Imbalances in the EU Automotive Industry

April 2009

A Call for a Sector-Specific Regulatory Framework

Independent Union of the European Lubricants Industry

TABLE OF CONTENTS

I. Executive Summary

This paper focuses on the Block Exemption Regulation 1400/2002 concerning motor vehicle distribution and servicing (BER 1400/2002). The BER 1400/2002 is due to expire on 31 May 2010 and consequently currently subject to the European Commission's evaluation as to the future of the regulatory regime for the automotive industry. UEIL is concerned about the direction the review of BER 1400/2002 is taking. Therefore, the aim of this paper is to contribute to the current debate by advancing strong arguments for a possible way forward, which would accommodate the concerns of the lubricant industry and those, as we understand, of the majority of automotive operators.

This paper seeks to illustrate the crucial role the lubricant industry has in Europe's economy and for consumers, as an important driver of competition. It also seeks to illustrate the unique and particular character of the automotive market environment, which often prevents operators from unfolding their full competitive potential. This paper argues that an intervention in the form of a sector-specific regulatory framework, which takes into account the special features of the automotive industry, is needed so as to allow for effective and fair competition in the industry. Particular attention is also paid to the critical issues in the market place that the current legislation has not yet solved, and concrete proposals are made on how the existing framework could be improved.

This paper calls on the Commission to abstain from a removal of BER 1400/2002 and to instead consider an improvement of some of its key provisions, in particular the automotive aftermarket, with a view to ensure adequate protection of small and medium-sized market players, so that they can continue to contribute to competition to the benefit of consumers.

Ultimately, UEIL calls on the Commission to come forward with a proposal that ensures a fair level playing field, to the benefit of all stakeholders, which could best be ensured through:

- an improvement of the BER provisions relating to those areas where it has been identified that competition problems remain, namely the after-sales market.
- the embedment of these improved provisions within a clear and enforceable sector-specific framework, which would be supplemented with explanatory guidelines.

In particular, the aftermarket rules should be reinforced so as to ensure that consumers can choose between different alternatives and that all operators can offer high quality products and services at affordable prices. With respect to lubricants, this can be achieved by:

- allowing all lubricant manufacturers and distributors to **obtain immediate access in a non-discriminatory way to technical information** that is required to produce and distribute lube oil for all brands and models;
- ensuring that consumers, dealers and repairers can **freely choose between several competing lubricants**, which meet vehicle manufacturers' specifications.

UEIL is strictly against an integration of the automotive sector into other existing legislative frameworks, such as the vertical Block Exemption Regulation 2790/1999, nor does it support a 'guidelines-only' approach. Alternatively, a prolongation of the existing BER for a term of two years would be an agreeable solution, provided that subsequent to this term a new Regulation is proposed with improved rules relative to the automotive aftermarket.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

II. THE LUBRICANT INDUSTRY: AN OVERVIEW

1. About UEIL

Founded in 1963 and headquartered in Brussels, UEIL is the independent, umbrella association for the European lubricants industry, representing more than 400 predominantly small and medium-sized companies who manufacture and distribute lubricant products under their own various trademarks throughout the European Union.

With members in 16 European countries, and a growing presence in new Member States, UEIL is the sole and pre-eminent representative body for companies in the lubricants industry in Europe, which features a unique collective experience of lubricants and the lubricants market. UEIL provides its members with a platform to speak with one single voice on various issues affecting the sector. It is UEIL's policy to promote any effort to improve the competitive conditions for lubricants and to advocate for a fairer, stable and transparent regulatory level playing field to strengthen the position of lubricant operators and their offerings to consumers.

As part of its strategy, UEIL also plays a leading role in empowering small and medium sized companies (SMEs) and independent operators as a fundamental pillar of the EU economy.

2. About the Lubricants Market

Lubricants are a very important fabric of modern society. Almost every manufactured product relies on lubricants, from glass to primary metals, from concrete moulding to automotive, aerospace and computer manufacture through to power generation and even the manufacture of beverages. Furthermore, the figures available show that the lubricant industry is an important element for Europe's economy: The sector as represented by UEIL employs around 87.000 staff and generates a turnover of around 21 bn. Euros[1]; estimations lead to conclude that the turnover in the EU 27, amounts to approximately 30 bn Euro and the number of employees amounts to more than 100 000.

