

**BENELUX OFFICE FOR INTELLECTUAL PROPERTY  
OPPOSITION DECISION  
N° 2015950  
of 29 March 2022**

**Opponent:** **Natural Organics Inc.**  
548 Broadhollow Road  
NY 11747-3708 Melville  
United States of America

**Representative:** **Killburn & Strode LLP**  
Laapersveld 75  
1213 VB Hilversum  
Netherlands

**Invoked right 1:** **EU trademark 18005206**

NATURES PLUS

**Invoked right 2:** **EU trademark 15355746**

NATURES PLUS

**Invoked right 3:** **EU trademark 13141205**

NATURE'S PLUS SPIRU-TEIN

**Invoked right 4:** **EU trademark 9836297**

NATURE'S PLUS

*against*

**Defendant:** **UNIVA Marketing Limited**  
Suites 2105B-07B 21/F Tower 1 China Hong Kong City  
33 Canton Road - Hong Kong  
Hong Kong

**Representative:**      **Bureau M.F.J. Bockstael nv**  
Arenbergstraat 13  
2000 Antwerpen  
Belgium

**Contested trademark: International application 1511625**



## I. FACTS AND PROCEEDINGS

### A. Facts

1. On 6 November 2019 the defendant filed an international trademark application designating the



Benelux, for the semi-figurative mark for goods in classes 5 and 29. This application was processed under the number 1511625 and was published in the Gazette 2020/3 on 30 January 2020.

2. On 30 March 2020 the opponent filed an opposition against the registration of the application. The opposition is based upon the following earlier registrations:

- EU trademark 18005206 for the wordmark NATURES PLUS, filed on 2 January 2019 and registered on 4 July 2019 for services in classes 35 and 44;
- EU trademark 15355746 for the wordmark NATURES PLUS, filed on 19 April 2016 and registered on 16 January 2017 for goods in class 5;
- EU trademark 13141205 for the wordmark NATURE'S PLUS SPIRU-TEIN, filed on 4 August 2014 and registered on 12 January 2015 for goods in classes 5 and 30;
- EU trademark 9836297 for the wordmark NATURE'S PLUS, filed on 24 March 2011 and registered on 5 October 2011 for goods in classes 3, 5 and 30.

3. According to the register the opponent is the actual holder of the trademarks invoked.

4. The opposition is directed against all of the goods covered by the contested trademark and is based on all of the goods and services covered by the trademarks invoked.

5. The grounds for opposition are those laid down in article 2.14, 2 (a) of the Benelux Convention on Intellectual Property (hereinafter: "BCIP").

6. The language of the proceedings is English.

### B. Course of the proceedings

7. The opposition is admissible and was notified by the Benelux Office for Intellectual Property (hereinafter: "the Office" or "BOIP") to the parties on 1 April 2020. During the administrative phase of the proceedings both parties filed arguments and the opponent also filed proof of use upon being requested to do so by the defendant. The course of the proceedings meets the requirements as stated in the BCIP and the Implementing Regulations (hereinafter "IR"). The administrative phase was completed on 12 January 2021.

## II. ARGUMENTS

8. The opponent filed an opposition at the Office under article 2.14, 2 (a) BCIP, in accordance with the provisions of article 2.2ter, 1 (b) BCIP: the likelihood of confusion based on the identity or similarity of trademark and sign and the identity or similarity of the goods or services concerned.

**A. Opponent's arguments**

9. The opponent starts his arguments with the comparison of the trademarks in question. The opponent states that the trademarks at hand are similar. This in particular as it is the element "NATURALLY PLUS" that must be considered to act as the main source indicator and plays a decisive role in the overall impression of the contested trademark and thus in the comparison of the trademarks.

10. Addressing the comparison of the goods and services, the opponent notes that the goods for which the contested trademark has been filed are identical and/or similar to the goods and services in the earlier trademarks.

11. The opponent states that the relevant public is the average consumer of the goods for which the contested trademark was filed, in this case the public at large. The application covers consumer goods meant for everyday use that can be found in supermarkets and drug stores.

12. The opponent ends with stating that the earlier trademarks have been intensively used since 1972 and are therefore distinctive.

13. Upon request of the defendant, the opponent filed proof of use for those earlier registrations that were – according to the parties - subject to the requirement of genuine use at the time of the filing of the contested trademark.

