

Public Summary of Report

International NGO Training and Strategy Seminar on the OECD Guidelines for Multinationals

"A tool to combat violations of
environmental and workers' rights?"

by Julie Smith

International NGO Training and Strategy
Seminar on the OECD Guidelines for
Multinationals, held on Thursday 20 March -
Saturday 22 March 2003 at Kontakt der
Kontinenten, Soesterberg, The Netherlands.



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Background

Strong instruments and coalitions are needed to counter the adverse social and environmental effects of multinational enterprises (MNEs). This seminar explored the issue of internationally binding regulations for corporate accountability and whether the revised OECD Guidelines offer a useful tool to support this.

More specifically, the seminar explored to what extent and when the revised OECD Guidelines can be used to call MNEs to order when they violate their environmental and social responsibilities, engage in bribery or tax evasion or otherwise inhibit sustainable development.

The OECD Guidelines are recommendations from governments to their MNEs and, although they are not binding, they are a widely recognised standard promoted by OECD member states. Specific complaints against MNEs can be filed at National Contact Points (NCPs) if companies do not abide by the Guidelines. These National Contact Points are part of national ministries in the OECD member states.

About 50 participants representing NGOs and trade unions from 37 countries attended the seminar. There were about 30 participants from Asia, Latin and Central America and Africa, which included NGOs active on environmental and labour issues and trade union representatives. There were about 20 participants from the West- and East Europe and North America and Australia representing NGOs active on issues of corporate accountability. The seminar was held as a roundtable using showcase presentations, working groups and panel discussion. The programme included opportunities for participants to exchange information and to share their experiences of filing complaints at NCPs.

In preparation, participants were sent the Toolkit about the Guidelines prepared by FOE NL and the Reader prepared for this strategy and training seminar.

The Seminar

Thursday 20 March

Participants were welcomed by Teo Wams, Director of Milieudefensie FoE/NL and Peter Pennartz, IRENE.

Teo Wams talked about the OECD Guidelines which were revised two and half years ago, noting that they now address most MNE issues about global processes, but pointing out that they are not binding and have weak monitoring and enforcement processes. However, the fact that the Guidelines exist means that they are worth testing and the goal of the seminar was to talk about experience to date and develop strategies for the future.

Peter Pennartz welcomed participants on behalf of IRENE and EED. He commented on the important mix of participants from the NGO and trade union worlds -representing both labour and environmental issues - and stressed that future strategies need to keep these partnerships alive.

Peter talked about previous IRENE seminars which addressed legal accountability and workers' rights. A typical characteristic of the discussions so far on corporate social responsibility is the fact that governments take a very passive attitude when it comes to addressing the responsibilities of corporations. There is very little governmental support in favour of binding rules - if at all. Governments seem to enjoy their position on the sidelines. Peter stressed that the Guidelines provide an opportunity to drag governments back into the arena of corporate social responsibility and pinpoint governments again at their responsibilities towards civil society. They have to address corporate accountability issues from a legal point of view through the NCPs.

Session 1: The OECD Guidelines - an appraisal

Patricia Feeny of RAID (Rights & Accountability in Development) gave an appraisal of the OECD Guidelines and presented her paper Making Companies Accountable: an NGO Report on implementation of the OECD Guidelines for Multinational Enterprises by National Contact Points (in the Reader for this seminar). Patricia made the following key points:

Some NGOs feel the revised Guidelines are an important step towards getting corporate compliance with international labour and human rights standards whereas others feel that they are fundamentally flawed because they remain non-binding.

Major discrepancies occur in both the way National Contact Points are set up and in the ways they operate. They are not independent of government or business and it is not apparent how they can fulfil an effective watch-dog role. Bringing complaints to NCPs poses problems for NGOs - they do not offer clearly specified time frames for dealing with complaints and they do not communicate over progress of cases. Some NCPs also use blanket confidentiality to keep cases out of the public domain.

Supply chain cases have raised additional issues. Despite the fact that there is specific provision in the text dealing with "suppliers and subcontractors", some members claim that supply chain issues are outside the scope of the Guidelines.

