# SUPPLEMENTARY SUBMISSION TO THE SENATE INQUIRY ON

## The ILLEGAL LOGGING PROHIBITION BILL 2011

#### 22/12/11

From the following Associations:

- Window and Door Industry Council www.wadic.org.au
- Timber Veneer Association of Australia www.timberveneer.asn.au
- Timber and Building Materials Association <u>www.tabma.com.au</u>
- Australian Furniture Association South West <a href="www.australianfurniture.org.au">www.australianfurniture.org.au</a>
- Timber Merchants Association www.timber.asn.au
- Cabinet Makers Association (Vic) www.cmavic.com.au
- Cabinet Makers Association (WA) www.cmawa.com.au
- Qld Timber Importers, Exporters and Wholesalers Association
- Australian Shop and Office Fitting Industry Association <u>www.asofia.com.au</u>
- Furnishing Industry Association of Australia Ltd <u>www.fiaa.com.au</u>

## "DEFINITION OF "ILLEGALLY LOGGED"

As per our main submission, we propose that this be amended to: "harvested in contravention of <u>Forest</u>-related <u>National</u> and <u>Sub-national</u> laws in force in the place (whether or not in Australia) where the timber was harvested". We wish to provide more information on this matter:

## a. "Forest" Laws

The intent of the Bill is to improve <u>forest</u> governance, this should be explicitly reflected in the definition. This will significantly reduce business compliance costs whilst still maintaining regulatory effectiveness. Anything that unnecessarily adds significant costs and barriers to imports of legal timber and wood products, without increasing regulatory effectiveness, is extremely undesirable and could be regarded as acting as a trade barrier, especially when lower cost (but equally effective) "pathways" are available.

Also, throughout the illegal logging process the Government has promoted the goal of their policy and future law as being about improving forest governance: "reducing forest degradation, protecting habitat and biodiversity, protecting sustainable livelihoods, reducing global carbon emissions and ensuring government revenue" (<a href="http://www.daff.gov.au/forestry/international/illegal-logging">http://www.daff.gov.au/forestry/international/illegal-logging</a>, <a href="http://www.daff.gov.au/forestry/international/illegal-logging/background">http://www.daff.gov.au/forestry/international/illegal-logging/background</a> and the original Jaakko Poyry Report <a href="http://www.daff.gov.au/data/assets/pdf">http://www.daff.gov.au/data/assets/pdf</a> file/0004/785065/illegal logging report.pdf)

The broad definition of "illegally logged" as in the Bill ("harvested in contravention of laws in force in the place [whether or not in Australia] where the timber was harvested") does not reflect the specific goal of improved forest governance and laws. Rather, it could be about any laws. In this way it exposes businesses to great uncertainty and massive potential compliance burdens of not just having to ensure compliance to forest laws, but also to a far larger number of non-forest laws such as human rights, OHS, trade, customs laws, competition, tax, employment, export and criminal laws.

Of course it would be good if compliance to such non-forest laws could be increased, but Australian importers, and especially small businesses, should not and cannot be expected to operate as some kind of proxy human-rights and general legal compliance watch-dog in overseas countries.

We have done case studies for two countries of harvest (Germany and the US) to illustrate this compliance cost problem that would be created by the current broad and loose definition of "illegally logged" (see Attachment 1). We have only chosen National and EU Acts and Regulations, not State or Municipal laws, nor forest codes, because of the short notice of the inquiry and resultant lack of time.

<u>Germany</u> – From the sources and data available we estimate that there are twelve German Federal Acts/Regulations, plus four EU Acts/Regulations that specifically relate to *Forest* Governance. If importers have to ensure compliance to *non-forest* laws, this increases to sixty-three Federal plus thirty-three EU Acts/Regulations (total = ninety-six laws). Making the reasonable assumption that compliance costs are, to some degree, proportional to the number of laws, if importers have to ensure compliance to ninety-six laws, this would cost far more than just ensuring compliance to sixteen *forest related* laws.

<u>United States</u> - We estimate that there are twelve US Federal Acts that specifically relate to *Forest* governance. If importers have to ensure compliance to *non-forest* laws then the number of laws increases to thirty eight, with resultant significant increases in compliance costs.

#### b. "National and Sub-national" laws

Clarification - By this we also include nationally <u>enacted</u> (in the country of harvest) international treaties and conventions, but not non-enacted treaties, or those international treaties which the country of harvest is not a signatory to.

