



QUALITY



EUREGIO VENLO
Fossa Eugenia

culture of quality



Fossa Eugenia

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Fossa Eugenia

Fossa Eugenia is a group of vegetable growers from the Euregio of Venlo. Together with our growers and chain partners, we offer a complete range of sustainable fresh, safe and healthy vegetables, herbs, strawberries, blackberries and raspberries every day, using short channels and without unnecessary actions in between.

We cultivate in a market-oriented, innovative way and respond to requirements with regard to sustainability, food safety and quality.

This formula appeals to customers and growers alike. The group continues to expand in terms of grower numbers, production area and range for a good reason.



History

The completion

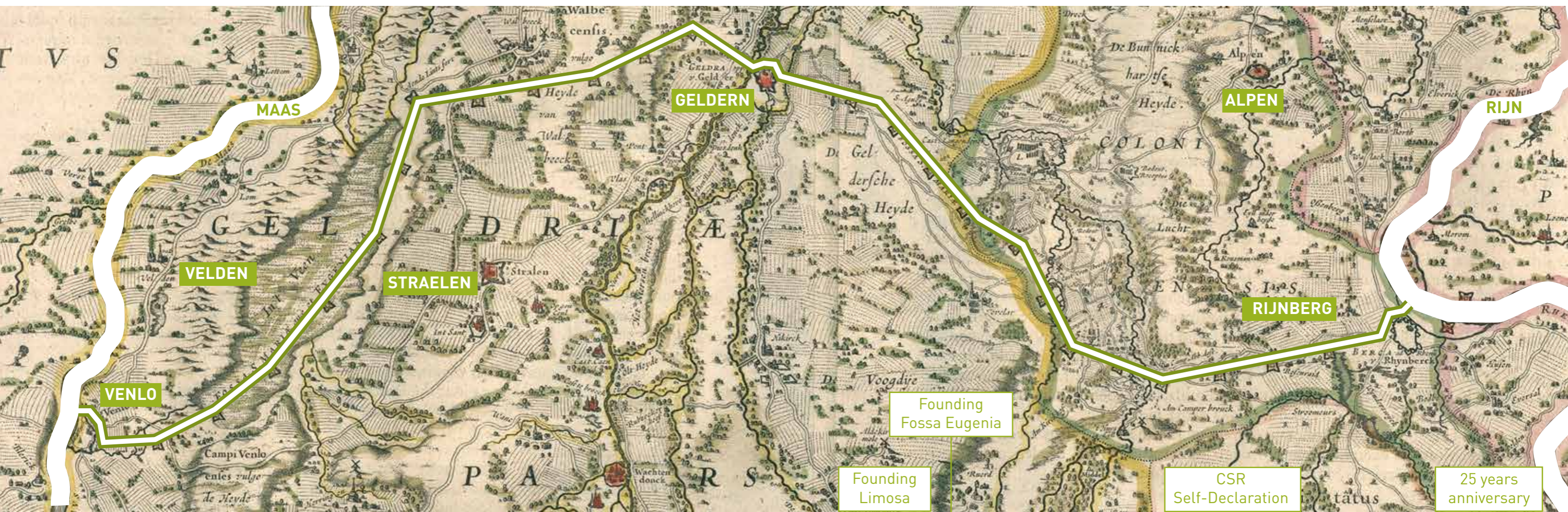
In the 17th century, the Spanish-Dutch government of the time decided to build a canal between the Rhine and the Maas rivers. Unfortunately the 'Fossa Eugenia' link was never completed, a feat even Napoleon was unable to accomplish a century later.

But contrary to Bonaparte, armed conflict, lack of funding and height differences failed to discourage a forward thinking group of growers from the Venlo region. In the autumn of 1995 short links with Germany were created, followed by the rest of Europe and even America. Fossa Eugenia as a symbol for bringing the world together.

The concept

The basic concept the growers had was simplicity itself: to supply quality produce that complies in every detail with the wishes of critical consumers and to market the produce via short chains, avoiding unnecessary links, in the quantities and for the prices agreed.

Every grower can deliver to Fossa Eugenia's customers. This means that inferior quality can't be camouflaged by the "bulk". Each grower is fully responsible and accountable for the quality of his or her own contribution. This also applies to logistics. Special requirements relating to grades and packaging are communicated straight to the individual growers, so they can react as quickly as possible to changing customer and market demands.



1626 1633

The Spanish-Dutch government decided in the 17th century the construction of a canal between the Rhine and the Maas. Unfortunately, the "Fossa Eugenia" connection was never completed.

1804

From 1804 to 1810 under Napoleon Bonaparte work was done on the Fossa Eugenia. But Napoleon also couldn't accomplish it a century later.

1995 1998

But contrary to Bonaparte, armed conflict, lack of funding and height differences failed to discourage a forward thinking group of growers from the Venlo region. In the autumn of 1995 short links with Germany were created, followed by the rest of Europe and even America. Fossa Eugenia as a symbol for bringing the world together.

