



Food Law Academy *Africa*

Food Law Academy

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course-description October 2009

Food Law Academy

Africa

period	October 2009
venue	Sierra Leone
funding	The Technical centre for Agricultural and Rural Cooperation ACP-EU (CTA) (www.cta.int)
coordinator	Mr. Jeffrey Macarthy
teachers	Prof. dr. Bernd van der Meulen, dr. Margherita Poto
literature	<ol style="list-style-type: none">1. This study guide;2. Book: Bernd van der Meulen & Menno van der Velde, Handbook European Food Law, Wageningen Academic Publishers 2008. Hereafter it is referred to as; 'Handbook';3. Legislation and case law electronically available (these sources of law are for the purpose of reference; having regard to the quantity, do not print all the materials);4. Additional reading electronically available.

The *Food Law Academy* is a joint initiative of the European Institute for Food Law, Wageningen Business School and Dijkstra Voermans Attorneys at Law (Amsterdam). As from 2009 the Food Law Academy provides intensive courses in food regulatory affairs to businesses, authorities and academics in the EU. At the request of the Develop Africa Foundation (DAFO) and with the support of the Technical Centre for Agricultural and Rural Cooperation (CTA) the current version of the Food Law Academy has been developed to serve the needs of trainers and consultants for food sectors in Africa exporting or aiming to export to the European Union.



Overview

Lecture	Topic	Period/Duration	Teacher
First day			
1	Opening ceremony and Welcome remarks	9:30 – 10:15 am	MAFFS Mr. Vincent Fautrel, CTA Jeffrey Macarthy director DAFO
2	Introduction to the course	10:15 – 10:45 am	Prof. Van der Meulen
	DISCUSSION	10:45 – 11:00	
3	Introduction to law	11:00 – 11:45 am	Prof. Van der Meulen
4	EU law and institutions	11:45 – 12:30 pm	Dr. Poto
	DISCUSSION	12:30 – 1:00 pm	
	L U N C H	1:00 – 2:00 pm	
5	Food Law in the Global Arena	2:00 – 3:00 pm	Dr. Poto
	DISCUSSION	3:00 – 3:30 am	
6	International Food Law (SPS, Codex Alimentarius)	3:30 – 4:30 pm	Prof. Van der Meulen
	DISCUSSION	4:30 – 5:00 pm	
Second day			
7	Development of EU food law	9:00 – 10:00 am	Prof. Van der Meulen
	DISCUSSION	10:00 – 10:30 am	
8	General Principles of European Food Law	10:30 – 11:00 am	Dr. Poto
	DISCUSSION	11:00 – 11:30 am	
9	Food Safety Authorities	11:30 – 12:30 pm	Dr. Poto
	DISCUSSION	12:30 – 1:00 pm	
	L U N C H	1:00 – 2:00 pm	
10	Food Hygiene (HACCP)	2:00 – 3:00 pm	Prof. Van der Meulen
	DISCUSSION	3:00 – 3:30 pm	
11	Contaminants & Food Safety Targets	3:30 – 4:30 pm	Prof. Van der Meulen
	DISCUSSION	4:30 – 5:00 pm	
Third day			
12	Supply Chain crisis Management	9:00 – 10:00 am	Dr. Poto
	DISCUSSION	10:00 – 10:30 am	
13	Withdrawal & Recall, Enforcement and Product Liability	10:30 – 11:30 am	Prof. Van der Meulen
	DISCUSSION	11:30 – 12:00 Noon	
14	Market Access Procedures (Novel Foods)	12:00 – 12:30 pm	Prof. Van der Meulen
	DISCUSSION	12:30 – 1:00 pm	
	L U N C H	1:00 – 2:00 pm	
15	Food Labelling	2:00 – 3:00 pm	Dr. Poto
	DISCUSSION	3:00 – 3:30 pm	
16	The Regulation of Genetically modified crops	3:30 – 4:30 pm	Dr. Poto
	DISCUSSION	4:30 – 5:00 pm	
Fourth day			
	Examination	9:30 – 12:00 am	



Philosophy

The Food Law Academy *Africa* is based on the belief that businesses exporting or wishing to export to the European Union will benefit from an understanding of the regulatory environment in which their products will be brought to the market.

Required background

To be successful in this course participants need to be fluent in the English language and to be of academic level (Bachelors). Specific background in law is an advantage, but not strictly required.

Lecturers

Bernd van der Meulen and Margherita Poto are senior staff members of the Law and Governance Group at Wageningen University in the Netherlands. They have ample experience in research and teaching of food law.

