

# Analysis

## Republika Srpska: Draft Law on the Special Registry and Transparency of the Work of the Nonprofit Organisations (March 2024 Version)

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European Center for  
Not-for-Profit Law

**ICNL**

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## Introduction

At the request of local partners, the European Center for Not-for-Profit Law (ECNL) with support from the International Center for Not-for-Profit Law (ICNL) conducted a comparative analysis of the [Draft Law on the Special Registry and Transparency of the Work of Nonprofit Organisations](#) (draft law) published by the Ministry of Justice on April 3, 2024.

The draft law provides for the creation of a special registry of non-profit organisations (NPOs) under the Ministry of Justice. NPOs are defined as associations, foundations, and foreign and international organisations that are registered in Republika Srpska (RS) and are partially or fully funded or assisted by foreign entities. Under the law, foreign entities include governments, legal entities such as civil society organisations (CSOs) and corporations, and individuals. The law does not provide a minimum threshold above which NPOs are obligated to register, meaning that any funding or support from a foreign entity triggers the requirement.

The law requires an NPO to:

- Register within 15 days after receiving funding or support from a foreign entity and then report every new source of funding in the same period (art. 8 (1));
- Update its information within 30 days if there are any changes to its activities (art. 8 (2));
- Submit semi-annual and annual reports with information about the payer, the amount of funds allocated, the type and amount of compensation and income expressed in money or other value, as well as a report on the expenditure of funds (art. 11 (1));
- Submit to regular inspection of the legality of the NPO's work once a year (art. 13), as well as to potential additional audits based on requests or publications (art. 14);
- Put the NPO mark on all their materials published online or in any other way (art. 5).

The law also introduces the term “agent of foreign influence” which refers to NPOs that engage in “*political activities or in activities endangering democracy, violating the integrity of the Republic of Srpska, violating the Constitution of the Republic of Srpska guaranteed freedoms and rights and inciting national, racial or religious hatred and bigotry*” (art. 2 (5)). The fact of receiving foreign funding and engaging in activities listed in art. 3 (political activities as defined by law), qualifies an organisation as an “agent of foreign influence” and there is no need to show any instruction, guidance or request from the foreign entity or to prove that the funding was received/used specifically to engage in political activities. NPOs (organisations receiving foreign funding) are prohibited from engaging in the listed activities by the draft law itself (in the case of political activities) or under other laws, including



the Law on Associations and Foundations (see art. 3). Therefore, in order to qualify as an “agent of foreign influence”, an NPO must engage in illegal activity.

The law prohibits NPOs from engaging in broadly defined political activities, including implementing political activities with an aim to frame public opinion for the purpose of accomplishing political goals. This covers “any activity towards bodies, institutions or elected representatives of the RS or RS representatives at the BiH institutions in terms of policy formulation, political or public interest of Republika Srpska.” This vague formulation may make it a prohibited activity for an NPO, for example, to organise a public discussion of how to develop a strategy to keep young people in Republika Srpska.

An NPO can be banned if it engages in “acts contrary to the RS Constitution and RS regulations, operates and carries out activities in the manner prescribed by Article 3 of this Law, that is when it acts as foreign influence agent at the detriment of the individual and other rights of citizens or if Tax Administration determines irregularities in the financial operation”. In addition, the “responsible representatives” of the organisation can be subject to criminal proceedings in accordance with the Criminal Code of RS.

The law also provides for sanction ranging from 1000 to 5000 KM for not marking its materials, for not registering foreign support or not updating their registration or for failing to submit a report.

## Key problems

### *Violation of Bosnia and Herzegovina’s human rights commitments*

The draft law is also contrary to Bosnia and Herzegovina’s human rights commitments under the European Convention on Human Rights (ratified in 2002) and the International Covenant on Civil and Political Rights (ratified in 1993). The draft law endangers freedom of association (and may negatively impact access to resources), puts a blanket presumption of suspicion that could further obstruct and stigmatise CSOs legitimate work and restricts freedom of expression and the right to participation. The draft law also leads to discrimination of foreign-funded CSOs.

