

GUIDEBOOK

ARTICLES OF PRECIOUS METALS IN FINLAND

Manufacture, import and sale

tukes



Finnish Safety and Chemicals Agency

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JEWELLERY AND other products made of precious metals have been a part of Finnish tradition since time immemorial. The assaying of articles of precious metals began in the Middle Ages, with the authorities starting to supervise the manufacture of these products in the late 15th century. Gold and silver had great significance as precious metals, and therefore surveillance was considered important in society. The state sought to guarantee that private citizens making investments would be protected against fraud and economic loss. Today's surveillance has exactly the same targets. National authorities are obliged to protect consumers' economic interests and fair competition between businesses in the field.

Nowadays, EU legislation and principles are binding and have to be followed, but there are no harmonized requirements or legislation for articles of precious metals in the European Union. Nevertheless, there are common rules, the mutual recognition of products and the Vienna Convention, ratified by most of the EU countries and a number of non-members. Otherwise, each country has a free hand to act in accordance with its own national legislation.

This guidebook is intended for manufacturers, importers and sellers of articles of precious metals.

The assaying of the articles of precious metals began in the Middle Ages.



WHAT ARE ARTICLES OF PRECIOUS METALS?



AMONG THE usual articles of precious metals are jewellery, tableware, and cutlery. Pure precious metals are usually too soft for manufacturing purposes; they are therefore used in alloys with other metals. Alloyed materials are also used to achieve the desired colour, better treatment characteristics and lower raw-material costs. Products made of base metals and coated with precious metals, e.g. gold-plated necklaces and bracelets or electrolytically coated items, are not regarded as articles of precious metals.

In Finland, the raw materials for articles of precious metals are gold, silver, platinum, and palladium.

The term articles of precious metals denotes products manufactured from a metal alloy, in which

- the gold fineness is at least 375 thousandths of fine gold, or
- the silver fineness is at least 800 thousandths of fine silver, or
- the platinum fineness is at least 850 thousandths of fine platinum, or
- the palladium fineness is at least 500 thousandths of fine palladium.

THERE ARE a number of legal requirements for articles of precious metals which are sold in Finland. The requirements apply to precious metal alloy finenesses, technical solutions, and marks. This guidebook will firstly present the technical requirements and then the requirements for marks.

Anybody bringing articles of precious metals onto the market in Finland is liable to ensure that the product

- *has a fineness of precious metal alloy that is approved in Finland*
- *carries marks that indicate at least the fineness and the responsible organization*
- *contains solders permitted for the precious metal, and that a low-fineness solder is used only to the extent necessary for the soldering*
- *fillings are used in permitted articles only, and the product description provides the product structure*
- *only has base metal parts that are clearly distinguishable from the precious metal parts*
- *fulfils all the legal requirements in addition to precious metal legislation.*

In Finland, the raw materials for articles of precious metals are gold, silver, platinum and palladium.





Finenesses and solders

The chart on the opposite page shows the fineness marks permitted for articles of precious metals. The product's gold, silver, platinum or palladium fineness should at least be that indicated in the fineness mark; lower finenesses are not allowed. The fineness marks must not bear any other digits. In certain cases, solders may have a fineness lower than that of the material itself.

Fillings, glue and solder

No precious metal with fineness lower than that indicated by the fineness mark, base metal, other material or solder can be used to reinforce, fill or increase the weight of the article.

The solders permitted for articles of precious metals are listed in the chart on the opposite page. Acceptable low-fineness solders should be used only to the extent necessary for soldering.

When attaching or filling a handle on a piece of cutlery or a stand for a candlestick or similar articles made of sheeted precious metals, a precious metal with a fineness

lower than that indicated by the fineness mark, base metal or other material can be used for certain justified reasons. In this case, the manufacturer should provide written justified grounds with a description of the structure and materials used in the product. The written product description for consumers may either be supplied with the product or be readily available at the point of sale.

Coatings

Articles of precious metals may have coatings. The fineness mark on a coated article indicates the fineness of the precious metal that has been coated. For example, a gold-plated piece of silver jewellery weighing over 10 grams should be marked with a fineness mark for silver, in addition to the responsibility mark or the hallmark. Nevertheless, no parts made of base metals or other materials and coated with a precious metal can be used in an article of precious metals.

