometimes reports from the EWC are given at members meetings. It can be assumed that the majority of union members are not aware of the EWC and is not informed about what goes on at the EWC meetings. The EWC is a matter for the union activists.

The trade union insider from Italy reports that he consults with the local shop steward before going to the EWC meetings. The co-operation between the different unions is much better at the local compared to national level. The shop stewards tend to ignore the political differences that exist between the different unions.

In Italy the EWC delegates produce their own summary report from the EWC meeting. These reports are displayed at notes boards and are transmitted orally at meetings.
The Italian EWC delegate has contacts between meetings with the delegates from France, Holland, Germany and Sweden.

The trade union outsider from Italy reported that he receives the minutes from the EWC meetings and that he also receives oral information after each EWC meeting. He also takes part in discussion before the EWC meeting. That means that he has the possibility to raise questions for the EWC meeting even if he does not formally is part of setting the agenda. Occasionally reports are given at members meetings but it can be assumed that most rank and file employees are not aware of the work and existence of the EWC.

*Interaction within management*

It is the Group Management that takes part in the EWC meetings. The Group CEO and the Heads of Communication and Human Resources always take part and some Division Presidents are always present.

The Management has accepted that the EWC is a union forum and the role of management us just to provide information, to listen and discuss and to fund the meeting. There is no ambition from management to use the EWC as an instrument for the operation or fore the development of company policy. The corporate management sees no need for any wider consultation among managers before the meetings of the EWC.

After the EWC meeting the minutes are distributes by the Group Human Resource Manager to the divisional HR-managers. They in their turn inform plant and national managers. This information is probably selective, as much of what is reported in the minutes is not relevant to many plant managers.

In Italy the managers at the plant where the delegates work get oral information from the delegates.

**Outcomes and Impacts**

*Employees*

The SKF World Works Council was stared in order to improve the contacts between union representatives from different plants in SKF and to strengthen the role of the unions in the company. When the EWC was started in 1996 it was more or less integrated as a part of the World Works Council and has continues with much the same orientation and way of operation.

The EWC plays an important role for building up contacts between union delegates from different countries. These contacts have also contributed to common views and attitudes in industrial relations matters.

Reporting and information take up the major part of the EWC meetings. There are country reports from the delegates and there is a comprehensive report given by the Group Management. This reporting is an important complement to the information that the union representatives get at national level. This is confirmed by the interviews in Sweden as well as in Italy. The Swedish delegates perceive the information from management as less important.
as they claim that they get the same information much quicker from meetings at national level.

According to the Swedish union representatives it is the “weakest” union the gain most of the work in the EWC. Unions from countries with a less developed union tradition and where unions are less accepted benefit from the EWC in two ways. They learn a lot at the EWC meetings and they can mobilise moral and factual support at the EWC meetings. They also have the possibility to contact the EWC chair between meetings and in the case of local conflicts with management use the EWC chair as support or mediator.

According to the statues the EWC shall not deal with questions regarding wages and conditions in SKF. It is correct that these issues are not brought up at the meetings where management takes part. But in the union only part of the meetings there is an exchange of information about wages and conditions. It can be characterised as a kind of benchmarking where all union representatives find out what goes on in other parts of the organisation and use that information in collective bargaining at home.

The EWC can also serve as a forum for new initiatives that affects the whole company. One recent example is the ethical Code of Conduct for SKF. The Code of Conduct was worked out by a sub-committee of the World Works Council and accepted by the company board in 2002. The Code follows UN: s Global Compact Principles and the OECD Guidelines for Multinational Enterprises. The Code covers four key areas, SKF: s relations to customers, employees, and shareholder and to society.

Management

The EWC is a forum for the unions in SKF. Management sees it as their role to fund the EWC and to inform as required and takes part in discussions at the EWC meetings. But management has no clearly defined expectation of an outcome and does not see the EWC as part of the management structure.

Management sees the EWC as a useful channel for information to the leading union representatives. Management does not know how the union representative’s use the information they get at the EWC meeting and how far out into the system it penetrates.