### *Stigmatisation of civil society*

The draft law is based on the logic that foreign funding means foreign influence, but at the same time, it does not aim to address foreign influence through foreign investment or foreign companies. By targeting civil society organisations and introducing specific requirements and prohibitions for those organisations that receive foreign funding, the draft law leads to stigmatisation and singling out of organisations receiving funding from abroad. For example, the fact that political



activities (whose definition covers advocacy on a range of issues of public interest) are prohibited only to organisations receiving funding from abroad, creates a sense of distrust in these organisations. The draft law only targets civil society organisations, who receive only a small portion of the support provided by international partners and foreign countries in Bosnia and Herzegovina and Republika Srpska, in particular.

On the other hand, the use of the term “agent of foreign influence” comes with a strong negative connotation and is usually interpreted as a synonym for a “foreign spy.” In the case of CSOs, whose reputation is one of their key assets, this is highly damaging.

### ***Duplication of existing regulation***

According to the drafters, the main reason for the proposed draft law is to ensure publicity of the work of non-profit organisations. However, the requirements of the law follow some already existing limitations that associations and foundations in RS have – for example, the engagement in political campaigns and fundraising for political parties and political candidates, or financing of political parties and political candidates is already prohibited under art. 3 of the Law on associations and foundations. In addition, CSOs already submit reports to the authorities in RS. In principle, the need for transparency can be addressed through existing laws and a large part of the proposed requirements duplicate existing regulation.

### ***Practical problems***

The draft law has the following key problems:

- It will create undue burden on both CSOs and the administration to implement and/or comply with it. The draft law puts an equal burden on both big and small CSOs, regardless of the amount of foreign funding they receive.
- It requires foreign-funded CSOs to label their materials.
- It introduces excessive reporting: CSOs that already report to the government need to report twice per year.
- It creates the possibility for bureaucratic harassment: regular inspection will be carried out once a year, additional inspections of the legality of the work of CSOs receiving foreign funding could be based on requests from citizens and various bodies.
- It prohibits foreign funded CSOs to engage in very broadly defined political activity.
- It introduces heavy sanctions, including the possibility to terminate the registration of a CSO.



## International perspective

Republika Srpska is not the only government to adopt or consider adopting legislation related to limiting “foreign influence” or “foreign agents” (we will call such laws “foreign agent” laws in the current analysis). In the last years several countries have enacted or are considering such legislation. However, this legislation varies considerably across countries, with very different impacts or potential impacts on civil society. Republika Srpska’s legislation is of a nature that specifically seems designed to target nonprofits, instead of foreign influence. Below we compare such legislation based on two key criteria to better understand the purpose and impact of foreign agent laws:

- What entities fall under the regulation (who is covered?).
- What type of relationship should exist between the foreign entity and the covered person.

### Who is covered?

In some of the countries this type of legislation covers only CSOs. This is the case of the original Russian foreign agent law (adopted in 2012), the recently adopted Kyrgyz law (2024), the repealed Hungarian law (2017), the draft Georgian law (2023 and 2024) and legislation in Nicaragua (2021), among others. In all of these cases, the legislation has been seen as an attempt to silence critical voices and to restrict independent civil society. For example, as a result of “foreign agent” laws, a number of independent civil society organisations have been terminated in [Russia](#) and [Nicaragua](#).

On the other hand, foreign agent laws in US, UK and the EU would apply to all types of entities, including commercial actors, and do not single out CSOs.

### Type of relationship

Receipt of funding from abroad is not sufficient for an organisation to be registered as a “foreign agent” in the US, UK and the EU. In all three cases, there is requirement for a different type of relationship (e.g. to provide an interest representation service in the EU or to act at the “order, request, or direction or control” of a foreign entity in the US). On the other hand, in Russia, Nicaragua, Kyrgyzstan, etc., the mere receipt of foreign funding is sufficient to require registration.

As a result, we can underscore that **the draft law in Republika Srpska puts the country in the group of countries that use or have used “foreign agent” laws to primarily target civil society instead of making transparent foreign influence. The group of countries includes Russia, Kyrgyzstan, Nicaragua, Georgia and**



**Hungary.** On the other hand, the legislation in countries such as the US, UK and the EU has a different objective and does not aim to restrict civic space.