#### Support for National Sovereignty

One of the best ways that Australia can reduce illegal logging is by supporting national sovereignty in the countries of harvest; that is, doing all that we can do to support the Governments in these countries in formulating, passing and enforcing their own forest laws. Australia should *not* act in a way that diminishes Government authority or responsibility, such as by "imposing" non-enacted international treaties or conventions.

#### International Treaties and Conventions

There is a large set of international treaties and conventions that importers need to be aware of, and to ensure compliance to. Attachment 2 shows our estimate - five International Treaties and Conventions likely to be specifically applicable to *forest* harvest and management, but if *non-forest* international treaties are applied, this brings the total to forty-seven Treaties/Conventions. This would significantly increase compliance costs. It is also an unnecessary duplication, because National (plus State) laws cover forest governance quite adequately.

#### Non-enacted tribal, customary, religious and archaic laws

If compliance to these laws is required this would drive costs and uncertainty even higher.

### c. Total Number of Laws to ensure Compliance to

- (i) The Illegal Logging Bill seems to assume that importers are aware of, and understand, all the foreign laws that have to be complied with. This is not possible because of the sheer number of likely laws, as the following illustration shows:
- One importer may source from say five countries.
- Using the average of the US and Germany, assume each country has 67 National laws (Attachment 1).
- Add to this an equivalent number of State/Province laws (as an estimate) = 67
- Plus international treaties = 47 (Attachment 2)
- TOTAL = 181 laws
- Multiply by 5 countries = 905 laws.

This excludes forest codes and municipal/local laws, so it is not unreasonable to assume that this "average" importer would have to be aware of and understand about 1,000 foreign laws, regulations and codes, and ensure compliance to these.

- (ii) If importers only have to ensure compliance to *Forest-related* **National** and **Sub-National** laws then this compliance burden is far less:
- Using the average of the US and Germany, assume each country has 14 Forest-related laws.
- Add to this an equivalent number of State/Province laws = 14
- TOTAL = 28 laws, multiply by 5 countries = 70 laws.

Add in forest codes and municipal/local laws and it would be reasonable to assume that in this case there would only be 100 foreign laws to ensure compliance with - one order of magnitude less than the case in (i). This illustrates why a tight definition of Illegal Logging just about *Forest* laws and only *National* and *Sub-national* laws, is crucial in keeping down compliance costs and ensuring business affordability.

## **COST-BENEFIT CALCULATIONS**

#### Benefits

In their Regulation Impact Statement the Australian Government presented the CIE estimate that the world-wide social and environmental benefits of stopping illegal logging would be around US\$101.3 billion p.a. (page 14). The RIS estimated that Australia's "share" of the worldwide illegal logging problem as 0.034% (page 7). That would correspond to a benefit to Australia of around 0.034% of US\$101.3 billion = AUD\$34 million p.a.

#### Costs

Recent work from DAFF has found that there are around 10,000 "repeat" regular "business importers" of timber and timber products (as identified by HS customs codes). If the total compliance cost for each business is an average of AUD\$20,000 per annum, this would mean that the "national compliance cost" would be 10,000 businesses x AUD\$20,000 per business = AUD\$200 million p.a.

AUD\$20,000 p.a. per importer is not an unreasonable estimate of compliance costs given that *legality audits alone* could cost \$5,000 to tens of thousands of dollars per annum (see page 5 of our main Submission

https://senate.aph.gov.au/submissions/comittees/viewdocument.aspx?id=75aabc7c-6712-430a-871f-cf8762746c41.) To this has to be added reporting, declaration, research, risk-assessment, Due-Diligence, information systems, training, risk-mitigation and likely re-sourcing costs.

Many complex and composite wood-based products have not been "picked up" by the HS Codes, so it is likely that the total number of wood-based product importers "to be regulated" could actually be more like twice this number, that is, 20,000 businesses, bringing total national compliance costs to AUD\$400 million p.a. Even if no products were "regulated", but all importers were just subject to the Prohibition Requirement, common sense "Due care" to eliminate illegal timber in one's imports would still cost a significant amount per business.

#### Benefit:cost ratio

The conservative estimate of cost (AUD\$200 million p.a.) and benefit of AUD\$34 million p.a. gives a benefit : cost ratio of 0.17 : 1 (34:200). This negative result is vastly different to the CIE positive estimate of benefit : cost being 1.2 : 1, because none of their cost estimates took into account the actual number of businesses and estimates of compliance costs per business. Even if our estimate of average compliance cost per business is too high, and costs are more like \$10,000 per business per annum, this would still result in costs being three times greater than benefits.

