



The control of the Landing Obligation in France

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Key findings

- Reporting obligations for French fishers with respect to the landing obligation were not fully implemented until 2019, after more than four years' delay.
- Until 2019, no infringement of the landing obligation was sanctioned by the French authorities, indicating that this obligation is not enforced in the waters.
- French authorities are planning to implement a pilot project to use Remote Electronic Monitoring to control the landing obligation. This move is welcome and should be encouraged.



1. Introduction

Introduced in 2013 in the Common Fisheries Policy (CFP) Basic Regulation,¹ and gradually implemented since 2015, the landing obligation (the obligation to land all catches subject to catch limits and, in the Mediterranean Sea, to Minimum Conservation Reference Sizes – including the ones which were previously discarded) has shifted the focus of operations to control fishing from land to sea. It has been fully in force since 1 January 2019 and the extent and consequences of its implementation are still to be precisely measured.

In France, as in any other EU Member State, the control of the implementation of the landing obligation raises a number of questions related to the reliability of the data now reported by fishing operators, to the efficiency and adequacy of the means used to monitor and control it and to its effective enforcement.

These questions are addressed and discussed below, in two separate sections, each of them relating to one crucial aspect of the control of the landing obligation:

- The operational control of the landing obligation, which comprises both the reporting requirements now applicable to fishing operators and competent authorities and the control activities themselves carried out by the French authorities;
- The enforcement of the landing obligation, which encompasses the legal framework in place to sanction infringements to the landing obligation and its implementation in practice.

Various sources of information have been used to prepare this report:

- Information publicly available through desk-based research;²
- Information received by ClientEarth following access to information requests sent to the French Maritime Fisheries and Aquaculture Directorate in September 2018³ and in April 2019;⁴
- Information contained in the annual reports that Member States have to submit to the European Commission on the implementation of the landing obligation from 2016 to 2020.⁵ In the case of France, the only report available is the 2016 one.⁶ It seems that since then, the French competent authorities have not fulfilled their reporting obligations under Article 15 of the CFP Basic Regulation;
- Information gathered through discussions or interviews with persons working on the implementation and control of the landing obligation in France.



2. Operational control of the Landing Obligation

2.1 Reporting requirements

The main difficulty with the operational control of the landing obligation lies with the fact that it is an obligation subject to many derogations. According to Article 15 of the CFP Basic Regulation, it applies only to catches of species subject to catch limits and, in the Mediterranean, to catches subject to minimum sizes, with further exemptions for, *inter alia*:

- Species in respect of which fishing is prohibited and which are identified as such in a Union legal act adopted in the area of the CFP;⁷
- Species for which scientific evidence demonstrates high survival rates, taking into account the characteristics of the gear, of the fishing practices and of the ecosystem;
- Catches falling under *de minimis* exemptions;
- Fish which shows harm caused by predators.

High survival and *de minimis* exemptions are found in so-called discard plans, adopted at the EU level through Commission delegated regulations on the basis of joint recommendations from the regional Member States, and whose list is available on the Commission's website.⁸ Many of these exemptions are applicable to French vessels.⁹

With so many exemptions, there is a need for accurate reporting of catches and discards by fishers and, at the subsequent stage, by competent authorities, to ensure that:

- The data communicated to scientific institutes is complete and enables the production of reliable scientific assessments and catch advice, which form the basis of good fisheries management;
- The implementation of Article 16(2) of the CFP Basic Regulation, which makes it an obligation to set fishing opportunities based on catches rather than on landings when the landing obligation is introduced in respect of a stock, does not lead to overfishing because unreported discards are not taken into account when setting catch limits;
- Data cross-checks can be performed by the competent authorities to verify if catches retained on board or discards are legal.



Data reporting requirements for fishers are found in the EU fisheries Control Regulation ('the Control Regulation'),¹⁰ and its subsequent implementing legislation.¹¹ When it comes to reporting requirements, a distinction has to be made between fishing vessels depending on their overall length. Vessels above 12 metres' length overall are required to use an electronic logbook to report their catches, whereas vessels between 10 and 12 metres' length overall can report using a paper logbook and vessels below 10 metres' length only have to report if their flag Member State decides so.¹² In France, fishing vessels below 10 metres' length have to report their catches on paper, using a simplified version of the fishing logbook called "fiche de pêche".