### Are foreign agent laws targeting CSOs the same as FARA?

The US FARA was adopted in 1938 to fight Nazi propaganda. While often cited as a reason for adopting foreign agent laws in other countries, there are a number of important differences between FARA and laws similar to Russia's, or RS's proposal:

- FARA does not specifically target CSOs, but covers any entity or individual engaged in covered activity.
- Under FARA one does not have to register simply because one receives funds from a foreign source. In fact, many US CSOs receive foreign funding and do not register.
- There are only 516 registered entities and individuals overall (as of April 2024).
- Most of those registered are law firms and lobbyists – often operating on behalf of foreign governments. Less than 5 % of those registered are CSOs, and those are frequently branches of foreign political parties.

## A “regrettable and undeniable major step backwards” from EU accession

The European Union has been speaking against the adoption of foreign agent laws that restrict civil society operation. Clear statements against such laws have been made in the case of [Kyrgyzstan](#), [Georgia](#), and [Nicaragua](#).

Hungary is the only EU country that has so far adopted legislation similar to the proposed draft law. In the case of Hungary, the European Commission launched a case against Hungary in the European Court of Justice (ECJ). On June 18, 2020, the ECJ ruled that Hungary's Law on Transparency of Organisations Supported from Abroad (Transparency Law) was in breach of EU law,<sup>1</sup> including the Treaty on the Functioning of the European Union (Article 63), and the Charter of Fundamental Rights of the EU. As a result of the ECJ decision, Hungary repealed the law in 2021. In its decision, the ECJ concluded that in addition to violating Article 63 of the Treaty on the Functioning of the European Union, by introducing provisions of the Transparency Law “*which impose obligations of registration, declaration and publication on certain categories of civil society organisations directly or indirectly receiving support from abroad exceeding a certain threshold and which provide for the possibility of applying penalties to organisations that do not comply with those obligations, Hungary has introduced discriminatory and unjustified restrictions on foreign donations to*

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<sup>1</sup><http://curia.europa.eu/juris/document/document.jsf?text=&docid=227569&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=5811640>



*civil society organisations*”, and has also violated Articles 7, 8 and 12 of the Charter of Fundamental Rights of the EU (covering respectively the right to respect for private and family life, the right to the protection of personal data and the right to freedom of association).

Bosnia and Herzegovina is a candidate country and at the end of March 2024 the [EU decided to open accession negotiations](#) with the country. In November 2023, in Bosnia’s progress report the EU stated:

*“A draft law targeting civil society groups as ‘foreign agents’ was adopted in the first reading by the entity assembly. If finally adopted, this law would further undermine the effective functioning of democracy and would mark another regrettable and undeniable major step backwards.”*

At the same time, in December 2023 the European Commission published the [Defence of Democracy package](#). One of its three elements is the Proposal for Directive establishing harmonised requirements in the internal market on transparency of interest representation carried out on behalf of third countries. While the proposal currently contains some problematic provisions, as noted above, its objective is not to disproportionately target and single out CSOs that are recipients of foreign funding. Moreover, the text of the proposal for directive is still under discussion and there are a number of proposals on how to improve its definitions to ensure there is no negative impact on civic space. Below are listed some of the key differences with the proposed draft law in RS:

- The directive does not specifically target CSOs.
- The receipt of foreign funding in itself is not sufficient to fall under the registration requirements, instead entities need to provide interest representation services.
- The directive covers only interest representation on behalf of third countries (central government and other public authorities), not just any foreigner (i.e. a foundation, company, individual, etc.).
- The directive does not aim to automatically discredit all recipients of foreign funding and requires EU Member States to implement additional measures to prevent the stigmatisation of covered entities, especially by presenting the register in a neutral manner or ensuring that registered entities do not face any adverse consequences. For example, the fact that an entity is subject registration *“should not be presented with or accompanied by statements or provisions that could create a climate of distrust with regard to the registered entities, apt to deter natural or legal persons from Member States or third countries from engaging with them or providing them with financial support”* (recital 50, draft EU directive).
- The draft directive does not have any requirements to label materials of a registered entity.
- The draft directive does not have any prohibition for engaging in any activities. On the contrary, one of the other elements of the Defence of



Democracy package is the Recommendation on the participation of citizens and civil society organisations to policy-making.