14. As a result of the above, the opponent considers that there exists a likelihood of confusion for the consumer. He asks the Office to grant the opposition, not to register the contested trademark and to order that the costs be borne by the defendant.

**B. Defendant's arguments**

15. The defendant starts his arguments with a comparison of the goods and services in question, explaining that the defendant actually holds another trademark registration which is highly similar to the contested trademark that predates the invoked rights of the opponent. As this trademark registration is for goods in class 5, which are identical to the goods in both classes 5 and 29 of the contested trademark, the defendant holds earlier rights in relation to the goods in classes 5 and 29.

16. Concerning the comparison of the trademarks, the defendant starts again by noting that the defendant already holds a registration for a trademark highly similar to the contested trademark, which means that the trademarks at hand have already been on the market side by side for years without any problems.

17. Furthermore, the defendant finds that the graphical elements of the rights involved make for a significant difference between the contested trademark and the invoked trademarks. In addition, the element "NATURALLY PLUS" in the contested trademark refers to the trade name of the applicant, whereas the element "SUPER LUTEIN" is the most relevant element of the contested trademark; this differs significantly from the earlier trademarks 'NATURE'S PLUS', 'NATURES PLUS' and 'NATURE'S PLUS SPIRU-TEIN'.

18. The trademarks at hand are also phonetically totally different since they are pronounced as 'SUPER LUTEIN' versus 'NATURE'S PLUS', 'NATURES PLUS' and 'NATURE'S PLUS SPIRU- TEIN', so claims defendant.

19. As the element 'SUPER LUTEIN' refers to 'an orange xanthophyll C<sub>40</sub>H<sub>56</sub>O<sub>2</sub> occurring in plants, animal fat, egg yolk and the corpus luteum of good quality', whereas the earlier trademarks refer to 'a higher degree of the specified quality of all the animals, plants, rocks, etc. in the world and all the features, forces, and processes that happen or exist independently of people, such as weather, the sea, mountains, the production of your animals or plants, and growth', the defendant finds that the trademarks at hand also differ on a conceptual level.

20. In relation to the proof of use as filed by the opponent, the defendant notes that said proof is not relevant as i) the defendant has earlier rights in relation to those goods, ii) does not show use of the trademarks and iii) should not be taken into consideration as the evidence (more specifically articles from Greek and Spanish magazines) has not been translated into the language of the procedure (English).

21. In that regard and considering the arguments above, the defendant finds that there exists no risk of confusion for consumers between the trademarks. Thus, he asks the Office to register the contested trademark and to order that the costs be borne by the opponent.

### **III. DECISION**

#### **A Proof of use**

22. In accordance with Article 2.16bis of BCIP, the opponent shall, at the request of the defendant, provide proof that the earlier mark has been put to genuine use in accordance with Article 2.23bis BCIP, or that there were valid reasons for non-use. In view of the date of filing of the opposition, the opponent must demonstrate proof of use in the period of five years prior to the date of filing or priority of the later mark the trademark against which the opposition is directed.

23. The priority date of the contested trademark is 27 June 2019. The period to be taken into account - the relevant period - therefore runs from 27 June 2014 till 27 June 2019.

24. Since the invoked EU trademark 9836297 wordmark NATURE'S PLUS was registered more than five years prior to the date of priority of the contested trademark, the request to submit proof of use is well-founded in relation to this registration.

25. However, as EU trademark 13141205 wordmark NATURE'S PLUS SPIRU-TEIN had not yet been registered for more than five years at the date of the priority of the contested trademark, the request to submit proof of use was not well-founded in relation to this registration.

26. For reasons of procedural economy, the Office will proceed with those registrations invoked that were not yet subject to the requirement of genuine use.

#### **B.1 Likelihood of confusion**

27. In accordance with article 2.14 BCIP, the holder of a prior trademark may submit a written opposition to the Office, within a period of two months to be calculated from the publication date of the application, against a trademark which in the order of priority, ranks after its own in accordance with Article 2.2ter BCIP.

