

AS TO THE ADMISSIBILITY OF

Application No. 27033/95
by KÖNKÄMÄ and 38 other Saami villages
against Sweden

The European Commission of Human Rights sitting in private on
25 November 1996, the following members being present:

Mr. S. TRECHSEL, President
Mrs. G.H. THUNE
Mrs. J. LIDDY
MM. E. BUSUTTIL
G. JÖRUNDSSON
A.S. GÖZÜBÜYÜK
A. WEITZEL
J.-C. SOYER
H. DANELIUS
F. MARTINEZ
M.P. PELLONPÄÄ
M.A. NOWICKI
I. CABRAL BARRETO
B. CONFORTI
N. BRATZA
J. MUCHA
D. SVÁBY
G. RESS
A. PERENIC
C. BÎRSAN
K. HERNDL
E. BIELIUNAS
E.A. ALKEMA
M. VILA AMIGÓ

Mr. H.C. KRÜGER, Secretary to the Commission

Having regard to Article 25 of the Convention for the Protection
of Human Rights and Fundamental Freedoms;

Having regard to the application introduced on 7 December 1994
by Könkämä and 38 other Saami villages against Sweden and registered
on 13 April 1995 under file No. 27033/95;

Having regard to the reports provided for in Rule 47 of the Rules
of Procedure of the Commission;

Having regard to the observations submitted by the respondent
Government on 30 January 1996 and the observations in reply submitted
by the applicants on 21 March 1996;

Having deliberated;

Decides as follows:

THE FACTS

The applicants are the following 39 Swedish Saami villages
(samebyar): Könkämä, Lainiovuoma, Saarivuoma, Gabna, Laevas, Girjas,
Mellanbyn, Sörkaitum, Sirkas, Jäkkäkaska, Tuorpon, Luokta-Mavas,
Semisjaur-Njarg, Svaipa, Gällivare, Serri, Udtja, Ståkke, Maskare,
Östra Kikkejaure, Gran, Ran, Umbyn, Vapsten, Vilhelmina Norra,
Vilhelmina Södra, Malå, Frostviken Norra, Frostviken Mellersta,
Rattevare, Hotagen, Offerdal, Sösjö, Kall, Handölsdalen, Tåssåsen,
Mittådalen, Tännäs and Idre. Before the Commission they are
represented by their lawyer, Mr. Jörgen Bohlin, Umeå.

The facts of the case, as submitted by the parties, may be summarised as follows.

A. Particular circumstances of the case

In December 1992 the Swedish Parliament passed a Bill (1992/93:32) introducing a new system for licensing small game hunting and fishing on State property above the cultivation line (odlingsgränsen) and in the reindeer grazing mountains (renbetesfjällen). One purpose of the Bill was to give the general public wider access to hunting and fishing in the mountain region.

As part of this new system, the Government enacted a new Reindeer Herding Ordinance (Rennäringsförförordningen, 1993:384) containing provisions on the licensing of hunting and fishing. It entered into force on 1 July 1993. By virtue of an authorisation in the Ordinance, the National Board of Agriculture (Statens jordbruksverk), on 30 July 1993, issued more detailed regulations on this matter. The regulations entered into force on 16 August 1993.

Following the introduction of these regulations, the various County Administrative Boards (länsstyrelserna) issued regional rules. The Board of the County of Västerbotten issued rules regarding hunting on 13 August 1993 and regarding fishing on 16 November 1993. The Board of the County of Jämtland issued its rules on 15 September and 22 December 1993 respectively. Finally, the rules of the Board of the County of Norrbotten were issued on 2 November 1993 as regards hunting and on 14 and 30 December 1993 as regards fishing.

The Saami villages in Västerbotten and Norrbotten appealed against their County Administrative Boards' decisions on the licensing of fishing, claiming that they were not in conformity with the regulations of the National Board of Agriculture. That Board rejected the appeal on 8 February 1994. The villages' further appeal was rejected by the Government on 17 March 1994.