Permitted precious metal finenesses and solders

PRECIOUS METAL	CHEMICAL SYMBOL	FINENESS*	LOWEST ALLOWED FINENESS OF SOLDER*
Gold	Au	999	750
Gold	Au	916	750
Gold	Au	750	750
Gold	Au	585	585
Gold	Au	375	375
Silver	Ag	999	550
Silver	Ag	925	550
Silver	Ag	830	550
Silver	Ag	800	550
Platinum	Pt	999	800
Platinum	Pt	950	800
Platinum	Pt	900	800
Platinum	Pt	850	800
Palladium	Pd	999	Fineness of gold,
Palladium	Pd	950	silver, platinum
Palladium	Pd	850	or palladium
Palladium	Pd	500	in the solder: 500

*) in thousandths of mass

Nickel in jewellery

White gold is made by adding e.g. palladium, silver or a nickel-containing alloy to fine gold.

White gold with nickel has become popular due to its lower price and better treatment characteristics. It does not suit all consumers, however, as nickel is the main cause of contact dermatitis in Northern Europe. Some nickel allergy sufferers may also get allergic reactions to palladium.

The Finnish precious metals legislation does not apply to the nickel in articles of precious metals. Instead, the EU Chemicals Regulation REACH lays down limitations for nickel release from articles. The regulation applies to products which may release nickel when they come into prolonged contact with the skin. The amount of the released nickel can be analysed in a laboratory, and it must not exceed 0.5 µg/cm² a week. For jewellery fitted immediately after piercing, the minimum allowed amount is even lower.

Articles with several precious metals or other materials

An article of precious metals may consist of various metal parts. Generally, no other metal whose appearance and colour is similar to the relevant precious metal can be affixed to the article.

Should any parts made of other metals or materials be used, the parts which are not of the relevant precious metal subject to marking should be indicated with a permanent marking, e.g. METAL or another clear indication used for the metal or material. If the other parts cannot be marked for technical reasons, they must be clearly distinguishable from the relevant precious metal subject to marking and be visible (e.g. enamel and stones). If the product contains clearly distinguishable parts made of various precious metals, it is recommended that each of them be marked with its own fineness mark.

Reinforcing, filling or increasing the weight of articles of precious metals is not allowed with anything other than precious metals.



Marking

A mark is a permanent marking intended for articles of precious metals. Hallmarks are either punched or marked by laser onto the article; other marks may be punched, cast, engraved or marked by laser. After the marking, the article may not be processed in such a way that the specific features of the marks are made less distinct. For example, cast jewellery is manufactured in several treatment stages, where the clarity of a cast mark must not be affected.

Mandatory marks and weight limits

Articles of precious metals released onto the market and intended for sale in Finland must carry a responsibility mark registered with Tukes and a fineness mark, or alternatively a hallmark of a national assay office plus a fineness mark. The manufacturer, importer and retailer of an article of precious metals are responsible for ensuring that a product on sale bears at least the mandatory marks.

Articles of precious metals containing a minimum of 1 gram of gold, platinum or palladium are subject to the mandatory markings. For silver products, the limit is 10 grams. The marking of articles whose precious metal content is below the weight limits is voluntary. Should any marks be used on them, they must include the fineness mark at the very least.

THE MILLESIMAL NUMBER FINENESS MARK indicates, in thousandths of mass, the content of fine precious metal in the precious metal alloy. The use of the shield around the digit is now voluntary, but it is recommendable for the sake of clarity. For example, palladium and platinum



have similar finesses, and different shield shapes are required for easier identification.

As the shape of the shield containing the fineness mark on articles marked in countries other than Finland may be different from those presented in the following illustration, the precious metal in the product must be indicated by the millesimal number. The millesimal number shown in the illustration are the only marks approved in Finland.

THE RESPONSIBILITY MARK indicates the importer, manufacturer or seller who is responsible for the article and its conformity with requirements. Articles of precious metals on sale in Finland must be marked with a responsibility mark duly registered with Tukes, or alternatively with a hallmark. More information on the responsibility marks registered in Finland is available on the website www.tukes.fi.

