

**Greek League for Women's Rights  
National Council of Greek Women**

**Shadow Report on the compliance of Greece with the CEDAW  
Observations on the 7<sup>th</sup> Greek Report (2005-2008)**

**General observations**

This Shadow Report of the Greek League for Women's Rights (GLWR) and the National Council of Greek Women (NCGW) draws on the "Observations of the Greek National Commission for Human Rights (NCHR) on the 7<sup>th</sup> Greek Report (2005-2008)",<sup>1</sup> which were submitted to the General Secretariat for Gender Equality, the competent national authority for the drafting of the Report.

The GLWR was founded in 1920. Its seat is in Athens and it is active in several parts of Greece where it has established sections. It is affiliated to the International Alliance of Women (IAW). The GLWR is a member of the NCHR and has contributed in this capacity to the NCHR Observations on the 7<sup>th</sup> Greek Report.

The NCGW, a federation of fifty women's NGOs from Greece and Cyprus, is the oldest women's NGO, founded in 1908. Its seat is in Athens. It is affiliated to the International Council of Women (ICW) and to the European Council of the ICW (ECICW).

The GLWR and the NCGW note that the 7<sup>th</sup> Greek Report (the Report) does not cover, as it should, the whole period between the consideration of the previous Greek Report and the submission of the current Report. The missing period (2008-2010) should be added. The Report should also be updated with information on the period from its submission to its examination by the CEDAW Committee.

Moreover, the Report should contain at least three starting points: (a) information on the implementation of the concluding observations to the previous report and explanations for the non-implementation or difficulties encountered; (b) an analytical and result-oriented examination by Greece of additional legal and other appropriate steps and measures undertaken towards the implementation of the Convention; (c) information on any remaining or emerging obstacles to the exercise and enjoyment by women of their human rights and fundamental freedoms in the civil, political, economic, social, cultural or any other field, on the basis of equality with men, as well as information on measures envisaged to overcome these obstacles.

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<sup>1</sup> The NCHR was established and is operating under the UN Paris Principles (UN General Assembly, 85<sup>th</sup> Plenary, 20.12.1993, A/ RES/48/134) as an independent advisory body to the Greek State for the protection of Human Rights. See the full text of the NCHR Observations on the 7<sup>th</sup> Greek report, in Greek, and a summary thereof in English on: [www.nchr.gr](http://www.nchr.gr).

The Report should also contain specific impact assessments, which should also include references to relevant case-law of national courts. Moreover, the impact of the economic crisis on the situation of women, the measures taken and the results which are expected therefrom should also be reported.

## **Observations per article (and cluster)**

### **PART I**

#### **Article 1 – Elimination of discrimination**

The GLWR and the NCGW strongly recommend the use of the term “inequalities” which is enshrined in Article 116(2) of the Greek Constitution and Article 8 of the Treaty on the Functioning of the European Union (TFEU). The concept of “inequality” is different in nature from and broader than the concept of “discrimination”. It covers *de facto* situations affecting mainly women, due to prejudices and stereotypes which infiltrate socio-economic structures. Inequalities survive the repeal of discriminatory provisions and hinder the achievement of substantive gender equality. Moreover, women are neither a group nor a minority, but one of the two forms of the human being and half of mankind and they often suffer multiple inequalities. This is why gender equality is a positive and pro-active principle, a horizontal objective (to be effectively mainstreamed in all areas) and a fundamental right under the CEDAW and EU law – not a mere prohibition of discrimination. Consequently, positive action is its natural corollary.<sup>2</sup> The Report should stress this and it is in this spirit that it should present and evaluate the measures aimed at complying with the CEDAW.

Other concepts, such as direct and indirect discrimination, harassment and sexual harassment should also be mentioned and information on their application in law and in practice, including information on recourses to national courts and case law of the latter. Further, reference should be made to the scope of special laws as well as to their impact.