The Saami claim that they have immemorial rights including not only rights of reindeer herding, hunting and fishing on certain land, as confirmed by a 1993 amendment to the Reindeer Herding Act (Rennäringslagen, 1971:437), but also ownership to the land and waters above the cultivation line and in the reindeer grazing mountains. In any event, they claim exclusive hunting and fishing rights in these areas. Under the new licensing system they have allegedly no control of where and to what extent hunting and fishing take place. Under the previous system, hunting and fishing licences were granted by the County Administrative Boards after consultation with the Saami villages concerned. There was no obligation to grant licences even in cases where the requirements under Section 32 of the Reindeer Herding Act were met, as this Section only stated that licences "may" be granted. Section 3 of the new Reindeer Herding Ordinance, however, provides that licences "shall" be granted if these requirements are met.

The applicant Saami villages and some individual Saami thus applied to the Supreme Administrative Court (Regeringsrätten) for a review of the decisions of the National Board of Agriculture and the different County Administrative Boards under the Act on Judicial Review of Certain Administrative Decisions (Lagen om rättsprövning av vissa förvaltningsbeslut, 1988:205 - "the 1988 Act"), claiming that these decisions were unlawful.

By decision of 22 June 1994, the Supreme Administrative Court dismissed the application, finding that, under Section 1 of the 1988 Act, it could only review decisions in administrative matters (förvaltningsärenden), i.e. decisions in individual cases. As the challenged decisions had the character of norm decisions, they could not be reviewed under the 1988 Act.

On 23 June 1994 the County Administrative Board of the County of Jämtland introduced some further rules on hunting. The appeals lodged by some Saami villages and individual Saami were rejected by the National Board of Agriculture on 13 April 1995 and the Government on 16 November 1995.

B. Relevant domestic law and practice

Reindeer herding, hunting and fishing are fundamental elements of the Saami culture. Reindeer herding is regulated by the Reindeer Herding Act. A person of Saami extraction has, under the Act, a right based on custom from time immemorial (*urminnes hävd*) to use land and waters in designated areas of northern Sweden for reindeer herding. To exercise this right, the Saami has to be a member of a Saami village. The villages are registered by the County Administrative Boards, which also allocate land for reindeer herding to each village. According to Section 10 of the Act, a Saami village is responsible for the herding within its area and represents its members in such matters.

General rules concerning hunting and fishing are to be found in the Hunting Act (*Jaktlagen*, 1987:259) and the Fishing Act (*Fiskelagen*, 1993:787). The rights of hunting and fishing normally belong to the respective property owners, who may sell hunting and fishing licences to the public. With regard to the Saami's right of hunting and fishing, reference is made to special provisions governing these rights. These provisions are included in the Reindeer Herding Act and the Reindeer Herding Ordinance.

According to Section 25 of the Reindeer Herding Act, a member of a Saami village may, with certain restrictions, hunt and fish on the land allocated to the village. This particular section is placed under the heading "The Exercise of the Reindeer Herding Right", indicating that the right to hunt and fish is part of the Saami's immemorial right to herd reindeer. Persons who are not members of the Saami village may, according to Section 32 of the Act, be granted licences to hunt or fish. On State property above the cultivation line and in the reindeer grazing mountains licences may not be granted if considerable inconvenience for the reindeer herding or unacceptable infringements of the village members' rights under Section 25 are caused. Licences are, since 1886, granted by State authorities, at present the County Administrative Boards. The licence fees are divided between the Saami villages concerned and a special fund (*Samefonden*) the object of which is to promote reindeer herding, Saami culture and Saami organisations. The Saami villages and their members are not allowed to grant hunting and fishing licences.

According to Section 3 of the Reindeer Herding Ordinance, licences for small game hunting and fishing with hand-held tackle shall be granted unless it causes significant inconvenience for the reindeer herding or is prohibited by Section 32 of the Reindeer Herding Act. Section 8 of the Ordinance provides that the National Board of Agriculture shall issue more detailed regulations in this respect. Under Section 2, the respective County Administrative Boards decide on the granting of hunting and fishing licences.

Under Sections 2 and 3 of the regulations issued by the National Board of Agriculture (*Föreskrifter om upplåtelser av rätt till småviltsjakt och fiske på statens mark ovanför odlingsgränsen och på renbetesfjällen*, SJVFS 1993:95), persons living within the municipalities concerned shall be given annual licences for small game hunting and others shall be given day licences. These sections do not affect the right of the Saami to hunt free of charge on the land allocated to their villages. Sections 4 and 5 contain certain restrictions aimed at protecting reindeer herding. For example, hunting may not take place within certain distances from settlements and reindeer grazing areas. In respect of the licensing of fishing,

Sections 10-12 lay down certain restrictions, inter alia that licensing may be prohibited in some areas if the Saami's needs of fishing waters so require.