## **CONCLUSION**

Clearly, cost:benefit estimates of around 3:1 to 6:1 mean that active steps need to be taken to amend the Bill and design the regulations for least-possible business compliance costs, whilst still maintaining regulatory effectiveness. We recommend to the Committee that they seriously consider all of our Alliance's amendments (as proposed in our main submission) as the best way to move towards a more favourable cost:benefit ratio and create greater business certainty:

- 1. Definition of illegally logged to be "harvested in contravention of *forest-related National* and *Sub-national* laws in force in the place (whether or not in Australia) where the timber was harvested"
- 2. A review of the business affordability and achievability of the Regulations, to occur one year after the Regulations come into force, with this requirement to be written into the bill.
- 3. Delete major part of Section 14 (5). Also, that the "laws" referred to in this section are explicitly stated to be only *forest-related National and Sub-national laws*, to prevent this Due Diligence Section from being interpreted as requiring compliance to *other* laws.
- 4. To give businesses time to comply with the Prohibition requirement in the most cost effective way, the Prohibition requirement to come into force at least twelve months after the bill receives Royal Assent.
- 5. The Prohibition Fault element to be changed from the "default" of "knowingly, intentionally or recklessly", to be explicitly stated as "knowingly or intentionally".

ATTACHMENT 1	
German Federal Acts and Regulations	http://www.cgerli.org/index.php?id=95
n cases of amendments, the earlier law is not listed, only the i	
FOREST LAWS - Laws that <i>specifically</i> relate to <u>forest</u> management, harvest and governance (eg conservation,	
vildlife, biodiversity, sustainability, water quality, soil	GENERAL LAWS - eg human rights, employment, OHS,
conservation)	competition, tax, export and trade laws
2 LAWS	63 LAWS
Conservation of Species Regulation	Act against Restraints of Competition
nvironmental Damage Act nvironmental Impact Assessment Act	Act on Long-Term Care Leave Act on the Federal Audit Office
Environmental Information Act	Animal Welfare Act
Invironmental Liability Act	Chemicals Act
Federal Nature Conservation Act	Civil Code - First, Second and Third Book
ederal Soil Protection Act	Civil Code - Fourth and Fifth Book
Federal Soil Protection and Contaminated Sites Regulation	Code of Crimes against International Law
Fertilisation Act Plant Protection Act	Commercial Code - Fourth Book Chapters 4 - 6 Commercial Wastes Regulation
Plant Variety Protection Act	Conservation of Species Regulation
Regulation on Plant Protection Products	Construction Code
	Construction Sites Regulation
	Criminal Code (#1)
	Criminal Code (#2) Environmental Appeals Act
	Environmental Damage Act
	Environmental Impact Assessment Act
	Environmental Information Act
	Environmental Liability Act
	Equipment and Product Safety Act
	Extension of Industrial Property Rights Act Federal Nature Conservation Act
	Federal Soil Protection Act
	Federal Soil Protection and Contaminated Sites Regulation
	Fertilisation Act
	Foreign Trade and Payments Act
	Foreign Trade and Payments Regulation  Generation of Electricity from Biomass Regulation
	Hazardous Substances Regulation
	Hours of Work Act
	Industrial Safety and Health Regulation
	Insolvency Act
	Liability Act Major Accidents Regulation
	Maternity Protection Act
	Money Laudering Act
	Occupational Safety and Health Act
	Packaging Regulation
	Plant Protection Act Plant Variety Protection Act
	Preventive Flood Control Act
	Product Liability Act
	Regional Planning Act
	Regulation on Plant Protection Products
	Road Traffic Act
	Road Traffic Regulation Unfair Competition Act
	Use of Personal Protection Equipment at Work Regulation
	Used Batteries and Accumulators Regulation
	Vocational Training Act
	Vocational Training Promotion Act
	Waste Incineration and Co-Incineration Regulation Waste Management Concepts and Waste Balance Sheets
	Regulation
	Waste Oil Regulation
	Waste Recovery and Disposal Records Regulation
	Waste Transport Licences Regulation
	Waste Water Charges Act
	Waste Water Regulation Waste Wood Management Regulation
	Water Management Act (#1)
	Water Management Act (#2)
	Young Persons Protection Act