The lubricant industry is strongly characterized by its SME structure, as they account for the vast majority of the European lubricants operators. SMEs represented by UEIL not only gather all the training and expertise of the lubricant sector, but are also important providers of job opportunities and key contributors to competitive markets.

...the lubricants segment represents about **15% of the overall aftermarket in terms of retail value...**

[1] The figures are based on an estimation by UEIL derived from figures of its membership available for 2006.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

The lubricants market is divided into two fundamental sectors, one sector focusing on the refining process and the other sector dealing with the lubricant manufacturing process. The former is mainly handled by the major oil companies (MOCs) whose main business objective is the discovery, extraction and refining of crude oil and whose business in the lubricant sector only accounts for a very small part of their business. The latter is mainly represented by independent companies, the majority of them small and medium-sized enterprises, the core business of which is to manufacture and market lubricants.

Today, lubricants represent a major item of the aftermarket expenditures for consumers and have therefore a considerable importance within the European vehicle distribution and repair system. Beyond the automotive sector, the lubricant industry also plays a central role in other key industrial areas such as aviation, maritime and manufacturing, to name a few.

Striving to assert themselves over the powerful MOCs and vehicle manufacturers (VMs), the lubricant industry plays an essential role every day in ensuring the promotion of effective competition. Over the years, lubricant operators have become central to the EU economy, with valuable benefits for consumers. They offer high-performing lubricants such as engine, gear and hydraulic oils; many of them also concentrate on specialties and niche business with expert customer service being part of the package. As a result, nowadays the lubricant industry is a strong and wealthy actor, representing a crucial economic factor.

Production output:
7,5 Million Tons of Oils

Major target areas:
Automotive (50%), Industry (40%), Process (10%)

Number of Employees:
100.000 +

Annual Turnover (billion of Euros):
30 bn. EUR

€

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

3. Lubricants' Contribution to Consumer Welfare

An important aspect to be considered in the Commission's review process is the lubricant industry's contribution to consumer welfare. Through their service offering, lubricant companies are often the interface between the manufacturing industry and the end consumer. They support the sales and distribution process of vehicles and the repair servicing in under-populated areas of Europe, which is often only possible through SMEs. This allows the industry to recognize and assess consumer needs, provide customer care and optimal service.

The lubricant industry has furthermore a tremendous value for consumer welfare, as consumers benefit from increased competition generated by lube businesses, translating into higher quality of products and services and a reduction in costs, which are verifiably lower than those offered through VMs' authorized networks. Failing to recognise the crucial role of the lubricant industry within the aftermarket sector will inevitably lead to a situation whereby consumers will be faced with reduced or no choice, along with unacceptable costs for lube products. There are numerous examples evidencing this situation already today – it can be expected that a removal of the BER will aggravate the situation.

III. Allowing for Full Competition in the Automotive Sector: Regulatory Perspective

1. Preliminary Remarks

BER 1400/2002, which is currently under the Commission's scrutiny, governs the distribution, sale and servicing of cars, light commercial vehicles and trucks. It aims to create a '*safe harbour*' for vertical agreements concluded between VMs on the one hand and distributors/after-sales operators on the other, for the distribution and servicing of vehicles, on the basis of which, it can be assessed if agreements are in line with the EC competition rules.

In principle, the BER provisions are intended to overcome the competition problems specific to the automotive sector, in particular the persistent attempts by certain VMs and OEMs to segment the EU's Internal Market, as well as to '*put customers in the driving seat*'. Striving to give dealers greater independence from VMs, the BER aims to create a level playing field by promoting competition between the different VMs and distributors and by liberalising the aftermarket so that all operators can compete on fair terms, offer good quality products and at attractive prices where consumers are free to choose between different alternatives.