A decision by a County Administrative Board on licences, whether it concerns general rules to be applied when granting licences or the actual grant of an individual licence, may, under Section 36 of the Reindeer Herding Ordinance, be appealed to the National Board of Agriculture. That Board's decisions may be appealed to the Government, in accordance with Section 5 of the Instruction for the National Board of Agriculture (Förordning med instruktion för statens jordbruksverk, 1991:375) in conjunction with Section 30 of the Ordinance on Government Agencies and Institutions (Verksförordningen, 1987:1100). Under Section 22 of the Public Administration Act (Förvaltningslagen, 1986:223), a negative decision may be appealed by those who are concerned by it. According to general legal principles, this means that the decision must have effects on interests of the appellants which are acknowledged by law. As the rights of the Saami village members are to be taken into account when granting individual hunting and fishing licences (cf. Section 32 of the Reindeer Herding Act and Section 3 of the Reindeer Herding Ordinance), Saami villages have locus standi to appeal against decisions to grant such licences.

Neither the Reindeer Herding Act nor the Reindeer Herding Ordinance contains any provision providing for the possibility to appeal to a court. However, under the 1988 Act, the Supreme Administrative Court has jurisdiction in certain cases. The Act applies to decisions which affect the personal status of private citizens or their mutual personal or economic relations (cf. Chapter 8, Section 2 of the Instrument of Government (Regeringsformen)), as well as decisions which affect the relations between private citizens and the public administration and relate to obligations incumbent upon private citizens or otherwise interfere with the personal or economic affairs of private citizens (cf. Chapter 8, Section 3 of the Instrument of Government). Section 1 of the 1988 Act provides as follows:(Translation)

"At the request of a private party in such administrative proceedings before the Government or an administrative authority as pertain to any situation envisaged by Chapter 8, Sections 2 and 3, of the Instrument of Government, the Supreme Administrative Court shall review whether the decision in the case is contrary to any legal rule in a manner indicated by the requesting party or otherwise apparent from the circumstances of the case.

Judicial review may pertain only to such decisions as

- imply exercise of public authority in relation to a private subject,
- cannot otherwise be reviewed by a court except following a request for relief for substantive defects, and
- cannot otherwise be subject to review."

Moreover, under Chapter 13, Section 2 of the Code of Judicial Procedure (Rättegångsbalken), a judgment declaring whether or not a certain legal relationship exists may be requested in the ordinary courts, provided that there is uncertainty as to the relationship and this uncertainty is detrimental to the plaintiff. Under this provision, a physical or legal person may bring proceedings in the courts, claiming to have a "better right" than another person, including the State, to certain property. The right claimed may be a right of ownership or, for instance, a more limited right such as an exclusive right to hunting and fishing.

In the so-called Taxed Mountains Case (Skattefjällsmålet, NJA 1981:1), five Saami villages of the county of Jämtland - the Saami

villages Frostviken Norra, Frostviken Mellersta, Rattevere, Hotagen and Offerdal, all applicants before the Commission in the present case - sought a declaratory judgment establishing that they had a "better right" than the State to certain areas of Jämtland, the main part known as the taxed mountains. They claimed that they had a right of ownership or, alternatively, several types of limited rights, including exclusive hunting and fishing rights, to the area in question. After extensive investigations made by courts at three levels, the Supreme Court (Högsta domstolen) rejected the villages' claims by judgment of 15 January 1981, although it acknowledged that the members of the Saami villages had a strongly protected right of usage (bruksrätt).

PROCEEDINGS BEFORE THE COMMISSION

The application was introduced on 7 December 1994 and registered on 13 April 1995.

On 4 September 1995 the Commission decided to communicate the application to the respondent Government, pursuant to Rule 48 para. 2 (b) of the Rules of Procedure.

The Government's written observations were submitted on 30 January 1996. The applicants replied on 21 March 1996.