Management stresses the importance of good labour - management relations and point at the fact that SKF has a very good record as regards labour relations and conflicts. Management is aware of the fact that the EWC and SKF World Works Council is strongly influenced by the Swedish Metal Workers Union and that they can use it as a forum to advance their own union culture but sees not problem with that.

The outcome of the meetings is reported to the HR managers in the company. They are expected to inform plant and national managers. How this function is not quite clear. The management outsider from Italy that was interviewed had never seen any minutes from the EWC nor received any formal reporting from EWC meetings. He was however well aware of the EWC and had a general idea of the functioning of the EWC. He saw it as a useful instrument for information and consultation with the unions and as a complement to the national level unions contact. He did however not see it as a management tool or as a forum to develop company policy.
The conduct of human resource management and industrial relations

The EWC does not have a direct significant role in the conduct of human resource management and industrial relations. As the EWC is a union only forum, management does not see it as an instrument for the management.

There is however reason to believe that the existence of the EWC and even more so the World Council has contributed to making SKF an advanced company in terms of industrial relations and personal management. The company have a good record in industrial relations and have, at least in Sweden a solid reputation for good labour – management relations. The development of the SKF Code of Conduct can be seen as a recent confirmation of this tradition.

Discussions and analyses

The EWC does not seem to play any significant role in influencing management’s decisions. One obvious reason is the low frequency of meetings. There is only one meeting per year where the management take part and considering the speed of managerial decision making it is hard do time the EWC meeting to coincide with the right moment for important discussions.

The SKF industrial relations culture is however one where management listens and do make an effort to take the union views into account. The impression is that unions are influential in SKF, but that the EWC is not the most important forum to influence the management.

It is also obvious that the management does not see the EWC as an instrument for its own decision making. The EWC is a union forum and the role of the management is to inform and consult on the matters brought up by the unions.

Another and more important reason is that the unions do not particularly try to reach a common standpoint at the EWC meetings in controversial matters. In important structural matters that involve reducing the number of employees the union see the EWC as a forum for information. The defence of the interest of the members is primarily exercised at national level. Industrial action would typically be a national issue rather than a EWC issue. The view of the Swedish union representatives is that it would not benefit the long-term interest of the EWC to try to take majority decisions in the EWC in controversial matters.

The large structural changes in SKF took part in the 1980s before the start of the EWC. Since the EWC started the structural changes have been limited.

In assessing the importance of the EWC one can not ignore the fact that the chair of the EWC is also a board member of SKF and the leading union spokesperson at the company head quarter. A true evaluation of the EWC should also look at union influence at other forum where the unions are represented.

As a forum for information the EWC functions very well. The way the chairperson and the select committee conduct their duties seem to constitute a very useful format for the meetings. Also the preparation before meetings and the reporting of meetings seem to function well. The information about the EWC activities seems to reach the shop steward level in Sweden and
Italy. It is primarily the blue-collar unions that are active in the EWC. It is not clear from this study to what extent the EWC information reaches out to the white-collar employees. The impression is that the rank and file employee is not aware of the performance of the EWC and in many cases not even the existents of it.

One of the main concerns of the present chair of the EWC is the language situation. There is no common language at the meeting and simultaneous interpretation is normally provided in five languages. The chairperson finds that too much is lost in the interpretation and that the quality of exchange would improve it all delegates where able to communicate in English.

On critical views has been expressed regarding the representative role of the EWC. The Italian situation where the largest union, FALI is not represented in the EWC can constitute a problem.

Key Conclusions, SKF EWC

- The EWC is a well functioning forum for information and union networking
- The EWC has a limited role for influencing management decision. The unions are influential in SKF, but primarily through other forum. The EWC has not hade a role in structural change.
- The EWC builds on some 20 years experience of the SKF World Works Council.
- The EWC has a role in building a SKF industrial relations climate of co-operation and participation.
- The impression is that it is primarily the unions from countries with less developed union tradition that benefit from the work of the EWC.
- The SKF EWC is primarily a union forum. The management does not use the EWC as part of the management system.

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