Policy rule on maintaining the quality of petrol and diesel intended for export to low and middle income countries outside the EU, with special reference to the ECOWAS countries 2022

Human Environment and Transport Inspectorate (2022)

Policy Rule of the State Secretary for Infrastructure and Water Management of 28 July 2022, no. IENM/ILT-2022/36807, regarding the establishment of an enforcement policy on the quality requirements applicable to petrol and diesel for on-road use intended for export to low and middle income countries outside the EU, with special reference to ECOWAS countries, in connection with the supervision and enforcement of the duty of care laid down in Article 9.2.1.2 of the Environmental Management Act (Policy Rule Enforcement of Quality of Petrol and Diesel for Road Transport Destined for Export to Low and Middle Income Countries outside the EU, destined in particular for ECOWAS countries, 2022).

The State Secretary of Infrastructure and Water Management,

Having regard to Sections 4:81(1) of the General Administrative Law Act and Section 9.2.1.2 of the Environmental Management Act

Decision:

Article 1 Definitions

In this policy rule, the following definitions apply:

a. petrol and diesel: petrol and diesel for use as fuel in road transport
b. ppm: parts per million
c. v/v: volume/volume
d. produce: manufacture, import into the Netherlands, usage, processing or supplying to another party
e. ECOWAS: Economic Community of West African States
f. Low and middle income countries: low and middle income countries according to the definition and current classification of the World Bank.

Article 2 Quality of petrol and diesel

1. In enforcing the duty of care under Section 9.2.1.2 of the Environmental Management Act, the Human Environment and Transport Inspectorate operates at least the following specifications to petrol and diesel intended for export to low and middle income countries outside the EU until 1 April 2023:
    a. petrol contains up to 150 ppm of sulphur, up to 1% (v/v) of benzene and up to 6 mg/litre of manganese
    b. diesel contains up to 350 ppm of sulphur.

2. In enforcing the duty of care under Section 9.2.1.2 of the Environmental Management Act, the Human Environment and Transport Inspectorate operates at least the following specifications for petrol and diesel intended for export to low and middle income countries outside the EU from 1 April 2023:
    a. petrol contains a maximum of 50 ppm sulphur, a maximum of 1% (v/v) benzene and a maximum of 2 mg/litre manganese
    b. diesel contains up to 50 ppm of sulphur.

Article 3 Evaluation

This policy rule will be evaluated two years after its publication.

Article 4 Entry into force

This policy rule shall enter into force the day after being published in the Dutch Government Gazette.

Article 5 Official title

This policy rule shall be cited as: Policy rule on maintaining the quality of petrol and diesel intended for export to low and middle income countries outside the EU, with special reference to the ECOWAS countries, 2022.

This policy rule and the explanatory memorandum shall be published in the Netherlands Government Gazette.

THE STATE SECRETARY FOR INFRASTRUCTURE AND WATER

MANAGEMENT,

on behalf of these,

THE INSPECTOR-GENERAL FOR THE HUMAN ENVIRONMENT AND TRANSPORT,

J.A. van den Bos

EXPLANATORY MEMORANDUM

The policy rule implements the supervision and enforcement by the Human Environment and Transport Inspectorate (ILT) of the duty of care set out in Section 9.2.1.2 of the Environmental Management Act concerning the quality of petrol and diesel intended for export to low and middle income countries[1] outside the EU. This policy rule includes specifications for both fuels produced for on-road use and exported to these countries, particularly to the ECOWAS countries. This clarifies the situation for fuel producers, traders and terminals that produce (including blending) and export this petrol and diesel.

Publications ILT and TNO

The ILT published the following reports in the period 2018-2021 on:

- the quality of the petrol and diesel that were blended in the Netherlands and exported from
  the Netherlands to West Africa *(On-road fuels for West Africa; ILT, June 2018)*[2]
- the quality of vehicles that were exported from the Netherlands to Africa
  (Used vehicles exported to West Africa; ILT, October 2020)[3]
- the consequences of using the quality exported
  fuels in the exported vehicles. *(Petrol fuel quality and its effects on the vehicle technology and the environment, TNO, January 2021).*[4]

The first report stated that petrol and diesel exported from the Netherlands, especially to ECOWAS countries, contained much higher concentrations of sulphur, benzene and manganese than is allowed in European petrol and diesel due to their being a health hazard. The second report describes the quality of the used road vehicles exported from the Netherlands to Africa, i.e. a significant proportion of vehicles of emission quality EURO 3 and partly EURO 4. The TNO report then describes the consequences of using the observed quality of exported fuels in the vehicles.