COMPLAINTS

1. The applicants claim that the national regulations and regional rules on small game hunting and fishing, decided in 1993 by the National Board of Agriculture and the respective County Administrative Boards, constitute an infringement of their exclusive rights to hunting and fishing in the area in question and thus violate their rights under Article 1 of Protocol No. 1 to the Convention. The applicants further claim that these decisions discriminate against the Saami, as, unlike other property owners, they are not allowed to license hunting and fishing on their property themselves. In this respect, they invoke Article 14 of the Convention in conjunction with Article 1 of Protocol No. 1.

2. Furthermore, under Article 6 of the Convention, the applicants complain that they have not been able to obtain a court determination of their rights.

THE LAW

1. The applicants claim that the national regulations and regional rules on small game hunting and fishing, decided in 1993 by the National Board of Agriculture and the respective County Administrative Boards, constitute an infringement of their exclusive rights to hunting and fishing in the area in question and thus violate their rights under Article 1 of Protocol No. 1 (P1-1) to the Convention. The applicants further claim that these decisions discriminate against the Saami, as, unlike other property owners, they are not allowed to license hunting and fishing on their property themselves. In this respect, they invoke Article 14 (Art. 14) of the Convention in conjunction with Article 1 of Protocol No. 1 (P1-1).

Article 1 of Protocol No. 1 (P1-1) reads as follows:

"Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

The preceding provisions shall not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in

accordance with the general interest or to secure the payment of taxes or other contributions or penalties."

Article 14 (Art. 14) of the Convention provides the following:

"The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national authority, property, birth or other status."

The respondent Government submit firstly that, although the applicant Saami villages are to be regarded as non-governmental organisations, they cannot claim to be victims of the alleged violations within the meaning of Article 25 (Art. 25) of the Convention as the hunting and fishing rights under the Reindeer Herding Act are not afforded to the villages but to their members. The applicants' victim status is excluded also on the ground that they found their complaints on rights which they do not have. Their alleged ownership rights to the land and waters in question or their - alternative - exclusive rights to hunting and fishing in the area are not recognised under Swedish law nor have they been substantiated before Swedish courts.

The Government further submit that the Saami villages have chosen an inadequate and certainly ineffective domestic remedy, as the authorities and courts which deal with an appeal against or a legal review of the decisions called into question are not entitled to take into consideration any of the alleged Saami rights as long as a dispute with regard to these rights has not been finally settled by a court of law in due order. In the Government's view, all domestic remedies for the purpose of establishing the existence of ownership rights or exclusive rights to hunting and fishing must be exhausted before the question whether any such right has been violated can be brought before the Commission. With respect to the five applicant Saami villages which were parties to the proceedings in the Taxed Mountains Case, adjudicated by the Supreme Court in January 1981, the Government contend that the period of six months for lodging an application with the Commission, laid down in Article 26 (Art. 26) of the Convention, has not been observed. As regards the remaining 34 applicant villages, the Government maintain that they have failed to exhaust domestic remedies as prescribed by Article 26 (Art. 26), as they have never taken proceedings against the Swedish State regarding the question whether the Saami, rather than the State, have the rights claimed. As is shown by the Taxed Mountains Case, such an action has been and is still open to them. Moreover, the applicants applied to the Supreme Administrative Court for a review under the 1988 Act of the decisions of the National Board of Agriculture and the respective County Administrative Boards. However, only the decisions of the County Administrative Boards of Västerbotten and Norrbotten with respect to fishing were appealed to the Government, and no review of the Government's decision was requested. Thus, the applicants have failed to exhaust domestic remedies also in this respect.

The applicants submit, with respect to the question of victim status, that the Swedish Supreme Court has found that the Saami villages, under Swedish law, both represent their members and receive compensation for any infringements of the reindeer herding rights. Moreover, the members have personal economic liability for the obligations of the respective Saami village. The applicants further maintain that the question is not whether they base their complaints on rights which, according to the Government, they do not have but rather that the Swedish State, by introducing the new system for licensing hunting and fishing, tried to give itself rights which the State did not previously claim.

In regard to the question of exhaustion of domestic remedies, the applicants assert that the legal remedies referred to by the State have already been tried with respect to a sufficient number of decisions with known results and are not, in any case, effective since the authorities examining them are the very authorities that have issued the challenged regulations. The Commission considers that the exclusive hunting and fishing rights claimed by the applicant Saami villages in the present case can be regarded as possessions within the meaning of Article 1 of Protocol No. 1 (P1-1).

