

PROCEDURAL GUIDELINES FOR HANDLING SPECIFIC INSTANCES – NCP NORWAY

The *OECD Guidelines for Multinational Enterprises*¹ (MNEs) (hereinafter called the Guidelines) are recommendations on responsible business conduct addressed by governments to multinational enterprises. The Guidelines describe good practice for all types of enterprises in all sectors and are based on internationally recognised standards. The Guidelines contain recommendations regarding disclosure; human rights; employment and industrial relations; the environment; bribery, and extortion; consumer interests; science and technology; competition and taxation. OECD member countries and other countries adhering to the OECD Guidelines are required to establish National Contact Points (NCPs) to promote the Guidelines, handle enquiries, and contribute to the resolution of specific instances related to companies' implementation of the Guidelines.

The Norwegian NCP (hereinafter called the NCP) was reformed and strengthened in 2011 and has four independent expert members and a secretariat. Together, they handle specific instances and conduct promotional activities regarding the Guidelines. The Ministry of Foreign Affairs has administrative responsibility for the NCP. This memo describes the four stages of the NCP's handling of specific instances. The Guidelines provide general guidance,² while these procedural guidelines provide a more detailed overview of the NCP's case processing.

BACKGROUND

TERMINOLOGY

NCP	National Contact Point for the OECD Guidelines for Multinational Enterprises
Company	The multinational enterprise against which the complaint is made
Complainant(s)	The party or parties who submit(s) the complaint in a specific instance
Parties	The complainant(s) and the enterprise being complained against in the specific instance
The Guidelines	The OECD Guidelines for Multinational Enterprises

¹ <http://responsiblebusiness.no/retningslinjer>

² OECD Guidelines, Part II, Procedural Guidance

Specific instance A complaint/enquiry that is submitted to the NCP concerning a company's alleged failure to comply with the Guidelines; the terms "specific instance" and "complaint" are synonymous

WHO CAN FILE A COMPLAINT?

According to the Guidelines, any "interested party" can file a complaint with the NCP. The complainant may for example be a local community affected by a company's activities, employees, a trade union, or an NGO. A complaint can also be filed on behalf of other identified and concerned parties. The complainant must have a legitimate interest in the matter, and certain requirements apply concerning the content of the complaint; see below under "Deciding whether the case merits further consideration" for further details.

The complaint form and further information are available on the NCP's website:

<http://www.responsiblebusiness.no/en/assessment-of-complaints/how-to-submit-a-complaint>

THE NCP'S ACTIVITIES

KEY PRINCIPLES

The NCP is intended to contribute to resolving issues relating to compliance with the Guidelines. This is to be done in a manner that is in keeping with the principles and standards set out in the Guidelines:³

- **Transparency.** The NCP will seek to strike a balance between transparency and confidentiality in accordance with the Guidelines and the requirements of the Norwegian Freedom of Information Act (2009).⁴
- **Accessibility.** The NCP will facilitate access to its good offices by businesses, labour and employer organisations, NGOs and other members of the public. The NCP will respond to all legitimate requests for information, and seek to deal with specific issues raised by parties concerned in an efficient manner.
- **Impartiality.** The NCP will ensure impartiality in the resolution of specific instances. The NCP is subject to the impartiality provisions of the *Public Administration Act* (1967).

³ See the OECD Guidelines, Part II, Procedural Guidance, Commentary Section (hereinafter called "the Comments") 9 and 22.

⁴ The Norwegian Freedom of Information Act, see Section 2, applies to all public administration, including the activities of the NCP and the secretariat. The main rule set out in Section 3 of the Act is freedom of information, and the NCP cannot make agreements that are not in accordance the main rule that documents are public. Various considerations may nonetheless indicate that some NCP documents should be exempt from public disclosure. The OECD Guidelines emphasise the need for confidentiality in the handling of complaints. Information that could constitute trade secrets may be subject to a duty of confidentiality, and must therefore be exempt from disclosure pursuant to the Norwegian Freedom of Information Act Section 13, cf. the Public Administration Act Section 13 first paragraph (2). Source protection to ensure the NCP's future access to information, as well as considerations relating to the source's personal security, may also require exemptions to be made. According to the Freedom of Information Act, a public agency can deny disclosure of documents that are prepared for the agency's internal administrative procedures (Section 14 first paragraph).

