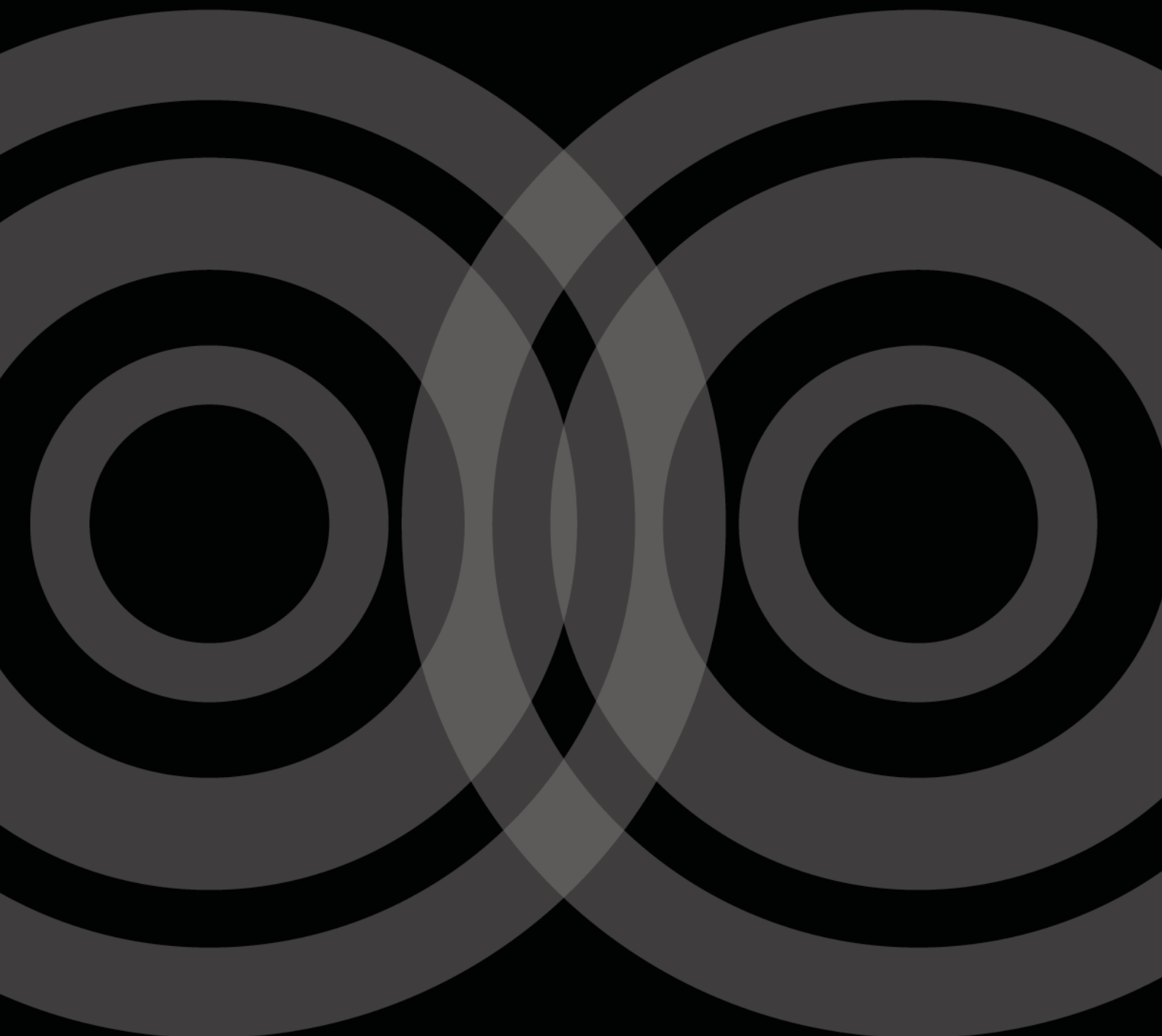


Fair, honest, safe and fun

The case for cross border gambling in the European Union



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Executive Summary

1. Remote gambling is the newest and fastest growing part of the world gambling industry. For the first time it has made gambling a truly international product which brings with it new challenges for regulators and governments.
2. Within the European Union this has been reflected in the number of legal cases related to cross border gambling that have arisen in national courts and the European Court of Justice. It has also led to complaints being made to the European Commission and for it in turn to open infringement proceedings against numerous Member States.
3. Under European law there are public interest grounds that can be relied upon to justify the imposition of restrictions on gambling within the borders of a Member State and on the cross border trade of gambling operators based in other Member States.
4. However, those restrictions must be necessary, non-discriminatory, and proportionate.
5. In some, if not all, cases the restrictions are being enforced primarily to protect domestic gambling providers and/or tax revenue and not, as claimed, for acceptable public interest reasons. This amounts to an unwarranted restriction on the freedoms that are the basis of the Internal Market.
6. It also shows that, even where the restrictions are put in place with the best of intentions, they are unnecessary if the gambling provider is properly licensed and regulated in another Member State.
7. Gambling is a legal legitimate service in the sense of the Treaty. As such Articles 43 and 49 of the EC Treaty apply to gambling.
8. Gambling is, and is increasingly accepted as, an extremely popular activity that provides a great deal of harmless enjoyment and entertainment for the vast majority of its customers. Within most European societies it is a mainstream leisure activity.
9. Free movement of services and freedom of establishment in the European Union are basic principles of the EU. Gambling services should be subject to the fair application of these principles and be treated no differently to any other legitimate cross border service.
10. By reference to the regulatory regime in the UK this report demonstrates that remote gambling can be controlled in a way that meets all reasonable public policy, security and health concerns.
11. Prohibition is not a realistic option. It is only by regulating operators rather than by prohibiting them that the gambling public across Europe can be ensured of proper protection.
12. The demand for gambling in Europe is there for all to see and new technologies mean that it will become increasingly available by remote means. If they are not available from providers in the EU then consumers will be forced towards operators in jurisdictions outside the EU that might not have the same safeguards or standards.
13. Opinion formers across the EU have a responsibility to EU based providers and consumers to consider all of the arguments and issues objectively and independently.