The Commission notes that it is not disputed that the applicant Saami villages are to be regarded as non-governmental organisations within the meaning of Article 25 (Art. 25) of the Convention. The Commission further recalls that the villages, under the Reindeer Herding Act, are responsible for the herding within their respective areas and represent their members in such matters. Moreover, the rights designated in that Act can be exercised by a Saami only as a member of a Saami village. For these reasons, the Commission considers that the applicant villages may, for the purposes of Article 25 (Art. 25), claim to be victims of the violations alleged under the Convention and Protocol No. 1.

The other points raised by the Government under Article 25 (Art. 25) of the Convention touch upon the question whether the domestic remedies available to the applicants have been exhausted, i.e. whether the applicants have complied with the requirements under Article 26 (Art. 26) of the Convention and will therefore be considered below.

The Commission recalls that, in the present case, the applicants are challenging the regulations on the licensing of hunting and fishing issued, on the basis of the 1993 Reindeer Herding Ordinance, by the National Board of Agriculture on 30 July 1993 and the regional rules on these matters issued by the respective County Administrative Boards between August and December 1993. The Saami villages of Västerbotten and Norrbotten appealed to the National Board of Agriculture and the Government against their County Administrative Boards' decisions regarding fishing, claiming that they were not in conformity with the regulations issued by the National Board of Agriculture. However, with respect to the other regional decisions challenged before the Commission, no appeal was made.

The applicants maintain that they did not have an effective domestic remedy, as the appeal authorities, i.e. the National Board of Agriculture and the Government, had issued the regulations challenged before the Commission. The Commission notes, however, that the Government had not issued the challenged regulations. It is true that the Government had enacted the Reindeer Herding Ordinance on the basis of which the regulations of the National Board of Agriculture were issued. This does not mean, however, that the Government was unable independently to determine whether the decisions taken by the County Administrative Boards were in conformity with the said regulations or with the Ordinance itself (cf. Eur. Court HR, *Silver and Others v. the United Kingdom* judgment of 25 March 1983, Series A no. 61, p. 43, para. 116). Thus, in so far as the applicants complain about this alleged lack of conformity, they had an effective domestic remedy which was only partially exhausted.

It appears, however, that the question as to whether the regional rules decided by the County Administrative Boards conform with superior norms is not the real subject-matter of the applicants' complaints to the Commission. Instead, the applicants consider that the new hunting and fishing system introduced in 1993 was harmful to Saami interests and violated their exclusive hunting and fishing rights in the areas concerned.

If the Saami villages were to be considered to have such

exclusive hunting and fishing rights as they claim, these rights might have been infringed first, in a more general way, as a result of the introduction in 1993 of the new system for licensing hunting and fishing in that the Reindeer Herding Ordinance and the regulations and regional rules issued under that system could be considered to have deprived the Saami of their exclusive rights, and secondly, in a more concrete manner, by the individual decisions to grant licences to hunt or fish in the areas concerned.

It thus appears that the central issue is whether the Saami villages were holders of exclusive hunting and fishing rights, and the question arises whether they had any remedy in this respect before the Swedish courts.

The Commission notes that the existence of any such exclusive rights is in dispute between the parties. No exclusive rights are provided for in the applicable legislation, but the Saami villages base their claims on various historical facts of considerable complexity.

The Commission notes that related issues were examined in the Taxed Mountains Case where the ordinary courts, in the last resort the Supreme Court, decided on the claims of five Saami villages to have a "better right" than the State to certain areas in Jämtland. Similarly, the Swedish courts would also appear to be competent to give a declaratory judgment on whether or not the Saami villages are holders under Swedish law of exclusive hunting and fishing rights in the areas concerned in the present case.

It is true that five of the applicants, i.e. the Saami villages Frostviken Norra, Frostviken Mellersta, Ratteväre, Hotagen and Offerdal, were also parties to the Taxed Mountains Case and that the Supreme Court's judgment in that case deals to some extent with their hunting and fishing rights. However, in so far as that judgment could be considered to have determined the claim of those five applicant villages to exclusive hunting and fishing rights, the Commission notes that the present application has not been brought before the Commission within six months from that judgment as required by Article 26 (Art. 26) of the Convention.