High concentrations of these substances in petrol and diesel lead to much higher emissions of particulates, SO_2, benzene and VOCs (Volatile Organic Compounds) than the petrol and diesel used in Europe. The use of imported petrol and diesel in the ECOWAS countries also causes damage to the catalytic converters and particulate filters of the vehicles. This gives rise to additional emissions of air pollutants.

Several reports state that these additional emissions lead to reduced air quality and to health problems and contribute to premature deaths[5], for example in urban areas/agglomerations in the ECOWAS countries. The reports go on to say that the cost of the damage to health is expected to be much higher than the cost of improving fuel quality.[6] To mitigate these health risks, the United Nations Environment Programme (UNEP), through the Partnership for Clean Fuels and Vehicles

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[1] These are all countries with the exception of "high-income economies" ("those with a GNI per capita of $12,696 or more") according to the World Bank definition and current classification. WDI - The World by Income and Region (worldbank.org)

[2] https://english.ilent.nl/documents/reports/2018/07/04/heavy-fuel-oil-for-sea-going-vessels

[3] https://www.ilent.nl/documenten/rapporten/2020/10/26/rapport-used-vehicles-exported-to-africa

[4] https://english.ilent.nl/documents/reports/2021/04/24/petrol-fuel-quality-and-its-effects-on-the-vehicle-technology-andthe-environment

[5] Due to air pollution from road traffic, as well as biomass cooking and waste incineration

[6] Among others: -ICF International (September 2009) "Final Report Sub-Saharan Africa Refinery Project" Volume I and Volume II, ICF International commissioned by the Worldbank and African Refiners Association p.138 (Volume II) and The estimated 10-year benefits of reduced sulfur fuels modelled in Scenario 2 for all SSA (about $43 billion) are similar to the benefits shown in other studies. For example, the benefits of reducing health impacts in China, including total mortality and chronic bronchitis, modelled for the years 2008-2030, are about $45 billion (in 2005 US dollars) for total mortality and $10 billion (in 2005 US dollars) for chronic bronchitis. A similar study conducted in Mexico predicted benefits of about $40 billion (in 2000 US dollars) modelled for the years 2006-2030". P 7-8, chapter 7 Health Study Summary and Discussion, Volume I-A. en -World Bank (September 2020) "The costs of air pollution in Lagos"

(PCFV), has been working since 2005 to reduce the sulphur content in petrol and diesel worldwide to 50 ppm. Governments and the oil industry have endorsed this global goal.

On 8 October 2021, the UN Human Right Council recognised a clean, healthy and sustainable environment as a human right.[7] According to the World Health Organisation, 24 % of the world's annual mortality is due to environmental hazards, such as air pollution and exposure to chemicals.

The use of high-sulphur diesel also leads directly to black carbon emissions. Black carbon is an air pollutant and is a subcategory of particulate matter (PM 2.5). Black carbon increases the greenhouse effect/ global warming.[8]

Finally, the export of high-sulphur fuel deprives importing countries of the opportunity to rejuvenate their vehicle fleets and take advantage of modern vehicles with emission-reducing technology and lower fuel consumption. This is because catalytic converters break down at high sulphur levels and lose their emission-reducing effect for the rest of their live spans. To improve the quality of the global vehicle fleet, the Netherlands urges the European Commission to include strict requirements for exporting used vehicles in the revision of the EU End-of-Life Vehicles Directive.

Duty of care for substances and mixtures pursuant to section 9.2.1.2 of the Environmental Management Act

Article 9.2.1.2 of the Environmental Management Act stipulates that:

'Any person who professionally manufactures a substance, mixture or genetically modified organism, or imports it into the Netherlands, applies it, processes it or makes it available to another person, and who knows or could reasonably have suspected that their actions with this substance, mixture or organism could cause hazards to human health or the environment, is obliged to take all measures that can reasonably be required of them to prevent or limit these hazards as much as possible.'

The duty of care laid down in the article above applies to the manufacture, import into the Netherlands, usage, processing or providing to another party substances and blends, such as fuels. Given the actions referred to, the duty of care is incumbent on (among others) refiners, terminals and fuel traders of petrol and diesel for road use destined for low and middle income countries outside the EU.