14. It is the confirmed belief of the RGA that only one conclusion can be reached: reputable, well regulated cross border gambling operations pose no threats that cannot be fully addressed and they offer fair, honest, safe and fun products for consumers.

Introduction

15. The Remote Gambling Association (RGA) was established in 2005 following the merger of two existing trade associations (ARGO and iGGBA). Its aim is to promote the interests of remote gambling companies. It is a condition of membership that all of the operators who make up the RGA must hold gambling licences within Europe, although this does not preclude them from having additional licences elsewhere. Further information about the RGA and a full list of the current membership can be found at www.rga.eu.com.
16. The purpose of this report, an earlier version of which was published by ARGO in 2005, is to assess the issues surrounding cross border gambling in the European Union and to explain why properly regulated EU-based operators should have full access to European markets.
17. The report demonstrates that the current situation is unsatisfactory and, in the longer term, unsustainable. It is designed to inform future debates on this subject and it should be of particular interest to European Commissioners, Members of the European Parliament, officials and regulators from Member States, and everyone else that is willing to adopt an objective approach to the issue of the free movement of remote gambling services and the appropriate regulation of these activities.
18. In a closely integrated single European market, where people routinely cross borders, work and live in different Member States, it is illogical to fragment that market artificially and illegally into 27 separate national gambling markets. This is especially true when the position adopted in many Member States is illegal under EU law. The actions of these Member States are denying people the opportunity of gambling safely with properly regulated operators who provide a full range of consumer protection measures. They are preventing an increase in tax revenues for Member States. They are standing in the way of what could be a thriving, reputable gambling industry across the EU that will increasingly become an important part of the mainstream leisure sector.

19. At the same time there exists a world market for remote gambling that respects few national borders and there are no shortage of jurisdictions that are willing to play host to companies that offer a vast range of gambling products.

The current position in Europe

20. Before looking ahead at the detailed issues and the arguments, it is important to be clear about the current status of cross border gambling in Europe. The following sections therefore outline:
 - the relevant EU law;
 - existing case law;
 - related initiatives, such as the Services Directive; and
 - as this is a uniquely international industry, the environment outside of the EU.