There have been some successful cases, including a case where the timely intervention of the Canadian NCP removed the immediate threat of violent evictions of peasant farmers from mine land in Zambia. In addition, a recent UN report to the security council which investigated the illegal exploitation of diamonds and minerals from the Democratic Republic of Congo (DRC) listed 85 MNEs, of which 53 were based in OECD countries, who had violated the Guidelines. How this is dealt with will either expose the Guidelines as a total cosmetic exercise or begin to make progress.

Details of NCP cases

SOMO, the Centre for Research on Multinational Corporations, based in the Netherlands, has compiled an inventory for Novib of cases filed by NGOs and trade unions. 25 cases have been filed

(mostly trade union). A few cases have been concluded. It was noted that the trade union cases have had a high failure rate. Many concern factory closures using the provision that there should have been prior consultation with the workforce. Companies are using arguments that either they did consult workers or that they could not disclose information because of stock market sensitivity to deflect cases.

There was discussion about filing a complaint about an action from the past eg an oil spill in 1999. Although it is assumed that this is possible, using the version of the Guidelines in use at the time, and demonstrating that it is still a relevant complaint with an existing environmental impact, others felt it was only worth doing if the case was likely to get a lot of public support as there was no mechanism to bring cases in previous versions of the Guidelines.

There was discussion about the supply chain issue and about the countries who are trying to get the text removed. This included NGO experience of bringing cases in this context.

Session 2: Showcase presentations of complaints filed at an NCP

In the afternoon there were four Showcase Presentations from NGOs who had filed cases with lead NCPs in Canada, the Netherlands (one case transferred to Chile) and Austria (case transferred to Germany and to the USA). The NGOs gave the background to each case and its outcomes and then went on to talk about what they had learned from their experience.

I.) Zambia, the privatisation of a mining company - by Patrick Mbewe, DECOP and Patricia Feeny, RAID (NGO Case 2 in the Reader) Case raised 16 July 2001 concluded 4 February 2002

Patrick is Project Coordinator for the Development and Education Community Project, Zambia. He explained what happened when ZCCM, a Zambian parastatal mining company was privatised and the company was sold to Mopani/ First Quantum Mining. The company tried to evict tenant and long term squatter communities from mine areas, refused to enter into dialogue with affected communities and threatened to call in the Zambian Army to evict the squatters. DECOP made a complaint for human rights, lack of trust and lack of adequate and timely communication violations by the company with assistance from Oxfam Canada at the NCP in Canada.

Outcome

Mopani has set aside 12,000 hectares of land for seasonal, small-scale farmers and proper assessment is taking place. It has given settlers a year before a final decision is made and the World Bank has also put a belated package together. Although the short term measures put in place by the company are welcomed, continuing efforts are required to find a long term solution.

In addition, after the OECD ruling in 2001, Mopani, the local government, DECOP and all departments dealing in land and related issues formed a Land Task Force Committee. Its objectives are:

- To identify vacant land for agriculture and resettlement
- To protect the environment and to provide information to the public on land and environmental issues

- Resolve any land disputes at local level.

Technically no decision was made by the NCP because the violations brought in the case had not happened, they were threatened. The positive outcome of the case demonstrates that challenging company behaviour through NCP cases may avert violations.

II.) Child labour in soccer ball production - by Gerard Oonk, India Committee of the Netherlands (NGO Case 1 in the Reader) Case raised 20 June 2001 concluded December 2002

The India Committee of the Netherlands (ICN) brought a complaint against Adidas for failing to encourage its supplier to produce in accordance with the OECD Guidelines. This case was based on a report "The Dark side of Football - child and adult labour in India's football industry and the role of FIFA" (June 2000). ICN claimed the OECD Guidelines were being violated in many ways - minimum wage, access to trade unions, health and safety standards, child labour etc.

The report was sent to FIFA and Adidas. FIFA replied, but Adidas did not. ICN took the case to the Dutch NCP to ask for clarification. It took until March 2002 for the first meeting to take place.

Outcome:

At this meeting Adidas said that they had shifted production to larger units as criticism was widespread. The NCP concluded on the basis of the information supplied by Adidas that the company encourages its suppliers to operate in a socially responsible way.