In May 2008, the Commission published an Evaluation Report on the operation of BER 1400/2002[2], in which it presented its preliminary views on the functioning of this Regulation. In particular, the report assessed the impact of the BER on the competitive conditions in the automotive markets in the EU with a view to decide on the regime applicable after the

[2] Evaluation report on the operation of regulation (EC) n° 1400/2002 concerning motor vehicle distribution and servicing, European Commission: 28 May 2008: http://ec.europa.eu/competition/sectors/motor_vehicles/documents/evaluation_report_en.pdf

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

Regulation expires on 31 May 2010. The Commission concludes that the market could function without the BER after its expiry, since overall competitive conditions have improved and given that many BER provisions have proven unnecessary, over-prescriptive and even counter-productive, or will be superseded by rules in other EU policy areas.

Although the Report does not contain any indication as to the form and content of the future regime, it does imply that it might be more beneficial to remove BER 1400/2002 and to instead apply less complex rules to the sector, such as the more general Block Exemption Regulation 2790/1999 (BER 2790/1999), and the general competition rules of Articles 81, 82 EC Treaty.

Consequently, the lubricant industry is concerned that some of the key provisions contained in the BER will be abandoned in the future and that the sector will be subjected to a regulatory regime, which is not at all adapted to its particular features. **UEIL believes that such a move would represent a severe challenge to the role of a majority of market operators with detrimental effects for consumers.**

Therefore, this section of the paper strives to highlight the relevance that a sector-specific Regulation, such as the BER 1400/2002 has for the lubricant industry and makes the case for an improvement of certain key provisions of the BER instead of removing the Regulation. It also aims at showing the best way forward for the industry after May 2010.

2. Implications of BER 1400/2002 for the Lubricant Industry

Being the only sector-specific exemption regulation tailored to the needs of the automotive industry, the BER has, to a certain degree, helped to level out the imbalances of the power structure in the automotive industry, characterized by the dominant position of a few major suppliers (VMs/OEMs) and a great number of predominantly small and medium sized retail and after-sales operators (dealers, repairers, spare part manufacturers and suppliers), which account for the vast majority of players in this industry. Its underlying principles have been pivotal to ensure that today in particular independent operators in the automotive distribution and after-sales market are able to offer their services in a fair level playing field, thus being able to unfold their full competitive potential, of which consumers are benefitting.

For the lubricant industry, BER 1400/2002 has been crucial in allowing operators to access VMs' networks and to reduce, to a certain extent, the persistent attempts by certain VMs to squeeze operators off the market, simply by reminding them of their obligations under competition law with reference to the BER stipulations. Being one of the main driving forces for competition, UEIL's members fully subscribe to the spirit of BER 1400/2002 and hence we believe that any change of the regulatory framework needs to happen in harmony with this spirit, which has been the Leitmotif for the motor vehicle sector for the last 6 years.

The importance of the BER for lubes is based on the following elements:

- Lubricants fall within the scope of BER 1400/2002, as it ***defines lubricants as spare parts*** [Art. 1(1)(s)], which encompasses all goods that are to be installed in or upon a motor vehicle as a replacement of a component. As a result of the spare part definition, lubricants benefit from all aftermarket-relevant provisions of the BER.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

- The BER allows lube companies to have ***access to the VMs networks by imposing a set of hardcore restrictions concerning the sale of repair and maintenance services and of spare parts***. In particular, according to Art. 4 (1)(k), suppliers are not allowed to restrict distributors or repairers to buy from suppliers of their choice. They should be free to choose between "original spare parts" and "spare parts of matching quality" and use them freely for the repair or maintenance of motor vehicles, with the exception of repairs carried out under warranty, free servicing and vehicle recall work.
- Articles 1 (1)(b) and 5 (1)(a) limits the proportion of VM-supplied parts that VMs can require their dealers and repairers to purchase to a maximum of 30% of the buyer's total annual spare part needs. Any direct or indirect obligation by the VM causing the buyer (i.e. the dealer or repairer) to abstain from entering into commercial relations with sources of his/her choice regarding competing products/services, or obliging the buyer to purchase more than 30 % from the VM or his partners, has to be considered as non-compete obligation, prohibited under the terms of BER 1400/2002. As a result, ***authorised networks should be free to source 70% of their annual lubricant needs from the lubricant industry***.
- BER 1400/2002 is vital for the lubricant industry, as Article 4 (2) requires VMs to grant ***access to technical information*** to independent operators. In order to be able to produce lubes which meet VMs' standards and requirements, the lubricant industry is dependent on receiving the specifications of the lubricant, the use of which VMs dictate for their particular engines.