2014

CSR Self-Declaration

2022

25 years anniversary



Vision Fossa Eugenia

Fossa is a cooperative by and for growers who sustainably produce healthy fruit and vegetables year-round. It aims to collectively sell its products and assist customers to do so successfully, so that consumers can enjoy its healthy and high-quality products, in order to achieve a healthy return for its growers.

To achieve this, Fossa has identified the following three areas for attention between 2019 and 2023:

1. Strengthening the supply chain;
2. Strengthening the product range based on new Product Market Combinations (PMCs);
3. Stimulating sustainably produced fruit and vegetables.

As part of the “Strengthening the supply chain” focus area, Fossa is considering, among other things, direct supply to and intensive cooperation with various retailers in order to remain or become the preferred supplier. The aim is to supply 50% of our products directly to these retailers by 2023 (versus 38% in 2017). Fossa aims to achieve this by, among other things, focusing on the further development of Electronic Data Interchange (EDI), data analysis and article information, the use of category management, etcetera.

Fossa expects these efforts to result in greater efficiency both for Fossa and in the chain, to ensure the right product arrives on the shelf at the right time. Fossa also wants to make the consumer more aware of the properties of the products they buy in terms of composition, health and sustainability.

Fossa also wants to make more use of the loading and packing station where a part of the Fossa products is collected or prepared for delivery. Fossa expects direct delivery to retailers to make the delivery process even more efficient.

As part of the focus area “Strengthening the product range on the basis of new PMCs”, Fossa is thinking of growth in terms of volume (expansion of acreage) and price of the product range. Fossa’s activities in this area will include broadening its assortment (more different products and different and market-oriented sorting and packaging), year-round production, sustainability and quality, finding new customers in existing markets and opening up new markets. All this will be supported by promotion used to further position Fossa products in the market.

In the context of the focus area “**Stimulating sustainably produced fruit and vegetables**”, Fossa is considering, among other things, reducing the use of fossil fuels by using 2nd screens, buffer tanks, organic crop protection, quality labels and reducing the use of crop protection agents and nutrients by investing in machines for precision fertilization, etcetera.

The best quality, in the shortest way.
Quality, environment and purity.
Triple quality assurance.



Features and results

Features Fossa Eugenia

- Flat organisational structure
Cluster managers and account managers maintain a network of internal and external contacts aimed at realizing the objectives of Fossa Eugenia
- Virtual association structure
- Quick decision structure
- Extensive national / international structure
- Organisation of professionals (intense, businesslike approach to achieving professional goals)
- Wide package of produce (greenhouse/field grown)
- Modern companies
- Innovative companies
- Commercial concept development
- Balance between 'people, planet and profit' (CSR)
- The products of the members of Fossa Eugenia U.A. are sold via Fossa Eugenia B.V.

Results

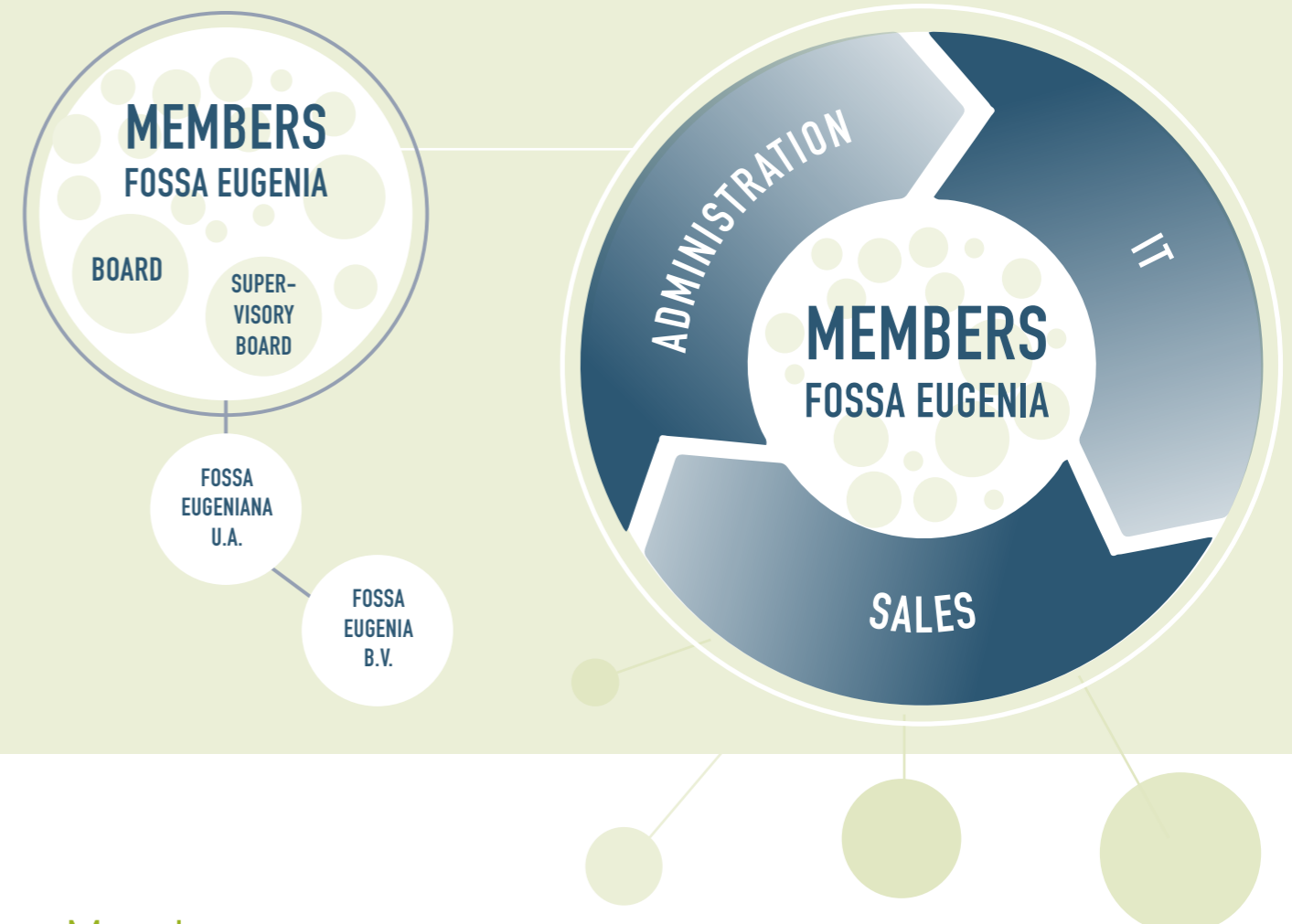
- High quality produce
- Fixed and short lines and communication routes
- Thinking in terms of quality
- Guaranteed food safety
- Growth of Fossa Eugenia