Remarks:

- Both the time-scale and how much research the NCP was going to carry out was unclear
- Unclear about the confidentiality issue. The information was already in the public domain.
- It opened up space for further discussion with Adidas.
- It tested out the NCP procedures
- Strong back-up from a Southern partner is needed. (But there were lots of issues involved and this is a big job for a local NGO.)
- ICN could have pushed harder for answers to questions on which labour standards Adidas was implementing.

III.) The Dutch company Nutreco, the world's leading producer of salmon, and salmon production in Chile - by Juan Carlos Cardenas, Centro Ecoceanos and Monique de Lede, FOE/NL. (NGO Case 8 in the Reader)

Case raised 22 August 2002

The Case began in 2001 when there was a strike demand for a 10% increase on the minimum wage (USD 158 per month) by Marine Harvest (a subsidiary of Nutreco) workers in Puerto Montt, Chile. 435 workers went on strike from a workforce of 560 (77.6% turnout). The company only offered 2% increase (USD3.1), fired 57 workers once the strike was over and started anti-union activities.

The case was filed over environmental and social violations of the Guidelines and it was submitted to the Dutch National Contact Point as Nutreco is a Dutch MNE. The case was redirected to the Chilean NCP. The case is still active.

IV.) Adidas and NIKE in Asia - by Christian Muecke, Clean Clothes Campaign Austria (NGO case 7 in the Reader)

Case filed 1 October 2002 rejected 18 November 2002

This was a Clean Clothes Campaign (CCC) consumer based campaign building up pressure about labour conditions in the production side of the clothing industry to bring about legally binding rules.

The case was about Adidas and Nike operations in Asia and used an existing report - We are not machines by Timothy Connor - as the basis of the complaint on poor labour standards throughout the companies' supply chains in Asia. A disadvantage was that this report was not specifically researched and drafted to support an NCP complaint.

A complaint can focus on specific violations in a factory or can look at shortcomings at company level. This complaint concentrated on the structural shortcomings of the MNEs to try and bring about significant and sustained change within the companies.

The Austrian NCP transferred the cases to US and Germany because there was not sufficient connection to Austria.

The case was rejected by the NCP in November 2002.

Session 3: Working Groups - lessons to be learnt from the case presentations

The afternoon was spent in working groups with participants using their own experience and what they had learned from the presentations to look at needs of the North and the South; advantages and disadvantages of the Guidelines; and the functioning of National Contact Points. The results of their discussions are recorded below:

What are the needs of groups in the South and North for filing cases?

| Assessment of needs South | Assessment of needs North |
|---|---|
| Capacity building amongst NGOs about OECD process | Information prior to filing a case |
| Build alliances with experienced NGOs | Mobilization of public opinion in favour of your case |
| When 2 NCPs involved, they should work together | Level of confidentiality needs to be better defined |
| MNEs have different operating standards. Strict guidelines in home-based countries but not in South | Better partnership and shared concerns/ goals between partners in South & North |
| Research on re-defining role of | Selection of NCPs: where the |

| | |
|---|--|
| MNEs in Southern countries | violation is taking place or in the country of the violating company |
| Parallel efforts as well as OECD guidelines process | |
| Interactive website to inform NGOs about what is going on | |
| More access to information from Southern governments | |
| Media needs targeting to promote processes | |

The advantages and disadvantages of the Guidelines

| Advantages of Guidelines | Disadvantages of Guidelines |
|---|--|
| Governments agreed on them. Can illustrate the case for binding rules | Voluntary nature plus no timeline, weak interpretation etc |
| Expose detail of weaknesses of governments | Vagueness and exemptions (where governments already give them) |
| Another tool for leverage/ publicity | Monitoring and verification weak/lacking |
| Generate responses from companies/ governments | Not a blueprint for binding regulations |
| Can be positioned as binding (just not legally so) | Don't stand alone as a tool |
| Preventative use - raising cases has future value | Uncertain outcomes |
| Can be linked to realities on the ground (incl. possibility of working to solve problems and keep jobs) | Don't stop "Race to the Bottom" |
| | Governmental exemptions/ incentives |
| | A political compromise |
| | Confidentiality clauses and restrictions on publicity |
| | Don't question the fundamental economic contribution of MNEs |