- **Predictability.** The NCP will ensure predictability by providing clear and publicly available information on its role in the resolution of specific instances, including information about the stages of the complaint process with indicative timeframes, and the potential role the NCP can play in following up agreements reached between the parties.
- **Equitability.** The NCP will ensure that it is possible for the parties to engage in the process on fair and equitable terms, for example by providing reasonable access to sources of information relevant to the procedure.
- **In keeping with the guidelines.** The NPC will ensure that agreements entered into through dialogue or mediation conducted or facilitated by the NCP are in keeping with the Guidelines.
- **Based on dialogue.** The NCP will offer a forum for discussion and assist the business community, labour organisations, other non-governmental organisations and other parties concerned to deal with the issues raised. The NCP will seek to resolve the issues in dispute through dialogue, and, if relevant, through conciliation or mediation.

The NCP depends on the parties to the process cooperating in good faith, however. Among other things, that means⁵ to respond on time, to maintain confidentiality where necessary, to refrain from giving inaccurate descriptions of and making threats or initiating reprisals against other parties to the process, and to engage in the process with a sincere wish to arrive at a solution. Failure to cooperate with the NCP is not in keeping with the expectations set out in the Guidelines and will be emphasised in the final statement, if one is issued.

GENERAL INFORMATION ABOUT THE STAGES IN THE NCP'S HANDLING OF SPECIFIC INSTANCES

There are three stages in the NCP's handling of specific instances, and an opportunity for follow-up:

	Activity	Timeframe ⁶	Publication
Stage 1	<p>Initial assessment</p> <p>Confirmation of receipt of complaint and forwarding to the company</p> <p>Decision on whether the complaint merits further consideration or is rejected</p>	<p>Within ten working days after receipt of the complaint.</p> <p>Within three months after receipt of the complaint</p>	<p>This stage is concluded by the NCP publishing its decision to consider or reject the case. Normally, the NCP will then also make public the complaint and any response from the company. Before this, the NCP will normally not make any information in the case public.</p>
Stage 2	<p>Dialogue/Mediation OR examination</p>		<p>The NPC makes public information about the process;</p>

⁵ Comment 21

⁶ The deadline starts running when the NCP as a collegial body receives the complaint for assessment, see Comment 40.

	<p>Mediation with a view to achieving a joint statement/agreement between the parties. The parties are encouraged to include concrete follow-up measures and state their opinion about what role, if any, the NCP should play in a follow-up process.</p> <p>If mediation is declined or is unsuccessful, the NCP will examine the case and make recommendations if relevant.</p>	<p>Within a further 6–12 months, with a possibility of extension to obtain facts, or if extension is otherwise deemed to be expedient</p>	<p>that dialogue/mediation/examination is under way and information about any external mediators, but not about the content of the proceedings. The parties normally agree to maintain confidentiality for the duration of the dialogue/mediation.</p>
Stage 3	<p>Final statement</p> <p>Drafting the final statement</p>	<p>Within a further three months</p>	<p>Normally issued together with a press release. If dialogue/mediation was successful, normally at the same time as the agreement between the parties is made public.</p>
Optional Stage 4	<p>Follow-up</p> <p>Parties to the case are given the opportunity to submit an evaluation of the NCP's handling of the specific instance etc.</p> <p>When mediation results in a joint statement, the NCP invites the parties to a follow-up meeting.</p> <p>When the NCP has made recommendations in a final statement, it can invite the parties to a meeting to request their feedback on whether/how the recommendations have been followed up.</p>	<p>Within three months after the final statement</p> <p>Within a year after the final statement was entered into</p> <p>Within a year after publication of the final statement</p>	<p>Made public unless there is legal authority for exempting it from public disclosure in whole or in part.</p> <p>The NCP makes public that a follow-up meeting has been held. The agenda and any reflections by the secretariat/the NCP will normally be enclosed with the announcement.</p>

The NCP endeavours to handle specific instances of alleged failure to comply with the Guidelines in an efficient manner. The goal is to complete the entire process from receipt of a case to publication of a final statement within 12 months, with the possibility of extension to up to 18 months. The parties are urged to comply with deadlines set by the NCP. Failure to cooperate could result in the NCP making its decision without relevant information. The NCP can make exceptions from the deadlines if that is deemed to be beneficial to the process and outcome. The NCP will then report such delays to the parties concerned, explain the reasons behind the decision and provide a revised timetable.⁷

⁷ The Guidelines recognise that it could be necessary to extend the time frame if the situation so indicates, for example if the conduct that the case concerns took place in a country that does not adhere to the Guidelines.