Board

Chairman	Peter van Dijck	Cluster managers	René Baetsen Marcel Dings Peter van Dijck
Vice-chairman	Erik Gipmans		
Treasurer	René Baetsen		
Clerk	Marcel Dings	Sales	Ronny Bruijnen <i>commercial director</i> Susan van Horssen Annemie Cleven Céline van de Ven Jaëlle Kuijpers Danny Geulen
Boardmembers	Erik Geurts Johan Tielen		
Advisor/Dir.	Ton Holthuijsen		
Advisor	Nico van Knippenberg		



Structure Fossa Eugenia



Members

Abra	B	Houwen Groenten	B	Vitacress Real <i>guest member</i>	B
Groentebedrijf Baetsen	A	In 't Zandt Agro	B	Willemssen	B
Bato	B	Kwekerij Goorts	A	Ringelberg Witloftrekkerij	B
Bio Brothers	A	Kwekerij Litjens	D	Witlofkwekerij Selles	B
Brookberries	D	Litjens Venkel	A		
Bruins IJsselhof	C	Rasing Groenteproducties	A		
Kwekerij M. Christis	B	Reefresh Kwekerijen	C		
De Leeuwerik Groenteproducties	C	J.S.P. Reijnders	C		
Dings Aardbeien	C	Siberia	D		
Eldorado Agro	B	Spargel und Erdbeerhof Bonnacker	B		
Especia	D	Stemkens Lof	B		
Trostomatenkwekerij Geurts	C	Tielen Groenten	D		
Gipmans Agro	D	Van Dijck Groenteproducties	D		
Groentemakers	D	Van Lipzig Tuinderijen	B		

Number of employees:
 A = 0 - 5 | B = 5 - 15
 C = 15 - 25 | D = 25 - +

Overview certifications

AQS

In addition to unannounced TÜV inspections, all Fossa Eugenia growers are tested weekly by quality inspectors from Agro Quality Support (AQS). AQS was founded by the Quality Control Agency for Fruit and Vegetables (KwaliteitsControle-Bureau voor Groenten en Fruit, or KCB: www.kcb.nl), and is active as an independent inspection institution in the agricultural and food sector. AQS offers an extensive range of services to growers, traders and chain stores, and to sorting and packing stations. Its services range from quality assessments of fresh fruit and vegetables, to system assessments in the context of quality and hygiene care.

EU Organic

This EU regulation establishes the legal framework for all levels of production, distribution, supervision and labelling of organic products that are supplied and traded in the EU. On 1 July 2010, the EU introduced a new Organic logo to protect consumers and ensure compliance with organic farming regulations. In 2012, Bio Brothers and Especia were the first producers of growers' association Fossa Eugenia to become BIO certified by Skal. The Skal Foundation supervises organic cultivation in the Netherlands and has been designated for that purpose by the Ministry of Economic Affairs, Agriculture and Innovation. Fossa Eugenia is also BIO certified. This certification allows us to further expand production and trade in organic products.