The functioning of NCPs

| Country | Functioning of NCPs |
|---------|--|
| UK | 1 person in Department of Trade and Industry: no consultations, transparency. Need for NGOs to push NCP to do a lot more |
| US | Department of State, Office of Investment Affairs. 5 cases filed by trade unions. Up to now no action taken. Recent corruption cases have been linked and are on website |
| Germany | Not clear who is the NCP. Ministry of EC and Labour has the lead. Working group - ministries, trade unions, employers & NGOs - has an advisory role. Three cases filed by NGOs |

| | |
|-------------|---|
| Mexico | Department within Ministry of Finance. Dealing with TU case transferred from Germany. Don't do anything and no information sharing |
| Argentina | Ministry of Foreign Affairs - very low dept in government No information, no contact |
| Ghana | No NCP , made aware of Guidelines by NGOs. Embassies from OECD countries could raise awareness |
| Netherlands | Ministry of Economic Affairs. Consultation with trade unions and NGOs separately. Only for sharing information. Legitimising process. |

Supply chain responsibility

| Issues | Action |
|--|--|
| Need to look at MNEs patterns of behaviour | There is a need to pool resources as small NGOs don't have resources |
| NCPs need to take their responsibility seriously | NCPs should assist with research required |
| Investment versus trade | Need to avoid being dragged into this |

Session 4: PANEL - The Guidelines: problem or solution?

In the evening there was a panel discussion on the pro's and con's of the OECD guidelines. There were short presentations from panel members followed by questions and discussion. The panel was Matt Phillips, FoE Wales and Northern Ireland (ENWI); John Evans, General Secretary of the Trade Union Advisory Committee to the OECD (TUAC); André Driessen, Deputy Director, International Economic Affairs of the Confederation of Netherlands Industry and Employers VNO - NCW; and Rien Sikkel, Chair of CIME and coordinator of the Dutch NCP

Matt Phillips argued that the OECD Guidelines are limited in what they can achieve and the process is very uncertain. He looked at the wider picture of campaigning which only brings success at the local level and argued for the need to drive a bigger picture of global change which needs binding international rules. He expressed concern about pursuing lots of cases through the OECD Guidelines and the danger that we will only get a whole set of ambiguous outcomes that don't give us any big change to the global development model.

John Evans said that he was encouraged that NGOs are beginning to think about how to use the Guidelines. He proposed that the Guidelines should be established as a bench-marking tool for other government policies. They should also get benchmarked into trade union framework agreements.

John felt worried for a number of reasons. There is no critical mass of active NCPs; awareness is low and NCPs are not mentioned in government meetings; CIME is slipping backwards for example, re-editing reports to take out any reference to company names. And members want to discuss the supply chain issue at the next meeting.

What do we do now? Maybe it's time to go above CIME to work with government groupings with political mandates. There is a need to use the NCPs to get messages through in the post-Enron era. The output end needs to link up with the constitution end.

André Driessen was involved in the review process through BIAC, the Business and Industry Advisory Committee to the OECD. He sees the Guidelines as a two way process and doesn't relate to them as a problem, he sees them as a solution.

He sees the Guidelines as a good frame of reference for companies trying to balance profit and impacts. The Guidelines are recommendations to business (not NGOs or governments) and the concept of trust is important. It is a consensus.

André concluded by saying that the debate can continue but the Guidelines should be used for what they are - they are a compromise. If we only focus on enforcement a whole part of the Guidelines will be lost.

Rien Sikkel wants to make the Guidelines a global instrument and this meeting shows that many are trying to get familiar with them. He accepts that the Guidelines are not a perfect instrument - they were devised through a process of negotiation and they are a compromise. But they are a unique instrument with something in them for everybody. There are clear rules and level playing fields providing a forum for discussion and the NCP mechanism. They are not a solution, they are an opportunity.