3. BER 1400/2002: Areas of Improvement

UEIL takes note of the fact that in its Evaluation Report[3] , as well as during the Stakeholder Roundtable organized in February 2009, DG Competition recognized that the vehicle repair sector still features market failures reflected through VMs' overarching market power, upscale price levels for repairs and a flagging independent repair sector. This finding is also confirmed by the London Economics study[4] carried out on behalf of the Commission in 2006.

UEIL tends to concur with this position, as experience shows that the competitive conditions are not as prosperous as they should be. We have observed over the years that certain VMs recurrently try to circumvent their competition obligations by discreetly employing abusive practices, which compromise full and unencumbered access to their networks.

We would therefore like to urge the Commission to seize the opportunity of the BER review for a systematic overhaul and strengthening of the provisions governing the automotive aftermarket so as to achieve the strengthening of the competitive situation.

The following list illustrates some examples of VMs' abusive behaviour vis-à-vis independent operators. Any future regulatory framework would have to be designed in a way to ensure that such behaviour is eliminated:

[3] See footnote 1.
[4] Developments in car retailing and after-sales markets under Regulation N° 1400/2002: Part 3 Developments in the European market for automotive spare parts, June 2006: http://ec.europa.eu/competition/sectors/motor_vehicles/documents/block_exemption_final.pdf.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

- It is a widespread practice that ***VMs do not provide technical information, in particular the specifications needed to produce lube oil, to independent operators***[5], such as lubricant producers; or provide it in an incomplete or inadequate way[6]; or access is granted with great time-delays[7]. Consequently, competing lubes do not exist on the market or they only appear on the market a long time later. In many cases, VMs ask for considerable investments in return for obtaining technical information. Many companies, in particular SMEs, cannot afford such investments.
- VMs delay the approval of competing lubricants by assigning only a ***very small number of laboratories*** to realise tests for the qualification of a lubricant as one that meets the VMs specifications. As a result of such practice, for a very long time-span, consumers and repairers can only acquire one approved lubricant on the market, which is the lubricant recommended by VMs[8].
- VMs foreclose the market and eliminate any competition simply through **extending warranty periods** from initially 6 months/1 year to 3, 5, 7 or even 10 years or by imposing maintenance contracts with the obligation to use a particular lubricant[9].
- The **bonus systems used by VMs** vis-à-vis their networks are still an important incentive not to buy parts outside the VM supply channel. Trends clearly show that practices persist whereby authorised dealers and repairers are being convinced to buy greater quantities of parts, or all parts from their respective VMs[10]. With this exclusionary practice, VMs bypass the limit set by the BER on non-compete obligations. It hampers, or renders impossible, market access for competitors and curtails co-contractors possibility to choose between various supply sources.

Further, some BER provisions have proven to cause issues when applied in practice and would therefore need particular attention, in the context of a new framework:

- The provision whereby VMs can oblige authorised partners to purchase a minimum of 30% of all spare parts from the VM, which in turn may have important consequences for the 70%, which is up for ‘free supply’ from any source. The sourcing of parts is a complex business and repairers aim to minimise the possibility of disruption. Having to source parts from different suppliers inevitably involves duplication of costs. This in itself puts VMs at a clear advantage to often supply 100% instead of just 30%.
- The provision whereby VMs are allowed to require the use of original spare parts supplied by them for repairs carried out under warranty, free servicing and vehicle recall work. VMs use this provision in an inappropriate way to oblige consumers and repairers to use the lubricant designated by them.

