



Valvira
National Supervisory Authority
for Welfare and Health

Finnish Adoption Board Annual Report 2018

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Foreword

The number of children arriving in Finland for adoption was at an all-time low in 2018, with the arrival of just 52 children from abroad. As in earlier years, most children arrived from South Africa, followed by Thailand. Around 42% of the children are under the age of two years on arrival. Nevertheless, the combined number of permits granted for intercountry adoption has remained more or less unchanged over the past four years. Around 200 permit decisions on intercountry adoption are made each year.

There are various reasons for the decline in the number of children arriving in Finland from abroad. The applicants' circumstances, personal qualities or their wishes regarding the child may possibly not meet the requirements of the countries placing the children for adoption. The decline in the number of children arriving may also be because there are fewer children than earlier available for intercountry adoption in the countries placing children for adoption.

Nevertheless, thousands of adoptees have come to Finland through the years and many are interested in their background. International adoption service providers offer invaluable support and guidance in gaining access to the background information. This post-adoption service offered by adoption service providers for adoptees and their families is ever increasing.

A total of 50 permits were granted for domestic adoption in 2018. The Finnish Adoption Board does not have information available as to the number of domestic adoptions taking place each year based on permits granted.

The programme to address reform in child and family services (LAPE) and the amendments to legislation concerning parental leave were on the agenda in the Adoption Board's plenary session in 2018. In earlier years, the plenary session has taken the initiative with regard to amendments to the Health Insurance Act (1224/2004) to improve the parity of families and children. In 2018, the Finnish Adoption Board submitted a statement concerning amending the Health Insurance Act. The Adoption Board's initiatives in earlier years to amend the Decree on Maternity Allowance and Adoption Support progressed to law drafting. The Adoption Board's statement on the legislative proposal to this concerning updating and increasing the adoption support paid to adoptive parents was given in 2018. The statements were prepared together with the Section for international matters.

The plenary session continued monitoring implementation of the joint initiative made in 2017 by the Adoption Board and the Ombudsman for Children on post-evaluation of the Adoption Act and the development of post-adoption support. During the current year, 2019, a reminder letter from the Adoption Board and Ombudsman for Children concerning implementation of the joint initiative has been submitted to the ministry responsible. It is now time to include implementation of the post-evaluation of the Adoption Act and other measures proposed in the initiative in the action plans of the new government and responsible ministries and to make a start on actioning them.

Merja Vuori
Counsellor of Social Welfare
Chairman of the Finnish Adoption Board

1 Composition and duties of the Adoption Board

The Finnish Adoption Board operates under Valvira, the National Supervisory Authority for Welfare and Health, as a special expert, permission and supervisory authority in adoption matters. The Board grants permissions for domestic and intercountry adoptions, as well as operating licences to intercountry adoption service providers¹ and monitors their operation.

Adoption is regulated according to the Adoption Act (22/2012) and the Government Decree on Adoption (202/2012). In all decisions and other measures concerning the adoption of a minor child, the best interests of the child shall be the paramount consideration. [Finnish Adoption Act, Act No 22/2012 can be found here in English.](#)

The Adoption Board is the central authority as referred to in The Hague Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption (Treaty SopS 29/1997) and the competent national authority as referred to in the European Convention on the Adoption of Children (Treaty SopS 39/2012).

The Finnish Adoption Board consists of a plenary session, a section for international matters and a section for adoption permission matters. The Chairman or the Deputy Chairman of the Adoption Board chairs the plenary session and the sections. The Finnish Government appoints the Adoption Board for a maximum term of five years at a time. The current term of office is from 1 July 2017 until 30 June 2022. The Government appoints the Chairman, the Deputy Chairman, members and deputy members to the Board. The Chairman, Deputy Chairman and secretaries are officials of Valvira.

Merja Vuori, Counsellor of Social Welfare, serves as Chairman of the Adoption Board and Riitta Husso, Senior Officer, Legal Affairs, as Deputy Chairman. Johanna Huovinen, Senior Officer, Legal Affairs and Minna Malviniemi, Senior Officer, serve as secretaries to the Board.

The Section for international matters has at least four members in addition to the Chairman or Deputy Chairman. One of the members must be a representative from the Ministry for Foreign Affairs of Finland. The section must also include members with expertise in legal matters relating to international adoptions, the practical intercountry adoption operation and child welfare.