#### **Article 2 – Legislative and judicial protection**

The GLWR and the NCGW emphasize that women are reluctant to claim their rights before the courts or other competent authorities. There are procedural rules in EU gender equality directives regarding the standing of organizations to pursue the claims of victims of discrimination before the courts and other competent authorities and the shifting of the burden

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<sup>2</sup> See A. Yotopoulos-Marangopoulos, *Affirmative Action; Towards Effective Gender Equality*, Marangopoulos Foundation for Human Rights, Sakkoulas/Bruylant, 1998; S. Koukoulis-Spiliotopoulos ‘The amended equal treatment directive (2002/73): an expression of constitutional principles/fundamental rights’ 12 *Maastricht Journal of European and Comparative law* 4 2005 pp. 327-369.

of proof<sup>3</sup>. These rules aim to encourage the pursuance of claims of victims of discrimination and protect them from victimization due to their recourse to the courts. The Acts transposing the directives contain these rules, which however have not yet been applied by the Greek courts. This is because the rules remain in the transposing Acts; they have not been incorporated in the Greek procedural codes, and they are thus unknown to judges and lawyers.

Moreover, the EU rule on the standing of organizations is not correctly worded in Acts 3896/2010 and 3769/2009 transposing Directives 2006/54 and 2004/113, respectively. These Acts require that the aggrieved person give his/her “consent” for the organization to have recourse to the court, while the directives require the “approval”, not the “consent” of these persons. According to Greek law, the “consent” has to be given before the recourse is lodged, while the “approval” can be given later, until the case is heard. This means that, until the consent is given, the remedy may well be time-barred (e.g. a dismissal can be challenged within three months of its notification; an administrative act within sixty days of cognisance thereof). It is only Act 4097/2012 transposing Directive 2010/41 that has correctly transposed this rule, as it requires “approval”.

The above problems have been repeatedly pointed out by the NCHR<sup>4</sup> and they are very serious, all the more so as the reluctance of workers, in particular women, to have recourse to Justice, due to the fear of being victimized or labelled troublemakers and due to lack of evidence, is increasing with the crisis.

It should be noted that remedies and sanctions in civil and administrative cases, including gender equality cases, are proportional and dissuasive and can serve as a model. A discriminatory dismissal is declared null and void (by civil courts) or annulled (by administrative courts). The dismissal is deemed never to have occurred and the worker retains his/her post, reinstatement being unnecessary. A discriminatory refusal to hire or promote is declared null and void by civil courts and the hiring or promotion is deemed to exist from the time it should have occurred. Administrative courts annul such refusals and order the issuance of an administrative act of retroactive hiring or promotion. In all cases, the worker is entitled to full back pay plus legal interest and moral damages. The Act transposing Directive 2006/54 has added disciplinary sanctions for civil servants and extended the administrative fines already

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<sup>3</sup> E.g. in Directive 2006/54/EC, on equal treatment of men and women in employment and occupation (recast), transposed by Act. 3896/2010, OJ A 207/08.12.2010; in Directive 2004/113/EC, on equal treatment of men and women in access to and supply of goods and services, transposed by Act 3769/2009, OJ A 105/01.07.2009; in Directive 2010/41/EU on equal treatment of men and women engaged in an activity in a self-employed capacity, transposed by Act 4097/2012, OJ A 235/03.12.2012.

<sup>4</sup> See e.g. NCHR ‘Comments on the Bill transposing Directive 2006/54’; Letter to the Minister of Labour and Social Security, 31 October 2010, and Observations on the 7<sup>th</sup> Greek Report to the CEDAW: <http://www.nchr.gr>.

provided for employers to directors or their representatives. It also increased the penal sanctions for a ‘violation of sexual dignity’, provided by Article 337 of the Penal Code when it constitutes exploitation of workers or candidates for work. However, courts often do not have the opportunity to apply these sanctions in gender equality cases, due to workers’ reluctance to initiate such cases. Moreover, the Labour Inspectorate, which has the power to impose fines, does not often do so, due to acknowledged shortages in personnel and material means.<sup>5</sup>

#### **Article 4 – Special measures**

The Report should provide more information on the measures taken and specify their results.

#### **Article 5 – Social and cultural patterns**

The Report mentions studies regarding stereotypes and the mass media, but it does not mention whether and how they were used in practice and whether they had any impact.