---

[5] In Oct 2008, a VM informed a technical editor that technical information was only available for authorised dealers.
[6] Many VMs allocate internal codes to define the lubricant required for a particular engine instead of providing clear technical specifications, which are required for the reproduction of this lubricant.
[7] Example: A VM launched new specifications for new engines in September 2007. The definitions for these specifications were set in January 2006. However, apart from the “recommended lubricant manufacturer”, lubricant operators only got the information about these standards during the first semester of 2008 and their products could only be approved during the second semester 2008.
[8] Recently, a VM for its new specification assigned only one laboratory to realize tests for the approval procedure.
[9] Example: There are many cases where VMs threaten consumers and repairers with an alleged breach of warranty if they do not use the lubricant designated by the VM.
[10] UEIL is aware of cases where special bonuses are granted on captive parts in case a certain percentage of “competed” parts is bought from the VM and year-end bonuses allocated for considerable purchases of VMs’ parts.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

IV. Proposals for a Future Regulatory Framework

1. Call for a Sector Specific Block Exemption Regulation

UEIL believes that in light of the above situation, there is a need for regulatory intervention with a view to achieve the challenging and ambitious objective of creating a competitive Internal Market in the vehicle sector. Considering the complexity of the automotive aftermarket and its distinctiveness from other industry aftermarkets, a special treatment is required, which rules out the industry's absorption by other more general legislative frameworks such as the vertical BER. Hence, the best way forward would be to replace BER 1400/2002 with a stringent and prescriptive regulatory framework specifically tailored to the needs of the industry, designed in such a way so as to provide for a true level playing field, which allows all operators to unfold their full competitive potential.

Given the size of consumer expenditure on repair and maintenance, the objective of any future regime should be to ensure that operators and consumers can choose between different alternatives and that all operators are in a position to offer high quality products and services at attractive prices. VMs strong market power needs to be limited, persistent abusive practices eliminated, access of independent operators to manufacturers' networks should be facilitated and a benchmark should be set for what is allowed and what is prohibited.

To achieve these objectives with respect to lubricants, it is essential to ***identify and remove existing loop-holes allowing operators to circumvent their obligations under EU competition law and to improve the current aftermarket provisions so as to:***

- Ensure that all lubricant manufacturers and distributors get access immediately, without delay and in a non-discriminatory way to VMs technical information required to produce and distribute competing lubricants that meet VMs specifications, based on objective performance criteria;
- Ensure that consumers and repairers have the right to source lubricants, which meet the specifications of VMs, from the competing lubricant manufacturer or distributor of their choice.

In order to allow the lubricant industry to continue offering consumers a wider and more diversified choice of products than VMs, it is crucial that the VMs' position does not get more dominant than it already is and that any discriminatory commercial practices vis-à-vis independents are forbidden. Such behaviour clearly represents a ***barrier to the good functioning of the Internal Market*** and respective agreements should hence not be exempted.

Another aspect speaking in favour of sector-specific rules, is the **Commission's new SME policy** embodied in its recent "Small Business Act", which stipulates the so-called "Think Small First" principle. It aims at ensuring that EU policy measures create conditions, which encourage the setting up of small firms and allow small businesses to thrive and achieve economic growth, lasting prosperity and the creation of new jobs. Considering that SMEs are the engines of Europe's economy and a considerable driver for sustainable growth, and in compliance with the EU's SME policy, UEIL strongly believes that a regulatory framework is needed, which establishes rules for fair competition in the Internal Market.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

Sector specific, clear and enforceable rules are also required to provide the **safeguards needed to encourage investments** and to protect smaller players faced with the contractual power of VMs. This is particularly true given the current financial turmoil, which is adversely affecting almost every operator in the automotive chain, in particular SMEs. While national support measures can help to kick-start the recovery, such measures remain transitional – they cannot under any circumstance replace a stable and long-term regulatory framework.