Discussion

There were a number of questions and comments about the problems NGOs and trade unions have faced when bringing cases to NCPs and about the lack of clarity over procedures and status of NCPs. There was a question about the Netherlands position on applying the Guidelines to export credit subsidies which had been opposed by CIME and another about the Chilean case which had been transferred from the Dutch NCP to the Chilean one.

John Evans:

On lack of effectiveness of NCPs - there has to be more commitment from OECD on this. There is a major problem of getting NCPs to function. We need to deal with where we are at the moment - business has to apply these guidelines but they are government expectations and to this extent they are more than voluntary initiatives. The Guidelines can be a useful tool to make change. If this isn't translated into action soon the impetus will be lost. John feels that they could be translated into some binding legislation.

André Driessen:

How do you get more business organisations to promote the Guidelines? There is a North-South divide and a Transatlantic divide (US companies come from a very legalistic structure and find it difficult to say anything about the Guidelines). BIAC has a constructive role. It has a Guidelines reference guide on its web-site.

We are not against enforceable standards but if the Guidelines had been drafted as binding global instrument we would have been left with 10% or even 1% of the text.

Why were we so against the proposed Dutch Government linkage with export credit subsidies? If all the countries agreed that the Guidelines were voluntary, asking companies to sign something to qualify for the subsidy conflicts with this voluntary nature.

Rien Sikkel:

Non active National Contact Points need pressure from all sides. CIME wrote to all embassies where NCPs weren't working. On the question about the Dutch NCP sending the case to Chile, the rules are that the case should be heard in the country where the problem originates. He added that the Dutch NCP has been working with the Chilean NCP informally.

There was a further question on the situation in the Congo and the recent UN report listing 83 companies violating the Guidelines. What are the different NCPs doing?

The response was that although the UN panel lists enterprises, there is no detailed information in the report. They are establishing a procedure about how to exchange information and those asked to supply this have a deadline of March 31. This will be extended. The UN panel has been invited to the next CIME meeting in April to meet with NCPs in the countries involved.

There were also some discussions about the use of the Guidelines in non-OECD member countries where companies from OECD countries violate the Guidelines. Although those affected can take their complaint to the NCP in the companies' home country, the point was made that groups in the South need to use connections with groups in the North to do this effectively. John Evans remarked that about a third of the current cases relate to non-OECD countries. Trade unions are trying to use the Global Union federations as channels for making complaints.

Friday 21 March

Session 5: Working Groups - Assessment of concrete cases of the participants in relation to their activities

The morning session was spent with participants working in four groups - a Spanish speaking group, two English speaking groups and a Franco-phone group. Each group looked at the experience of participants who had brought cases and at whether the Guidelines had been a useful campaign tool.

The groups were asked to consider their priorities in campaigning for corporate accountability; and the options for addressing corporate accountability, corporate crime and misbehaviour inside and outside the OECD Guidelines.

The following countries with cases were represented within the groups: Mexico, Chile, UK, Ghana, South Korea, South Africa,

Cambodia, Cameroon, Democratic Republic of Congo, Togo, Haiti, Zambia, US.

Session 6: Panel - Presentation by participants from the South and from Eastern Europe on their experiences both with and without the Guidelines

In the afternoon there were more showcase presentations from the South and Eastern Europe. Two trade union cases were presented and participants were also able to hear about and discuss two further cases where NGOs were considering filing complaints with NCPs.

Trade Union cases:

Vladimir Matousek: CMKOS Czech-Moravian Confederation of Trade Unions

(Trade Union Case 7 in the Reader)

Cases filed during 2001 and resolved during 2002

Many disputes were occurring in the Siemens factories and although trade unions were recognised, the management was obstructing workers' rights to representation and collective bargaining. Trade Unions were not recognised in the Bosch factories who were threatening to move and to fire people if a trade union was formed.

Outcomes:

The cases eventually went to the Czech Republic NCP (who also consulted the German NCP) and both cases were settled after the companies agreed to negotiate and take part in a social dialogue. The NCP was central to the outcome as it offered a forum for everyone to meet. Siemens sacked the top level management and trade unions were able to sign collective agreements with both companies.