After completion of stages 1 (initial assessment), 3 (final statement) and 4 (follow-up) of the process, the NCP secretariat will send the published documents to the OECD's Investment Committee for entry in the OECD's database of specific instances. The NCP also submits annual reports on the status for the handling of specific instances to the OECD's Investment Committee through the Common Reporting Framework for NCPs.

STAGE 1: INITIAL ASSESSMENT

"The NCP will: Make an initial assessment of whether the issues raised merit further examination and respond to the parties involved."

- OECD Guidelines, Part II, Procedural Guidance, Section (C)

CONFIRMATION THAT A COMPLAINT HAS BEEN RECEIVED

The NCP secretariat will confirm that the complaint has been received and forward it to the company named in the complaint. This is normally done within ten working days of receiving the complaint.⁸

DECIDING WHETHER A CASE MERITS FURTHER CONSIDERATION (INITIAL ASSESSMENT)

The NCP will first determine whether any members of the expert panel or the secretariat can be deemed to be disqualified⁹ from participating in the further consideration of the case on grounds of conflict of interest. The NCP will then assess the complaint: Does it meet the criteria below? If necessary, the NCP may seek the advice of relevant authorities and consult NCPs in countries relevant to the complaint. In its initial assessment, the NCP will¹⁰ take into account:

- Whether the Norwegian NCP is the correct entity to assess the complaint. In this context, the NPC will consider whether the complaint concerns a Norwegian company's activities or alleged conduct in Norway. If the complaint concerns other countries' NPCs, the NCPs concerned should consult with each other to agree on which one should lead the work to assist the parties.¹¹
- Whether the company subject to the complaint is a multinational enterprise.
- The identity of the party concerned and its interest in the matter. The complainant cannot be anonymous. If the complainant fears serious consequences if his/her identity is revealed, he/she should appoint a representative (for example a competent NGO) to represent the complainant in dialogue with the company and the NCP. Without knowing the complainant's identity or having a representative of the complainant to relate to, it is

⁸ *Stage 1:* The company will be invited, but not expected, to submit its comments on procedural aspects of the claim to the NCP by a set date. *Stage 2:* The parties will be invited and expected to substantiate their claims with material and procedural information on the request of the NCP.

⁹ See voluntary declarations from NCP members that exceed the legal requirements, for example as regards conflicts of interest, impartiality and confidentiality: www.responsiblebusiness.no

¹⁰ See Comment 25

¹¹ See Comment 24

not possible for the NCP to determine whether the complainant has a legitimate interest in the case, nor can it facilitate meaningful dialogue between the parties.

- Whether the complaint is material and substantiated.
A complaint must be substantiated in order for the NCP to assess whether it merits further consideration. The complainant is requested to substantiate the case with facts as far as possible. It is preferable to include copies of original documents/first-hand accounts rather than describing such documentation. The case must also be material and concern an issue covered by the Guidelines.
- Whether there is a link between the activities of the company subject to the complaint and the issue raised in the specific instance.
- The relevance of applicable law and procedures, including court rulings.¹²
- How similar issues have been or are being handled in other domestic or international proceedings.
- Whether the consideration of the specific instance would contribute to the purposes and effectiveness of the Guidelines.¹³

If the above criteria are deemed to be met to a sufficient degree, the NCP will accept the case for consideration. At this stage, the NCP has not reached a conclusion as to whether or not the company subject to the complaint has acted in a manner that warrants criticism. If the criteria are not met, the case will be rejected. Either way, the NCP will make public its conclusion from the initial assessment (see the following section). If the parties reach an agreement or the complaint is withdrawn before the NCP has issued an initial assessment, the NCP will conclude its consideration of the complaint.

PUBLISHING A DECISION TO ACCEPT THE CASE FOR CONSIDERATION

When the NCP decides whether or not to accept the case for consideration, it will draft an initial assessment. The initial assessment, which will be made public in its entirety, will usually include:

- The names of the parties.
If the case is rejected and a written request has been submitted, the NCP can consider not naming the parties.¹⁴ The NCP will always comply with the relevant legislation, including the *Freedom of Information Act*.¹⁵
- The substance of the complaint, including reference to the relevant portions of the Guidelines.
- A summary of the process to date.
- The reasons for accepting or rejecting the complaint, including:
 - Which parts of the complaint are found to be within and outside the scope of the Guidelines;
 - A statement emphasising that acceptance of a complaint for further consideration does not mean that the company subject to the complaint has acted in a manner warranting criticism;

¹² See Comment 26.

¹³ See Comment 25.

¹⁴ See Comment 32

¹⁵ The NCP will consider the need to preserve the confidentiality of sensitive business information, the identity of the parties and other information in accordance with the Freedom of Information Act.

- An outline of the next stages in the NCP's complaint procedure.

The draft initial assessment will be sent to the parties, and they will be invited to submit comments within ten working days. The NCP will decide at its own discretion whether or not to incorporate any comments received. The initial assessment will then be sent to the parties and published on the NCP's website.

STAGE 2: MEDIATION OR EXAMINATION?

"The NCP shall offer a forum for discussion and assist the (...) parties in dealing with the issues raised (...)"

- OECD Guidelines, Part II Procedural Guidance (C)

MEETINGS WITH THE PARTIES

The preferred outcome when handling a specific instance is to reach agreement between the parties. When the NCP has decided to accept a case for consideration, it will offer its good offices to contribute to resolving the alleged issue. The NCP will help to ensure that it is possible for the parties to take part in the process and involve any other parties concerned, if relevant. The NCP will usually first offer to meet separately with each party to discuss the complaint. If the parties choose to proceed with the mediation, the NCP will, as a rule, convene a joint "pre-mediation meeting" to agree on the framework for the mediation process. At these meetings, the NCP will:

- Verify that the parties have the authority to move beyond the convening stage and to enter into binding commitments.
- Clarify the precise nature of the complaint and, if necessary, ask the complainant to present documentation, and ask the company for a response to the complaint.
- Clarify the neutral role of the NCP and the NCP secretariat's possibility of hiring an external consultant to fulfil its duty to provide guidance pursuant to the Public Administration Act Section 11. Such a consultant cannot represent either party, but should provide guidance to both parties as necessary.
- Explain how mediation will work if the parties choose this option, as well as the option of having the NCP conduct an examination, and any other options for handling the specific instance.

Following the initial assessment and meetings, and in consultation with the parties, the NCP will recommend mediation if that is deemed expedient. The alternative is for the NCP to examine the matter.

Sometimes, one or more of the parties may be sceptical about proceeding with dialogue/mediation even if the NCP believes that dialogue could be expedient. In such case, the NCP shall do its utmost to ensure that the parties understand the dialogue/mediation process, its purpose and the benefits of the parties endeavouring to reach agreement through dialogue/mediation instead of the NCP examining the case and issuing a final statement with recommendations for improvement.

MEDIATION

WHAT IS MEDIATION?

Mediation can be viewed as “assisted negotiations” between the parties in which a third party (the mediator) assists in an attempt to reach a settlement agreeable to both parties. The NCP will facilitate dialogue and propose solutions, but it is a voluntary process, so it must not put pressure on the parties to agree to mediation or accept a certain solution. The mediation can be undertaken by the NCP or by an external third party acceptable to both parties, see below. The NCP may also use other external expertise in the mediation in accordance with the Public Administration Act. For each specific instance, only one of the mediation courses will be selected.

NCP mediation

The NCP members can be made available as mediators in a matter, unless a conflict of interest exists or arises that could give rise to doubts about the member’s impartiality. In such case, the NCP member or secretariat member concerned will withdraw from further involvement in the procedure.

External mediator

In cases where an external mediator is used, the NCP will usually enter into a contract following a competitive tendering procedure. The NCP will then prepare terms of reference for the mediator and draft a list of possible mediators for the parties to comment on. The mediator must be approved by both the NCP and the parties. The mediator will be responsible for agreeing with the parties on the mediation methods and procedures, and for ensuring that any agreements arrived at through mediation are in keeping with the Guidelines. The NCP will request regular updates from the mediator. The mediator can seek advice from the NCP during the mediation process.