28. Article 2.2ter, para. 1 BCIP stipulates that, "*A trademark shall, in case an opposition is filed, not be registered (...) where: b. because of its identity with, or similarity to, the earlier trademark and the identity or similarity of the goods or services covered by the trademarks, there exists a likelihood of*

*confusion on the part of the public; the likelihood of confusion includes the likelihood of association with the earlier trademark."*

29. According to case law of the Court of Justice of the European Union (hereinafter: the "CJEU") concerning the interpretation of Directive 2015/2436 of the European Parliament and of the Council of 16 December 2015 to approximate the laws of the Member States relating to trademarks (hereinafter: "Directive"), the likelihood of confusion of the public, which is defined as the risk that the public might believe that the goods or services in question come from the same undertaking or, as the case may be, from economically-linked undertakings, must be appreciated globally taking into account all factors relevant to the circumstances of the case (CJEU, Canon, C-39/97, 29 September 1998, ECLI:EU:C:1998:442; Lloyd Schuhfabrik Meyer, C-342/97, 22 June 1999, ECLI:EU:C:1999:323; CJBen, Brouwerij Haacht/Grandes Sources belges, A 98/3, 2 October 2000; Marca Mode/Adidas, A 98/5, 7 June 2002; Supreme Court of the Netherlands, Flügel-bottle, C02/133HR, 14 November 2003, ECLI:NL:HR:2003:AK4818; Court of Appeal Brussels, N-20060227-1, 27 February 2006).


### **Comparison of the trademarks**

30. The wording of Article 5, 1 (b) of the Directive (cf. article 2.2ter, 1 (b) BCIP) according to which "there exists a likelihood of confusion on the part of the public including the likelihood of association with the earlier trademark" shows that the perception of marks in the mind of the average consumer of the type of goods or services in question plays a decisive role in the global assessment of the likelihood of confusion. The average consumer normally perceives a mark as a whole and does not proceed to analyse its various details (CJEU, Sabel, C-251/95, 11 November 1997, ECLI:EU:C:1997:528).

31. Global assessment of the visual, aural or conceptual similarity of the marks in question, must be based on the overall impression given by the marks, bearing in mind, in particular, their distinctive and dominant components (CJEU, Sabel and Lloyd, already cited).

32. The overall impression created in the memory of the relevant public by a complex mark might, in certain circumstances, be dominated by one or more components of that mark (CJEU, Limonchello, C-334/05 P, 12 June 2007, ECLI:EU:C:2007:333). With regard to the assessment of the dominant characteristics of one or more components of a complex trademark, account must be taken, in particular, of the intrinsic qualities of each of these components by comparing them with those of other components. In addition, account may be taken of the relative position of the various components within the arrangement of the complex mark (EGC, Matratzen, T-6/01, 23 October 2002, ECLI:EU:T:2002:261 and El Charcutero Artesano, T-242/06, 13 December 2007, ECLI:EU:T:2007:391).

33. The trademarks to be compared are the following:

<b>Opposition based on:</b>	<b>Opposition directed against:</b>
NATURE'S PLUS SPIRU-TEIN	

*Visual comparison*

34. The earlier trademark NATURE'S PLUS SPIRU-TEIN is a wordmark, consisting of the elements "NATURE'S", "PLUS" and "SPIRU-TEIN".

35. The contested trademark is a combined mark (word- and figurative elements), consisting of the word elements "NATURALLY PLUS" and "SUPER LUTEIN" and several figurative elements. It is the element "SUPER LUTEIN" that catches the eye, due to its size and the fact that it is depicted in white, which contrasts with the dark blue of the background against which the element "SUPER LUTEIN" is placed. Furthermore, in the case of combined trademarks (word and figurative elements), the word element often has a greater impact on the consumer than the figurative element. The reason for this is that the public does not always analyse the signs and often refers to the sign by using the word element (see also, in that regard, EGC, SELENIUM-ACE, T-312/03, 14 July 2005, ECLI:EU:T:2005:289). The other elements of the contested trademark are visually speaking not of such a nature that they will take away from the eye-catching element "SUPER LUTEIN": the word element "NATURALLY PLUS" is much less noticeable due to its size and placement within the trademark, whereas the figurative elements - a diamond shape represented in dark blue, a leaf and the drawing of the Vitruvian man- are rather small in comparison and not stylized in a particularly striking manner.

36. The above also means that the trademarks at hand are visually somewhat similar, as the element "SPIRU-TEIN" of the invoked trademark and the visually dominant element "SUPER LUTEIN" of the contested trademark are of a similar length, both consisting of two visually separated elements, the first of which both starting with the letter "S", and the second both ending with the letters "TEIN".