Under EU law, for vessels above 10 metres' length overall or more, quantities of each species caught and kept on board above 50 kilogrammes of live-weight equivalent must be recorded.¹³ This includes quantities of fish which were previously discarded and now have to be landed. In addition, all discards above 50 kilogrammes of live-weight equivalent for species not subject to the landing obligation have to be recorded as well as any discard of prohibited species, or of species for which one of the following exemptions applies: high survival, *de minimis* or fish showing damage caused by predators.¹⁴ According to the Control Regulation Implementing Regulation, the catches kept on board which are below the minimum conservation reference size shall be recorded separately in the logbook from the legally sized catches, using the code BMS.¹⁵ Estimates of discards shall also be recorded, using the DIM code for *de minimis* exemptions, and one overarching code (DIS) for all other discards.¹⁶

The software supporting the electronic logbook differs from one Member State to another (there is no unified EU standard in this respect) and the competent authorities of each flag Member State have to approve the software in each case before it can be used. In 2015, after the adoption of several amendments to align the Control Regulation and its Implementing Regulation with the landing obligation introduced through the CFP Basic Regulation, the French competent authorities had the legal obligation to ensure that fishers using the electronic logbook could report all their catches, reflecting the new obligations to include in their logbook data for the catches below the minimum conservation reference size kept on board (BMS code) and data about the catches discarded according to the *de minimis* exemption (DIM code). However, it was not until the end of 2017 that the French authorities started to progressively implement a new version of the software allowing fishers to comply with their reporting obligations under the Control Regulation. The deadline provided by French authorities to equip all fishing vessels above 12 metres with this updated version of the logbook was 30 April 2019.¹⁷

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This means that between 2015 and 2019, French fishers were reporting their discards without distinguishing the ones allowed under the *de minimis* exemptions and were unable to separately record their catches under minimum conservation reference size. The same situation applied to paper logbooks for vessels between 10 and 12 metres' length overall and for the simplified logbooks for vessels below 10 metres. A note circulated by the French competent authorities seems to imply that, as of early 2019, not all small-scale vessels were equipped with updated versions of the paper logbooks and simplified logbooks.¹⁸ It is not clear if other alternative reporting methods were used in the meantime to follow the implementation of the landing obligation. In one email exchange with ClientEarth, the French authorities have indicated that before 2019, the monitoring of the exemptions uptake was made according "to the order of magnitude". It is unclear what this means, but it **seems to indicate that no precise data was collected at that time.**

This explains why, in their reply to ClientEarth's access to information request, the French authorities could only provide the total quantity of reported discards for the years 2015, 2016 and 2017, as at that time, the logbooks used by French fishers did not allow a distinction to be made between discards made under the *de minimis* exemptions and the other ones. For the year 2018, data on the *de minimis* discards has been provided, but it is not clear to what extent this data is comprehensive or only covers the vessels which were equipped, at that time, with an updated version of the electronic logbook.¹⁹

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In order to incentivise French fishers to comply with their reporting obligations, the authorities have circulated a note in which they indicate that "the discards of today will be the quotas of tomorrow".²⁰ Their reasoning is based on the fact that, since 2019 and according to Article 16 (2) of the CFP Basic Regulation, for all stocks subject to the landing obligation, fishing opportunities will be fixed according to catches and no longer based on landings. Indeed, the Total Allowable Catches (TACs) and quotas set at EU level still have to include the landings of catches of a legal size but also now the previous discards, which progressively had to be landed. The part of the previous discards in the TACs and quotas is called "**uplift**" or "**top-up**" and the French authorities do expect that in the long-term, and with the introduction of more selectivity, this top-up part will become a permanent addition to existing TACs and quotas if it consists of fish of a legal size which could be sold for human consumption. This would in the end benefit the French fishers, who would sell these new products of a legal size at a better price than undersized fish which would have been previously discarded and are now subject to the landing obligation and destined for purposes other than direct human consumption. Not declaring (or keeping on board) its catches below the minimum conservation reference size would therefore in the end mean reducing the TAC set for that stock and, in turn, the national quota available to French fishing operators. Although the French authorities describe briefly in the note which mechanism will be used to share this quota increase between fishing operators, they also indicate that this process will not be used in 2019, "**in light of the circumstances**", **without further detailing what these circumstances are.**