European Union Law

21. In EU law there is a legal framework within which all decisions must be taken. This section sets out what it is.
22. The key points to note are that:
 - The Treaty does not distinguish gambling from other services and it requires that all services must be dealt with in the same way;
 - Article 43 of the Treaty provides that, in the absence of certain allowable justifications, restrictions on the freedom of establishment of nationals of a Member State in the territory of another Member State shall be prohibited;
 - Article 49 of the Treaty prohibits restrictions on freedom to provide services within the Community for nationals of Member States who are established in a Member State other than that of the person for whom the services are intended;



- Article 50 of the Treaty defines what is meant by a service and the ECJ has indicated that gambling is a service within the meaning of Article 50;
- Article 153 of the Treaty deals with consumer protection, stating that the EU will contribute to protecting the health, safety, and economic interests of consumers and take consumer protection into account when defining and implementing other policies and activities; and
- Under Article 226 of the Treaty the Commission can take action against Member States whose laws are in breach of the Treaty.

ECJ case law

23. In the interpretation of EU law, there is now a relatively consistent body of case law on gambling issues within the EU and copies of the judgements can be found at www.curia.eu.int

24. The main points of reference are:

Case C – 275/92	Schindler
Case C – 67/98	Zenatti
Case C – 124/97	Laara
Case C – 243/01	Gambelli
Case C – 42/02	Lindman
Case C – 338/04	Placanica

25. In its recent case law, and particular in *Gambelli*, the ECJ, irrespective of the particulars of the case, reached several conclusions about EU law which have a wider significance. They include:

- where there are restrictions these must be exceptional measures (para 60) expressly provided for in Articles 45 or 46 or justified for reasons of overriding public interest;
- *‘the diminution or reduction of tax revenue is not one of the grounds listed in Article 46 and does not constitute a matter of overriding general interest’* (para 61);
- the restriction must *‘reflect a concern to bring about a genuine diminution of gambling opportunities’*; therefore public policy concerns for limiting the participation of foreign undertakings in the national gambling market cannot be invoked by Member States if they themselves encourage consumers to participate in gambling, for example, through advertising campaigns (para 69);
- importantly, the ECJ set out a specific test for the assessment of proportionality of restrictions on the provision of gambling services. The key is that they must limit activities in a *‘consistent and systematic manner’*;

- the financing of social activities through a levy can only be *'an incidental beneficial consequence and not the real justification for the restrictive policy adopted'*; and
- *'moral, religious, and cultural factors, and the morally and financially harmful consequences for the individual and society associated with gaming and betting'* could justify restrictions.

26. *Gambelli*, reinforced previous findings and laid down a clear test in assessing proportionality of restrictions. The case law can be summarised as saying that Member States are entitled to place restrictions on the provision of services, for one or more of the following purposes:

- Consumer protection;
- Prevention of fraud; or
- Preservation of public order.

27. However, the crucial caveats are that those restrictions must be proportionate to the risks presented by the gambling opportunities being provided, and must *'serve to restrict betting activities in a consistent and systematic manner'*. This cannot be true of the discriminatory restrictions imposed by many Member States where gambling offered by domestic providers is already, or soon will be, widely available and promoted with the support of the Member State concerned.

Directives

28. It has become common practice to exclude gambling from the scope of Directives. Prime examples of this are the **Services Directive** and the **E-Commerce Directive**. As remote gambling is one of the few economic e-commerce success stories and is a legitimate and legal industry, the RGA maintains that gambling should be treated like any other legitimate service and not excluded from the ambit of these Directives. In any event, the fact that gambling is excluded from their scope (and the absence, for the moment, of specific secondary legislation on this activity at EU level) does not preclude Member States from complying with the provisions of the Treaty.

29. There have been suggestions that there should be a new Directive specific to gambling, but as there has been concerted opposition to including gambling in existing Directives then this may not be easily achievable. In the absence of such a Directive it is important that the European Commission and Member States respect and defend the right to provide cross border gambling services under Article 49 of the Treaty.



The position globally

30. Cross border gambling is a global issue and not just a European one. EU-based remote gambling businesses have to compete in the international market. The justifiable restrictions which may be used to prevent a provider licensed in one Member State from accepting bets from customers in a different Member State are much harder to enforce when the gambling is being offered from outside of the EU, sometimes from places that may have little regulatory base or standards of compliance by operators. In many cases, enforcement is impossible.