EU Acts and Regulations	http://eur- lex.europa.eu/SuiteLegislation.do?T1=V100&T2=V1&T3=V4&RechType=RECH_legislation&Su bmit=Search
In cases of amendments, the earlier law is not listed, only the most recent amended FOREST LAWS - Laws that specifically relate to forest management, harvest and governance (eg conservation, wildlife, biodiversity, sustainability, water quality, soil conservation)	law     GENERAL LAWS - eg human rights, employment, OHS, competition, tax, export and trade     laws
4 LAWS	33 LAWS
31999R1545 - Commission Regulation (EC) No 1545/1999 of 14 July 1999 amending Regulation (EC) No 1091/94 laying down certain detailed rules for the implementation of Council Regulation (EEC) No 3528/86 on the protection of forests against atmospheric pollution	31974R2988 - Regulation (EEC) No 2988/74 of the Council of 26 November 1974 concerning limitation periods in proceedings and the enforcement of sanctions under the rules of the European Economic Community relating to transport and competition
32004R2121 - Commission Regulation (EC) No 2121/2004 of 13 December 2004 amending Regulation (EC) No 1727/1999 laying down certain detailed rules for the application of Council Regulation (EEC) No 2158/92 on protection of the Community's forests against fire	32000R1916 - Commission Regulation (EC) No 1916/2000 of 8 September 2000 on implementing Council Regulation (EC) No 530/1999 concerning structural statistics on earnings and on labour costs as regards the definition and transmission of information on structure of earnings
32006R1737- Commission Regulation (EC) No 1737/2006 of 7 November 2006 laying down detailed rules for the implementation of Regulation (EC) No 2152/2003 of the European Parliament and of the Council concerning monitoring of forests and environmental interactions in the Community	32003L0088 - Directive 2003/88/EC of the European Parliament and of the Council of 4 November 2003 concerning certain aspects of the organisation of working time
32010/0995 - Regulation (EU) No 9952010 of the Eupean Parlament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market Text with EEA relevance	32003R0001 - Council Regulation (EC) No 1/2003 of 16 December 2002 on the implementation of the rules on competition laid down in Articles 81 and 82 of the Treaty 32003R0450 - Regulation (EC) No 450/2003 of the European Parliament and of the Council of 27 February 2003 concerning the labour cost index
	32003R1216 - Commission Regulation (EC) No 1216/2003 of 7 July 2003 implementing Regulation (EC) No 450/2003 of the European Parliament and of the Council concerning the labour cost index
	32005R1737 - Commission Regulation (EC) No 1737/2005 of 21 October 2005 amending Regulation (EC) No 1726/1999 as regards the definition and transmission of information on labour costs
	32005R1738 - Commission Regulation (EC) No 1738/2005 of 21 October 2005 amending Regulation (EC) No 1916/2000 as regards the definition and transmission of information on the structure of earnings
	32006R0341 - Commission Regulation (EC) No 341/2006 of 24 February 2006 adopting the specifications of the 2007 ad hoc module on accidents at work and work-related health problems
	to the production of, and trade in, agricultural products  32006R1907-Regulation (EC) No 1907/2006 of the European Parliament and of the Council of  18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
	32008R0340 - Commission Regulation (EC) No 340/2008 of 16 April 2008 on the fees and charges payable to the European Chemicals Agency
	to Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals 32008R0522 - Commission Regulation (EC) No 622/2008 of 30 June 2008 amending Regulation (EC) No
	773/2004, as regards the conduct of settlement procedures in cartel cases  32008R0771 - Commission Regulation (EC) No 771/2008 of 1 August 2008 laying down the rules of organisation and procedure of the Board of Appeal of the European Chemicals Agency
	32008R1338 - Regulation (EC) No 1338/2008 of the European Parliament and of the Council of 16 December 2008 on Community statistics on public health and health and safety at work 32009R1022 - Commission Regulation (EC) No 1022/2009 of 29 October 2009 amending Regulations
	(EC) No 1738/2005, (EC) No 698/2006 and (EC) No 377/2008 as regards the International Standard Classification of Occupations 32010R0330 - Commission Regulation (EU) No 330/2010 of 20 April 2010 on the application of Article
	101(3) of the Treaty on the Functioning of the European Union to categories of vertical agreements and concerted practices  32011R0143 - Commission Regulation (EU) No 143/2011 of 17 February 2011 amending Annex XIV to
	Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals
	32011R0328 - Commission Regulation (EU) No 328/2011 of 5 April 2011 implementing Regulation (EC) No 1338/2008 of the European Parliament and of the Council on Community statistics on public health and health and safety at work, as regards statistics on causes of death
	32011R0349- Commission Regulation (EU) No 349/2011 of 11 April 2011 implementing Regulation (EC) No 1338/2008 of the European Parliament and of the Council on Community statistics on public health and health and safety at work
	32006R1184 - Council Regulation (EC) No 1184/2006 of 24 July 2006 applying certain rules of competition to the production of, and trade in, agricultural products 32006R1907-Regulation (EC) No 1907/2006 of the European Parliament and of the Council of
	18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)  32008R0340 - Commission Regulation (EC) No 340/2008 of 16 April 2008 on the fees and charges
	payable to the European Chemicals Agency
	Evaluation, Authorisation and Restriction of Chemicals  32008R0622 - Commission Regulation (EC) No 622/2008 of 30 June 2008 amending Regulation (EC) No 773/2004, as regards the conduct of settlement procedures in cartel cases
	32008R0771 - Commission Regulation (EC) No 771/2008 of 1 August 2008 laying down the rules of organisation and procedure of the Board of Appeal of the European Chemicals Agency 32008R1338 - Regulation (EC) No 1338/2008 of the European Parliament and of the Council of 16 December 2008 on Community statistics on public health and health and safety at work
	32009R1022 - Commission Regulation (EC) No 1022/2009 of 29 October 2009 amending Regulations (EC) No 1738/2005, (EC) No 698/2006 and (EC) No 377/2008 as regards the International Standard Classification of Occupations
	32010R0330 - Commission Regulation (EU) No 330/2010 of 20 April 2010 on the application of Article 101(3) of the Treaty on the Functioning of the European Union to categories of vertical agreements and concerted practices
	32011R0143 - Commission Regulation (EU) No 143/2011 of 17 February 2011 amending Annex XIV to Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals
	32011R0328 - Commission Regulation (EU) No 328/2011 of 5 April 2011 implementing Regulation (EC) No 1338/2008 of the European Parliament and of the Council on Community statistics on public health and health and safety at work, as regards statistics on causes of death  32011R0349-Commission Regulation (EU) No 349/2011 of 11 April 2011 implementing Regulation (EC)
	No 1338/2008 of the European Parliament and of the Council on Community statistics on public health and health and safety at work