Composition of the Section for international matters as at 31 December 2018 (principal member above, deputy member below in parentheses)

¹ The term service provider is derived from the current Finnish legislation. Finnish Adoption Act, Act No 22/2012 Section 32: "An intercountry adoption service may be provided by municipal social welfare organs and other organisations (service providers) which have been licensed thereto by the Adoption Board."

member representing the Ministry for Foreign Affairs of Finland:
Hanna Rantala, Legal Officer
(Henna Harju, Legal Officer)

Expertise:

Legal matters relating to international adoptions
Laura Määttänen, Senior Adviser for Legislative Affairs, Ministry of Justice
(Outi Kemppainen, Senior Adviser for Legislative Affairs, Ministry of Justice)

Practical intercountry adoption operation
Markus Söderlund, Executive Director, All Our Children
(Anja Wikstedt, Adoption Curator, All Our Children)

Child welfare
Johanna Laisaari, Lawyer, City of Vantaa
(Miia Kokko-Pekkola, Head of Family Affairs Unit, City of Espoo)

Other members:

Annika Parsons, Senior Secretary, Ministry of Social Affairs and Health

Eeva-Maria Nieminen, Senior Officer, Finnish Immigration Service
(Leena Turku, Senior Officer, Finnish Immigration Service)

The section for adoption permission matters has at least four members in addition to the Chairman or Deputy Chairman. The section must include members with expertise in child welfare, adoption counselling, a child's growth and development as well as a member with medical expertise.

Composition of the section for adoption permission matters as at 31 December 2018 (principal member above, deputy member below in parentheses)

Expertise in child welfare
Päivi Sihvo, Social Work Manager, City of Vantaa
(Mervi Vihersalo, Senior Social Worker in child protection, City of Vantaa)

Expertise in adoption counselling
Sanna Schultz-Karlsson, Social Worker, City of Helsinki
(Kaisa Tervonen-Arnkil, Development Manager, Save the Children)

Expertise in a child's growth and development
Otto Helve, Paediatrician, Senior clinical lecturer; Children's Hospital, Helsinki University Hospital and the University of Helsinki
(Marjatta Kekkonen, Specialist Adviser, National Institute for Health and Welfare)

Medical expertise
Persephone Doupi, Specialist Researcher, National Institute for Health and Welfare

(Jukka Mäkelä, Specialist Adviser, National Institute for Health and Welfare)

Other members:

Marita Raassina, Senior Officer, National Supervisory Authority for Welfare and Health, Valvira
(Eine Heikkinen, Head of Unit, National Supervisory Authority for Welfare and Health, Valvira)

At a **plenary session**, all members of the aforementioned sections are present. In addition, a necessary number of members representing the authorities and organisations operating within the field of operation of the Adoption Board are appointed to attend the plenary session. If necessary, also other members may be appointed to attend the plenary session.

Composition of the plenary session as at 31 December 2018 (principal member, deputy member below in parentheses) included the aforementioned members and deputy members of the section for international matters and the section for adoption permission matters referred to above and:

Aulikki Haimi-Kaikkonen, Senior Social Worker, City of Helsinki
(Saara Leinonen, Adoption Coordinator, City of Helsinki)

Irene Pärssinen-Hentula, International Adoption Director, Save the Children Finland
(Kristiina Mattinen, Head of Regional Activities, Save the Children Finland)

Salla Hari, Director for Adoption Program, Interpedia ry
(Anja Ojuva, Executive Director, Interpedia ry)

Minna Vihavainen, Executive Director, Adopterade Finland rf
(Anna-Maija Laitinen, Adopterade Finland rf)

Anu Uhtio, Executive Director, The Adoptive Families in Finland
(Veera Adolfsen, Communications and Organisational Secretary, The Adoptive Families in Finland)

Päivi Jalkanen, Aikuiset adoptoidut ry
(Saara Laakkonen, Aikuiset adoptoidut ry)

Johanna Repo, Diverse Families network
(Jenni Kerppola-Pesu, Diverse Families network)

Juha Jämsä, Executive Director, Rainbow Families
(Anna Moring, Project Manager, Rainbow Families)

2 Operations of the Adoption Board in 2018

2.1 Administration of the Adoption Board

The Finnish Adoption Board operates under Valvira, the National Supervisory Authority for Welfare and Health. The Adoption Board's secretariat is placed in Valvira's Private sector licencing and social welfare supervision department.