EKO stands for organic food. This means "food produced according to European rules for organic farming". Special standards have been drawn up for EKO quality mark holders: the EKO standards. EKO standards are concrete measures for extra sustainability. Only companies that meet these standards receive the EKO quality mark. View the EKO standards per sector here: <https://eko-keurmerk.nl/>. Whether quality mark holders adhere to the EKO standards is independently checked.

GlobalGAP

Today's consumers expect the food they buy to be safe. Supermarkets, among others, consider food safety to be of paramount importance with good reason. Today, GlobalGAP is the overarching European umbrella standard for quality and food safety in the primary production of agricultural products intended for human consumption. All products traded by Fossa Eugenia meet this standard.

IFS & BRC

IFS and BRC set the highest possible demands for management and production with respect to food safety and quality. All herbs and cucumbers produced for Fossa Eugenia are IFS and BRC certified. BRC is the main standard for deliveries to the United Kingdom.

IFS Broker

Since the winter of 2010, Fossa Eugenia has been certified as a sales organisation in accordance with the IFS Broker Standard. This means Fossa Eugenia is allowed to supply directly to German chain stores.

ISO 9001

All growers who are affiliated with Fossa Eugenia are ISO 9001 certified. This ISO certification sets high demands for the quality management system used. With this ISO certification, Fossa Eugenia increases customer satisfaction. ISO standards are also used to assess whether organisations meet the requirements of customers and their own organisation, and legislation and regulations.

PlanetProof

The independent label 'On the way to PlanetProof' indicates that the products customers buy have been produced in a more sustainable way and are, therefore, better for nature, the environment, the climate and animals. With this label, farmers and horticulturists strive to keep their working methods in balance with the capacity of our planet. In this process, we are increasingly taking steps to reduce the burden on our planet. Only farmers and horticulturists who meet strict requirements are allowed to use the 'On the way to PlanetProof' quality mark. These suppliers can become certified if they produce or grow in a more sustainable way. Traders, packaging companies and product processors must also meet the PlanetProof criteria. This is all monitored by external independent parties.

'On the way to PlanetProof' farmers and horticulturists are working on cleaner air, fertile soil, good water quality and animal welfare. They pay attention to more nature on the farm, processing circular waste and recycling. The requirements for becoming PlanetProof are reviewed every year and fine-tuned wherever possible. Fossa Eugenia aims to have all its growers PlanetProof certified by the end of 2020. For more information, please visit the website: www.planetproof.nl

QS

In order to be able to offer German customers a quality guarantee as well, the growers of Fossa Eugenia are QS certified in addition. QS is a specific German standard for the primary sector. This certification was set up through a collaboration of six large German companies. It aims to offer safe and high-quality products.

TESCO Nurture

TESCO's Nurture Standard was designed for primary production growers who supply their products to TESCO (UK). This standard was drawn up by TESCO itself and includes annual inspections by accredited institutions on behalf of CMi. The Nurture Standard is a certificate that can be regarded as 'GlobalGAP+', entirely focused on TESCO's vision. In comparison with GlobalGAP, the Nurture Standard pays more attention to environmental and social and ethical responsibility requirements.

TÜV

Our growers continuously deliver top performance for quality, environment and purity. This quality has been documented since 1997 with the certification of the TÜV quality seal for high-quality vegetables. In addition to periodic TÜV inspections, all Fossa Eugenia products are also permanently monitored by the Agro Quality Support quality inspectors.

RIK Certification

Fossa Eugenia has a product quality management system that meets the RIK requirements (Internal Quality Control Regulation). In this way, we meet the requirements of the KCB (Quality Control Bureau) quality code. This is audited on a regular basis.

RIK participants undergo an annual company audit to check that the requirements of the KCB quality code are still being met. Since as a growers' association, we have also brought our cultivation companies under the RIK recognition, KCB also visits and checks them as part of the audit.