<u>US Federal Acts</u>	
In cases of amendments, the earlier law is not listed, o	only the most recent amended law
FOREST LAWS - Laws that specifically relate to forest management, harvest and governance (eg	
conservation, wildlife, biodiversity, sustainability,	GENERAL LAWS - eg human rights, employment,
water quality, soil conservation)	OHS, competition, tax, export and trade laws
12 LAWS	38 LAWS
Clean Water Act of 1972	Civil Rights Act of 1964
Coastal Wetlands Planning, Protection, and	Of the Figure 7 tot of Foot
Restoration Act of 1990	Civil Rights Act of 1991
Emergency Wetlands Resources Act	Clean Water Act of 1972
Emergency vveliding resources not	Coastal Wetlands Planning, Protection, and Restoration
Endangered Species Act of 1973	Act of 1990
Fish and Wildlife Coordination Act of 1958,	Comprehensive Employment and Training Act of 1973
Forest Service Organic Act of 1897	Economic Opportunity Act of 1964
Lacey Act	Emergency Wetlands Resources Act
Land and Water Conservation Fund Act of 1965	Employee Retirement Income Security Act of 1974
Multiple Use and Sustained Yield Act of 1960	Employment Act of 1946
Notice of Equipmental Delicus Act (NEDA) of 1000	Endomenad Charles Act of 4070
National Environmental Policy Act (NEPA) of 1969	Endangered Species Act of 1973
North American Wetlands Conservation Act	Environmental Quality Improvement Act Fair Labor Standards Amendment of 1977
Wild and Scenic Rivers Act	
	Fair Labor Standards Amendment of 1989
	Federal Water Project Recreation Act
	Fish and Wildlife Coordination Act of 1958
	Fish and Wildlife Coordination Act of 1958
	Individual Income Tax Act of 1944
	Internal Revenue Code of 1954
	Land and Water Conservation Fund Act of 1965
	Manpower Development and Training Act of 1962
	Many Revenue Acts
	Marine Mammal Protection Act
	Marine Protection, Research, and Sanctuaries Act of
	1972
	Migrant and Seasonal Agricultural Workers Protection Act of 1986
	National Environmental Policy Act (NEPA) of 1969
	National Historic Preservation Act
	Native American Graves Protection and Repatriation Act
	Nonindigenous Aquatic Nuisance Prevention and Contro Act of 1990
	North American Wetlands Conservation Act
	Personal Responsibility and Work Opportunity Act of 1996
	Rivers and Harbors Act of 1958
	Safe Drinking Water Act
	Various Flood Control Acts
	Veterans Employment Opportunities Act of 1996
	Vocational Rehabilitation Act of 1965
	Wild and Scenic Rivers Act
	Workforce Investment Act of 1998