31. There are tools, such as financial transaction and ISP blocking, which can be used by governments and regulators to restrict access to markets, but these are all flawed and experience has shown, for example in the USA, that they have only had very limited success when applied. The demand is such that ways will always be found to circumvent any restrictions that might be imposed

32. This world market for remote gambling does not respect national borders and there is no shortage of jurisdictions that are willing to play host to companies that offer a vast range of gambling products. It may not be welcomed by all, but these are already easily accessed through the Internet and telephone. It is a fact of life that newer, cheaper and modern communication technologies and payment methods will make this sort of activity even easier to supply and access in the future.
33. This process makes it ever more important to develop a European gambling market that ensures the current gambling regulations are consistently and coherently applied to gambling providers throughout the EU and that such regulations reflect genuine and legitimate public policy concerns.
34. Restrictions between Member States are ineffective in protecting the consumer and constitute an unjustifiable barrier to trade. Moreover, the situation damages the competitive position of EU gambling service providers when competing with providers based outside of the EU.
35. The following information indicates the scale of the industry (source H2 Gambling Capital):
- Online Gambling gross gaming yield (GGY) globally is estimated to be \$20.8bn in 2008 up from \$16.9bn in 2007. The figure is expected to rise to \$31.6bn by 2012.
 - In 2008 the GGY from European players is estimated to be \$8.61bn, up from \$7.22 in 2007. The figure is expected to rise to \$13.82bn by 2012.
 - GGY for European operators in 2008 is estimated to be \$9.54bn in 2008, up from \$7.02 in 2007.
 - 41% of online gamblers are based in Europe (34% in North America)
 - Betting makes up 34% of the market, followed by casino games 23%, poker 18%, and state lotteries 14%.
36. There may be differences of opinion about the exact number of consumers involved or how much they are gambling, but there can be no doubt that the market is substantial. It will continue to exist and thrive even if there are no EU based operators at all, and EU consumers will continue to access it.
37. Crucially, consumers will also seek out sites which offer the best value for money for their entertainment. Operators based in jurisdictions that have uncompetitive tax regimes and who are therefore forced to provide lower rates of return to their customers will find it very difficult to retain those customers. Likewise, regulations that put in place undue restrictions which have the effect of diminishing the gambling experience of consumers and therefore their enjoyment of the products, will serve to drive them away.

Justifications for restrictions by Member States

38. Leaving aside the situation in the rest of the world, it is right for the purposes of this report to return to the justifications which are used by Member States for imposing restrictions on the supply of cross border gambling services by licensed operators in other Member States. Those justifications all come under one of the following categories (see Article 46 of the EC treaty):
- public policy (for example, consumer protection);
 - public security (for example, combating crime, fraud, money laundering etc); or
 - public health (for example, preventing problem gambling and its social consequences).
39. The following sections will consider each of these justifications in turn and show that, almost without exception, the restrictions that are now in place are either disproportionate or plainly wrong. It should be stressed that the burden of proof when restrictions are imposed rests with the authorities of the Member State imposing them.

Public policy justifications

40. Justifications that have been cited under this heading include the need to protect consumers, to safeguard tax revenues, and to ensure income for good causes.
41. It is of course right for Governments to protect their citizens and all Member States have some form of consumer protection or fair trading laws. The key question is whether the restrictions that have been imposed, for instance by several Member States to prevent access to their markets by betting operators licensed in other EU jurisdictions, are proportionate or necessary?
42. The answer must be that they fail on both counts if the regulation in the Member State where the gambling operator is based is sufficiently robust to provide an adequate level of consumer protection. Additional restrictions cannot be justified where that is the case.
43. Furthermore, there is strong evidence that operators in properly regulated jurisdictions offer much better value than gambling operators based in jurisdictions where state monopolies are the norm or where there are so few licences that there is little effective competition.
44. It is well established within the European Union that competition between businesses is healthy and produces real benefits for the consumer. Attempting to exclude consumers from having access to competitive services offered by EU-based providers is not in their interests and driving them to other less well-regulated providers is harmful. That is as true in the gambling sector as it is in any other.
45. Further information on this is contained in a report by Europe Economics, entitled, *The case for a single European Gambling Market* (2004). It concluded that the British gambling industry is better at providing products that consumers want, that it offers a better range of products, and that those products offer better value than those being provided from other Member States.
46. As for revenue protection and raising money for good causes, the ECJ has already found that by themselves they do not justify restricting access to markets.