Several certificates can be downloaded: fossaeugenia.com



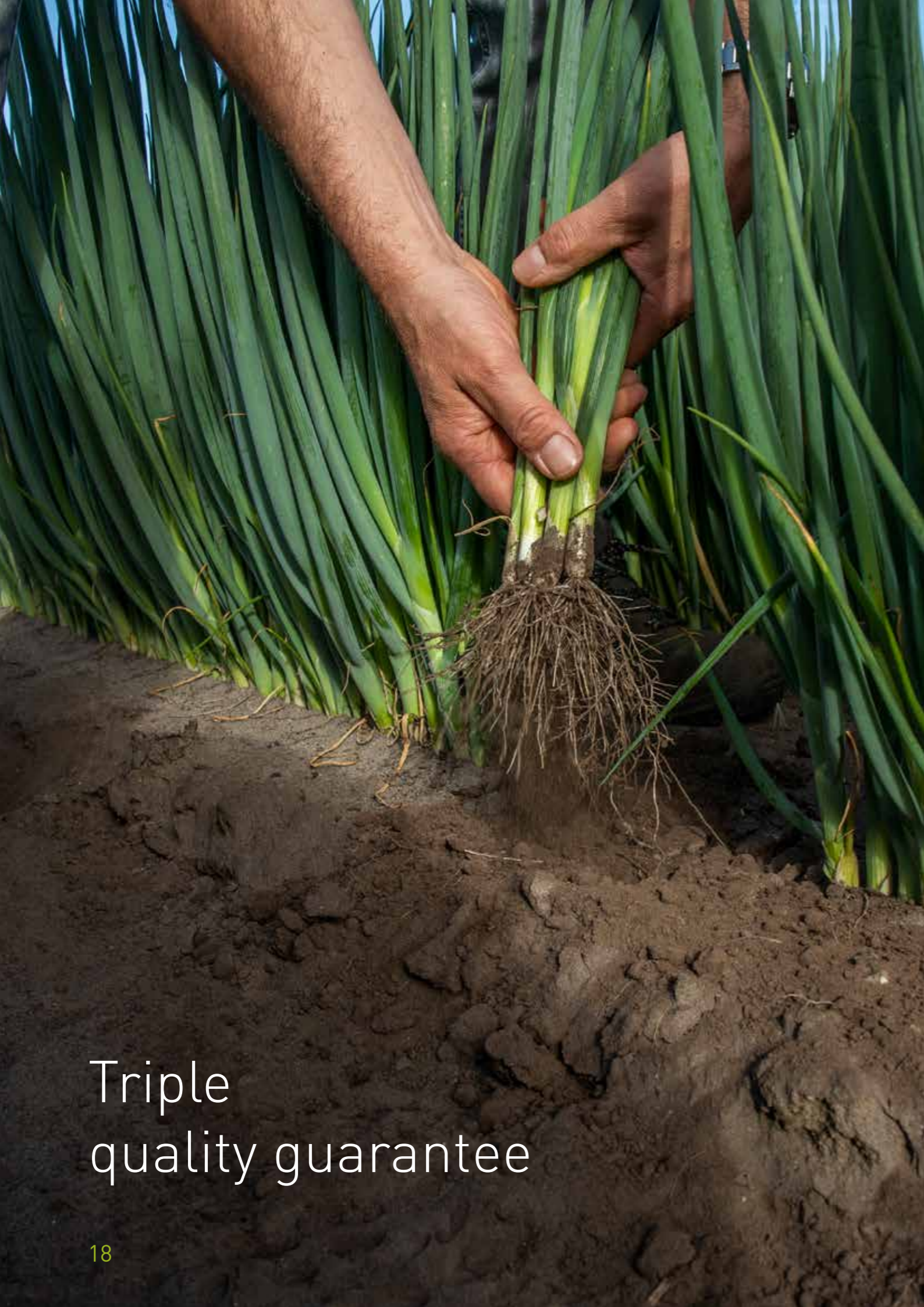
GLOBALG.A.P.



Man
society
environment

Man, society and the environment are central to Fossa Eugenia. Together we strive for the highest quality, trust among members and our business relationships.





Triple
quality guarantee

Man, society & environment

People

Equal rights for every employee

Much of the work performed at the growers of Fossa Eugenia is still manual labour. Depending on the type of company, the amount of work sometimes has high peaks and, at other times, quieter periods. As a result, the growers often work with temping agencies in order to be able to manage the deployment and quality of the required work flexibly and customised.

The employees who work for the growers through temping agencies come from various parts of the EU, and generally not from the Netherlands. We apply the same rights and obligations for them as for employees of Dutch origin. The growers also provide good housing, remuneration and facilities. When it comes to the well-being of the employees and the safety of the work to be performed, growers and employees have a common interest.

Society

Ever since its foundation in 1995, quality has been the guiding principle in everything Fossa Eugenia does. Much progress has been made since then, both in terms of reliable quality, environmental protection, food-safe products and a safe and pleasant working environment for the employees who help our horticulturists achieve this. Fossa Eugenia also attaches great importance to mutual trust between all our members and with our business relations.

Triple quality guarantee

The continuous efforts for quality, environment and purity have been confirmed since 1997 by the certification with the 'TÜV quality seal for high-quality vegetables'. In addition to periodic TÜV inspections, Fossa Eugenia's products are also permanently monitored by the Agro Quality Support quality inspectors. However, the most important product assessment happens in the market, every day. The best quality guarantee for Fossa Eugenia products can be derived from this: your assessment as a consumer.

ISO26000

Fossa Eugenia has set itself the goal of acting on sustainability even more decisively. Our sustainability goals focus on production as well as long-term relationships with our stakeholders. In order to fulfil our sustainability ambitions, we set up a CSR working group within Fossa Eugenia and contacted Adviesbureau The Terrace, a consultancy firm in Amsterdam. Together, we developed our ISO26000 Self-declaration and formulated our CSR principles.



Fossa Eugenia and CSR

Ever since it was founded back in 1995, Fossa Eugenia's goal has been to lead the way in quality. We have made a great deal of progress over the years in terms of reliable quality, environmental protection, food-safe products, and providing a safe and pleasant working environment for the employees who work with our growers to achieve these goals.