Scope of the policy rule

The fuel producers, traders and terminals operating from the Netherlands produce and supply fuels for the entire world. The fuel market in West Africa is important regarding exported fuels outside the EU. The ECOWAS region comprises 15 countries with a total population of 400 million. The region depends on imports for more than 80% of its fuel consumption. Nigeria is the largest fuel market in the ECOWAS region and is over 90% dependent on imports for petrol. In the last three years (2019-2021), an average of over 40% of Nigeria's imported fuels were produced in and sourced from the Netherlands.[9]

The ECOWAS region's dependence on fuel imports may increase in the future, depending on the progress of production possibilities in the destination countries. This is because fuel consumption is growing rapidly: in the ECOWAS region it is expected to increase from 28.2 million tonnes (in 2017) to 54 million tonnes in 2040.

Partly in view of the large share of Dutch exports in the West African fuel market, it is important to draw the attention of the operating fuel producers, traders and terminals to compliance with the duty of care under Article 9.2.1.2 of the Environmental Management Act.

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[7] Access to a healthy environment declared a human right by UN rights council | UN News

[8] Under the umbrella of the Climate and Clean Air Coalition (CCAC), a coalition led by the governments of the US, Canada and Switzerland, UNEP and the ICCT on the global reduction of black carbon emissions from Heavy Duty Vehicles (such as trucks and buses). One of the coalition's targets is to reach 10 ppm sulphur in fuels worldwide by 2025.

[9] Compilation of mainly statistical data.

Sulphur

The internationally generally accepted specifications have been followed for the quality of petrol and diesel. The UNEP Partnership for Clean Fuels and Vehicles (PCFV) aims for a maximum sulphur content of 50 ppm in both petrol and diesel worldwide. The TNO report, among others, shows that fuels with a maximum sulphur content of 50 ppm are acceptable to prevent damage to catalytic converters and particulate filters in older vehicles. The vast majority of the world's population has a road fuel quality of no more than 50 ppm of sulphur or lower.[10] Stricter fuel standards apply in various countries and regions.

In West Africa, the Heads of Government of the ECOWAS countries adopted two Directives in 2020 to harmonise and tighten up fuel and vehicle standards in the ECOWAS countries by 1 January 2021[11]. For petrol and diesel, the sulphur standard will be reduced to a maximum of 50 ppm (for example, 1,000 ppm for petrol and 3,000 ppm for diesel). The benzene content in petrol will be reduced to a maximum of 1% (previously 2%, 5% or no standard). The manganese content is also limited. Vehicles, including used vehicles for import, must meet at least the EURO 4/IV emission requirements. The ECOWAS guidelines have not yet been implemented in all countries. However, the ambition of the government leaders is clear. Efforts by companies should be aimed at an eventual reduction of the sulphur content to 50 ppm. For example, in 2017, Nigeria independently adopted new specifications for petrol and diesel[12]. For petrol, the sulphur content is a maximum 150 ppm and for diesel a maximum of 50 ppm. In Ghana and Cape Verde, the standard is a maximum of 50 ppm sulphur.

Benzene

The maximum benzene content in petrol is set in line with the current European standard because benzene is a carcinogenic substance and exposure to it should be minimised. European petrol may not contain more than 1% (v/v) benzene since 2000 due to its carcinogenic properties. The TNO report shows that the use of high benzene content petrol in old or poorly maintained cars will emit more benzene than the use of the same petrol in modern cars with more emission control technology. A lower benzene content is even more important in old and poorly maintained cars to avoid exposure to this carcinogenic substance.

Manganese

Adding manganese to petrol is prohibited in Europe. A manganese additive is added to petrol to increase the octane rating. If better raw materials are used, such as in European petrol, adding manganese additive is unnecessary. The TNO report shows that an excessively high manganese content damages a car's engine and catalytic converter, resulting in additional emissions. For this reason, the car industry also warns of the negative consequences of adding metal additives, including manganese, to petrol.

Term

When adopting the ECOWAS Guidelines, the Heads of Government of the ECOWAS countries agreed to implement the above specifications by 1 January 2021. In many countries, the relevant fuel standards have not yet been implemented in national legislation. Also in view of the clear wish of the ECOWAS government leaders, it is important that the Dutch fuel producers, traders and

[10] These include Australia, Burundi, Canada, Chile, China, Costa Rica, Europe, Philippines, Ghana, India, Japan, Kenya, Morocco, New Zealand, Russia, Rwanda, Saudi Arabia, Singapore, Tanzania, Thailand, Uganda, the USA and South Korea.