Today, only capital letters are approved for the responsibility mark. Nevertheless, any responsibility marks registered before 2001 can be used – provided that the registration is reconfirmed at regular intervals.

Finesses approved in Finland and voluntary shield shapes

Gold



Silver



Platinum



Palladium



Examples of responsibility marks incorporating symbols



Examples of responsibility marks incorporating letters

C HOT RURU KuKa aari K:lin

MARKS ON ARTICLES OF PRECIOUS METALS

Voluntary marks

THE DATE MARK indicates the year of manufacture or import by combining a capital letter with one digit, for example “Kg” = 2011. See page 23 for the key to the date marks.

THE LOCALITY MARK shows the locality of manufacture, and it can be used only for products manufactured in Finland. The shield shape of older locality marks is rectangular or square, but today the mark takes the form of a heraldic coat of arms. A municipality can apply to Tukes for a locality mark.

Despite the merger of municipalities, the former duly registered locality marks are still in force. A municipality may also apply for new locality marks to be added to the marks registered earlier.

THE HALLMARK certifies that the product has been examined by an impartial assay office. A company or a private person not having a responsibility mark of their own may place the product on the market stamped with a hallmark and a fineness mark.

Examples of locality marks



Finnish hallmark



Other marks and markings

Articles of precious metals may also bear other markings, if they are not misleadingly similar to the mandatory or voluntary markings. Then again, products made of substances other than precious metals must not bear any marks denoting articles of precious metals, nor even misleadingly similar marks (e.g. “18k” or “750” on a brass ring). As an exception, the responsibility mark may also be applied on items other than articles of precious metals (e.g. bronze jewellery, pewterware, and plastic bags).

Articles of precious metals may also bear marks that are used in other countries, but they should not be misleading for consumers. It is the seller of the article who has the primary responsibility for ensuring that no foreign marks on the product detract from the traceability of the responsible party. In addition, the product must bear the mandatory marks required in Finland.



Replacing marks with a certificate

THE FOLLOWING BODIES are entitled to replace the mandatory marks by issuing a written certificate:

- *the Customs*
- *bailiff authorities*
- *auction house*
- *pawnbroker's*
- *estates of bankrupt or deceased persons*
- *assay office, in the event that the product is damaged or suffers a loss in value by the marking*

The product fineness is marked on the certificate after being analysed. The fineness must be determined by a reliable method, e.g. with an X-ray fluorescence spectrometer, cupellation or potentiometric titration.

Products outside the scope of the legislation

THE FINNISH LEGISLATION on articles of precious metals does not apply to:

- *appliances and equipment intended for scientific, artistic, industrial or medical purposes*
- *legal tender and collector's coins*
- *raw materials and investment gold*
- *articles verified to be at least 50 years old*

The products above are not monitored by Tukes, as they fall outside the scope of the legislation on articles of precious metals.

THE VIENNA CONVENTION

THE VIENNA CONVENTION (the Hallmarking Convention, HMC) is an international treaty on the control and marking of articles of precious metals. Signed in 1972 by seven states, including Finland, the treaty entered into force in 1975, and now comprises of 19 states.

The Convention has created a common market area for articles of precious metals in the member states, and aims at facilitating cross-border trade and securing consumer protection.

In addition to domestic marks, an article of precious metals may be stamped with the Common Control Mark (CCM) in accordance with the Vienna Convention, once the product or the product batch has been examined by using an approved method of analysis as laid down by the Convention.

An article of precious metals needs no further assaying or hallmarking in another member state if it has already been assayed and marked with the Common Control Mark, together with a national hallmark, a responsibility mark and fineness.

The Vienna Convention is an international treaty on the control and marking of articles of precious metals.

Common Control Marks for various finesses

Gold



Silver



Platinum



Palladium





FINLAND, AS PART of the European Economic Area (EEA), and a member state of the European Union (EU), is bound to follow, on the grounds of the decisions made by the EC Court of Justice, the so-called mutual recognition in the non-harmonized product areas in order to secure the free movement of goods. In 1994 the EU Court of Justice ruled in the Houtwipper* Case in a way that affects the free movement of hallmarked products within the EU market.

Following the principle of mutual recognition, products legally manufactured and marketed in one of the member states must be given free access to any other member state, even if the product does not in all respects conform with the technical and quality-related regulations laid down nationally in the receiving state.