The Commission adds that, in regard to individual decisions by the County Administrative Boards to grant hunting and fishing licences, the Saami villages may lodge appeals with the National Board of Agriculture and the Government. It would appear, furthermore, that the Government's decisions on such individual matters, implying the exercise of public authority in relation to private subjects, could be reviewed by the Supreme Administrative Court under the 1988 Act. In such proceedings, it would be determined whether the decisions to grant individual licences are contrary to any legal rule. The applicants have not shown that they have appealed against any such individual decision.

Having regard to the above, the Commission finds that the applicants have not complied with the conditions laid down in Article 26 (Art. 26) of the Convention and that this part of the application is inadmissible under Article 27 para. 3 (Art. 27-3) of the Convention.

2. The applicants also complain that they have not been able to obtain a court determination of their rights. They invoke Article 6 (Art. 6) of the Convention which, in so far as relevant, provides as follows:

"1. In the determination of his civil rights ..., everyone is entitled to a ... hearing ... by [a] ... tribunal ..."

In addition to the objections referred to under 1 above, the Government submit that the applicants' complaints are manifestly ill-founded. In so far as the complaints are founded on the assertion that the applicants' exclusive rights to hunting and fishing have been

violated, the Government acknowledge that the dispute concerns their civil rights and that Article 6 (Art. 6) of the Convention is applicable. The Government maintain, however, that proceedings brought under Chapter 13, Section 2 of the Code of Judicial Procedure, in which it would be determined whether the Saami have the alleged rights, would clearly satisfy the requirements of Article 6 (Art. 6). Should a Saami village or an individual Saami be successful in such proceedings, the 1993 provisions on hunting and fishing would be unconstitutional and could not be applied by courts and public authorities.

In so far as the applicants' complaints are founded on their rights to hunting and fishing under the Reindeer Herding Act, the Government submit that the regulations introduced in 1993 have not affected these rights to the detriment of the Saami. The power to control the conditions for hunting and fishing rests with the State, as being the land owner, and the introduction of the new regulations was not decisive for the dispute regarding Saami rights as brought before the Commission in the present case. In the Government's view, the dispute concerning the new regulations does not, therefore, concern the applicants' civil rights. Thus, Article 6 (Art. 6) of the Convention does not apply to this dispute. Should the Commission find that Article 6 (Art. 6) does apply to this dispute, the Government contend that it does not give a right to challenge a law or other regulations issued in accordance with the law, in the present case the Reindeer Herding Ordinance and the normative rules and regulations founded on that Ordinance.

The applicants submit that there is no reason for them to institute proceedings against the Swedish State, as it is the State, and not the Saami villages, that claims that both the State and the Saami have hunting and fishing rights in the relevant region. Furthermore, in view of the fact that appeals are to be made to the authorities which have issued the challenged regulations, the Saami villages have already done what can be done.

The Commission notes that the dispute in the present case concerns the applicants' rights to hunt and fish in certain areas. These rights are "civil rights" within the meaning of Article 6 para. 1 (Art. 6-1) of the Convention. Thus, this provision is applicable to the present complaint.

The Commission recalls that the Saami villages may bring proceedings against the State in the ordinary courts, requesting these courts to declare that the Saami, rather than the State, have the rights which they claim. Furthermore, the villages may appeal to the Government against the County Administrative Boards' individual decisions to grant hunting and fishing licences and it would appear that the Government's decisions on such matters could be reviewed by the Supreme Administrative Court under the 1988 Act. The Commission further recalls its conclusion under 1 above that these remedies require to be exhausted according to Article 26 (Art. 26) of the Convention.

Considering that the ordinary courts, in the final resort the Supreme Court, as well as the Supreme Administrative Court are undoubtedly "tribunals" within the meaning of Article 6 (Art. 6) of the Convention, the Commission finds that the applicants had access to courts for the determination of their civil rights.

It follows that this part of the application is manifestly ill-founded within the meaning of Article 27 para. 2 (Art. 27-2) of the Convention.

For these reasons, the Commission, unanimously,

DECLARES THE APPLICATION INADMISSIBLE.

H.C. KRÜGER
Secretary
of the Commission

S. TRECHSEL
President
of the Commission