Course contents:

Legal issues concerning food quality and food safety are rapidly developing. In Europe, food standards are being developed and applied at the national level of the Member States and at the European level. They are also developed at the global level (WTO, FAO, WHO, Codex Alimentarius). Many of these standards are of a technical nature and focus on food safety, food quality, consumer protection and consumer information.

This course introduces the different players who are active in the field of food law in the EU. The main part of the course is devoted to the system and the content of food law in the European Union. Topics discussed are amongst others:

- The functioning of the European Union and other international organisations.
- The development of food law from the general principle of free movement of goods.
- The architecture of the body of food law by means of the so-called General Food Law.
- Food labelling.
- Food hygiene and safety.
- Novel foods including genetically modified foods.
- Enforcement of food law.

Preparing for lectures

As is explained here below, in each lecture a separate subject is treated. For most of these subjects the material consists of a mix of literature and sources of law (legislation and/or case law). Participants are invited to read the literature in advance and to train

themselves in extracting the applicable rules of law from their sources.

Detailed contents

1. Opening ceremony and Welcome remarks

The Food Law Academy *Africa* will be opened by a welcoming address by the Ministry of Agriculture, Forestry and Food Security (MAFFS) followed by remarks from Mr. Vincent Fautrel from the Technical Centre for Agricultural and Rural Cooperation (CTA ACP-EU) and Mr. Jeffrey Macarthy from DAFO (Develop Africa Foundation).

2. Introduction to the course

The lecturers will introduce themselves and explain the objectives and methods of the course. If the group of participants is not too big, the participants will also introduce themselves and express their expectations.

3. The briefest of introductions to law

The third lecture will be used to provide some background in law.

Food law is a specialisation in *law*. As not all the participants will have taken prior courses in law, a brief introduction to the science of law is provided. The fourth session will build on the third by providing a somewhat more thorough introduction to the European Union and its law.

Aims of the 3rd session:

- Participants have a first impression of the method of law.
- Participants are aware of national differences in legal systems.
- Participants know what sources of law are;
- Participants can distinguish civil law and public law.
- Participants can distinguish criminal law and tort law.
- Participants can distinguish national law and international law.

Lecturer: Bernd van der Meulen

Literature: Handbook chapters 1, 2 and 3.

4. European law and Institutions

Food law can be found at every level of law: national, regional, global and even private. The core of this 'Food Law Academy' is European food law. Therefore some insight in the structure of European law is necessary.

In the rest of the course different types of legislation and proposed legislation in different stages of development are used along with case law.

Aims of the second session:

- Participants can apply the general knowledge on law they acquired in the first session to European law.
- Participants can distinguish the role and function of the different European institutions that play a role in the crafting and application of food law.
- Participants can distinguish directives and regulations.
- Participants can distinguish different types of case law.

Lecturer: Margherita Poto

Literature: Handbook chapters 4, 5 and 6.

Legislation: EC Treaty

5 and 6. The global level of food law

The most important international standards in food law are found in the so-called Codex Alimentarius. This Codex Alimentarius is the product of the work of the joint FAO/WHO Codex Alimentarius Commission. The Codex increases in significance as the World Trade Organisation relies on it for dispute resolution.

Aims of the 5th and 6th session:

- Participants have an insight in the function of food law at a global level.
- Participants appreciate the role of WTO.
- Participants have a first understanding of the role and functioning of the SPS-Agreement.
- Participants are aware of the Codex Alimentarius.
- Participants realize the growing importance of the Codex Alimentarius.
- Participants grasp the interaction between food law at the global level and European food law.

Lecturers: Margherita Poto, Bernd van der Meulen

Literature:

- Handbook chapter 16

Legislation: SPS Agreement

7. Food law: development, crisis and transition

From the beginning of the European Community in 1958 until the BSE-crisis in the mid-nineties, European food law was meant to create an internal market for food products in the EU. The BSE-crisis and some other food scares that followed soon after, brought serious shortcomings to light in the legal system. The European Commission realised that the body of food law as it had developed up till then needed a fundamental reform. The Commission gave its vision on the future of European food law in a so-called White Paper on Food Safety. This state of affairs

explains why so much legislation has recently been changed and why more proposals are underway.

In short the changes can be characterised as:

- More emphasis on horizontal legislation than vertical legislation.
- More use of regulations and less of directives.