#### **Article 6 – Violence against women**

##### *Domestic Violence*

The NCHR and the GLWR commenting on the Bill which became Act 3500/2006 (OJ A 232/24.10.2006) had stressed that: (1) it does not deal with the essence of the problem, i.e. violence against women, nor with its root cause, the persisting roles of “man-master” and “woman-servant”; (2) the acts it claims to punish are those already covered under the Penal Code, except for the case of rape within marriage; moreover, there is a risk of confusion as to which acts will continue to be regulated by the Penal Code and/or by pre-existing law; (3) the relevant legislation is neutral from the point of view of gender, covering perpetrators and victims of both genders; but why is the perpetrator left unpunished when the victim is the wife and the perpetrator her husband or companion? (4) the establishment of ad hoc institutions, including specialized social services, to deal with the issue is not provided for; (5) the institution of mediation on criminal issues, as provided for, raises doubts regarding both its constitutionality and its efficiency; (6) the police and the Prosecutor remain the main arbiters in the pro-judicial phase, although they have already proven to be unsuitable for the task, while the establishment of an ad hoc institution to deal with the problem, such as a special body of family social workers, is not provided for; (7) the recommendation (23.06.2005) addressed to the General Secretariat for Equality by the GLWR has obviously not received due attention. A law addressing an issue of concern to a considerable number of families should be the product of a participatory process. However, no significant improvements were made.

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<sup>5</sup> See Labour Inspectorate Annual Reports: <http://www.ypakp.gr>.

The Report does not present and assess the implementation of Act 3500/2006. In fact, the experience of the GLWR and the NCGW is that the process of mediation is either not applied or applied inadequately. There are only a few judgments on acts sanctioned by this Act, which show, on one hand, the difficulty to prove domestic violence<sup>6</sup>, and on the other hand that this Act contains provisions which constitute regression in the protection of the victims.<sup>7</sup>

### *Human Trafficking*

It should be noted that Greece has ratified the United Nations Convention against Transnational Organized Crime and its Protocols, as these instruments introduce positive measures in the Greek legal order. Nonetheless, the provisions should be effectively implemented. The Report gives no relevant information.

### **Article 7 – Participation of women in decision making organs**

Relevant information should be updated in order to include the recent legislation on local administration (Law 3852/2010). There is a clear regression, as according to recent legislation, the 1/3 quota is calculated on the basis of the members of councils and not on the basis of all candidates included in the ballot, as it was before. On the initiative of the Marangopoulos Foundation for Human Rights and the GLWR, more than twenty important Greek NGOs, including the NCGW, expressed their strong disagreement on the new provisions in a letter dated 8 October 2010, addressed to the competent Minister (the Minister of the Interior, Decentralisation and Electronic Governance), in which they stressed the non-conformity of the new provisions to the CEDAW and recalled the right of recourse to the CEDAW Committee, in accordance with the 1999 Protocol to the CEDAW.<sup>8</sup>

### **Article 9 – Equal rights, nationality**

The Report should clarify whether issues and impediments related to the dependence of women from their husband's status have been addressed and to what extent the (male) "breadwinner" concept has been effectively combated.

### **Article 11 – Employment and social security**

In its Observations on the 7<sup>th</sup> Greek Report, the NCHR dealt in detail with the deregulation of labour relations and its prejudicial impact on women's already weak position in the labour market. In a previous report, the NCHR had highlighted the increase of multiple discrimination

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<sup>6</sup> See e.g. Supreme Civil and Penal Court, Penal Section, judgment 963/2012.

<sup>7</sup> See e.g. Supreme Civil and Penal Court, Penal Section, judgment 1274/2011

<sup>8</sup> See the letter on [www.leaguewomenrights.gr](http://www.leaguewomenrights.gr).

and had requested the adoption of specific provisions which would explicitly prohibit it. These concerns were confirmed by decisions and reports of international and European Treaty bodies, which we will mention indicatively, by chronological order.

Moreover, on the initiative of the Marangopoulos Foundation for Human Rights and the GLWR, more than twenty important Greek NGOs, including the NCGW, addressed to all competent ministers a list of proposals for the elimination of gender discrimination and the promotion of substantive gender equality.<sup>9</sup>

It should be noted that since May 2010, due to a deep financial crisis, Greece has been under an EU/International Monetary Fund (IMF) assistance programme, which includes pooled bilateral loans by the Euro area Member States in conjunction with IMF funding. The disbursements were made dependent on compliance with austerity measures required by two consecutive Memoranda of Understanding signed by the European Commission, acting on behalf of the Euro area Member States, and the Hellenic Republic. Among the austerity measures were sweeping employment and social security law reforms, coupled with drastic social spending cuts and tax increases. Several clauses of the second Memorandum (of February 2012) are of immediate and direct effect. Compliance with the Memoranda is controlled by the “*troika*” (IMF, European Commission, European Central Bank).