In 2017 government budget financing was secured for ensuring international adoption service providers' statutory post-adoption services. Valvira has distributed the appropriation to the service providers in 2018.

2.2 Training, national cooperation and statements

Each year, the Adoption Board arranges adoption training, which is primarily intended for adoption counsellors and international adoption service providers. In 2018, training was held at the House of the Estates in Helsinki on 25 January. Training themes were strengthening the resources and identifying the vulnerabilities of adoption applicants, adoptions from the perspective of the Finnish Immigration Service and post domestic adoption contact. In addition, the Adoption Board presented questions arising in considering permission. A total of 68 persons working with adoption matters took part in the training.

During the year, the chairman and secretaries of the Board attended various cooperation meetings for adoption professionals and took part in other events as experts and lecturers.

On 23 May 2018, the Adoption Board submitted to the Ministry of Social Affairs and Health a statement on international adoption service fees, on 12 September 2018 a statement on the draft for a government proposal for an act on amending and temporarily amending the Health Insurance Act and on amending certain other acts, as well as on 12 December 2018 a statement on an increase in adoption support.

2.3 Plenary session

The plenary session of the Adoption Board is tasked with monitoring development in adoption matters and, where necessary, making initiatives in matters concerning adoption. During 2018, the Adoption Board's plenary session had three meetings.

The plenary session of the Adoption Board monitored development in adoption matters including in relation to programme to address reform in child and family services (LAPE) and the role of adoption matters more generally in health and social services reform. The plenary session of the Adoption Board considers it important to safeguard services for adopted children and adoptive families in the government's key project and in health and social services reform. Meetings of the plenary session raised the need to develop adoption counselling.

The plenary session continued monitoring implementation of the joint initiative made in 2017 by the Adoption Board and the Ombudsman for Children on post-evaluation of the Adoption Act and the development of post-adoption support. In 2019, a reminder letter from the Adoption Board and Ombudsman for Children concerning implementation of the joint initiative has been submitted to the ministry responsible.

The plenary session monitored legal amendments concerning parental leave for adoptive parents and adoption support. In earlier years, the plenary session has taken the initiative with regard to amendments to the Health Insurance Act (1224/2004) to improve the parity of families and children. In 2018, the Finnish Adoption Board submitted a statement concerning amending the Health Insurance Act. The amendments to the regulation came into force on 1 January 2019 and 1 April 2019.

The Adoption Board's initiatives in earlier years to amend the Decree on Maternity Allowance and Adoption Support progressed to law drafting. The Adoption Board's statement on the legislative proposal to this concerning updating and increasing the adoption support paid to adoptive parents was given in 2018. The amendments to the regulation came into force on 1 January 2019.

2.4 Section for international matters and international cooperation

International cooperation of the Adoption Board is based on the international conventions mentioned before and the Adoption Act. These conventions require the central authority of each Contracting State to work in close cooperation with each other in adoption matters.

According to the Government Decree on Adoption, the section for international matters shall

- to the appropriate extent gather and maintain information about the legislation and practices concerning adoption and intercountry adoption service in foreign states and, on request, provide information about these to authorities and service providers;
- monitor compliance with the Hague Convention in Finland and, when necessary, take measures to ensure compliance with the Convention;
- cooperate with the central authorities or the bodies responsible for the duties of a central authority in foreign states that are contracting states in the Hague Convention in order to achieve the objects of the Convention and to exchange the information referred to in the Convention;
- cooperate with the national authorities designated by the state parties in the European Convention on the Adoption of Children, concluded in Strasbourg on 27 November 2008, to exchange the information referred to in the Convention;
- grant licences for the provision of intercountry adoption service and cancel licences that have been granted;
- grant a Finnish service provider licence to cooperate with a foreign service provider and cancel licences that have been granted;
- monitor the operation of the service providers and their cooperation with foreign service providers;

- provide the reports referred to in section 78 of the Adoption Act and give the statements referred to in section 79 of the Adoption Act;
- grant the approvals referred to in Article 17 (c) of the Hague Convention and issue the certificate referred to in section 8 of this Decree in cases where a service provider has not been used;
- perform the central authority functions under the Hague Convention, unless a certain function has been delegated to another body by Act or government decree.