Aims of the 7th session:

- Participants understand why the subject matter of European food law is a 'moving target'.
- Participants appreciate the legal mechanisms that rule the European market in food products.
- Participants appreciate the role of case law in the development of European food law.
- Participants can distinguish vertical and horizontal legislation.
- Participants can grasp the vision of the European Commission on the future of European food law.

Lecturer: Bernd van der Meulen

Literature:

- Handbook chapters 6 and 15
- White Paper on Food Safety

Case law: ECJ 20 February 1979 C-120/78 'Cassis de Dijon'

8. General principle of European food law and

9. Food Safety Authorities

The first step in the realisation of the reform of food law as planned in the White Paper on Food Safety, is 'Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety'. The popular name of this regulation is: the General Food Law. As is apparent from its official name this regulation does three things:

- 1) It lays down the principles on which food legislation must be based in the European Union as well as in the member-states.
- 2) It establishes the European Food Safety Authority.
- 3) It gives procedures for food safety crises: including the so-called Rapid Alert System.

Aims of the 8th and 9th session:

- Participants can appreciate the consequences of the choice to lay the General Food Law down in a regulation instead of a directive as envisaged in the White Paper.
- Participants are aware of the principles on which the system of European food law is built.
- Participants have an insight in the functioning of the so-called Rapid Alert System.

- Participants appreciate the role and function of the European Food Safety Authority in its institutional environment.
- Participants can appreciate the role of independent food safety authorities in the EU.

Lecturer: Margherita Poto

Literature:

- Handbook chapters 5 and 8

Legislation: Regulation 178/2002 the General Food Law

Case Law: ECJ 9 June 2005 C-211/03 Food & Pharma

10. Food hygiene

Legislation concerning food handling concerns both food treatment within the company and the relations between the players in different stages of the food chain.

According to article 17 of the General Food Law, food business operators are responsible for meeting the relevant (food safety) requirements at all stages of production, processing and distribution of food. Under the Hygiene regulations they are even held responsible for formulating these requirements. These Hygiene regulations brings together prescriptions that up till recently have been distributed over different directives and regulations.

Aims of the 10th session:

- Participants can appreciate the interaction between food hygiene prescriptions and self regulation to implement them.

Lecturer: Bernd van der Meulen

Literature:

- Handbook chapter 11,

Legislation:

- Regulation 852/2004 Hygiene 1
- Regulation 853/2004 Hygiene 2

11. Contaminants & food safety targets

The use of veterinary drugs and plant protection products in the EU is heavily regulated. Risk assessment plays an important role in the setting of maximum residue limits for residues of veterinary drugs and pesticides. Other contaminants are present in food due to for example environmental contamination, processing or are of natural origin. To protect the health of the consumer and not to disturb trade, also for these substances maximum limits are set at the EU level.

Aims of the 11th session:

- Participants have an insight in the rules relating to food safety targets.

Lecturer: Bernd van der Meulen

Literature:

- Handbook chapter 10,

Legislation:

- Regulation 315/93 on contaminants;
- Regulation 1881/2006 on MRLs for contaminants;
- Regulation 396/2005 on pesticide MRLs.

12. Supply chain crisis management and

13. Enforcement & product liability

If food safety problems cannot be prevented, at least businesses and authorities must be prepared to deal with them and to act when they occur.

To this end, Article 18 of the General Food Law establishes the requirement of traceability between the different stages of food production and distribution.

A typical feature of law is that the choice to obey it or not, is not a neutral one. Breaking the law may have consequences.

People can be forced to comply with the law and sanctions can be applied to people who do not. In article 17 the General Food Law holds the Member States responsible for the enforcement of food law. European food law increasingly sets standards for the national enforcement and provides for supervision. Public authorities are not the only ones who may want to uphold food law. Ultimately the responsibility of food business operators may result in liability in case not all the food safety requirements are met.

Aims of the 12th and 13th session:

- Participants have an insight in the structure and consequences of the requirement of traceability.
- Participants can distinguish between administrative law and criminal law enforcement.
- Participants have an insight in European requirements on national enforcement of food law.
- Participants have an insight in the role and function of the FVO.
- Participants are aware of possible civil law consequences of non-conformity with food law.
- Participants have an insight in the requirements of product liability.

Lecturer: Margherita Poto; Bernd van der Meulen

Literature:

- Handbook chapter 12

Legislation: Regulation 882/2004 Official controls

14. Market access requirements

Food law applies from farm to fork. It seems self evident that the ultimate test of the effectiveness of food law lies in quality and safety of the food product

when it reaches the fork. However only a relatively small part of the legislation is concerned with the properties of the food product when it reaches the consumer.