## Conclusion

As a conclusion, the draft law violates Bosnia and Herzegovina's human rights commitments. It is also against EU standards and goes against Bosnia's EU accession aspirations. It is neither in line with the best international practices related to transparency of foreign influence as it directly targets civil society. Moreover, adopting such a law can lead to a slippery slope – once the narrative that CSO foreign funding is dangerous, RS may follow the path of countries such as Belarus or Azerbaijan which severely restrict foreign funding: they have introduced permission for receiving foreign funding or limited its receipt only to certain areas.





## Annex 1. Analysis of the implications of the draft law on fundamental human rights

Below we review the key human rights standards that may be affected by the adoption of the draft law.

### Freedom of Association

The right to freedom of association is guaranteed under Article 11 of the European Convention on Human Rights<sup>2</sup> (“ECHR”) and Article 22 of the International Covenant on Civil and Political Rights<sup>3</sup> (“ICCPR”). The right to freedom of association includes the freedom to seek, receive and use funds by CSOs. Article 13 of the UN Declaration on Human Rights Defenders<sup>4</sup> states that “*everyone has the right, individually and in association with others, to solicit, receive and utilise resources for the express purpose of promoting and protecting human rights and fundamental freedoms through peaceful means in accordance with Article 3 of the present Declaration*”. Principle 7 of the OSCE/ODIHR – Venice Commission Guidelines on Freedom of Association<sup>5</sup> also reaffirms that. The requirement for reporting specifically for foreign-funded CSOs affects their right to use such resources and introduces additional burdens on them.

In order for any restriction or limitation to be considered acceptable under international law, it must meet the requirements of being prescribed by law, serving a legitimate aim (an exhaustive list is provided in international law) and be necessary and proportionate (necessary in a democratic society).

#### Is there interference?

The draft law is an interference with the freedom of association because it requires CSOs to change their behaviour. They need to decide whether to accept foreign funding and register under the law (and be subject to additional reporting) and/or decide to limit their receipt of foreign funding. Non-compliance with the draft law leads to heavy fines, which will also influence their decision. In addition, one of the possible sanctions relates to the possibility to terminate an organisation.

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<sup>2</sup> Convention for the Protection of Human Rights and Fundamental Freedoms Rome, 4.XI.1950. Signed in 1995, ratified in 1997, by Ukraine.

<sup>3</sup> Adopted and opened for signature, ratification and accession by General Assembly resolution 2200A (XXI) of 16 December 1966 entry into force 23 March 1976, in accordance with Article 49. Signed in 1968, ratified in 1973 by Ukraine

<sup>4</sup> General Assembly Resolution A/RES/53/144  
<https://www.ohchr.org/en/issues/srhrdefenders/pages/declaration.aspx>

<sup>5</sup> <https://www.osce.org/files/f/documents/3/b/132371.pdf>



Separately, the law also prohibits CSOs to engage in “any activity towards bodies, institutions or elected representatives of the RS or RS representatives at the BiH institutions in terms of policy formulation, political or public interest of Republika Srpska”. This is another restriction of freedom of association because CSOs should be able to act “as a vehicle for communication between different segments of society and public authorities, through the advocacy of changes in law and public policy”<sup>6</sup>.

Therefore, **the draft law represents an interference with the freedom of association**. Below we will assess whether the proposed restrictions are permissible under international law.

### Is the limitation prescribed by law?

In order for an interference to be considered “prescribed by law”, the law needs to be sufficiently clear and foreseeable. There should also be a “protection against arbitrary interference by public authorities”<sup>7</sup>.

The RS draft law introduces broad formulations which are difficult to interpret narrowly. That creates uncertainty for entities that may be subject to the law’s requirements. Moreover, the sanctions are extremely serious and therefore, any misunderstanding on the law’s scope may lead to serious consequences. For example, art. 1 says that subject to registration are organisations “that are financially or in some other way assisted by the foreign entities” (art.1). Separately, the draft law prohibits any activity of organisations funded from abroad “in terms of policy formulation, political or public interest of Republika Srpska” (art. 3 (2)). There is no definition of any of these terms and it may be interpreted extremely broadly.