THE MEDIATION PROCESS

The mediator invites the parties to engage in dialogue to reach a solution to the matter underlying the complaint. The mediator guides the mediation process, proposes possible ground rules for mediation, prepares, distributes and retains relevant documents, ensures adherence to protocols and follows up confidentiality. The mediator will attempt to ensure that the parties act in good faith and will him/herself act in a manner that is impartial, predictable, fair and in keeping with the Guidelines.

- **Pre-mediation:** The mediator and/or the NCP secretariat will meet with both parties to prepare for the mediation. During these meetings, they will explore the issues, explain the mediation process and answer questions. The mediator will explain the voluntary nature of mediation, identify the objectives and interests of the parties, set forth possible courses of action and identify what is necessary for each party to see the mediation as successful. The mediator will ensure that the parties have the necessary authority to be involved in mediation on behalf of their organisation and where needed, identify additional parties. The parties will be reminded that the Guidelines are of a non-judicial nature, and that the dialogue can easily be “judicialised” if a lawyer serves as the

company and/or complainant's main representative during the mediation. It should therefore be made clear at the pre-mediation stage that the parties can be assisted by an external lawyer or other adviser if that is deemed expedient, but that the NCP recommends that someone else speaks for the parties during the mediation.

- The mediator must obtain written consent to participation from all parties through terms of reference agreed to by the parties and the mediator. The participating parties undertake to:
 - Show a genuine commitment to mediation and not view the mediation process as a means of gathering further information or as an opportunity to avoid addressing issues or being held accountable for their conduct.
 - Adhere to the agenda and not raise new issues not known to the NCP or the other party beforehand.
 - Observe confidentiality except to the extent that it is necessary to seek professional advice or guidance from within their organisation. In these circumstances, those consulted will be expected to observe confidentiality.
 - All parties should be aware of the effect any public statements may have on the mediation process.¹⁶ If a party fails to respect confidentiality, the mediator may discontinue the process.
- **The mediation period:** The mediator will keep in contact with and hold meetings with the parties aimed at reaching an agreement or mapping out a process of ongoing dialogue.
- **Mediated agreement:** A successful mediation process will conclude in the NCP (or the external mediator) drafting a mediated agreement to be signed by both parties, preferably at the highest level(s) of each organisation involved in the process. The agreement between the parties will be enclosed with the final statement on the process prepared by the NCP (see stage 3). The parties can decide that only parts of the agreement are to be published. If the mediated agreement only covers some of the aspects of the complaint, the NCP can examine those aspects where mediation failed. If the majority of the key concerns of the complaint were resolved through mediation and the parties do not wish for the NCP to investigate the remaining issues, this must be reflected in the mediated agreement, for example by the complaint being withdrawn.

Should mediation be rejected or fail, the NCP will begin further examination of the complaint.

EXAMINATION

If mediation is rejected or is unsuccessful, the NCP will examine the complaint to assess whether it is justified. If an NCP member has acted as mediator in the case, he or she will not participate in the further examination unless both parties consent. The NCP may use several methods at this stage:

¹⁶ See Procedural Guidance, Section C.

- **Information gathering.** The examination is likely to involve the NCP collecting further information or statements from the complainant(s) and the company. The examination may also involve further meetings between the NCP and the parties. In each case, the meeting will have an agenda and minutes will be taken. Unless a good case is made for information to be withheld, all information and documentation received by the NCP will be shared with the parties.
- **Seeking advice and guidance.** The NCP may also seek advice from other relevant government agencies, foreign service missions, Innovation Norway, Norad, the UN, the OECD secretariat, business associations, and labour/employer organisations, NGOs or other agencies. If the NCP deems it appropriate, it will seek independent expert advice.
- **Fact-finding and technical assessments.** The NCP may seek further information relating to the complaint from the concerned parties and relevant experts. This may include field visits and interviews with relevant authorities, trade unions, local communities and indigenous groups, or technical assessments.

The NCP shall keep the parties informed of which methods are used. At the conclusion of the examination, the NCP will review all the available information and come to a conclusion as to whether the expectations set out in the Guidelines have been complied with in full or in part or whether the conduct is deemed to constitute non-compliance. The conclusion is published in a final statement (phase 3).

STAGE 3: FINAL STATEMENT

“If the parties involved do not reach agreement on the issues raised, the NCP should issue a statement and make recommendations as appropriate.”