*- The ILO Committee of Experts on the Application of Conventions and Recommendations*

Following complaints by the Greek General Confederation of Labour (GSEE), the ILO Committee of Experts on the Application of Conventions and Recommendations<sup>10</sup>, examined the compatibility of austerity measures with several international labour conventions. The ILO Committee expressed its ‘*deep concern*’<sup>11</sup> at the drastic ‘alterations’ of labour law through measures which ‘go to the heart of labour relations, social dialogue and social peace’, ‘nullifying the binding nature of collective agreements’.

The Committee underlined ‘the disproportionate impact’ of these measures on women and called for ‘adequate safeguards to protect workers’ living standards’. Women, especially those pregnant and mothers, were mainly affected by the exponential growth of part-time and rotation work imposed by the employer, while unfair dismissals due to pregnancy or maternity

<sup>9</sup> See these proposals on [www.leaguewomenrights.gr](http://www.leaguewomenrights.gr).

<sup>10</sup> International Labour Conference, 101st Session 2012, *Report of the Committee of Experts on the Application of Conventions and Recommendations*, Greece, ILO Conventions 98, 100, 102, 111 and 156: <http://www.ilo.org/dyn/normlex/en/f?p=1000:11003:0::NO>.

<sup>11</sup> Emphasis added in the observations on the application of ILO Convention 98 (Right to Organise and Collective Bargaining) by Greece. See International Labour Conference, 101st Session 2012, *Report of the Committee of Experts on the Application of Conventions and Recommendations*: <http://www.ilo.org/dyn/normlex/en/f?p=1000:11003:0::NO>.

leave and sexual harassment also increased. In view of the inadequacy of childcare and family care services, the Committee recalled the importance of measures which facilitate the reconciliation of work and family obligations by both parents and allow them to remain in the labour market, including such (adequate and accessible) services, while also promoting effective gender equality. It also stressed “the importance of addressing gender stereotypes, so that mothers are not automatically considered for part-time and rotation work”.

The Committee also noted that measures aimed at reducing employment in the public sector would greatly affect women who are the vast majority in this sector. Moreover, “small and medium sized enterprises (SMEs), which constituted an important source of female and youth employment, have been closing down on a massive scale”.

The Committee deplored the successive drastic pension cuts, which “undermine the people’s trust in the social security system and raise concerns for social justice in handling the crisis”. It warned that “in the event that unemployment increased to 1 million people from the current 800.000 (2011 figure), social security funds would be losing EUR 5 billion annually and the sustainability of the benefits provided by them would be called into question”.

Less than a year later (August 2012) the registered unemployed totalled 1.267.595 (in a total population of 9.903.268 (2011 census)) and registered unemployment rate was 25.4 %. The female rate was 29 %, the male rate 22.7 %, the youth rate (below 25-years-old) 58 % and the rate of the 25-34-years old 32.9%.<sup>12</sup> By GSEE estimates (May 2012), the real general rate was at least 29 %.<sup>13</sup> In the first trimester of 2012, about 60 % of unemployment was long-term (at least twelve months), the highest in the EU; the female long-term unemployment rate was 15.9 % and the male rate 10.4 %.<sup>14</sup> According to GSEE, in the second trimester of 2012, long term unemployment was 71%.<sup>15</sup> The ILO Committee noted that “a large part of women had joined the ranks of the ‘discouraged’ workers who are not accounted for in the statistics”.

It should be noted that unemployment benefits are 57 % of the NGCA minimum wage and are paid for a maximum of twelve months. They thus do not cover the long-term unemployed and, due to strict conditions, only about 160.000 persons receive them (May 2012 GSEE estimates).<sup>16</sup> Thus, unemployed women are more likely to miss out on this support.