Corporate Social Responsibility (CSR) is becoming more and more important worldwide, and producing and marketing fresh fruit and vegetables as sustainably as possible is our ultimate objective.

CSR implementation and the Self-Declaration

In 2014 Fossa Eugenia drafted the first Self-Declaration ISO26000. With this self-declaration, the organisation supported and elaborated on the choices made with respect to its social responsibility. The self-declaration, priorities matrix, stakeholder analysis, and action plan will be assessed and revised annually.

In general it's true to say that our growers' union and its stakeholders have increased their awareness both of CSR issues and the concrete interpretation of these. The growers are closely involved in this. Concrete successes in the past two years include:

- Carrying out annual GRASP audits of all associated growers. Following the audits of the past two years, our growers have increased awareness and implementation of health and safety for their employees. The growers will implement improvement measures from the audits within a year.
- Production of BIO vegetables and herbs is growing annually.
- PlanetProof certification obtained by 100% of its members.
- Communicating CSR with customers, including various retail chains.

The Self-Declaration is annually recognised by NEN (the Dutch standardisation institute) as being complete and in compliance with the ISO26000 standard. This will be confirmed by publication on the platform set up for this purpose (<https://www.nen.nl/Normontwikkeling/Publicatieplatform-ISO-26000.htm>). The current Self-Declaration can also be downloaded from the Fossa Eugenia website: www.fossaeugenia.com



Quality manager Hans Klerken is responsible for all of Fossa Eugenia's certifications



Growers' Association Fossa Eugenia's CSR principles

1. Accountability

Fossa Eugenia is accountable for the effects that the production of our fruit and vegetables have on society, the economy and the environment. We want to be open to discussion about this in order to give substance to the following:

- Registration and publication of the deployment of means of production
- Monthly monitoring of fresh products for presence of residues
- GRASP audits: assessment and evaluation of employee safety and well-being

2. Transparency

Fossa Eugenia is transparent about the organisation and its decisions and activities that affect the environment.

3. Ethical behaviour

Fossa Eugenia wants to behave ethically. For us, ethically correct conduct means:

- Respect of the association for the interests of all our stakeholders.
- Certifications at various levels serve as independent, private law proof for us. This includes BIO recognitions (BIO certification), IFS Broker, BRC Food Technical Standard, GlobalGAP/QS, Tesco's Nurture, Albert Heijn's Protocol and PlanetProof certification.
- Respect of the entrepreneurs (growers) for their employees' interests and personal values. International values and labour standards and Dutch occupational health and safety legislation are leading in this respect. GRASP recognition for all growers serves as independent, private law evidence for us.
- Respect of the entrepreneurs (growers) for the interests of the local community.
- Compliance with all core values and principles set out in this self-declaration.

4. Respect for the interests of stakeholders

Fossa Eugenia respects the interests of its stakeholders. Our main stakeholders are:

- Our members (growers)
- Our customers (retailers and chain stores)
- Temping agencies
- End consumers

5. Respect for the rule of law

Fossa Eugenia respects applicable laws and regulations.

6. Respect for international standards of conduct

Fossa Eugenia respects international standards of conduct. Where the applicable legislation in the Netherlands does not sufficiently protect the environment, employees or society, international standards of behaviour will be applied and propagated.

7. Respect for human rights

Fossa Eugenia recognises, respects and promotes the Universal Declaration of Human Rights. For us, this means:

- Our growers work in full compliance with Dutch occupational health and safety legislation, thus respecting their employees' safety and well-being.
- Our growers recruit and treat their employees in a way that does not entail any form of negative discrimination (origin, religion, gender, ethnicity).
- Wherever possible, we seek improvement through discussions with stakeholders, for example, with suppliers who produce their products in a way that violates human rights.

Environment Sustainable innovations

Research and development | Conscious investment

Fossa Eugenia invests Nowadays, innovation and functional requirements are key concepts in horticulture. This is why Fossa Eugenia consciously invests in Research & Development (€8,000,000) in the field of new cultivation methods, conscious use of energy and sustainable innovations within business systems. Fossa Eugenia aims to make good products even better and more cost effective.

Lettuce and pak choi grown on water

Growers in the Netherlands must ensure that the amount of manure or fertilisers ending up in the surface water is reduced. Our growers are also working every day to limit the use of pesticides. Growing crops on water offers many advantages:

- the crop is available year round
- consistent quality (controlled climate, no vermin and diseases)
- reduced CO2 emissions
- no use of plant protection products

Fossa Eugenia growers also grow crops on water. One example is Siberia BV, based in Maasbree. Since 2016, this grower has been cultivating a variety of lettuce and leaf crops on a hydroponic system, growing the vegetables in cultivation gutters using special biodegradable pots. The entire process—from sowing to harvesting—takes place in a controlled environment, all under the same roof. Optimal growing conditions reduce the cultivation period and energy costs per product. The plants get exactly what they need to grow optimally—no more and no less.