47. Viewed against this background any restrictions imposed or sought by Member States do not appear to protect consumers, but rather to protect the domestic providers or income they derive from their domestic gambling markets. Open competition from and with properly-regulated EU-based operators in other Member States would provide better value to their citizens but at the possible cost of reducing the revenue they and their licence holders currently receive.

Public security justifications

48. These justifications are normally taken to centre around crime-related issues such as combating fraud, money laundering, and keeping criminal elements out of the business.
49. These are worthwhile aims and it is a core objective of the legitimate gambling industry that it should remain crime-free. Its future success and credibility are dependent on them.
50. If Member States are to rely on public security grounds to curtail the activities of EU-based and licensed cross-border gambling providers, then the Member States must show that the providers and their services bring with them risks that can only be counteracted through such draconian measures as threatening them and sometimes their customers with criminal prosecutions.
51. It cannot be stressed too often that they have failed to do so.
52. There is no proof of any systematic gambling fraud involving reputable companies in properly-regulated jurisdictions.
53. There is no proof of any serious money laundering problems involving reputable companies in properly regulated jurisdictions. On the contrary, it is a view held by many specialists that, very much because of the systems in place (notably the banking and card-related systems) and the regulated nature of the activity, remote gambling provided by the larger operators is one of the least attractive routes for money launderers to consider. According to a study conducted by MHA Consulting in 2009 on behalf of the RGA online gambling is not attractive to money launderers because: *'...the identities of the gamblers are known; the financial transactions*



between the bettors and operators are all in electronic format; and all of the wagering is recorded'. The report also found that the absence of cases and examples of money laundering through online gambling 'appear to indicate that the risks are low.'

54. It should also be remembered that all online casinos within the EU are subject to the EU Money Laundering Directive and the consequent local regulations in each jurisdiction where they are licensed.
55. There is no proof of organised crime groups being involved with reputable companies in properly regulated jurisdictions. A regulatory environment that, as a first step, allows only suitable persons and organisations to obtain licences to provide gambling services is a key element of preventing this.

Public health justifications

56. These justifications can best be described as those designed to deal with problem gambling, prevent gambling by children, and address the undesirable social effects of both.
57. The RGA could not be more supportive of this principle. As providers of gambling services, the RGA's members are better placed than most to understand the complex issues involved. They are committed to operating in a socially responsible manner and have already produced a code of practice that sets out ways in which

companies offering remote gambling can empower their customers to deal with any problems that might develop. This includes everything from enabling the customer to exclude themselves for set periods, to limiting how much they might gamble with during a set period, to directing them to sources of help where specially trained counsellors can assist them. It also calls for its members to provide appropriate training about responsible gambling to their staff.

58. It is a fallacy that more gambling opportunities automatically create more problems. For instance, in the UK there are comparatively low levels of problem gambling (the latest British Gambling Prevalence Study in 2007 showed a rate of 0.6% of the adult population which was unchanged since 1999) despite the ready availability of betting, gaming and lottery products both on premises and remotely via the Internet, telephone, or interactive television. Problem gambling can be combated effectively through education, treatment and the socially responsible behaviour of properly licensed and regulated gambling providers.
59. The RGA is always willing to working with regulators, academics and problem gambling charities in order to minimise any and all potentially harmful side effects of gambling.
60. The RGA code of practice also covers measures to exclude children from being able to gamble, especially over the internet, even though there is no evidence of it being a widespread problem.



61. Even allowing for the progress that has already been made the remote gambling industry will continue to contribute financial and moral support to pieces of research that are designed to improve the understanding of what contributes to gambling addiction and the most effective ways to treat it.

Regulatory case study: British Gambling Act 2005

62. It is not for the RGA to suggest that one set of national regulations are inherently better than any other, but it is reasonable to refer to the position of the UK, which has similar concerns to other Member States, and yet has been able to satisfy itself that remote gambling can, and ought, to be regulated rather than prohibited.