The member states may restrict the import on certain grounds only, in accordance with the EEC Treaty and the strictly defined judicial grounds of the EU Court of Justice. Such grounds may include public health and the protection of consumer benefits.

Articles of precious metals marked in another EEA member state are approved in Finland. Nevertheless, the products must bear a responsibility mark registered in Finland and a fineness mark, or alternatively a hallmark and a fineness mark.

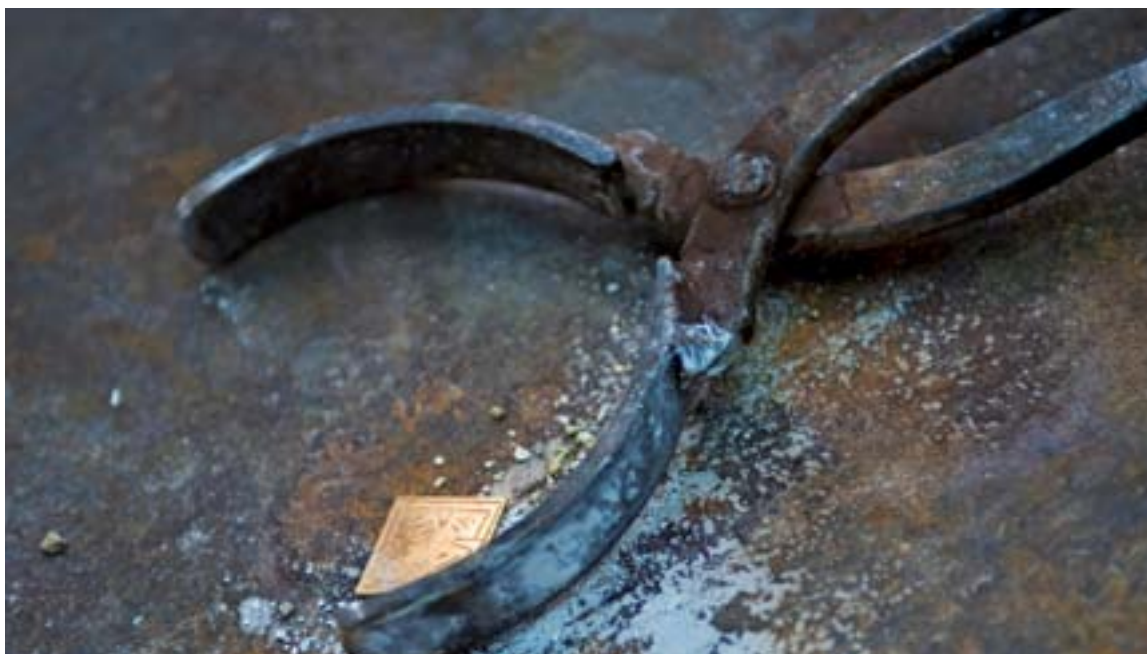
Should the product not bear a hallmark, its responsibility mark must be registered with Tukes.

The fineness mark must consist of the millesimal number used in Finland for the relevant precious metal.

If an article of precious metals has been hallmarked in a member state of the European Union, it must be approved as such for the Finnish market, in accordance with the Houtwipper Case, provided that the hallmarking in the country of manufacture can be considered to be at least at a level equivalent to the hallmarking in Finland. Furthermore, the markings must contain information which is equivalent to that provided by the marks required by the Finnish legislation and which is intelligible to Finnish consumers.

Articles of precious metals in Finland must comply with the entire Finnish legislation on articles of precious metals – not only when it comes to the markings. Some EU member states (e.g. Sweden) do accept negative tolerance of articles of precious metals. Despite this, low-fineness products cannot be placed on the Finnish market, even if they are in conformity with the requirements prescribed by law in another member state.

*Case C-293/93. Judgment of the Court of 15 September 1994. Criminal proceedings against Ludomira Neeltje Barbara Houtwipper. A question referred to the Court by Arrondissementsrechtbank, Zutphen, on the interpretation of Articles 30 and 36 of the EEC Treaty.