[11] Joint meeting of ECOWAS Ministers in charge of hydrocarbons and environment, Ouagadougou, Burkina Faso, 6 February, 2020. The subsequent Directives: C/DIR.9/2020 on harmonised specifications for automotive fuels (Gazoline and diesel) and C/DIR/2/09/20 on the harmonisation of vehicle exhaust and particulate matter emission limits from light, heavy, two-wheel motor vehicles, tricycles and quadricycles were discussed by the ECOWAS Parliament and a resolution passed in July 2020, that the Heads of States have formally adopted on September 4-7 in Niamey, Niger. Both directives were adopted accordingly.

[12] Nigerian Industrial Standard (NIS) 116:2017 Standard for Premium Motor Spirit (Petrol) and NIS 948:2017 Standard for Diesel fuel (AGO).

terminals, based on their duty of care and their role in the market, continue to maximise their efforts to realise the desired reduction of sulphur content by 1 April 2023. This is almost two years after the ILT called the sector to account for its compliance with the duty of care.

Until 31 March 2023

Immediately reducing high sulphur contents in petrol and diesel leads to a reduction in emissions of SO2 and particulates. Until 31 March 2023, the ILT will apply the transitional specifications set out in Article 2, paragraph 1. Lower sulphur contents in petrol and diesel reduce air pollutant emissions even in old cars with or without emission control technology.

These transitional specifications of 150 ppm and 350 ppm were considered appropriate at the time for vehicles of emission class EURO 3. The ILT study shows that in 2017 to 2019, many vehicles of this emission class were still being exported, but so were vehicles of emission class EURO 4. The latter emission class is designed for petrol and diesel with a maximum sulphur content of 50 ppm. Developments in Europe and Africa, including in the ECOWAS countries, make it clear that more and more vehicles with at least EURO 4 emission class are being exported to Africa and are becoming standard there. Ultimately, this means that the transitional specification cannot continue to exist, and the switch to 50 ppm is necessary.

Fairness

Technical feasibility

The quality of petrol and diesel stipulated in this policy rule is technically feasible. The European standard of 50 ppm sulphur in both petrol and diesel has been applied since January 2005. The standard of 10 ppm sulphur in both petrol and diesel has been applied since 2009. Petrol and diesel and their components must be desulphurised to meet the quality requirements. Refineries have long had desulphurisation technology for the production of European fuels to achieve the required quality.

Limiting the benzene content to a maximum of 1% can often be achieved by not using flows containing high levels of benzene as petrol components. In Europe, the benzene content has been limited to a maximum of 1% benzene since 2000.

Alternatives such as reformates and isomerates are available as metallic additives (such as manganese) to improve the octane rating. In Europe, the manganese content has been limited to a maximum of 6 mg/l since 2009 and was reduced to a maximum of 2 mg/l in 2014.

Financial feasibility

Although only limited information is available on profit margins, studies[13] show that the additional costs for cleaner fuels are estimated to be financially viable for the sector in a normally functioning oil market.

Studies of clean fuels and vehicle technology costs in the US, India, China, Africa and Mexico consistently show that these costs are lower than the damage to health caused by poor quality fuels and vehicles.[14]

[13] Blumberg, Walsh, Pera (2006) "Low-Sulphur Gasoline & Diesel, The Key to Lower Vehicle Emissions" p 29 - 33, COM(2001) final (2001) "Proposal for a Directive of the European Parliament and of the Council on the quality of petrol and diesel fuels and amending Directive 98/70/EC" p 11-12 and ICCT (2017) "Developing a roadmap for the adoption of clean fuel and vehicle standards in Southern and Western Africa" p 39.