Fresh strawberries year round

Fossa Eugenia's strawberry growers Brookberries, Christis and Dings Aardbeien are frontrunners in innovative and market-oriented production. They grow top-quality strawberries year-round using state-of-the-art technology and in the most environmentally responsible manner. They use green energy to keep the strawberries warm in winter.

Organic herbs

Since 2012, Bio Brothers and Especia have been the first producers of the growers' association Fossa Eugenia, BIO certified by SKAL. Fossa Eugenia is also BIO certified. This certification allows us to further expand production and trade in organic products.

Energy transition and control of waste flows

The growers register their use of production resources, such as plant protection products, fertilisers and energy, and make the data available to independent inspectors, including during GlobalGAP inspections. The results of these inspections are public and actively shared with customers. Points for improvement resulting from the inspections are resolved by means of the internal quality system.

In recent years, Fossa Eugenia's growers have already taken significant steps:

- a 90% reduction in the environmental impact of crop protection products in 2012, compared with 1998.
- a 52% reduction in energy consumption per kg of product in greenhouse horticulture production in 2012, compared with 1990.



The produce

The Fossa Eugenia growers' group offers a complete range of fresh, healthy and safe fruit, vegetables and herbs every day. For the seed selection for these cultivated varieties, our growers are always led by the shape, appearance and taste. After all, consumers assess our products with their eyes first and then with their taste buds. Environmentally friendly cultivation methods and biological crop protection guarantee a high-quality product.



Harvest Calendar

PRODUCT	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Eggplant												
Vine tomatoes												
Capsicum yellow, red, green												
Cucumber												
Zucchini yellow												
Zucchini green *												
Baby leaf												
Iceberg lettuce												
Trio of lettuce												
Romana lettuce mini												
Lettuce greenhouse												
Organic lamb's lettuce *												
Chicory												
Strawberries *												
Raspberries / blackberries												
Cherries												
Apples & pears												
Herbs cut												
Herbs pot *												

Scallions												
Pumpkin Butternut *												
Hokkaido pumpkin *												
Pumpkins various *												
Spinach & Baby spinach *												
Celery *												
Cauliflower												
Broccoli												
Romanesco												
Kale *												
Chinese cabbage												
Oxheart cabbage												
Brussels sprouts												
Celeriac												
Kohlrabi												
Pak Choy greenhouse												
Carrot												
Leek *												
Rhubarb *												
Fennel												
Asparagus white & green												

Strawberries



growers

Dings Aardbeien
Brookberries
Kwekerij M. Christis
Bio Brothers *organic strawberries*
Spargel und Erdbeerhof Bonnacker

Asparagus



growers

Rasing Groenteproducties
Spargel und Erdbeerhof Bonnacker

Apples & pears



grower
Fruit NL



Eggplant



grower
Abra

Baby Leaf



grower
Siberia

Bleekselderij

growers

Bio Brothers
Tielen Groenten

Cauliflower

growers

Groentemakers
De Leeuwerik Groenteproducties
Tielen Groenten
Rasing

Kale



growers
Van Dijck Groenteproducties
Bio Brothers organic kale

Blackberries



grower
Kwekerij Goorts Haarsteeg

Broccoli



grower

Van Dijck Groenteproducties

Chinese cabbage



growers

Van Dijck Groenteproducties

Tielen Groenten

Joop Litjens

J.S.P. Reijnders

Zucchini



growers

Bio Brothers organic zucchini
J.S.P. Reijnders
Tielen Groenten

Raspberries



growers

Kwekerij Goorts Haarsteeg
Spargel und Erdbeerhof Bonnacker

A close-up photograph of a person's hands harvesting a large, round iceberg lettuce head in a field. The person is using a small knife to cut the lettuce. The background shows rows of other lettuce plants.

Iceberg lettuce

growers

Eldorado Agro
Groentemakers
Houwen Groenten
Van Dijck Groenteproducties

A photograph of a harvested celeriac root vegetable. The root is thick and white, with a yellowish-brown base where it was attached to the soil. The green leaves are fresh and vibrant. The background shows more celeriac plants in a field.