- OECD Guidelines, Part II Procedural Guidance (C) (3)

The process concludes with a final statement from the NCP, regardless of whether the mediation resulted in an agreement or not. The final statement will generally include:

- Details of the parties involved and the date on which the complaint was submitted to the NCP.
- Details of the complaint and which chapters/sections of the Guidelines the complainants claim have been breached.
- A summary of the process the NCP has followed, the extent to which the parties have been cooperative and participated in good faith, and the outcome of any mediation in the form of an agreement between the parties.
- The NCP will offer its good offices to the parties involved to follow up the mediated agreement or the final statement.

In cases where dialogue/mediation was rejected or was unsuccessful and the NCP has conducted an examination, the final statement will also include;

- An assessment of the reasons why no agreement was reached between the parties.

- The results of the examination of the company's compliance with the Guidelines, including the rationale behind each conclusion.
- Details of aspects of the complaint that the NCP believes to be ill-founded and that were not dealt with in the initial assessment.
- Where relevant, recommendations to the company on how to improve its conduct in accordance with the Guidelines and a deadline for submitting an update on follow-up of the recommendations.
- Where relevant, examples of good company practice consistent with the Guidelines.

Once the NCP has drafted the final statement, the parties will be given ten working days to submit comments. The NCP will, at its discretion, decide whether to incorporate any changes before sending the finalised statement to the parties and publishing it on the NCP's website. In order to foster public policy coherence, the NCP will inform relevant government agencies of its statements and reports when relevant.

OPTIONAL EVALUATION AND FOLLOW-UP

"If the NCP makes recommendations to the parties, it may be appropriate under specific circumstances to follow up with the parties on their response to these recommendations."

- OECD Guidelines, Part II Commentary on the Implementation Procedures (36)

In order to contribute to improving the NCP's handling of specific instances, the parties will be asked to evaluate the NCP's handling of the case. This should take place within three months after the final statement was issued.

If the mediation was successful, the parties will often agree on some forward-looking measures. In such cases, it is recommended that the parties, with the assistance of the mediator, incorporate into the mediated agreement as concrete measures and specific formulations as possible regarding what is to be done, by whom, and by which deadlines. This is to create predictability regarding what follow-up the parties expect. The agreement should also clarify the parties' expectations of the NCP in the follow-up process.¹⁷ As a rule, the NCP will take the initiative to invite the parties to a follow-up meeting within a year to ask the parties to report on how useful the agreement is and on their respective part of any agreed follow-up measures. After the meeting, the NCP will announce that the meeting was held. The agenda and any reflections by the secretariat/NCP will usually also be enclosed with the announcement.

In cases where mediation did not result in an agreement, but where the NCP issued a final statement containing recommendations to the company, the final statement may contain a deadline by which the parties must update the NCP on certain matters. For example, the company can be requested/encouraged to inform the NCP about its efforts, if any, to implement the recommendations.

Any follow-up measures should be implemented within a year after publication of the final statement.

¹⁷ Comment 34

USEFUL CONTACTS

Organisations that contribute to the follow-up of the Guidelines in the OECD and in Norway, and organisations that have been involved in specific instances handled by the NCP.

OECD Guidelines for Multinational Enterprises

www.oecd.org/daf/investment/guidelines
investment@oecd.org

Trade unions

Trade Union Advisory Committee to the OECD (TUAC)
www.tuac.org/en/public/index.phtml
tuac@tuac.org

Norwegian Confederation of Trade Unions (including Fellesforbundet)

www.lo.no
lo@lo.no

Unio

www.unio.no/no
post@unio.no

Confederation of Vocational Unions (YS)

www.ys.no
post@ys.no

[Federation of Norwegian Professional Associations \(including Tekna – the Norwegian Society of Graduate Technical and Scientific Professionals\)](#)

www.akademikerne.no
post@akademikerne.no

Business organisations

The Business and Industry Advisory Committee to the OECD (BIAC)

www.biac.org/
biac@biac.org

Confederation of Norwegian Enterprise (NHO)

www.nho.no
firmapost@nho.no

Virke (the Enterprise Federation of Norway) www.virke.no

info@virke.no

Non-governmental organisations (NGOs)

OECD Watch

www.oecdwatch.org
info@oecdwatch.org

ForUM for Environment and Development, Norway (including Amnesty International Norway, the Future in our Hands, Friends of the Earth Norway, the Norwegian Support Committee for Western Sahara)

www.forumfor.no
forumfor@forumfor.no