[14] See note 6, -Heavy Duty Diesel Initiative of the Climate and Clean Air Coalition (2016) "Cleaning up the global on-road diesel fleet a global strategy to introduce low-sulfur fuels and cleaner diesel vehicles" (A Global Strategy to Introduce Low-Sulfur Fuels and Cleaner Diesel Vehicles | Climate & Clean Air Coalition (ccacoalition.org).
and - The ICCT (October 2013) "the impact of stringent fuel and vehicle standards on premature mortality and emissions"

Enforcement

For the enforcement of Article 9.2.1.2 of the Environmental Management Act, the National Enforcement Strategy[15] applies in addition to this policy rule. The ILT considers all facts and circumstances in its supervision and enforcement. This may also mean that it is possible to depart from the policy rule if it is clear that producers, traders and terminals are accepting their responsibility by taking concrete actions and measures that effectively lead to better fuel quality, thus complying with Article 9.2.1.2 of the Environmental Management Act. An active interpretation of producer responsibility is also in line with the producer responsibility that follows from the OECD Guidelines for International Corporate Social Responsibility (CSR). The ILT must base its enforcement on this policy rule and also consider Article 4:84 of the General Administrative Law Act.

Consultation

The ILT has submitted the draft policy rule for consultation to the known producers, traders and terminals that play a role in the fuel market for West Africa. The policy rule was also submitted to the trade associations. The ILT has received 13 responses. The companies endorse the need to achieve better fuel quality worldwide in the interests of human health and the environment. Some companies indicated that they would like to enter into consultations with relevant stakeholders to look into how they can contribute to the transition to an environmentally better fuel quality (including 50 ppm sulphur) 'at the pump', which is desirable in Africa.

The responses to the consultation focus on legal and market economy concerns. This is discussed below. The next point to be addressed is the sector's comment that the ILT has little contact with African stakeholders and the sector's desire for at least a European level playing field.

a. Legal objections

The following legal objections were raised by the companies:

- the duty of care article is said, in view of its genesis, to be limited primarily to the Netherlands where dangers to human health and the environment are concerned
- the exception in the Air Pollution Fuels Decree, that the European fuel specifications do not apply to petrol and diesel exported outside the EU, is actually rendered inoperative by the ILT's interpretation of the duty of care article
- the policy rule is said to be disproportionately intrusive as it would effectively prohibit production or export. The imposition of a production or export ban is reserved for the legislator and not for the ILT,
- the policy rule is said to be contrary to the EU Treaty because it would restrict free movement within the EU
- the sector is said not to be sufficiently involved in the drafting of the policy rule; there is said to be no proportionality test and that the parties subject to the regulation are unclear

Regarding the history, later in the legislative process of the now repealed Environmentally Hazardous Substances Act (Wms), in which the duty of care was included at the time, the legislator explicitly indicated that the duty of care for human health and the environment was not bound by borders and was therefore not limited to the Netherlands[16]. The Air Pollution Fuels Decree does not stand in the way of fulfilling the duty of care. The specifications laid down in the policy rule are less strict than the European specifications under the Decree on air pollution fuels but are appropriate for the vehicles that were and will be exported to African countries in particular. The specifications do not imply an export ban in the sense that producers, traders and terminals are not allowed to export petrol and diesel or only petrol and diesel of European quality.

[15] wetten.nl - Regulation - Policy Rule Enforcement Strategy Inspectorate for the Environment and Transport BWBR0045070 (overheid.nl)

[16] Quote from the explanatory statement Lower House, session year 1983-1984, 16800, no. 9, p. 46-49: 'that the protection of man and the environment against dangerous substances and preparations, which is the aim of this draft, is in principle not limited by borders. After all, these dangers can manifest themselves beyond the borders of the Netherlands and the European Communities'.

The policy rule binds the ILT in its supervision and enforcement. The Minister of Infrastructure and the Environment has delegated the authority to draw up 'enforcement policy', including this policy rule, to the Inspector General (IG) of the ILT, to the extent that it concerns the supervision and enforcement of legislation and regulations in the field of Infrastructure and the Environment. This is not altered by policy rule's intervention in market forces. Having regard to Article 36 TFEU, under which the provisions of Articles 34 and 35 TFEU do not preclude the application of quantitative restrictions on exports[17] within the EU based on aspects including the protection of human health and life, it also follows from Article 10 of Regulation 2015/479 that the application of quantitative restrictions on exports from the Union to third countries is justified on the grounds of the protection of health and life of humans. In view of this policy rule's purpose, there is no incompatibility with the principle of free movement of goods.