Meetings

The Section for international matters convened 10 times during 2018.

The Section gave a number of statements to district courts in matters confirming adoption that had taken place abroad as well as prepared statements on international adoption service fees to be submitted to the Ministry of Social Affairs and Health, a statement on the draft for a government proposal for an act on amending and temporarily amending the Health Insurance Act on amending certain other acts as well as a statement on an increase in adoption support.

The Section for international matters provided professional consultations for applications being considered by the Adoption Board's Section for adoption permission matters concerning adoption without a service provider. The Section for international matters gave a statement on the validity the legalisation of these applicants' documents and on the compliance of procedures in a foreign state with the Hague Adoption Convention.

In addition, the Section for international matters dealt with queries from its members or questions relating to international adoption that it had become aware of otherwise.

International adoption service

The Section for international matters granted one licence under section 90 of the Adoption Act for cooperation with a foreign service provider. The licence was granted to Interpedia and applied to the continuation of an existing valid cooperation contact with the Happy Child Association in Thailand.

On the initiative of the Section for international matters, adoption service providers were instructed on their obligation under section 49 of the Adoption Act to notify of any changes in the circumstances of adoption applicants during the validity of their adoption permit.

The Adoption Board invited adoption service providers to service provider meetings three times in 2018. The meetings discussed current practicalities of the service providers and questions about intercountry adoptions. Service providers also received the guidance they had requested.

Central authority cooperation

The Adoption Board's secretariat regularly replies to contacts and enquiries from central adoption authorities in different countries and similarly sends enquiries from

the Board to adoption service providers and central adoption authorities in different countries and, in individual cases, also to other authorities. The enquiries may involve, for example, complaints and adoptions taking place without a service provider, but also more general questions relating to legislation and practices. In topics that are broad or central to decision-making, the Section for international matters expresses its opinion on the answers or enquiries before they are sent

In 2018, the Section for international matters followed in particular the intercountry adoption situation in China and Taiwan. In December 2017, China took the decision to remove the orphanage charge included in intercountry adoptions. The section monitored the impact of the decision to end the charge and took part in the preparation and sending of a joint Nordic letter to the CCCWA. In late 2018, Taiwan announced a pause in intercountry adoptions until the start of 2019. A request was made for the views of the other Nordic countries on this.

The Philippines central authority visited Finland on 3 May 2018 and the Thailand central authority on 29 August 2018. Meetings discussed the countries' adoption organisation and practices.

Nordic central adoption authorities' meeting in Norway

The annual meeting of the Nordic central adoption authorities was held in Oslo in May 2018. The meeting was attended by Merja Vuori, Chairman of the Adoption Board, and Johanna Huovinen, Secretary of the Adoption Board.

The topics discussed at the meeting included Norway's new Adoption Act, the decline in the numbers of intercountry adoptions, the Hague Illicit Practice Working Group, post-adoption services and GDPR. China, Chile, Sri Lanka, Vietnam, South Africa and India were the cooperation countries brought up at the meeting.

Implementation of the Hague Adoption Convention

The Adoption Board participates in the Hague Conference on Private International Law Special Commission meeting, which is held every five years and is tasked with monitoring and improving implementation of the Hague Adoption Convention. The Conference was last held in 2015. Between the conferences, the central authorities of the Contracting States, in Finland the Adoption Board, take part in monitoring and development of the implementation of the Hague Adoption Convention each year by, among other things, answering various surveys of the Hague Permanent Bureau. In turn, the Permanent Bureau provides the Board with information in matters concerning individual Contracting States.

EurAdopt international conference in Italy

The EurAdopt international conference took place in Milan on 24-25 May 2018 on the theme "The Intercountry Adoption Dilemma, How we can provide the highest level of protection to abandoned children". Various topical questions about adoption widely discussed at the conference included the decline in numbers of intercountry adoptions, the development of the adoption process and best adoption practices, the wellbeing and origin of adoption children. Johanna Huovinen and Minna Malviniemi, secretaries of the Adoption Board, and Marita Raassina, member of the Section for adoption permission matters, attended the conference.

International Social Services (ISS)

The Adoption Board has used in its work country-specific information and reports by International Social Services (ISS). The adoption Board needs country-specific information and reports, especially when it considers granting a Finnish service provider a licence to cooperate with a foreign partner. Valvira pays Finland's annual ISS membership fee, which makes ISS services available to the Adoption Board and other authorities.

In 2018, expert help was requested from ISS to support planning of the Adoption Board's monitoring visit. In conjunction with the EurAdopt conference in Milan, ISS convened an unofficial meeting of the central authorities on 24 May 2018. The topic was the Vietnam report being prepared by ISS and authored by Mia Dambach and Nigel Cantwell. Johanna Huovinen, Secretary of the Adoption Board, attended the meeting.

Cooperation and monitoring visit

The Adoption Board planned its annual cooperation and monitoring visit in meetings of the Section for international matters. Since the visit was cancelled for reasons beyond the Board's control, the cooperation and monitoring visit exceptionally did not take place in 2018.

2.5 Section for adoption permission matters

The section for adoption permission matters considers matters relating to granting of permissions for adoption and extending the validity of permissions. The section for adoption permission matters also considers applications on amending terms and conditions, notifications about material changes in the adoption applicant's circumstances and cancellation of a granted permission.

As a rule, permission from the Adoption Board must be applied for whenever a person resident in Finland wishes to adopt a child under the age of 18 years. The permission requirement applies to both domestic and intercountry adoptions. A permission must be applied for in domestic adoptions conforming to section 40 of the Adoption Act, in intercountry adoptions through a service provider conforming to section 41 of the Adoption Act and intercountry adoptions without a service provider conforming to section 42 of the Adoption Act. An adoption permission is not required for domestic adoptions if the applicant intends to adopt a child of his/her spouse (so called intra-family adoption) or a child who has been cared for and brought up by the applicant on an established basis.

The permission for adoption is granted for a fixed term of no more than two years. If necessary, an extension to the validity of a granted permission must be applied for before the permission expires. The Adoption Board must immediately be notified if there is a material change in the prospective adopter's circumstances during the validity period of the permission.

In 2018, the Adoption Board's Section for adoption permission matters granted 66 new permits for intercountry adoption taking place via a service provider in compliance with section 41 of the Adoption Act. A negative decision was made in respect of one application. The validity of 64 permits granted for intercountry

adoption was extended and in one case, validity was not extended. A total of 24 decisions were made as a result of notifications of changed circumstances.

In 2018, the Adoption Board's Section for adoption permission matters granted 29 new permits for domestic adoption and extended the validity of 15 permits. A total of 4 decisions were made as a result of notifications of changed circumstances.

There was a rise in the number of decisions concerning new intercountry adoption permits compared to 2017. Regarding intercountry adoptions, applications concerning 53 new permits were resolved in 2017, whereas 66 applications were considered in 2018. The number of permits granted for domestic adoption remained more or less unchanged, with 30 new permits being granted in 2017 and 29 in 2018. There was a decline in the number of decisions concerning extending the validity of permits granted for intercountry adoption from 81 decisions in 2017 to 64 decisions in 2018, and a rise in the number of decisions concerning extending the validity of permits granted for domestic adoption from 14 decisions in 2017 to 15 decisions in 2018.

In exceptional circumstances, an adoption service cannot be used in intercountry adoptions. In these cases, a permit for intercountry adoption in compliance with section 42 of the Adoption Act may be granted for a named child primarily where the child to be adopted is a close relative of the applicant, a Finnish service provider does not operate in the child's country of origin and the child is in need of intercountry adoption. In 2018, permission was granted for intercountry adoptions of two children without a service provider.

The processing of an adoption permission application is the fastest stage of the adoption process. The processing of a permit took approximately 1–2 months in 2018. Most of the applications are processed in the following Board meeting. The process is usually delayed due to incomplete applications or the need of further clarifications.

Further information about the activities of the Adoption permission section can be found in the statistics on the [Adoption Board's website](#).

3 Intercountry adoptions

As a rule, an intercountry adoption service provider must always be used in intercountry adoptions. In 2018, there were three intercountry adoption service providers in Finland: Interpedia ry, Save the Children's intercountry adoption service and City of Helsinki Social Services and Health Care. International adoption service of the City of Helsinki does not accept new clients anymore, but it will complete pending applications and post-adoption services for former clients. At the end of 2018, the intercountry adoption service providers were licenced to cooperate with eight countries.

Service providers are responsible for assisting prospective adopters in measures relating to the intercountry adoption of a child under the age of 18 years and monitoring that the adoption takes place in the best interests of the child, with respect for the fundamental rights of the child as recognized in international law and without anyone deriving improper financial or other gain therefore. Service providers are also responsible for post-adoption services offered after the confirmation of the adoption.

3.1 Service providers' international partners

The Adoption Board grants licences for the provision of intercountry adoption service and grants Finnish service providers licences to cooperate with a foreign service provider. Licences are granted for a maximum of five years. The tables below show the valid contact licences by country held by service providers at 31 December 2018.

Save the Children		
Country	Central authority	Contact
Bulgaria	Ministry of Justice	ANIDO Association
The Philippines	Inter Country Adoption Board (ICAB)	Inter Country Adoption Board (ICAB)
China (PRC)	China Centre for Children's Welfare and Adoption (CCCWA)	China Centre for Children's Welfare and Adoption (CCCWA)
Thailand	Department of Children and Youth (DCY)	Department of Children and Youth (DCY) Thai Red Cross Children Home (TRRCH)
Interpedia ry		
Country	Central authority	Contact
Bulgaria	Ministry of Justice	Family National Association (FNA)
South Africa	Department of Social Development	Abba Specialist Adoption & Social Services (Abba)
India	Central Authority Resource Agency (CARA)	Central Authority Resource Agency (CARA)

China (PRC)	China Centre for Children's Welfare and Adoption (CCCWA)	China Centre for Children's Welfare and Adoption (CCCWA)
Colombia	Instituto Colombiano de Bienestar Familiar (ICBF)	Instituto Colombiano de Bienestar Familiar (ICBF) Centro para el Reintegro y Atención del Niño (Fundación CRAN) Fundación Casa de la Madre y el Niño La Fundación Ayuda a la Infancia Hogar Bambi Chiquitines
Taiwan	-	Christian Salvation Service (CSS)
Thailand	Department of Children and Youth (DCY)	Department of Children and Youth (DCY)
City of Helsinki		
Country	Central authority	Contact
Bulgaria	Ministry of Justice	Happy Child Association
South Africa	Department of Social Development	Jo'burg Child Welfare (JCW)
Thailand	Department of Children and Youth (DCY)	Thai Red Cross Children Home (TRRCH) Department of Children and Youth (DCY)

3.2 Development in number of children arriving in Finland

Since 1985, a total of 4,700 children have come to Finland via intercountry adoption through service providers. There were 142 children arriving in Finland through intercountry adoption in 2014, 93 children in 2015 and 58 children in 2016. The declining trend was reversed in 2017, when 70 children arrived in Finland, although in 2018 the number declined to 52.

There are no statistics on the number of domestic adoptions from outside the family because the Adoption Board does not receive information about such adoptions. The permission obligation only applies to domestic adoption applicants who began adoption counselling after 1 July 2012.

Further information about children who have arrived in Finland can be found in the statistics on the [Adoption Board's website](#).

The number of children arriving in Finland through an intercountry adoption via service providers in 1986–2018

	1985 - 2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Bulgaria														1			4
Dominican Republic	6																
South Africa	22	23	24	27	22	25	36	41	32	45	32	37	37	35	14	22	13
Ethiopia	191	6	7	5	15	13	14	16	10	10	3	3	3	1			
The Philippines	7	12	12	19	21	19	11	10	12	8	21	10	14	6	9	7	5
Guatemala	13																
India	97	6	8	15	4	9	2	7	3	7	8	8	7	5	5	5	6
Republic of Karelia	3																
Kenya									9	6	10	4	6	4			
China	265	61	133	140	49	46	18	33	23	41	62	47	33	27	10	13	7
Colombia	385	37	22	20	18	14	17	11	11	7	8	2	16	5	9	8	6
Poland	24	1	2	2													
Romania	34																
Sri Lanka	43																
Taiwan	1															2	1
Thailand	334	64	36	42	37	27	24	31	22	8	14	15	15	9	11	13	10
Russia	550	26	41	35	50	20	34	36	38	31	17	15	10				
Vietnam	35																
Estonia	60	2	4	3	2	3	1	2					1				
TOTAL	2070	238	289	308	218	176	157	187	160	163	175	141	142	93	58	70	52



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