Therefore, we can conclude that **the legal provisions of the draft law are not foreseeable**.

### Is it for a legitimate objective?

According to the motives of the draft law, the reason for proposing the law is to regulate the “publicity of the work of non-profit organisations” in order to prevent “the collapse of the constitutional order and legal order of the Republic of Srpska” and to prevent “harmful consequences on the work of the bodies and organisations of the Republic of Srpska”.

In order for a restriction to be permissible, under international law, it needs to fall under the legitimate objectives listed in the international treaties. According to Article 11(2) of ECHR and Article 22(2) of ICCPR, any restrictions on freedom of association are justifiable only if they are “necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals of for the protection of the rights and freedoms of

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<sup>6</sup> <https://rm.coe.int/recommendation-of-the-committee-of-ministers-to-member-states-on-the-l/1680a1f502>

<sup>7</sup> <https://hudoc.echr.coe.int/fre?i=001-217751>; Case of Ecodefence and Others v. Russia, 14 June 2022, point 90



others”. This list is exhaustive. Therefore, states may not add additional “reasons” for why they limit the fundamental right to freedom of association. **The stated aims in the Explanatory memorandum are not per se listed as a legitimate aim in the international and European instruments.** Of course, it may be argued that the collapse of the constitutional or legal order of RS is a matter of national security. However, it is highly doubtful to what extent the constitutional order in RS is at risk because there is no separate register of CSOs funds from abroad, especially without any evidence that there have been specific cases when such organisations threatened the RS system.

### Is it necessary in a democratic society?

Any restriction to the rights in the European Convention on Human Rights needs to be proportionate to the aims sought to be achieved and “necessary in a democratic society”. According to the Venice Commission, restrictions on the freedom of association can be “*considered to pursue legitimate purposes only if they aim to avert a real, and not only hypothetical danger. Any restrictions therefore can only be based on a prior risk assessment indicating “plausible evidence” of a sufficiently imminent threat to the State or to a democratic society*”.<sup>8</sup> The RS government has not shown any evidence of specific cases in which the constitutional or legal order of RS was threatened specifically by CSOs with funding from foreign sources.

In the ECHR case on the Russian foreign agent law, the Court has stated that “*the objective of increasing the transparency of the financing of associations, although legitimate, cannot justify legislation which is based on a presumption, made on principle and applied indiscriminately, that any financial support by a non-national entity and any civil society organisation receiving such financial support are intrinsically liable to jeopardise the State’s political and economic interests and the ability of its institutions to operate free from interference*”<sup>9</sup>. Separately, the Court also noted that the actual effect of the Russian foreign agent law “*is a legal regime that places a significant “chilling effect” on the choice to seek or accept any amount of foreign funding, however insignificant, in a context where opportunities for domestic funding are rather limited, especially in respect of politically or socially sensitive topics or domestically unpopular causes. The measures accordingly cannot be considered “necessary in a democratic society*”<sup>10</sup>.

The effect of stigmatisation that such additional reporting or “publicity” brings with it is an important consideration. Rather than increasing transparency, **the draft law increases the likelihood of stigmatisation of CSOs receiving foreign**

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<sup>8</sup> Para. 81, Report on Funding of Associations, Venice Commission, CDL-AD(2019)002. See also discussion under Venice Commission and ODHR Joint Opinion on Draft law no. 6674 on introducing changes to some legislative acts to ensure public transparency of information on finance activity of public associations and of the use of international technical assistance and on Draft law no. 6675 on introducing changes to the tax code of Ukraine to ensure public transparency of the financing of public associations and of the use of international technical assistance. Adopted by the Venice Commission at its 114<sup>th</sup> Plenary Session (Venice, 16-17 March 2018)

<sup>9</sup> <https://hudoc.echr.coe.int/fre?i=001-217751>; Case of Ecodefence and Others v. Russia, 14 June 2022, point 166

<sup>10</sup> <https://hudoc.echr.coe.int/fre?i=001-217751>; Case of Ecodefence and Others v. Russia, 14 June 2022, point 186



**funding**, because of the underlying expectation that this leads to negative foreign influence. The former Special Rapporteur on the rights to freedom of peaceful assembly and of association Maina Kiai has stated that he is extremely concerned that measures are proposed against civil society organisations “*on the sole ground that they had allegedly received foreign funding*”<sup>11</sup>.