63. Gambling regulation in the UK is generally accepted as being of a high standard. The UK has a very broad range of gambling activities which exist in competition with one another. The industry is crime free and problem gambling is regarded as being very low compared to most other jurisdictions. As the ECJ found in *Gambelli* (para 12) Stanley, the British bookmaker involved with the case, '*...is subject to rigorous controls in relation to the legality of its activities*'.

64. The previous gambling laws dated back to 1963 (betting) and 1968 (gaming) and served well. However, largely because they were overtaken by technology the British Government instigated a comprehensive review of its regulatory regime. After a lengthy and thorough consultative process it introduced a large Gambling Bill into Parliament in the Autumn of 2004. It became law in 2005.

65. On the specific subject of remote gambling the UK Government took comfort from the fact that remote betting was well established, firstly through telephone betting and more recently through online betting. There was no evidence that it had presented any noticeable problems from a regulatory perspective. It also took into account that online gaming, predominantly online casinos and poker rooms, were growing in accessibility and popularity.

66. The UK Government was left with two options: to regulate this new sector or to seek to prohibit it.

67. For two main reasons it chose regulation. Firstly, as all other sectors of the British gambling industry were regulated it was logical to do the same with this new sector. Secondly, and especially in the face of evidence which indicated that prohibition merely drove operators and their customers towards perhaps less well regulated jurisdictions, it made sense to offer British and other customers the chance to gamble remotely with fully regulated British-based operators.

68. The Gambling Act therefore contained provision for a whole new licence category: the remote gambling operator's licence. The Act was drafted with the aim of making it *'future proof'* so that there is capacity for the regulator, the Gambling Commission, to react quickly and effectively to any new technologies that might evolve.
69. The Act did not seek to criminalise consumers who gambled with offshore operators, nor to criminalise those operators for making their services available. It recognised that gambling and other e-commerce products are not capable of complete regulation within national boundaries. Instead it has adopted a pragmatic response which is to enable operators to offer safe products that are fully regulated and give that choice to consumers irrespective of where they are located.
70. The Act's licensing objectives are:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - ensuring that gambling is conducted in a fair and open way; and
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
71. There is an unavoidable connection between these criteria and those identified under European Law as being reasons that justify imposing restrictions. If the UK Government, with its long experience of regulating gambling and after considering all of the issues over a period of several years, believes that all of these objectives can be met through regulation and that such controls are sufficient to meet its regulatory objectives then other Member States might find it harder to explain their reasons for adopting a different approach.
72. It is of course encouraging that an increasing number of Member States, such as France, Italy and Spain, are willing to consider regulation of this activity, but when introducing regulatory and legal reforms all Member States must ensure that they are compliant with EU law and that includes Article 49 and the provisions about freedom to provide services.

Policy considerations

73. For cultural and historical reasons the approach to gambling prohibition or regulation varies from one Member State to another. This is understandable, but in itself this is not a justification for restricting cross-border gambling opportunities for companies licensed in other Member States.
74. EU law as interpreted by the ECJ is now clear about the grounds on which restrictions on movements of services may be imposed by Member States. These grounds do not include defence of preferential licensing regimes which are only available to companies from the host Member State and income from State-sponsored gambling operations.
75. An objective analysis will demonstrate that effective regulation of remote gambling, both within and across borders, is completely possible.
76. Where it can be shown that remote gambling can be conducted in a fair, crime-free, socially responsible way then it must be treated as a service like any other that should benefit from the principles of the single European market, as recalled recently by the ECJ.
77. The restrictions which are still being imposed by numerous Member States must, under EU law, be proportionate, non-discriminatory and justifiable. In the light of all the evidence it is hard to see how that can be the case when operators in certain Member States, already have in place extensive safeguards which are designed to address the very concerns cited by other Member States and the ECJ. Not only that, but the legitimate remote gambling industry is constantly striving to improve its processes.
78. Unless and until there is clear freedom of movement across the EU in a manner that accommodates the full spectrum of remote gambling, the European Commission and the ECJ will continue to receive numerous complaints. In dealing with those cases the Commission has the opportunity to remove unjustified trade barriers and to set clearer boundaries regarding what is acceptable in terms of national legislation.