The perverse effect of this quota top-up or uplift mechanism is that it could potentially lead to overfishing if compliance with the landing obligation is poor. Indeed, if discarding still takes place at more or less the same rate than before and if fishers do not declare their illegal discards, but also, at the same time, land their total share of their quotas, top-ups included, this means that in the end, the top-up part will be additional to what was previously fished in the years before 2019 – at a time when many fish stocks are still overfished in EU waters. Illegal discards, not reported, will not be fully taken into consideration by scientists in their stock assessments and in the scientific advice they provide to decision-makers. As a result, TACs and quotas will be set at levels too high to reach the Maximum Sustainable Yield (MSY) objective enshrined in Article 2(2) of the CFP Basic Regulation.

“ If discarding still takes place, but illegally and unreported, it will not be fully taken into consideration by scientists in their stock assessments and in the scientific advice they provide to decision-makers.

The note from the French authorities also provides additional incentives on why reporting only catches below the minimum conservation reference size which were previously discarded and also discards made under exemptions to the landing obligation. It underlines that if these exemptions do not appear to be used, they could well be suppressed in the following years. In addition, if discards are not reported by French operators, other Member States could ask to use these flexibilities for their own operators, an approach which would in turn weaken the French share of the EU quota (the relative stability key mechanism).

Incentivising fishers to comply with the landing obligation is a strategy that is only valid if it is accompanied by strong safeguards ensuring that there is indeed compliance on the ground. The following sections aim to shed some light on this issue.





2.2 Control on the ground

With so many exemptions, the landing obligation is quite complex to control and, as indicated above, requires that inspecting authorities shift their attention from landing sites to fishing operations at sea.

Traditional means of control available to French authorities in this respect would involve inspections at sea, control observers and cross-checks of data (for example, cross-checks between logbook data and sales notes data). A previous case study conducted by ClientEarth on the control and enforcement of fisheries in France has shown that in the past years, the number of inspections at sea has remained quite stable or even decreased.²¹ There is no indication that this figure will increase in the next years. French control authorities have rather indicated, in their reply to ClientEarth's access to information request, that they have two other priorities:

- Controlling the respect of the fishers' reporting obligations under the landing obligation (2019 priority);
- Targeting the vessels at higher risk of not respecting the landing obligation during inspections at sea, after a risk assessment has been carried out (to be implemented from the end of 2019). Rather than increasing the number of inspections at sea, the French authorities will therefore apply a risk-based approach to inspecting fishing vessels most at risk of not respecting the landing obligation.

In their reply to ClientEarth's access to information request, the French control authorities have indicated that the written instructions given to fisheries inspectors with respect to the control of the landing obligation could not be communicated due to operational reasons. This seems to indicate that such specific instructions were, at the very least, prepared and circulated.

Whereas the replies provided in the reply to the access to information request indicate that developments are ongoing to better control the implementation of the landing obligation in France, it is quite worrying that they come so late. The landing obligation has been gradually phased in since 2015, and there is no indication that before 2019, the specificities linked to its control were taken into consideration in the French inspection plans. This also has to be considered in the context of the delayed implementation, in France, of the specific reporting obligations linked to the landing obligation. Indeed, as electronic and paper-based logbooks were not updated for all French vessels until mid-2019, it was extremely difficult for inspectors to perform data analysis and cross-checks of data to verify compliance with the landing obligation.