37. Taking the aforementioned into consideration, the Office considers that the trademarks at hand are visually similar to a certain degree.

*Phonetic comparison*

38. As regards the aural comparison, it must be borne in mind that, strictly speaking, the phonetic representation of a composite sign is the same as that of its word components, irrespective of the graphical characteristics of those components, which are more subject to examination in the context of the visual aspect of the sign (EGC 25 May 2005, PC WORKS, T-352/02, ECLI:EU:T:2005:176 and 21 April 2010, Thai Silk, T-361/08, ECU:EU:T:2010:152).

39. The earlier trademark consists of the words "NATURE'S PLUS SPIRU-TEIN". As these words are the only (word)elements of the earlier trademark, the trademark will be pronounced as such.

40. With regards to the contested trademark, the Office considers that the consumer will most likely refer to said trademark by pronouncing the element "SUPER LUTEIN". Different to the opponent, the Office considers that it is unlikely that the word element "NATURALLY PLUS" will be pronounced; it is rather small and a mark consisting of several elements will generally be abbreviated into something easy to pronounce (see, to that effect, GEU, Green by Missako, T-162/08, 11 November 2009, ECLI:EU:T:2009:432 and judgment Brothers by Camper, T-43/05, 30 November 2006, ECLI:EU:T:2006:370).

41. The above also means that the trademarks at hand are similar in relation to their elements "SPIRU-TEIN" and "SUPER LUTEIN", as these elements are of a similar length, and have the same rhythm and intonation, particularly as both elements begin with the letter "S" and end with "TEIN".

42. In case the element "NATURALLY PLUS" will be referred to by the relevant public, the phonetic similarity between the trademarks at hand will be greater, as in said situation, the aural comparison would come down to "NATURE'S PLUS SPIRU-TEIN" vs. "NATURALLY PLUS SUPER LUTEIN", both consisting of a similar length, and having the same rhythm and intonation. This particularly as all of the individual elements of the trademarks start with the same letters ("N", "P", "S") and end with "TEIN".

43. Taking the aforementioned into consideration, the Office finds that the trademarks at hand are similar to a certain extent on a phonetic level for the part of the public that does not refer to the element "NATURALLY PLUS" within the contested trademark, whereas the trademarks at hand are similar for that part of the public that does also refer to the element "NATURALLY PLUS" within the contested trademark.

#### *Conceptual comparison*

44. Within the earlier trademark NATURE'S PLUS SPIRU-TEIN, the element "NATURES' PLUS" will be found to refer to the nature of the "SPIRU-TEIN", namely "spiru-tein being derived from the best of nature". The element "SPIRU-TEIN" will almost certainly have no meaning to the relevant public, although it cannot be ruled out that a part of the relevant public will believe that the "SPIRU-TEIN" is referring to a combination of "spirulina" and "protein" and/or "lutein".

45. The contested trademark will most likely be referred to as "SUPER LUTEIN". The element "LUTEIN" refers to a yellow-orange pigment found in many living things. Lutein is found, for example, in egg yolk, carrots and corn, whereas the element "SUPER" will be found to say something about the quality of the lutein ("lutein of a superb quality), therewith placing emphasis on the element "lutein". For the specialised part of the relevant public, i.e. medical and pharmaceutical professionals, the exact meaning of "LUTEIN" will be known. For the non-specialised part of the relevant public, i.e. the average consumer, the term "LUTEIN" will either be associated with a biological or chemical substance without necessarily knowing its exact nature, or it will not have any meaning at all (as it is, after all, not a well known and/or everyday used word). In case the element "NATURALLY PLUS" is to be taken into consideration as well, this would only reinforce the reference to the concept of "LUTEIN", as "naturally plus" would be found to refer to the nature of the "lutein", namely "lutein being derived from the best of nature".

46. For the part of the public that will know the meaning of either SPIRU-TEIN and/or SUPER LUTEIN, the trademarks at hand differ on a conceptual level. For the part of the public for which neither SPIRU-TEIN and SUPER LUTEIN have any meaning, a conceptual comparison is not possible.

47. Taking the aforementioned into consideration, the Office considers the trademarks NATURE'S PLUS SPIRU-TEIN and the contested trademark to be conceptually dissimilar for part of the public, whereas a conceptual comparison will not be possible for another part of the public.