In principle food producers are free in their choice of ingredients unless the law explicitly states otherwise. For an increasing number of food products the law indeed explicitly states otherwise. The use of additives, genetically modified foods and other novel foods is forbidden unless it is explicitly authorised

Aims of the 14th session:

- Participants have an insight in pre-market approval schemes.
- Participants can recognise situations in which pre-market-approval schemes apply.

Lecturer: Bernd van der Meulen

Literature:

- Handbook chapter 9

Legislation:

- Regulation 258/97 the Novel Foods Regulation
- Regulation 1829/2003 GMO

15. Consumer information: labelling & claims

The General Food Law lays down the following principle on consumer information:

Article 8

Protection of consumers' interests

Food law shall aim at the protection of the interests of consumers and shall provide a basis for consumers to make informed choices in relation to the foods they consume. It shall aim at the prevention of:

- (a) fraudulent or deceptive practices;
- (b) the adulteration of food; and
- (c) any other practices which may mislead the consumer.

Article 16

Presentation

Without prejudice to more specific provisions of food law, the labelling, advertising and presentation of food or feed, including their shape, appearance or packaging, the packaging materials used, the manner in which they are arranged and the setting in which they are displayed, and the information which is made available about them through whatever medium, shall not mislead consumers.

The upshot of this is that consumers should be given the opportunity to make informed choices and that they must be protected from misleading practices. These principles have been elaborated in the (horizontal) Labelling Directive. Several other pieces of legislation give additional standards on consumer information. Of these the Regulation on nutrition and health claims, the Regulation on protected

designations and the directive on nutrition labelling will be discussed.

Aims of the 15th session:

- Participants have such an insight into the rules relating to the presentation of food that they are able to devise by themselves a label that meets all the requirements.

Lecturer: Margherita Poto

Literature:

- Handbook chapter 12

Legislation:

- Labelling directive 2000/13
- Regulation 1924/2006 nutrition and health claims
- Directive 90/496 nutrition labelling
- Regulation 510/2006 on protected designations

16. The regulation of genetically modified crops

We will conclude the course by discussing the most controversial topic of EU food law; genetic modification. We will see to what extent the different elements of EU food law can be applied in this context.

Aims of the last session:

- Participants test if they have acquired confidence in applying their knowledge on EU food law to complicated issues.

Lecturer: Margherita Poto

Final examination

The course will conclude with an examination consisting of open questions that will test the ability of the participants to apply food law as taught in this course to practical cases.

A certificate of attendance will be given to all the trainees.

FOOD LAW ACADEMY AFRICA

SOURCES

International Treaties

1 SPS Agreement

http://www.wto.org/english/docs_e/legal_e/15sps_01_e.htm

2 European Union — consolidated versions of the Treaty on European Union and of the Treaty establishing the European Community

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2006:321E:0001:0331:EN:pdf>

EU legislation

3 Regulation 178/2002 'the General Food Law'

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2002R0178:20080325:EN:PDF>

4 Regulation 1331/2008 Common authorisation procedure

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0001:0006:EN:PDF>

5 Regulation 1333/2008 on food additives

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0016:0033:EN:PDF>

6 Regulation 258/97 Novel Foods Regulation

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1997R0258:20090120:EN:PDF>

7 Proposal COM(2007) 872 New Novel Foods Regulation

http://ec.europa.eu/food/food/biotechnology/novelfood/COM872_novel_food_proposal_en.pdf

8 Regulation 1829/2003 on genetically modified food and feed

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003R1829:20080410:EN:PDF>

9 Regulation 1830/2003 on traceability and labelling of genetically modified food and feed

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003R1830:20081211:EN:PDF>

10 Regulation 65/2004 on unique identifiers for genetically modified organisms

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:010:0005:0010:EN:PDF>

11 Regulation 396/2005 on pesticide MRLs

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2005R0396:20080410:EN:PDF>

12 Regulation 315/93 on contaminants

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1993R0315:20031120:EN:PDF>

13 Regulation 1881/2006 on MRLs for contaminants

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2006R1881:20090701:EN:PDF>

14 Regulation 852/2004 on the hygiene of foodstuffs

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0852:20090420:EN:PDF>

15 Regulation 853/2004 hygiene for food of animal origin

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0853:20090420:EN:PDF>

16 Directive 2000/13 on food labelling

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000L0013:20090120:EN:PDF>

17 Directive 90/496 on nutrition labelling

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1990L0496:20081211:EN:PDF>

18 Proposal COM(2008) 40 on food information to consumers

http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/publications/proposal_regulation_ep_council.pdf