Lightweight articles without hallmarking

Gold, platinum or palladium products weighing less than 1 gram, and silver products weighing less than 10 grams, are lightweight articles. The following rules apply to such products:

- *The product with its original markings is approved for the Finnish market.*
- *The fineness mark shield shape may be different from the shapes provided by law.*
- *The importer is entitled to add Finnish marks onto the product.*
- *If the product has marks in accordance with the Finnish legislation, it must bear a fineness mark at least.*
- *No locality mark may be added onto a product imported into Finland.*

Articles without hallmarking exceeding weight limits for marking

- *The original marks need not be removed, providing they are not misleading.*
- *The seller is responsible for ensuring that no original marks on the product detract from the traceability of the responsible party.*
- *Whenever required for securing the traceability of the responsible party, a responsibility mark, to be duly registered in Finland, must be added onto the product.*
- *The fineness mark must consist of the millesimal number provided by the Finnish legislation.*
- *The fineness mark shield shape may be different from the shapes provided by law.*
- *No locality mark may be added onto a product imported into Finland.*

The original marks need not be removed, providing they are not misleading.

HALLMARKING IN FINLAND is carried out by the assay offices duly approved and monitored by Tukes. At present, there is only one such assay office in Finland, Inspecta Oy.

The assay office's task is to examine the product for conformity with the requirements, e.g. for the precious metal fineness and marks, and it has the right to use the Finnish hallmark depicting a crown on a heart-shaped shield.



Finnish hallmark

An assay office may file an application with the Ministry of Labour and the Economy for the right to use the ccm hallmarks for various precious metal finenesses.

In addition, analysis laboratories may define precious metal finenesses or examine e.g. nickel and heavy metals released from the products, but are not entitled to use any hallmarks.

For more information on assay offices, scopes of accreditation, and assay offices in Europe, see: www.tukes.fi





ANY COMPANY or entrepreneur planning to manufacture or import articles of precious metals may file a written application with Tukes for a responsibility mark. The holder of the responsibility mark is responsible for ensuring that the articles marked in this way meet the requirements laid down by the Finnish legislation.

When importing articles of precious metals manufactured in other countries, a Finnish importer may order the articles to be stamped by the manufacturer with a responsibility mark registered in Finland and a fineness mark conforming to the Finnish legislation. The articles may also be ordered without marks. In this case, the importer must add the statutory marks before placing the products on the market in Finland, or he must have the articles hallmarked.

A manufacturer outside Finland may also apply for his responsibility mark to be registered with Tukes and added to Tukes' register, in which case the articles bear the manufacturer's responsibility mark, and do not need the Finnish importer's responsibility mark. It should be noted that the seller, manufacturer and importer are responsible for the product in Finland, even if it bears the responsibility mark of a manufacturer outside Finland.

The holder of the responsibility mark is responsible for the stamped article.



Anyone selling or placing articles of precious metals on the net must be responsible for their conformity.

THE RETAILER always has the responsibility for the articles he sells and the information regarding them. The seller must ensure that the product not only fulfils the requirements laid down by the Finnish legislation on articles of precious metals but also meets other regulations prescribed in trade legislation. The retailer must also know the limitations applying to the use of nickel in jewellery. The Finnish responsibility mark, duly registered with Tukes, helps in ascertaining the party responsible for the product.

Consumers expect articles of precious metals on sale to be of a high quality. For example, coatings are allowed by the Finnish precious metals legislation, but the business which has sold the product may be liable for the colour change that occurs when the coating has worn away.

The seller must give correct information about the product and be able to tell the consumer e.g. if the article contains nickel. White-gold products should usually not be recommended for people who are allergic to nickel.

The retailer acts as an importer if he places a direct order for articles of precious metals with a manufacturer outside Finland to be placed on the Finnish market. In that case, the retailer must have a responsibility mark registered in

Finland and certainty of the product's conformity with the requirements of the Finnish legislation. As an alternative, the retailer may also have the product hallmarked.

Internet trading

A Finnish consumer is free to order articles of precious metals for his own use from anywhere in the world. Should any article purchased on the net be sold later on, in Finland, anyone placing the product on the market must be responsible for ensuring that the product fulfils the national requirements of the Finnish legislation, including the markings.

If an importer or a retailer orders articles of precious metals on the net in order to sell them in Finland, the company or entrepreneur must be responsible for ensuring that the products fulfil the national requirements of the Finnish legislation.