2.3 Possible future developments

In their 2016 report on the implementation of the landing obligation, the French competent authorities indicated that they had envisaged the installation of cameras on board some French pelagic vessels classified as being at very high risk of not respecting the landing obligation and that they were developing further analysis for the demersal fleet before taking decisions.²² It seems that this project was slowed by the entry into force of the EU General Data Protection Regulation (GDPR),²³ according to which this type of project has to go through a GDPR impact assessment before being authorised. The project is now back on track, as in their reply to ClientEarth's access to information request, the French authorities indicated that a pilot project on the use of REM to monitor the implementation of the landing obligation will be launched in 2020.²⁴ The development of such pilot projects to control the implementation of the landing obligation and beyond is a move welcomed by many civil society organisations.²⁵

3. Sanctions of infringements of the Landing Obligation

According to Article 90 of the Control Regulation, “the failure to bring and retain on board the fishing vessel and to land any catches of species subject to the landing obligation set out in Article 15” of the CFP Basic Regulation is a serious infringement of the rules of the CFP. If any such infringement is detected by the French competent authorities (the Maritime Affairs or the Gendarmerie Maritime for example), and if it fulfils certain criteria defined in French and EU law,²⁶ then it must be sanctioned with **“effective, proportionate and dissuasive administrative sanctions”** or alternatively, with criminal sanctions.²⁷ These sanctions, which can consist for example of a fine, are accompanied by the administration of penalty points.²⁸ The addition of penalty points received for various serious infringements of the rules of the CFP can lead to the suspension or withdrawal of the fishing licence. Penalty points also have to be assigned to the master of the fishing vessel who commits an infringement. According to the Control Regulation Implementing Regulation,²⁹ a failure to fulfil obligations to land undersized fish shall, since 1 January 2017, lead to the assignment of 5 penalty points.

Under French law, both administrative and criminal sanctions can be used, alternatively or in combination, to sanction serious infringements to the landing obligation.

The French Rural and Maritime Fisheries Code makes the breach of the landing obligation a criminal offence (punishable with a fine of a maximum amount of 22.500 Euros).³⁰ Accompanying sanctions can also be given by the judge and can consist of the suspension or withdrawal of the fishing licence or of the seizure of the fishing vessel or of the fish illegally caught for example.³¹

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Under the administrative system, infringements to the landing obligation can in theory be sanctioned by one or more of the following penalties:³²

- An administrative fine of a maximum of either (a) five times the value of the products obtained in violation of the rules or (b) 1,500 Euros when the first case is not applicable – which is likely to be the case if illegal discarding has taken place;³³
- The suspension or withdrawal of the fishing licence or of the fishing authorisation;
- The assignation of penalty points to the licence holder or to the master of the fishing vessel, as well as their registration in the national register of infringements. It was in 2015 that the Control Regulation and its Implementing Regulation were amended to introduce into EU law that infringement of the landing obligation was serious and should entail the assignment of 5 penalty points to the licence holder and to the master of the fishing vessel. The French law relating to that serious infringement has not been amended since 2014. However, reading Article R 946-9 of the French Rural and Maritime Fisheries Code, it seems that its paragraph 2³⁴ could apply to the landing obligation. In this case, points are assigned to the licence holder if one or several of the following conditions are met: (i) in case of a fishing operation for, a transshipment of, or the landing of a regulated or prohibited species for quantities above 100 kg or of more than 20% of the catch; (ii) in the course of a fishing operation outside French or EU waters; (iii) where there is a recording error of more than 20% in weight or in number of species regulated in the fishing logbook, the transshipment declaration, the transfer declaration or the landing declaration; (iv) the sales value of the catches realised in violation of applicable laws is of more than 10,000 Euros or represents at least 20% of the total value of the catches made in the course of the shipping trip in the course of which the infringements were committed. Only conditions (ii) and (iii) seem to be here clearly applicable in case of infringements of the landing obligation;
- The publication of the entire decision or of an extract of that decision.