19	Regulation 1924/2006 on nutrition and health claims made on foods	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2006R1924:20080304:EN:PDF		
20	Regulation 510/2006 on protected designations	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2006R0510:20080529:EN:PDF		
21	Regulation 882/2004 on official controls	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0882:20081110:EN:PDF		
Case law		
22	ECJ 20 February 1979 C-120/78 'Cassis de Dijon'	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:61978J0120:EN:HTML		
23	ECJ 9 June 2005 C-211/03 Food & Pharma	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62003J0211:EN:HTML		
24	ECJ 5 December 2000 C-448/98 Emmenthal cheese case	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:61998J0448:EN:HTML		
25	ECJ 17 February 2009 C-552/07 French GMOs	<input type="checkbox"/>
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62007J0552:EN:HTML		
26	For other EU law, see:	<input type="checkbox"/>
http://eur-lex.europa.eu/RECH_menu.do?ihmlang=en		
Guidance documents		
27	Guidance on the implementation of Articles 11, 12, 16, 17, 18, 19 and 20 of Regulation (EC) n° 178/2002 on general food law Conclusions of the Standing Committee on the Food Chain and Animal Health	<input type="checkbox"/>
http://ec.europa.eu/food/food/foodlaw/guidance/guidance_rev_7_en.pdf		
28	Guidance document on the implementation of certain provisions of Regulation (EC) No 852/2004 On the hygiene of foodstuffs	<input type="checkbox"/>
http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_852-2004-new_en.pdf		
29	Guidance document on the implementation of certain provisions of Regulation (EC) No 853/2004 on the hygiene of food of animal origin	<input type="checkbox"/>
http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_853-2004-new_en.pdf		
30	Guidance document on the implementation of procedures based on the HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses	<input type="checkbox"/>
http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf		
31	Guidance document on certain key questions related to import requirements and the new rules on food hygiene and on official food controls	<input type="checkbox"/>
http://ec.europa.eu/food/international/trade/interpretation_imports.pdf		
32	Guidance document on official controls, under Regulation (EC) No 882/2004, concerning microbiological sampling and testing of foodstuffs	<input type="checkbox"/>
http://ec.europa.eu/food/food/controls/foodfeed/sampling_testing.pdf		
33	Working document guidance notes on EC import tolerances	<input type="checkbox"/>
http://ec.europa.eu/food/plant/protection/resources/working_en.pdf		
Additional readings		
34	Klaus-Dieter Borchardt, The ABC of Community Law (2000)	<input type="checkbox"/>
http://ec.europa.eu/publications/booklets/eu_documentation/02/txt_en.pdf		

35	Duncan. E. Alford, European Union Legal Materials: A Guide for Infrequent Users (2005/2008)	<input type="checkbox"/>
http://www.aallnet.org/products/pub_llj_v97n01/2005-03.pdf http://www.nyulawglobal.org/globalex/European_Union.htm http://www.nyulawglobal.org/Globalex/European_Union1.htm		
36	Morten Broberg, European Food Safety regulation and the Developing Countries. Regulatory problems and possibilities (2009)	<input type="checkbox"/>
http://www.policypointers.org/Page/View/9465		
37	Morten Broberg, Transforming the European Community's Regulation of Food Safety (2008)	<input type="checkbox"/>
http://www.sieps.se/en/publications/rapporter/transforming-the-european-communitys-regulation-of-food-safety.html		
38	Andrew Graffham, EU requirements for imports of fresh fruits and vegetables: a suppliers guide (2006)	<input type="checkbox"/>
http://www.agrifoodstandards.net/en/global/fresh_insights.html		
39	Margret Will and Doris Guenter, Food Quality and Safety Standards as required by EU law and the private industry. With special reference to the MEDA countries' exports of fresh and processed fruit & vegetables, herbs & spices. A Practitioners' Reference Book (2007)	<input type="checkbox"/>
http://www2.gtz.de/dokumente/bib/07-0800.pdf		
40	FAO, Understanding the Codex Alimentarius	<input type="checkbox"/>
ftp://ftp.fao.org/codex/Publications/understanding/Understanding_EN.pdf		
41	UNCTAD Course on Dispute Settlement in International Trade, Investment and Intellectual Property, part 3.9 SPS Measures	<input type="checkbox"/>
http://r0.unctad.org/disputesettlement/course.htm		





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Is endorsed by:

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