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<sup>12</sup> Hellenic Statistical Authority (ELSTAT) *Labour Force Survey August 2012*: <http://www.statistics.gr>.

<sup>13</sup> INE (Labour Institute of GSEE/ADEDY), *Greek Economy and Employment. Annual Report 2012*, p. 334: <http://www.inegsee.gr/kalwshlhate.html>.

<sup>14</sup> ELSTAT *Living Conditions in Greece 2012*, p. 27: <http://www.statistics.gr>.

<sup>15</sup> INE/GSEE monthly bulletin “Enimerossi”, No. 198, October 2012, p. 12: <http://www.inegsee.gr>.

<sup>16</sup> GSEE/ADEDY/INE *Greek Economy and Employment, op. cit.* p. 334: <http://www.inegsee> ; see also European Commission *Employment and Social Situation Quarterly Review* March 2012, p. 83: <http://ec.europa.eu/social>

The ILO Committee stressed that austerity measures should be assessed and planned with a view to preventing poverty; it was ‘the duty of the government, together with all the parties involved with the international support mechanism’, to do so.

*- The European Committee of Social Rights*

By two decisions of 23 May 2012, published on 19 October 2012,<sup>17</sup> the European Committee of Social Rights, which monitors the application of the European Social Charter (ESC), upheld in part two collective complaints by Greek trade unions against Greece on the compatibility of austerity measures with the 1961 ESC ratified by Greece.

The first decision concerns a provision stipulating that the first year of employment under a contract of indefinite duration is deemed a probationary period, during which the contract may be terminated without notice and redundancy pay. This provision violates Article 4(4) ESC (right to a reasonable period of notice).

The second decision concerns a provision on the employment of workers aged 15 to 18 under “special apprenticeship contracts”. These workers are excluded from the scope of application of labour law and are not entitled to at least three weeks’ paid annual holiday, in breach of Article 7(7) ESC; an adequate system of apprenticeship is not provided for them, in breach of Article 10(2) ESC; their social security coverage is confined to sickness benefits in kind and occupational accident coverage at a rate of 1%, in breach of Article 12(3) ESC. The last-mentioned provision, which requires the progressive raising of the social security system to a higher level, does not allow the establishment of a distinct category of workers who are excluded from the general national security protection system, as this constitutes a deterioration of the social security system, which is incompatible with Article 12(3) ESC.

The second decision also concerns a provision cutting the minimum salary for all workers under 25 years of age by 32 % of the national minimum wage, i.e. below the poverty line. This breaches Article 4(1) ESC (right to a fair remuneration sufficient for a decent standard of living of the workers and their families) as well as Article 4(1) ESC in light of the non-discrimination clause of the Preamble to the ESC (discrimination on grounds of age). It should be noted that the direct source of this provision is the second Memorandum (above page 6). Thus, the European Committee of Social Rights is the first treaty body to have assessed such a provision.

Both decisions recall that “*the economic crisis should not have as a consequence the reduction of the protection of the rights recognised by the [ESC]*”. The first decision adds:

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<sup>17</sup> *General Federation of Employees of the National Electric Power Corporation (GENOP-DEI) and Confederation of Greek Civil Servants’ Trade Unions (ADEDY) v Greece* (Complaints Nos. 65/2011 and 66/2011): [http://www.coe.int/t/dghl/monitoring/socialcharter/complaints/CC65Merits\\_en.pdf](http://www.coe.int/t/dghl/monitoring/socialcharter/complaints/CC65Merits_en.pdf)

“doing away with these guarantees ‘would not only force employees to shoulder an excessively large share of the consequences of the crisis, but also accept pro-cyclical effects liable to make the crisis worse and to increase the burden on welfare systems”. Both decisions quote passages of the NCHR Recommendation “*On the imperative need to put an end to the sharp decline in civil liberties and social rights*”.<sup>18</sup>

These decisions condemn provisions concerning young people. As young women are disproportionately hit by the crisis, including by unemployment (above pages 6-7), they confirm the direct and indirect adverse effects of austerity legislation on women.