A first access to information request made by ClientEarth in 2018 has shown that, for the year 2017 (the first year when infringements to the landing obligation were considered serious under EU law and had to be sanctioned), 0 serious infringements to the landing obligation were administratively sanctioned by the French competent authorities.³⁵ A follow-up access to information request made in 2019 gave the same outcome for the year 2018.³⁶ In their reply, the French competent authorities nevertheless note that “if no infringement to the landing obligation was characterised in 2018, the control of the respect [of the landing obligation] is a priority objective for the French administration”.

“ These elements seem to indicate that in France, at the moment, the landing obligation is not being enforced by the competent authorities.

No information is publicly available on the criminal sanctions which could have been applied by a judge for a serious infringement of the landing obligation.

These elements seem to indicate that in France, at the moment, the landing obligation is not being enforced by the competent authorities. The underlying reasons for this situation are not clear, but one could assume that the delayed introduction of the specific reporting requirements for the implementation of that obligation played a role in this, as it would have made the characterisation of any infringement more difficult. In addition, it should be noted that, in general, French authorities have been slow to fully implement the enforcement chapter of the Control Regulation,³⁷ and that the total number of serious infringements detected in France remains quite low (for example, 81 were detected in 2017 and only 55 were sanctioned, compared for example with the 805 serious infringements detected in Spain in 2014, out of which 404 were sanctioned with the administration of penalty points).³⁸

3 . Conclusions

Compliance with the landing obligation is the main concern raised regarding its implementation. In France, it seems that until now, the issue has not been fully addressed by the competent authorities. Indeed, there were more than 4 years of delay in the implementation of the reporting obligations for French fishers and the obligation seems evidently not enforced in the waters, since in 2017 and 2018, no serious infringement was detected and sanctioned by the French competent authorities.

One way forward to improve the situation would be the introduction of Remote Electronic Monitoring (REM) systems to, amongst other things, control the respect of the landing obligation at sea. First, at a time when budgetary constraints are often underlined by the French government as an argument to not increase the budget allocated to fisheries control, and notably to inspections at sea, this would allow economies of scale by

diminishing the number of patrol vessels and inspectors at sea needed to control the respect of this obligation. Then, it would also allow for a more efficient enforcement of the obligation itself. Indeed, infringements of the landing obligation take place at sea, and the only evidence available to administrative authorities or to judges is very often not robust enough to sanction them (logbooks or Vessel Monitoring System data for example). Video footage and data collected by REM systems would add to that and allow for enforcement to take place. Finally, REM systems would also make the data collected more reliable and allow scientists to provide sound scientific assessments and advice, making the setting and subsequent allocation of fishing opportunities more likely to follow the sustainability principles enshrined in the CFP Basic Regulation. In this respect, the development of pilot projects to introduce REM in France must be encouraged as a significant step in the right direction.