The same arguments can be applied to the draft law in RS. As a result, we can conclude that **the draft law is not necessary in a democratic society** because it:

- It does not respond to a pressing social need as there has been no specific evidence of the threats imposed by CSOs funded by foreign sources.
- The proposed regulation of foreign-funded CSOs is not proportionate to the need to ensure more transparency.
- The draft law can result in stigmatisation and would create a “chilling effect” on civil society.

## **Prohibition of discrimination**

### **Discrimination based on source of funding**

The draft law proposes different treatment between those organisations that receive foreign funding and those that don't. The Venice Commission has highlighted that in its case law the European Court of Human Rights was reluctant to accept the “*foreign origin of an NCO as a legitimate reason for a differentiated treatment; the same reluctance would a fortiori be in place in case of mere foreign funding.*”<sup>12</sup>

### **Discrimination based on type of legal entity**

The draft law introduces specific requirements for foreign funded non-profit organisations. Such limitations do not exist for other types of legal entities (e.g. commercial legal entities), despite the fact that they may also be a channel for the so-called foreign influence.

Discrimination is any unjustified difference in treatment of certain people or groups of people who are in the same, or at least similar situations. The Venice Commission in its analysis<sup>13</sup> on CSO funding has stated that “*unequal treatment between the civil society sector and other legal persons/non-state entities, for instance, the business sector, may raise issues when the State fails to provide specific justification for it*

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<sup>11</sup> Para. 33, Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association (24 April 2013), UN Human Rights Council, A/HRC/23/39

<sup>12</sup> Opinion on the Law Introducing Amendments to Certain Legislative Acts of the Russian Federation Regarding the Regulation of Activities of Non-Commercial Organisations Performing the Function of Foreign Agents (August 2013)

<sup>13</sup> Para. 125, Report on Funding of Associations, Venice Commission, CDL-AD(2019)002

*and demonstrate that there are legitimate grounds for imposing for example additional reporting obligations only to associations”*. This has been confirmed in the 2018 joint Venice Commission and OSCE/ODIHR Opinion on Ukraine<sup>14</sup> stating that there was no sufficient ground for introducing additional reporting requirements for CSOs as compared to businesses. In its recent judgment on the Hungarian law the ECJ also confirmed that the law “*introduced discriminatory and unjustified restrictions on foreign donations to civil society organisations*”.<sup>15</sup>

## **Freedom of expression and right to participation**

Public participation through regulated consultation channels is an essential element of democracy and is equally protected by the international human rights standards (see Article 25, ICCPR). The “free communication of information and ideas about public and political issues” requires the full enjoyment and respect of the rights of freedom of expression, peaceful assembly and association “including freedom to engage in political activity individually or through political parties and other organisations, freedom to debate public affairs, to hold peaceful demonstrations and meetings, to criticise and oppose, to publish political material, to campaign for election and to advertise political ideas.” (UN HRC General Comment No. 25, para 25).

However, considering NPOs that receive any funding from foreign entities as agents of foreign influence rather than representatives of their own interest/statutory mission may negatively impact their legitimacy when engaging in public participation and therefore affects their right to freedom of expression.

### **Conclusion**

If adopted, the draft law will violate Bosnia and Herzegovina’s obligations to guarantee freedom of association, freedom of expression and the right to participation, as well as the prohibition of discrimination.

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<sup>14</sup> Para. 42-45, Venice Commission and OSCE/ODIHR, Joint opinion on draft law no. 6674 on introducing changes to some legislative acts to ensure public transparency of information on finance activity of public associations and of the use of international technical assistance and on draft law no. 6675 on introducing changes to the tax code of Ukraine to ensure public transparency of the financing of public associations and of the use of international technical assistance (16 March 2018), CDL-AD(2018)006

<sup>15</sup><http://curia.europa.eu/juris/document/document.jsf?text=&docid=227569&pageIndex=0&doclang=EN&mode=req&dir=&occ=first&part=1&cid=5811640>





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