Jesús Torres Nuño, SNRT (Sindicato Nacional Revolucionario de Trabajadores de Euzkadi) trade union from Mexico - The Case of Continental Tyres

A company taken over by Continental Tyres in 1998 resulted in a huge deterioration in working conditions. The union could not accept this so Continental decided to close down the factory. Despite the closure the workers decided to strike to guarantee that their rights were respected. The government called it a strike "without merit".

The union is still fighting to get the factory re-opened and think that this was a political issue because they were the only free trade union that existed in Mexico in the corporate sector.

The union went to Europe for help and solidarity and decided to file a complaint with the Mexican and German NCPs. The case is still active.

Two possible new cases:

Avena Bhikha of the *South Durban Community Environmental Alliance (SDCEA)*, South Africa and Samuel Nguiffo of the *Center for the Environment & Development, FoE* Cameroon, presented two possible

new cases. Amongst others, the relation between World Bank policies and the OECD Guidelines was discussed.

Session 7: Representation of NGOs at CIME and at National contact Points

This session with **Pieter van de Gaag**, Northern Alliance for Sustainability (ANPED), gave the background to NGO involvement with the revision of the Guidelines and to their engagement with OECD.

NGO engagement with OECD began with negotiations over the Multilateral Agreement on Investment (MAI) and continued in Seattle (WTO). As a result of this they began to be seen as a force, and although they were not generally agreed with within the OECD, they brought in new information and perspectives.

When the review process started for the OECD Guidelines, CIME proposed that NGOs form a representative committee like TUAC or BIAC. NGOs made the decision to organise in a working group under the Taskforce on Business and Industry (ToBI) which never claimed to be representative.

NGO discussion established a core group of "negotiators", which met prior to every CIME meeting to thrash out difficulties, draft text and procedures. CIME met prior to each formal meeting with all interested stakeholders to discuss outcomes. It should be added that there was disagreement within the NGO community about involvement with the OECD and the usefulness of negotiations for Guidelines which remained non-binding.

Now that the review is over, CIME has continued with consultations but there is still little interest from NGOs. So what next? CIME is still willing to consult and the OECD Secretariat is still willing to cooperate on agenda setting. A needs analysis needs carrying out by NGOs together with further cooperation between the groups. More cases need bringing and more NGOs need to attend CIME.

NGO cooperation and the idea of an OECD Guidelines Watch

The session continued with **Joris Oldenziel**, SOMO talking further about NGO cooperation. He proposed an OECD Guidelines Watch which would coordinate NGO activities around the Guidelines.

Possible functions would include:

- Networking - organising meetings, email lists etc
- Representation of NGOs at CIME including lobbying and issuing statements
- Assistance to NGOs filing cases
- Collect information about, experiences with cases
- Offer training on using the OECD Guidelines as a tool

Next steps:

- draft proposal for funding, plan resources required etc.

After some discussion, the vast majority of participants voted in favour of continuing to use and develop the OECD Guidelines as an instrument in the toolbox for campaigning.

Saturday 22 March

Session 8: STRATEGIES FOR THE FUTURE

In the final session groups discussed strategies and proposals for taking work forward. Several groups looked at OECD issues including: NGO participation at CIME; improved functioning of NCPs; setting up networking and a database for information sharing; and a support structure for organisations filing complaints using the Guidelines.

Other groups, reflecting the expectation that a large number of participants will consider using the Guidelines as one of a range of tools to work on corporate accountability, looked at the wider context of successful campaigning and the trade and investment debate.

Specific working groups were formed, based upon the following issues:

- * the Guidelines, trade & globalisation;
- * Participation at CIME;
- * Improving the functioning of National Contact Points;
- * Networking and a database of MNE cases;
- * Support for groups filing cases;
- * Supply chain issues

In addition, one group looked at the practicalities for the **OECD Guidelines Watch proposal** which would coordinate NGO activities around the Guidelines. They came up with a structure and time frame, which was agreed, and the steering group was mandated to start work under the working title of 'OECD Watch'.

Concluding Remarks of the meeting

Myrthe Verweij of FOE NL thanked all participants for participating in an inspiring and informative meeting. She expressed the hope that the meeting was the beginning of a long term and sustainable relationship of working on corporate accountability issues.

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