Anyone selling or placing articles of precious metals on the net must be responsible for their conformity – in the same way as other entrepreneurs on the Finnish market. When it comes to internet trading, it must be noted that both the Finnish Act and the Finnish Decree on Articles of Precious Metals also apply to the trade between private citizens.

SCALES USED IN TRADE

WHEN THE price of the product is determined by weight, certain requirements apply to the measuring instrument used for this purpose. What is usually required is a type-approval, an initial verification (inspection prior to introduction), and periodic verifications (inspection at regular intervals) of an in-service instrument.

THE TYPE-APPROVAL OF A MEASURING INSTRUMENT is subject to a type-examination by an approved inspection body to ensure that the instrument's properties and construction comply with the legal requirements.

IN THE INITIAL VERIFICATION, the measuring instrument is inspected to ensure that it conforms with the approved type, functions accurately, and the margin of error does not exceed the permitted limits.

THE PERIODIC VERIFICATION involves a post-introduction inspection at regular intervals to ensure that an in-service instrument is functioning reliably.

By virtue of the Finnish Act on Weights and Measures, no unverified measuring instruments can be kept at the point of sale.

Legal requirements for scales used in the trading of articles of precious metals:

- Class II accuracy; scale display division up to 0.01 gram.

II

- Type-approval and initial verification.

M CE09 0000

- Periodic verifications at three-year intervals.





AN APPLICATION for a responsibility mark must be filed with Tukes, which keeps an official register of the marks. The responsibility mark indicates the entrepreneur who is responsible for the article and its conformity with the requirements. The holder of a registered responsibility mark must revalidate it at three-year intervals.

The responsibility mark is granted to a company and is no longer subject to the company's business line, nor to the so-called precious metals exam. This means that an operating company, regardless of its business line, may become a holder of a responsibility mark for articles of precious metals on application.

In accordance with the current legislation, only one or more capital letters are acceptable for a responsibility

mark. The responsibility marks register also includes previous marks featuring various figures, letters and signs, which may be used as long as the entrepreneur reconfirms the registration at three-year intervals.

The responsibility mark must be applied for in two stages. To start with, an application form with the requested enclosures must be submitted to Tukes, which will inform the applicant about on which of the applied for marks has been accepted. In the second stage, the mark must be stamped on a small plate for examination by Tukes, which makes a registration decision on the responsibility mark, given that the mark fulfils the requirements prescribed by law. After the responsible mark has been approved, it may be duly employed by the entrepreneur.

Tukes maintains a responsibility mark register.



FINNISH SAFETY AND CHEMICALS AGENCY (TUKES) is a government agency responsible for the surveillance of product conformity in Finland in order to safeguard consumers' economic interests and to promote fair competition between companies. The Ministry of Employment and the Economy supervises Tukes's operations and drafts legislation.

Our scope of operations includes:

- *Nationwide market surveillance of articles of precious metals in Finland.*
- *Participation in the drafting of legislation.*
- *Information on new legislation, legal amendments and other regulations.*
- *Advice for entrepreneurs and consumers.*
- *Approval of assay offices and surveillance of their operation.*
- *Approval and registration of marks: responsibility marks, locality marks and hallmarks.*
- *Co-ordination of the activities of the Forum for Articles of Precious Metals.*
- *Participation in R & D within the field of articles of precious metals.*
- *International co-operation and development activities.*

Tukes undertakes market surveillance of articles of precious metals.

FINNISH SAFETY AND CHEMICALS AGENCY (TUKES)

supervises articles of precious metals on the market in Finland. Our inspectors pay visits to retailers, importers, manufacturers, trade fairs, market places etc. in order to examine the marks on the products and in some cases to buy articles for further analysis. The surveillance authority has the right, regardless of confidentiality provisions in general, to obtain information to ensure that the requirements laid down by the Finnish Act on Precious Metals are being fulfilled. The requirements are discussed during the surveillance visits.

Tukes acts in co-operation with other authorities, e.g. the police, the Customs and the Consumer Agency.