Celeriac

growers

Groentebedrijf Baetsen
Berden Agro



grower
Van Lipzig Tuinderijen



Kohlrabi

grower
Van Dijck Groenteproducties

Lettuce



grower
Siberia

Herbs cut



growers
Vitacress Real
Tiel Groenten

Herbs pot



grower
Especia

Scallions



grower
Groentemakers

Pak Choy



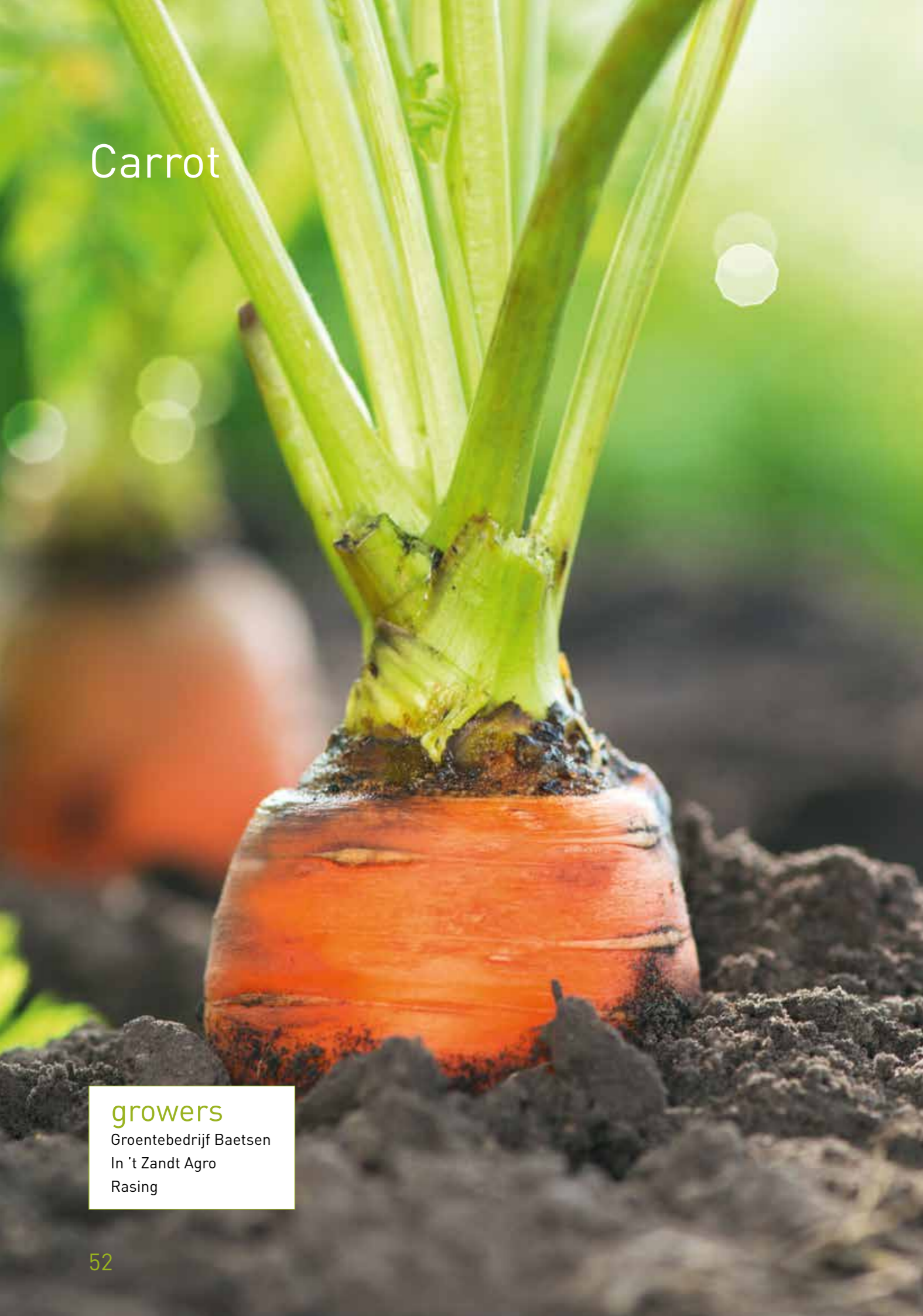
grower
Siberia

Bell Pepper



growers
Kwekerij Litjens
Reefresh Kwekerijen

Carrot



growers

Groentebedrijf Baetsen
In 't Zandt Agro
Rasing

Pumpkin



grower

Tielen Groenten
Bio Brothers

Leek



growers

Bio Brothers *organic leek*
De Leeuwerik Groenteproducties
Dris Agro
Eldorado Agro
Groentemakers
Rasing

Rhubarb



Bio-Rhabarber

growers

Bio Brothers *organic rhubarb*
Tielen Groenten
Rasing

Romana lettuce midi



grower
Van Dijck Groenteproducties

Romanesco



grower
De Leeuwerik Groenteproducties

Spinach



growers
Van Dijk Groenteproducties
Tielen Groenten baby spinach
Bio Brothers organic spinach

A close-up photograph of an oxheart cabbage. The central head is a pale, almost white, heart-shaped cluster of leaves. It is surrounded by several large, dark green, wavy-edged leaves with prominent veins. The lighting is bright, highlighting the texture of the leaves.

Oxheart cabbage

grower

Van Dijck Groenteproducties

A close-up photograph of a stalk of Brussels sprouts. The sprouts are small, round, and green, growing in a dense, vertical cluster along a central stem. The background shows more green leaves of the plant, slightly out of focus.

Brussels sprouts

grower

Van Dijck Groenteproducties



Trio of lettuce

grower
Siberia



Vine tomatoes

growers
Trostomatenkwekerij Geurts
Bato

Fennel

LITJENS
VENKEL

grower
Litjens Venkel

Chicory

growers
Bruins IJssellof
Stemkens Lof
Witlofkwekerij Selles



CULTURE OF