#### *Conclusion in relation to the comparison of the trademark NATURE'S PLUS SPIRU-TEIN and SUPER LUTEIN*

48. The earlier trademark and the contested trademark are visually similar to a certain degree, similar on a phonetic level for at least part of the public and differ on a conceptual level for at least part of the public.

#### **Comparison of the goods**

49. In assessing the similarity of the goods and services concerned, all the relevant factors relating to these goods or services themselves should be taken into account. These factors include, inter alia, their



nature, their end-users and their method of use and whether they are in competition with each other or are complementary (CJEU, Canon, already cited).

50. With the comparison of the goods of the trademark invoked and the goods against which the opposition is filed, the goods are considered only based on of what is expressed in the register.

51. The goods to be compared are the following:

<b>Opposition based on:</b>	<b>Opposition directed against:</b>
CL 5 Dietary supplements: dietary food preparations, meal replacement protein shakes and beverages; protein powders for making meal replacement beverages and shakes.	Cl 5 Nutritional supplements; all included in class 5 (other than for medicinal use).
	Cl 29 Preserved, dried and cooked fruits and vegetables; processed vegetable, fruit and edible fish oil in granular, tablet, solid, stick, powder, liquid, jelly or capsule form (other than for medicinal use).
Cl 30 Meal replacement protein energy bars and wafers.	

52. According to Rule 1.21(e) of the IR, compliance with the adversarial principle referred to in Article 2.16(1) BCIP implies, inter alia, that the examination of the opposition is limited to the arguments, facts and evidence put forward by the parties. Given the fact that the defendant does not contest the similarity between the goods at hand – the defendant even states that the goods in classes 5 and 29 are identical (see point 15) the Office concludes that the goods are, as argued by the opponent, identical and/or similar.

### *Conclusion*

53. The goods covered by the contested trademark are identical to the goods covered by the trademark invoked.

## **B.2 Global assessment**

54. When assessing the likelihood of confusion, in particular the level of attention of the relevant public, the similarity of the goods and services in question and the similarity of the signs are important factors.

55. The average consumer is deemed to be reasonably well-informed and reasonably observant and circumspect (case Lloyd, already cited). It should also be borne in mind that the average consumer's level of attention is likely to vary according to the category of goods or services in question. In the present case, the goods in question concern products meant for enriching and/or improving one's health and/or wellbeing, for which there is generally an increased level of attention, regardless of whether they are prescription drugs or not. Therefore, the Office is assuming an increased level of attention.

56. The global assessment of the likelihood of confusion assumes that there is a certain degree of interdependence between the factors to be taken into account, particularly between the level of similarity of the signs and of the goods they cover. A lesser degree of similarity between the relevant goods can be

offset by a greater degree of similarity between the trademarks, and vice versa (Canon and Lloyd, already cited).

57. The more distinctive the earlier trademark, the greater the likelihood of confusion. Marks with a highly distinctive character, either per se or because of the reputation they possess on the market, enjoy broader protection than marks with a less distinctive character (Canon, Sabel and Lloyd, already cited). In the present case, the trademark invoked is of average distinctiveness, as the element "SPIRU-TEIN" is not descriptive of the goods concerned; in any case not for a part of the relevant public. And confusion on a part of the public is sufficient to grant an opposition in respect of the goods and services found to be identical or similar (see Case T-33/03 Hai v Shark, 9 March 2005, ECLI:EU:T:2005:89).

58. Account must also be taken of the circumstance that normally, the average consumer perceives a mark as a whole and does not proceed to analyse its various details (Sabel and Lloyd, already cited). The figurative elements of the contested trademark - a diamond shape represented in dark blue, a leaf and the drawing of the Vitruvian man - are of a banal nature and refer to the nature of the goods in question (being goods derived from nature, to be used for the enrichment of one's health and/or body). Although generally speaking, the public will not consider a descriptive element of a combined mark to be the distinctive and dominant element of the overall impression created by that mark (see EGC, Budmen, T-129/01, 3 July 2003, ECLI:EU:T:2003:184), in the case at hand, all of the elements of the contested trademark are of such a nature. However, although none of the elements are particularly distinctive, this does not lead to the conclusion that none of the elements can be considered to be a dominant element. It is after all settled case-law that the possible weak distinctive character of an element of a composite mark does not necessarily mean that it cannot be a dominant element, since, in particular because of its position within the sign or its dimensions, it may catch the eye of the consumer and remain in his memory (see EGC, judgement representation of a cowhide, T-153/03, 13 June 2006, ECLI:EU:T:2006:157; Pagesjaunes.com, T- 134/06, 13 December 2007, ECLI:EU:T:2007: 387 and also see judgement Ahlers (a), T-115/02, 13 July 2004, ECLI:EU:T:2004:234). The Office considers this to be the case for the element "SUPER LUTEIN".