Endnotes

- 1 Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.
- 2 The publicly available documents used to prepare this report are referenced in footnotes throughout this document.
- 3 See: <https://www.documents.clientearth.org/wp-content/uploads/library/2018-12-05-reply-from-the-french-authorities-to-clientearths-access-toinformation-request-on-the-implementation-of-the-eu-fisheries-control-regulation-ext-fr.pdf>.
- 4 <https://www.documents.clientearth.org/library/download-info/Response-to-French-2019-LO-AIR-Request/>.
- 5 Article 15 (14) of the CFP Basic Regulation.
- 6 This report is available here: https://www.asktheeu.org/en/request/access_to_member_state_documents_2.
- 7 For the year 2019, these species are listed in Articles 14 and 50 of Council Regulation N° 2019/2014 of 30 January 2019 fixing for 2019 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Union waters and, for Union fishing vessels, in certain non-Union waters. 37 species are currently on this list.
- 8 See: https://ec.europa.eu/fisheries/cfp/fishing_rules/discards_en#Discard-plans.
- 9 A list of such exemptions for French vessels operating in 2019 in the South and North Western Waters, in the Channel and in the North Sea is available in Annexes 2 and 3 of the following document: https://www.comitedespeches-hautsdefrance.fr/wp-content/uploads/2019/03/2019-02-Me%CC%81mento-mise-en-oeuvre-OD_v9.pdf.
- 10 Council Regulation No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy.
- 11 Commission Implementing Regulation (EU) No 404/2011 of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 establishing a Community control system for ensuring compliance with the rules of the Common Fisheries Policy.
- 12 Articles 14, 15 and 16 of the Control Regulation.
- 13 Article 14 (1) of the Control Regulation.
- 14 Article 14(4) of the Control Regulation.
- 15 Annex X of the Control Regulation Implementing Regulation.
- 16 Ibid.
- 17 See: https://www.comitedespeches-hautsdefrance.fr/wp-content/uploads/2019/03/2019-02-Me%CC%81mento-mise-en-oeuvre-OD_v9.pdf, p.3.
- 18 See: <https://www.comitedespeches-hautsdefrance.fr/wp-content/uploads/2019/03/Guide-pratique-OD-%C3%A0-destination-des-professionnels.pdf>.
- 19 <https://www.documents.clientearth.org/library/download-info/Response-to-French-2019-LO-AIR-Request/>.
- 20 “Les rejets d’aujourd’hui feront les quotas de demain”, p.5 of: https://www.comitedespeches-hautsdefrance.fr/wp-content/uploads/2019/03/2019-02-Me%CC%81mento-mise-en-oeuvre-OD_v9.pdf.
- 21 See: <https://www.documents.clientearth.org/library/download-info/the-control-and-enforcement-of-fisheries-in-france/>.
- 22 See: https://www.asktheeu.org/fr/request/4283/response/13776/attach/13/FR.pdf?cookie_passthrough=1; page 2.
- 23 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and on the free movement of such data.
- 24 <https://www.documents.clientearth.org/library/download-info/Response-to-French-2019-LO-AIR-Request/>.
- 25 See for example: <https://www.documents.clientearth.org/library/download-info/joint-ngo-priorities-on-the-revision-of-the-eu-fisheries-control-system/p.2>.
- 26 Article R 946-9 of the Rural and Maritime Fisheries Code.
- 27 Article 90 of the Control Regulation.
- 28 Article 92 of the Control Regulation.
- 29 Commission Implementing Regulation (EU) No 404/2011 of 8 April 2011 laying down detailed rules for the implementation of Council Regulation (EC) No 1224/2009 establishing a Community Control System for ensuring compliance with the rules of the Common Fisheries Policy, Annex XXX.
- 30 Article L 945-4 (16) of the Rural and Maritime Fisheries Code.
- 31 Article L 945-5 of the Rural and Maritime Fisheries Code.
- 32 Articles L 946-1 to L 946-8 of the Rural and Maritime Fisheries Code.
- 33 One would wonder in this case if the maximum amount of 1,500 Euros would be dissuasive enough if, for example, the total value of the products discarded amounts to more than this sum.
- 34 In French: “La méconnaissance des obligations ou interdictions relatives [...] au rejet [...] des captures”.
- 35 See: <https://www.documents.clientearth.org/wp-content/uploads/library/2018-12-05-reply-from-the-french-authorities-to-clientearths-access-toinformation-request-on-the-implementation-of-the-eu-fisheries-control-regulation-ext-fr.pdf>.
- 36 <https://www.documents.clientearth.org/library/download-info/Response-to-French-2019-LO-AIR-Request/>.
- 37 See: <https://www.documents.clientearth.org/wp-content/uploads/library/2016-12-02-the-control-and-enforcement-of-fisheries-in-france-ce-en.pdf>.
- 38 See: <https://www.documents.clientearth.org/wp-content/uploads/library/2018-12-05-reply-from-the-french-authorities-to-clientearths-access-toinformation-request-on-the-implementation-of-the-eu-fisheries-control-regulation-ext-fr.pdf>.

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Elisabeth Druel

Fisheries Project Lead

Email edruel@clientearth.org

Tel +32 (0) 2808 4328

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Brussels

60 Rue du Trône (3rd floor)
Box 111050
Ixelles
Brussels

www.clientearth.org

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