BER 1400/2002 has provided the entire automotive market chain with the **legal clarity and security** which operators require to develop and prosper. These provisions provide much greater clarity and represent a far better enforcement tool than any individual assessment under the abstract set of rules laid down in Articles 81 and 82 of the EC Treaty ever could. Providing an efficient compliance benchmark has allowed stakeholders to settle disputes without costly legal actions. Several UEIL members have successfully managed to convince VMs to refrain from their abusive practices and comply with EU competition rules, simply by referring to the BER and the explanatory brochure. Also, considering that the vast majority of the lubricant industry consists of SMEs, most of the companies in this segment will not be able to self-assess their practices under the EC competition rules, as this will require costly economic evaluations and legal counsel. We would therefore discourage a moving away from the clear legislation in place without providing the industry with substitutive sector-specific guidance.

2. Concrete Propositions for Improvements

UEIL believes that to effectively defend consumers' interests, the following two aspects are central to any future legislative and regulatory framework governing the automotive sector:

1st Proposition: Ensure that all lubricant manufacturers and distributors have immediate and full access to technical information required to manufacture and distribute lubricants which meet vehicle manufacturers' specifications.

Specifications required by VMs for their respective motor lubricants must be determined on objective performance criteria and these specifications must be **provided immediately, without delay**, to all lubricants manufacturers and distributors. By withholding the required technical information from independent operators and competing manufacturers, the VM/OEM obtains abusive power and such a behaviour is to be considered as a barrier to the effective functioning of the Internal Market.

2nd Proposition: Ensure that end users, consumers, authorised and independent repairers have access to all competing lubricants which meet motor vehicles manufacturers' specifications.

By this proposition, we mean that, **without any exception**, the exemption granted by the Regulation must not cover agreements which impose on end users, consumers or on authorised or independent repairers the use of one specific lubricant and prevent them from using competing lubricants, which meet motor vehicles manufacturers' specifications.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org

V. CONCLUSIONS

This paper has demonstrated that while BER 1400/2002 plays an important role for the automotive industry and should therefore not be removed, it has not been successful yet in removing the totality of the competitive constraints still existing on the aftermarket. This is mainly due to the fact that most of the current distortive practices employed by suppliers are not *per se* unlawful, i.e. there is no formal violation of BER provisions or other EU legislation, but they are strategically tailored from VMs and OEMs to effectively circumvent their competition obligations.

The granting of special bonuses, difficult access to technical information, use of multi-annual warranties are only a few of the everyday distortive practices characterising the vehicle sector.

Nevertheless, the BER is an essential tool as it provides the entire automotive market chain and particularly small and medium-sized operators with the required legal clarity and legal security. In fact, an assessment of the lawfulness of an agreement on the basis of the BER is much easier, less costly and burdensome than Art. 81 and 82 of the EC Treaty.

Against this backdrop, UEIL is convinced that a removal of BER 1400/2002 without replacement cannot be the solution for the future. Instead, UEIL believes that a sector-specific regulatory framework is absolutely necessary for the automotive industry, which identifies and removes all the existing loop-holes allowing vehicle manufacturers to circumvent their obligations imposed by EU law and which reinforces and improves some of the existing key provisions, in particular those governing the aftermarket.

This is indeed the time to favourite an approach which promotes a more functional and effective market structure and which provides market players, investors and consumers with a stable, clear and enforceable set of rules. Putting the consumer at the forefront on the one hand and stimulating strong investments in the automotive industry on the other are crucial factors to recover from the current economic crisis.

For all these reason, UEIL invites the European Commission to abstain from a removal of the existing BER 1400/2002 without replacement and to instead come forward with a proposal for a strengthened and clearer sectoral framework that would apply after 31 May 2010 and that would put in place a fair level playing field to the benefit of all stakeholders. In UEIL’s view that could best be ensured through:

- an improvement of the BER provisions relating to those areas, where remaining competition problems have been identified, namely the after-sales market.
- an embedment of these improved provisions within a clear and enforceable sector-specific framework which would be supplemented by explanatory guidelines.

UEIL Asbl, Rue du Luxembourg, 22-24, B-1000 Brussels
Tel: +32 2 761 66 85, Fax: +32 2 213 13 63, email: info@ueil.org