ATTACHMENT 2	
International Treaties/Protocols/Conventions	http://www.austlii.edu.au/catalog/2356.html
In cases of amendments, the earlier law is not listed, only the most recent	
FOREST LAWS - Laws that specifically relate to forest management, harvest and governance (eg conservation, wildlife, biodiversity, sustainability, water quality, soil conservation)	GENERAL LAWS - eg human rights, employment, OHS, competition, tax, export and trade laws
5 LAWS Biodiversity - Convention on Biological Diversity (1992)	47 LAWS Abolition of Forced Labour Convention
Endangered Species - Convention on International Trade in Endangered	Abolition of roced Labour Convention
Species of Wild Fauna and Flora 1973 (CITES)	Biodiversity - Convention on Biological Diversity (1992)
Ramsar Convention - Convention on Wetlands of International Importance especially as Waterfowl Habitat 1971	Convention concerning Employment Promotion and Protection against Unemployment
The Rio Declaration on Environment and Development 1992	Convention concerning Forced or Compulsory Labour
UN Convention on Biological Diversity	Convention concerning Occupational Safety and Health Convention and the Working Environment
	Convention Concerning the Abolition of Forced Labour  Convention concerning the Prohibition and Immediate Action for the Elimination of
	the Worst Forms of Child Labour
	Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour
	Convention concerning the Promotion of Collective Bargaining
	Convention for the Protection of Human Rights and Fundamental Freedoms Convention on Civil Liability for Damage Resulting from Activities Dangerous to
	the Environment  Convention on Long-range Transboundary Air Pollution (1979) -
	UN/ECETreaties/Soft Law Agreements
	Convention on the Rights of the Child
	Cultural Property - Convention on the Means of Prohibiting and Preventing the Illicit Import Export and Transfer of Ownership of Cultural Property 1970 Cultural Property - UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects 1995 Declaration on the Rights of Disabled Persons
	Declaration on the Rights of Mentally Retarded Persons
	Declaration on the Rights of Persons Belonging to National or Ethnic, Religious or Linguistic Minorities
	Disabled Persons Discrimination (Employment and Occupation) Convention
	Draft Declaration on the Rights of Indigenous Peoples EIA Convention 1991 - Convention on Environmental Impact Assessment in a
	Transboundary Context 1991 Endangered Species - Convention on International Trade in Endangered
	Species of Wild Fauna and Flora 1973 (CITES)  Equal Remuneration Convention
	Freedom of Association
	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
	International Covenant on Civil and Political Rights
	International Covenant on Economic, Social and Cultural Rights
	OECD - Ministerial Declaration on the Protection of Privacy on Global Networks Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women
	Optional Protocol to the Convention on the Elimination of Discrimination against Women
	Optional Protocol to the International Covenant on Civil and Political Rights Prevention of Discrimination on the Basis of Race, Religion or Belief and Protection of Minorities
	Ramsar Convention - Convention on Wetlands of International Importance especially as Waterfowl Habitat 1971
	Rules of Conduct - Extortion and Bribery in International Business Transactions (1999)
	Rules of Conduct - Extortion and Bribery in International Business Transactions (1999) Standard Rules on the Equalization of Opportunities for Persons with Disabilities
	Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief
	The Rio Declaration on Environment and Development 1992 UN Convention on Biological Diversity
	United Nations Convention against Corruption
	United Nations Convention against Corruption United Nations Declaration against Corruption and Bribery in International
	Commercial Transactions United Nations Declaration against Corruption and Bribery in International
	Commercial Transactions United Nations Framework Convention on Climate Change (UNFCCC)
	United Nations Secretariat of the Convention to Combat Desertification Universal Declaration of Human Rights
	World Heritage Convention - Convention for the Protection of the World Cultural and Natural Heritage 1972