59. The aforementioned is of particular importance given the fact that the average consumer only rarely has the chance to make a direct comparison between the different marks but must place his trust in the imperfect picture of them that he has kept in his mind (Lloyd, already cited). As the trademarks involved contain similar word elements - including the dominant elements "SPIRU-TEIN" and "SUPER LUTEIN" and also the elements "NATURE'S PLUS" and "NATURALLY PLUS" - with the figurative elements of the contested trademark being descriptive and/or of a banal nature, the public might believe that the contested trademark is a mere figurative variation of the earlier trademark (see to analogy EGC, Kajman, T-364/13, 30 September 2015, ECLI:EU:T:2015:738).

60. Based on the abovementioned circumstances, despite the higher level of attention, the Office finds - in relation to the earlier EU trademark registration number 13141205 NATURE'S PLUS SPIRU-TEIN and the contested trademark- that due to the similarities between the trademarks, the relevant public might believe that the in part identical, in part highly similar goods would come from the same undertaking or from economically-linked undertakings.

### **C. Other factors**

61. The defendant argues it holds an earlier trademark registration in relation to the goods in class 5, which means that i) the opponent is infringing the applicant's trademark rights and ii) the trademarks already co-exist on the market.

62. In relation to point i), the Office notes that within opposition proceedings, the validity of the trademarks invoked cannot be disputed (also see in this respect CJEU, Formula One Licensing/BHIM, C-196/11 P, 24 Mai 2012, EU:C:2012:314), nor can the existence of trademark registrations held by the defendant be of relevance: only the earlier trademarks invoked within the proceedings, together with the contested trademark, are of relevance in relation to the opposition proceedings at hand. The comparison of the trademarks is solely based on the trademarks as registered and applied (see to that effect: CJEU, Quantum, C-171/06, 15 March 2007, ECLI:EU:C:2007:171; 02 Holdings Limited, C-533/06, 12 June 2008, ECLI:EU:C:2008:339 and EGC, Ferromix e.a., T-305/06-T-307/06, 15 October 2008, ECLI:EU:T:2008:444).

63. In relation to point ii), the Office notes that it should be borne in mind that it is certainly not entirely excluded that, in certain cases, the coexistence of earlier marks on the market may possibly lessen the likelihood of confusion found by the authorities between two conflicting marks. However, such a possibility can only be taken into consideration if, at least, in the course of the proceedings concerning relative grounds for refusal before BOIP, the applicant for the Benelux trade mark has duly demonstrated that such coexistence is based on the absence of a likelihood of confusion, in the mind of the relevant public between the earlier marks relied on by the defendant and the earlier mark of the opponent on which the opposition is based and provided that the earlier marks at issue and the conflicting marks are identical (see, to that effect, CFI, ARTHUR & FELICE, T-346/04, 24 November 2005, ECLI:EU:T:2004:420 and CFI, Top iX, T-57/06, 7 November 2007, ECLI:EU:T:2007:333). However, in the present case, such evidence has not been provided.

#### **D. Conclusion**

64. Based on the foregoing the Office is of the opinion that there exists a likelihood of confusion in relation to the earlier EU trademark registration number 13141205 NATURE'S PLUS SPIRU-TEIN and the contested trademark.

65. There is therefore no need to assess the opposition on the basis of the other trademarks, nor the proof of use.

#### **IV. DECISION**

66. The opposition with number 2015950 is justified.

67. The International application with number 1511625 will not be registered in the Benelux, for none of the goods for which it has been filed.

68. The defendant shall pay the opponent 1,045 euros in accordance with article 2.16, 5 BCIP in conjunction with rule 1.28, 3 IR, as the opposition is not justified. This decision constitutes an enforceable order pursuant to article 2.16, 5 BCIP.

The Hague, 29 March 2022



Camille Janssen

Pieter Veeze

Eline Schiebroek

*(rapporteur)*

Administrative officer: Gerda Veltman