*- The ILO Committee on Freedom of Association*

In its November 2011 session the ILO Committee on Freedom of Association examined a complaint submitted by four Greek trade unions<sup>19</sup> and supported by the International Trade Union Confederation (ITUC), concerning austerity measures imposed within the framework of the international loan mechanism for Greece, and reached conclusions similar to those of the ILO Committee of Experts on the Application of Conventions and Recommendations. According to the title of the ILO press release announcing this Report, “ILO calls on Greece to bring its labour relations system back to fundamental rights”<sup>20</sup>

More recently, the situation deteriorated even more; harder measures were taken, such as further drastic cuts in wages and pensions and interventions in collective bargaining and agreements, including a decisive blow: the replacement of minimum wage rates set by national general collective agreements (NGCAs) with statutory minimum rates – all this in parallel with rises in taxes and the introduction of new taxes.

The gravity of the situation, with unemployment, in particular of women and the young, soaring, and 68 % of the whole population living below the ‘at risk of poverty’ rate, is confirmed by the European Commission which, moreover, deplors that the ensuing social climate is the worst in the EU and the perspectives are bleak.<sup>21</sup>

Therefore, the call of the ILO organs and the European Committee of Social Rights on all the parties involved in the “support mechanism” for Greece to respect fundamental rights is more urgent than ever.

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<sup>18</sup> See this Recommendation, in Greek and in English, on [www.nchr.gr](http://www.nchr.gr).

<sup>19</sup> GSEE, the trade unions which had recourse to the Committee of Social Rights (ADEDY, GENOP-DEI) and the Greek Federation of Private Employees.

<sup>20</sup> Report of the Committee on Freedom of Association. 365<sup>th</sup> Report, paragraphs 784-1003: <http://www.ilo.org/brussels/lang--en/index.htm>

<sup>21</sup> European Commission *Employment and Social Situation Quarterly Review* June 2012, pp. 45-48: <http://ec.europa.eu/social>.

### **Article 12 – Health and family planning**

Attention should be drawn to the deterioration of the corporal and mental health of the Greek population due to the crisis and the austerity measures.

Further information should be submitted regarding Health Education Programmes as well as the inspections realised by Labour Inspectorate Body with regard to caesarean births. We consider that the socio-medical centres in Roma settlements are a good measure and suggest that further competences should be accorded to them.

### **Article 15 – Equality before the law**

#### *Minorities*

We support the proposal of the NCHR for the abolition of all jurisdictional and administrative competences of the Mufti, who must be confined to his religious duties.

### **Article 16 - Discrimination against women in all matters relating to marriage and family relations**

#### *Surname*

According to an amendment of Article 1388 of the Civil Code by Act 3719/2008, the wife may take her husband's surname if they both agree to that. The Explanatory Report states that this new provision allows spouses to hold the same surname if they so wish so that they are able to prove their relation status easier, especially when involving in any transactions abroad, and given that the surname of the spouse is not included in passports or identity cards. We consider this provision not to comply with the safeguard of substantive equality of two sexes and with the continuity of women's personality. Furthermore, it may endanger safety of transactions since it disrupts the continuity of women's identity through potential successive surname changes. Moreover, it is not compatible with the principle of gender equality as provided for by the Greek Constitution and the CEDAW.

#### *Children born out of wedlock*

Regarding the custody of children born out of wedlock, Article 1515 of the Civil Code, as amended by Act 3719/2008, provides that the father who has recognized his child may be assigned the custody in whole or in part after he applies to court, if that is in the best interest of the child. There is no reference to the mother's consent, as before the amendment. We consider that the mother's consent should be required as a rule for the assignment of parental custody, in whole or in part, to the father, in order for abusive practices to be avoided.

#### *Marriage validity*

We agree with the NCHR proposal that: (a) The minimum age for the conclusion of a marriage should be the age of 18 years old for all citizens. An exception should be authorized by a court for important reasons and the minimum age should be at 16 years old. Marriages by proxy should be considered by Greek law as “non-existent” with regard to the proxy and the principal’s “spouse” and as “null and void” with regard to the principal.

**Other issues**

Greece should ratify the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

We also share the CEDAW’s call to disseminate widely, in particular to women’s and human rights organizations, the Convention and its Optional Protocol, as well as the CEDAW Reports on the implementation of the Convention, something that is not be done by the Greek State. Information on the implementation of the Beijing Declaration and the Platform for Action should also be provided.

Athens, 28 January 2012.

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