79. Denying operators in Member States their right to offer gambling services across borders cannot achieve the objectives that all Member States claim to want to achieve.
80. State lotteries are perceived by some as being particularly susceptible to competition from lower margin gambling products like fixed odds betting or online casino games. However, it remains to be seen whether competition has an adverse effect. In the UK, which has one of the most competitive gambling markets in the world, the National Lottery has responded to competition and continues to be successful. Competition pressures have encouraged Camelot, the operator of the National Lottery, to become a more efficient organisation and to offer their customers a better, wider range of lottery products. They have managed to do that and still raise huge amounts for good causes.
81. Protectionist policies are doomed to failure. They fail to take into account the global nature of the remote gambling industry, continuing advances in new technology, and the repeated failure of attempts by individual countries, not just in Europe, to make prohibition work.
82. Proper regulation rather than the prohibition of remote gambling is the only long-term viable solution to the potential downsides that can be associated with the industry.
83. Proper regulation does not include the restrictions currently being imposed by numerous Member States. These are in breach of EU law, discriminatory, beyond what is necessary and proportionate and, as they appear to be primarily based on economic objectives, they are not in the general interest.
84. As a result of this, fully licensed remote gambling operators in some Member States are suffering immediate and ongoing harm. This will continue until finality is brought to the subject through ECJ or, preferably, European Commission enforcement of the freedom of movement provisions in the EU Treaty.
85. Regulated remote gambling operators in Member States are not seeking preferential treatment, nor are they asking for Member States to lose their right to impose restrictions where they are justified.
86. What they do want, and what they are entitled to under European Law, is fair access to markets and an acceptance that most of them already have in place adequate measures to satisfy any objective tests of legitimate restrictions based on public policy, public security or public health grounds.
87. Member States should not be allowed to hide behind these justifications in order to pursue protectionist policies that are designed to prevent the free movement of gambling services.



Conclusions

88. Against this background it is reasonable to reach the following conclusions:

- There is resistance to the fair application of EU rules as regards remote gambling services. It stems largely from the vested interests of domestic providers or governments seeking to protect revenues and to create further barriers;
- EU law and its interpretation by the ECJ provide adequate protections for Member States who, where it is defensible, can already lawfully impose restrictions on their markets. In that context, Member States could address this issue with EU harmonised rules so as to provide for minimum standards;
- However, until the issues are properly aired and debated there continues to be the risk that those opposed to the provision of cross border remote gambling services will use related measures to impede seriously the free movement of services provided for by the EU Treaty;
- There must also be a very real threat that some Member States or vested interests, like existing gambling monopolies, will claim that gambling is outside of the European Commission's sphere of competence. This is inappropriate and could set a worrying precedent. Any proposals of this kind should be resisted strongly.
- The position of the consumer is perhaps too often overlooked. Although it is right and legitimate for authorities to put in place regulations to protect consumers from any negative effects that might be associated with gambling, it needs to be remembered that, for the overwhelming number of consumers, gambling is a leisure activity that tens of millions of them take part in regularly. It is an activity which they enjoy, where they have fun, and where the experience is an entertaining one. If it was not then gambling would not be so prevalent and there would not be such a high demand for it. Gambling must be provided for them in a safe environment, but policy makers should not overlook the level of consumer demand or the views of the vast majority of consumers who enjoy gambling on a regular basis.



89. It is to be hoped that this Report will help inform the ongoing debates about cross-border gambling and serve to counter some of the arguments put forward by those who are opposed to this regulated activity being accepted as a legitimate source of cross-border commerce within the European Union.

90. Well-regulated cross-border service provision in other parts of the EU leisure market provides products which are fair, honest, safe, and fun and is accepted by all as being so. It is the view of the RGA and this Report that, on an objective consideration of all the issues, it must be concluded that cross-border gambling services offered by properly licensed EU-based providers are equally fair, honest, safe and fun. They deserve the same acceptance.



Remote Gambling Association

London Office

High Holborn House
52-54 High Holborn
London WC1V 6RL

Tel: +44 (0)20 7831 2195

Email: bwright@rga.eu.com

www.rga.eu.com

Brussels Office

Chaussée de Wavre 214d
1050 Brussels

Tel: +32 (0)2 626 95 72