To promote collaboration between importers and the surveillance authority, Tukes arranges so-called importer meetings on importers' premises to disseminate information about the latest legislation and the interpretation of the regulations. All parties benefit from these meetings, as any comments and suggestions from professionals in the field for further development of the legislation and the measures taken by Tukes are appreciated.

During inspection visits, markings are examined and pieces of jewellery may be purchased for analysis.



www.tukes.fi

Legislation

- *Act on Articles of Precious Metals, Finland (1029/2000, last amended by Act 977/2008)*
- *Council of State Decree on Articles of Precious Metals, Finland (1148/2000, last amended by Decree 8/2009)*
- *Act on the Right to Pursue a Trade, Finland (122/1919)*
- *Act on the Acceptance of the Convention on the Control and Marking of Articles of Precious Metals (the Vienna Convention), Finland (259/1975)*
- *Decree on the Implementation of the Convention on the Control and Marking of Articles of Precious Metals (the Vienna Convention), Finland (260/1975)*
- *Decree on the Implementation of Annex I of the Convention on the Control and Marking of Articles of Precious Metals (the Vienna Convention), Finland (704/1980)*
- *Degree on the Implementation of the Amendments to the Convention on the Control and Marking of Articles of Precious Metals (the Vienna Convention, 1972), Finland (153/2010)*
- *Sale of Goods Act, Finland (355/1987)*
- *Consumer Protection Act, Finland (38/1978)*
- *EU Chemicals Regulation REACH (32006R1907)*

Tukes Instruction Letters

The surveillance authority has the right to give harmonized technical and administrative instructions. These are called Tukes Instruction Letters and they aim at explaining and harmonizing the practices in relation to the interpretation of the legislation. For further information, please visit: www.tukes.fi

Responsibility mark

Application form for a responsibility mark:
www.tukes.fi/Tiedostot/englanti/precious_metals/notification.dot

Useful links:

- THE VIENNA CONVENTION:
www.hallmarkingconvention.org
- INTERNATIONAL ASSOCIATION OF ASSAY OFFICES (IAAO):
www.theiaao.com
- CONSUMER AGENCY, FINLAND:
www.kuluttajavirasto.fi/en-GB/
- MINISTRY OF LABOUR AND THE ECONOMY, FINLAND:
www.tem.fi
- ASSAY OFFICE INSPECTA, FINLAND:
www.inspecta.fi
- GOLD- AND SILVERSMITHS' RESPONSIBILITY MARKS UP TO 1950:
WWW.LEIMAT.FI/EN/

	1	2	3	4	5	6	7	8	9
A	1810	1834	1858	1882	1906	1930	1954	1978	2002
B	1811	1835	1859	1883	1907	1931	1955	1979	2003
C	1812	1836	1860	1884	1908	1932	1956	1980	2004
D	1813	1837	1861	1885	1909	1933	1957	1981	2005
E	1814	1838	1862	1886	1910	1934	1958	1982	2006
F	1815	1839	1863	1887	1911	1935	1959	1983	2007
G	1816	1840	1864	1888	1912	1936	1960	1984	2008
H	1817	1841	1865	1889	1913	1937	1961	1985	2009
I	1818	1842	1866	1890	1914	1938	1962	1986	2010
K	1819	1843	1867	1891	1915	1939	1963	1987	2011
L	1820	1844	1868	1892	1916	1940	1964	1988	2012
M	1821	1845	1869	1893	1917	1941	1965	1989	2013
N	1822	1846	1870	1894	1918	1942	1966	1990	2014
O	1823	1847	1871	1895	1919	1943	1967	1991	2015
P	1824	1848	1872	1896	1920	1944	1968	1992	2016
Q	1825	1849	1873	1897	1921	1945	1969	1993	2017
R	1826	1850	1874	1898	1922	1946	1970	1994	2018
S	1827	1851	1875	1899	1923	1947	1971	1995	2019
T	1828	1852	1876	1900	1924	1948	1972	1996	2020
U	1829	1853	1877	1901	1925	1949	1973	1997	2021
V	1830	1854	1878	1902	1926	1950	1974	1998	2022
X	1831	1855	1879	1903	1927	1951	1975	1999	2023
Y	1832	1856	1880	1904	1928	1952	1976	2000	2024
Z	1833	1857	1881	1905	1929	1953	1977	2001	2025



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