The ILT has shared and discussed the results of the above mentioned ILT- and TNO-reports with the sector organisations and parties and has called them to account. However, this has not yet led to the desired effect.
The draft policy rule has also been submitted for consultation to the industry association and companies involved in the export of the fuels. The policy rule provides a more detailed interpretation of the duty of care in the interests of supervision and enforcement. The policy rule provides clarity to the sector on how the ILT will exercise its authority and thus contributes to a level playing field. The possible consequences of the policy rule for the parties are not so unreasonably onerous in relation to the objective it serves that it should not be adopted.

b. Market economy concerns

In addition to these legal concerns, the following market concerns have been raised by the companies:

- better fuel is more expensive,
- the West African countries are not willing or able to pay for this, and
- one-sided improvement of the Dutch fuel quality will then lead to a situation where countries will buy their fuel elsewhere and the policy rule will not lead to any significant improvement in the quality of fuel available at the pump there.

None of the companies have substantiated these arguments with factual information that the ILT can verify.

The objections raised do not lead to a waiver of the policy rule. However, the objections have given rise to a number of amendments and clarifications to the policy rule. For manganese, a limit value is included in Article 2, which is in line with European development and advice from the car industry[18]. Which countries the policy rule applies outside the EU has also be clarified. The original deadline of 1 January 2023 for applying the ultimate desired sulphur content of 50 ppm for both petrol and diesel in enforcement by the ILT was extended to 1 April 2023 as a result of the consultation. This allows the companies to meet their duty of care independently and, if necessary, to devise alternative measures that can be demonstrated and verified has having at least the same or better effect.

Consultation stakeholders West African region

The sector has indicated that the ILT has little contact with stakeholders, particularly those in Africa. The ILT has consulted with UNEP, which is implementing a cleaner fuels (and vehicles) programme in Africa. The Dutch government is a partner and supporter of this programme (Partnership for Clean Fuels and Vehicles). UNEP supports the approach of the Dutch government which, with the policy rule, is taking joint responsibility for the public health risks of products produced and exported in the Netherlands. The policy rule is in line with the ambitions of UNEP and the West African countries in terms of quality specifications and deadlines. The ILT has actively contributed to the discussions on vehicles and fuels at various seminars in recent years,

[17] In addition to quantitative restrictions, the export of goods may not be subject to measures having an equivalent effect to quantitative restrictions (C-83/94, paragraph 21).

[18] European Automobile Manufacturers Association (ACEA) and others, Worldwide Fuel Charter, gasoline and diesel fuel, 6th edition, 2019

which have also been attended by African policymakers.[19] The ILT is also holding talks with the Nigerian authority NMDPRA (Nigerian Midstream And Downstream Petroleum Regulatory Authority). The ILT will continue to engage with UNEP and other relevant stakeholders. Based on the duty of care, the sector itself also has a role to play here.

European level playing field

The terminal sector in particular has pointed out that the entry into force of the policy rule in anticipation of this European level playing field will lead to economic damage at the terminals. This will result from the policy rule causing fuel producers and traders to shift their blending activities and future investment activities to terminals and locations in other European countries. The sector has therefore pointed to the need for at least a European level playing field. The ILT endorses this. The ILT pays constant attention to achieving an international level playing field. This will be aligned to the initiative of the Belgian and European Parliaments for legislation on an international duty of care for multinational companies. France introduced such legislation in 2017.[20] To achieve a level playing field, the sector itself also has a role to play based on its duty of care.

THE STATE SECRETARY FOR INFRASTRUCTURE AND WATER

MANAGEMENT,

on behalf of these,

THE INSPECTOR-GENERAL FOR THE ENVIRONMENT AND TRANSPORT,

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[19] 16/12/2020: CITA member and institutional stakeholders meeting on The control of used vehicles; 18/12/2020: UNRSF project: Safer and cleaner used vehicles for Africa 1st exporting countries stakeholders group meeting; 8/3/2021: World Bank Group: Global Trade in Used Vehicles - Impacts, Opportunities and Challenges for Africa; 8/4/2021: SSATP Africa's transport policy programme: Webinar Saferand Cleaner Used Vehicles for Africa; 7/6/ 2021: World Bank/WRI/Netherlands Decarbonisation Investments Series, Motorization Management and the Trade of Used Vehicles; 25/6/2021:UNEP/AU/UN-ECA and others: First African Used Vehicles Importers Meeting; 15/3/2022: UN-ECA's Kofi Annan Road Safety Award/Webinar on Used Vehicles in Africa

[20] de loi n° 2017-399 du 27 mars 2017 relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre