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European Community law and equal treatment for men and women in social security

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The Treaty of Rome establishing the European Economic Community deals explicitly in Article 119 with the question of equality of treatment for men and women but from a particular standpoint, namely equal remuneration. Under this Article each member State must ensure the application of the principle of equal remuneration for equal work as between men and women workers. It can of course be maintained that this obligation itself echoes a more general concept implicitly recognising the equal rights of workers regardless of sex. It has to be noted, however, that the authors of the Treaty dealt with only one aspect of such equality of rights, but one which the opening up of economic frontiers threw into special relief.

Rightly or wrongly, the idea had gained ground that the fact that women workers were systematically paid less in some countries could give those countries an advantage in competitive trading. Here, as in other fields, the levelling up of conditions of work and life seemed to offer a solution which would make it possible to avert any such risks. This solution entailed equal remuneration for men and women in all the member States, a principle which was, moreover, in accordance with the major social objectives of the Treaty.

But what, in fact, does this notion involve? What is meant by "remuneration"? Article 119 itself indicates a possible answer to these questions. For the purpose of that Article, "remuneration" means "the ordinary basic or minimum wage or salary and any additional emoluments whatsoever payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker's employment".

"Any additional emoluments whatsoever ..."–does this very wide definition go as far as to cover social security benefits? Do not these, in fact, form part of emoluments "in cash or in kind" paid–indirectly–via the employer's contributions to the systems applying to the wage-earning categories of workers? Moreover, have not social benefits been represented by some people as deferred earnings?

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On this fundamental question a ruling by the Court of Justice of the Communities in 1970 drew the essential distinctions in an action brought by an air hostess who considered that she was subject to discrimination as compared with her male colleagues (stewards) in regard to the statutory pension scheme.[1] The Court held on that occasion that a retirement pension established within the framework of a statutory social security scheme did not constitute an "emolument" as defined in Article 119 of the Treaty. The Court aligned itself thereby with the conclusions of the Assistant Public Prosecutor who had based them on a number of reasons which merit examination.

According to this interpretation, while emoluments in the nature of social security benefits are not in principle extraneous to the concept of remuneration, this concept should not, however, as defined in Article 119, cover social security schemes or benefits, including retirement pensions, directly regulated by law without any agreement at the level of the undertaking or occupational branch concerned and compulsorily applicable to general categories of worker. These schemes give the workers the benefit of a statutory system to whose financing the workers, employers and possibly the public authorities contribute to an extent which is less dependent on the employment relationship between employer and worker than on considerations of social policy. Consequently, the employer's share in the financing of such systems is not a direct or indirect payment to the worker. Moreover, the worker normally obtains benefits provided for by law not in virtue of the employer's contribution but solely as a result of meeting the prescribed conditions for the grant of benefits. Accordingly, discriminatory situations resulting from the application of such a system do not fall within the scope of Article 119 of the Treaty.

Statutory benefits are therefore excluded. However, the reasons given for excluding them would tend to support the inclusion of works schemes or those established by agreement since such schemes, known as occupational or supplementary schemes, appear to meet the criteria retained by the Court: agreement at the level of the undertaking or occupational branch, scope limited to a precise sector, and financing of the scheme. Consequently, it must *a contrario* be concluded that the benefits paid thereunder do in fact amount to "emoluments" for the purposes of Article 119 and, in the case of wage earners, fall within the concept of remuneration. This interpretation leads to the obvious conclusion that any discrimination based on sex is prohibited in such schemes by virtue of the Treaty itself.

It should, however, be noted–and this is what the Commission had done in several successive reports–that, even in respect of wages, the application of Article 119 left much to be desired, not just in some countries, but in all of them. Those which had supported equal remuneration in defence of economic interests thereafter lost interest in the matter. The Commission, as upholder of the Treaty and noting this deficiency, was consequently induced to draft a directive which would enjoin the Member States to take the necessary steps to apply the principle in question.

The problem was then to decide whether this 1975 directive (Directive 75/117/EEC) would include, among the emoluments linked with remuneration, the benefits of occupational social security schemes as implied in the case law of the Court of Justice. Because of the complexity of the schemes and their obvious links with statutory social security, they were finally not taken into consideration on the understanding that the whole question of discrimination in matters of social security would be studied separately.

Nor was the problem solved in a second directive, that of 1976 (Directive 76/207/EEC) on equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions. This time, however, it was formally provided that the Council, with a view to ensuring the progressive implementation of the principle of equal treatment in social security, would adopt provisions defining its substance, its scope and the arrangements for its application. The Commission was consequently instructed to draw up proposals to this effect which were issued in the form of a new directive, Directive 79/7/EEC of 19 December 1978 on the progressive implementation of the principle of equal treatment for men and women in matters of social security.

Hence, after a long period in which equal treatment for men and women had scarcely assumed more than the almost insubstantial form of a statement of principle, there were increasing moves from 1975 on to organise its effective application in Community law and to extend it to wider and wider fields: wages, access to employment, vocational training and promotion, working conditions and, finally, social security. Sociological developments clearly played a part in this, as did the pressures exerted on opinion by a number of organisations, associations or commissions campaigning for equality of opportunity, for which the Treaty itself provided, in Article 119, a decisive, unique, and as yet practically unexploited legal basis.

1. Equal treatment in statutory social security schemes

Existing inequalities

To begin with, and this may occasion some surprise, it should be pointed out that equal treatment for men and women is not the rule in statutory social security schemes. To be sure, the situation varies from country to country and it would be no easy matter to draw up an exhaustive list of inequalities of treatment in each of them; it would, moreover, quite soon prove to be a tedious exercise. But inequalities do exist, as the following few examples will show.

Women, like men, are compulsorily affiliated to social security;[2] they pay the same contributions, based as a rule on occupational income, and in principle receive the same benefits. Such is the principle. Its application differs somewhat.

The coverage of the schemes is, however, not identical, since the same contribution gives entitlement to a widow's pension in the event of the insured person's death but rarely, or under stricter conditions, to a widower's pension. There are sociological reasons for this distinction: it harks back to a period in which the economic security of a wife depended entirely on her husband's income. Times have changed, but in many cases social legislation has not kept pace.

Benefits calculated on the basis of previous earnings will often be lower for women since their wages are generally lower than those of their male colleagues. In this instance discrimination is not the fault of the social security scheme. This is not the case, however, when the scheme itself provides for a flat-rate benefit, for example a minimum benefit which is lower for women than for men, or again when, in determining an assumed income, the scheme takes into account differences based on sex.

It can also be seen that some benefits acquired by one or other of the spouses are compulsorily paid to one of them. An example is the family allowance paid to the husband whereas the wife is looking after the children or is even solely responsible for their keep.

The retirement age is sometimes different for men and for women, the difference often amounting to five years. A number of justifications have been produced for continuing this situation. But, whatever their relevance, how is one to explain that other countries, or simply other schemes in one and the same country, have the same retirement age for both sexes? In addition, when the pensionable age differs, the amount of the pension will sometimes be different and sometimes the same, despite the difference in the periods of insurance. There can also be more subtle differences. In one national pension scheme, despite the retirement age being the same, a married woman who is older than her husband will have to wait till he has reached this age before the couple can obtain the pension to which they are entitled; the reverse is not, however, true, and the husband will obtain the pension for the couple at 65 years, even if the wife is younger.

Another example is the dependent spouse. A married woman is always presumed to be dependent on her husband when she remains at home and, as such, is co-insured with him in respect of sickness insurance benefits in kind. Similarly, she is always presumed to be dependent on her husband if the latter claims the increases granted by certain legislations on top of the benefits granted to an insured person who is sick, unemployed, disabled, etc., for the benefit of his "dependants". The reverse is rarely true, and the husband will have enormous problems proving that he is dependent on his insured wife; sometimes even such proof is purely and simply rejected.

Directive 79/7/EEC of 19 December 1978

With a view to putting an end to discrimination in matters of social security, the Commission had made proposals covering both the statutory

and the occupational schemes. The Council of Ministers did not follow these up, so that the Directive of 19 December 1978 only concerns–and then only partially–discrimination in the statutory schemes.

It should be recalled that in Community law a directive is a binding legal instrument adopted unanimously by the Council of Ministers. It fixes one or more precise objectives which the member States must achieve within a specified period. However, unlike regulations which have immediate force of law, a directive allows each member State to choose what legal measures to adopt in the light of its own system–law, regulation, decree, order, circular, etc.–in order to adapt, within the stipulated time-limit, its national legislation to the Community law created by the directive.

What, however, happens if a member State does not comply with a directive? The Commission is entitled to institute what are called infringement proceedings against that State. In concrete terms, the Commission first of all notes the infringement and addresses to the State in question a letter requiring it to submit its observations within a specified time. In the event of no reply being forthcoming, or an unsatisfactory reply, the Commission sends that State a notification with a statement of reasons ordering the Government to take the necessary steps to comply with the directive. As a last resort, the Commission refers the matter to the Court of Justice, which can condemn the member State.

Individuals do not have such direct access to the Court of Justice. They must assert their rights under Community directives before the competent courts in their own country and these could possibly ask the Court of Justice to settle a dispute over interpretation.

Bearing these principles in mind, let us now examine the way in which the Directive of December 1978 deals with the problems of discrimination in statutory social security schemes or, more precisely, organises the "progressive" implementation of the principle of equal treatment for men and women.

The Directive applies to the working population, i.e. wage earners or self-employed persons as well as workers whose activity is interrupted by illness, accident or involuntary unemployment, persons seeking employment and retired or disabled workers. The range of persons covered is thus very wide. Conversely, the matters covered are limited to statutory schemes which provide protection against the risks of sickness, invalidity, old age, accidents at work and occupational diseases, and unemployment. Nevertheless, social assistance benefits are also taken into account to the extent that they are intended to supplement or replace social security benefits.

The principle of equal treatment means, for the purposes of the Directive, that there shall be no discrimination whatsoever on the grounds of sex, either directly or indirectly, by reference in particular to marital or family status. All aspects of the legislation are covered: the scope of the schemes, the conditions of access, the obligation to contribute and the calculation of contributions, the calculation of benefits (including increases

due in respect of a spouse and for dependants) and the conditions governing the duration and suspension of benefits.

It goes without saying that the provisions relating to the protection of women on the grounds of maternity must not be prejudiced.

Nevertheless, the Directive allows the member States to make certain exceptions. They may, for example, decide that equal treatment does not apply in fixing the age of retirement; or that it does not apply to social advantages granted to persons who have brought up children. A third exception relates to increases for a dependent wife but only in regard to long-term benefits (invalidity, accidents at work, old age). Other increases–for a child in all branches of social security and for a spouse in the sickness and unemployment branches–may in no circumstances be excluded from the scope of the Directive.

In the fields covered by the Directive, the member States must take the measures necessary to ensure that any of their legal provisions contrary to the principle of equal treatment are abolished. Any persons who consider themselves wronged by failure to apply the principle may pursue their claims by judicial process.

Finally, member States must periodically examine the matters they have excluded in order to ascertain, in the light of social developments, whether there is justification for maintaining them.

Notwithstanding these various exceptions, to which may be added the fields excluded from the Directive (survivors' benefits, family benefits), and although arrangements for the application of the principle to occupational schemes are to be decided upon at a later date, the period allowed for the entry into force of the Directive has been fixed at six years counting from its notification on 22 December 1978. The Commission's proposal, which originally included occupational schemes, provided for a period of two years (statutory schemes) to four years at most (occupational schemes). The difference is considerable.

Critical examination

With its exclusions, exceptions and its scope limited solely to statutory schemes the content of the Directive ill accords with its very general title. It represents in reality only an initial step in the direction indicated and other initiatives will be needed in the coming years to supplement this first set of pronouncements.

As it stands, however, it will certainly have repercussions on existing legislation, as the following few examples will show.

In the United Kingdom and Ireland it is still very difficult for a married woman to obtain increases in sickness or unemployment benefits for her dependent husband or children. Under the Directive she will be able to obtain these increases under the same conditions as her husband. If she becomes disabled or an old-age pensioner she will also be able to claim

increases for her children. In addition, basic benefit amounts fixed at a lower rate for women will have to be abolished and the benefit payment periods will have to be unified in Ireland (where married women still receive lower unemployment benefits and for a shorter period than other unemployed persons).

In the Netherlands a married woman who reaches the age of 65 before her husband does is not entitled to the national old-age pension. This provision will have to be revised.

In Belgium–but this applies doubtless to other countries as well–a married woman can only obtain medical benefits for a dependent husband under certain conditions: these will have to be made less restrictive.

In the Federal Republic of Germany the Constitutional Court has already called into question the difference in the actuarial value of the old-age pensions granted to women (despite contributions equal to those of men) and has decided that the differences in treatment between men and women should be eliminated before 1984.

Finally, generally speaking, in a number of countries spouses will have to be placed on an equal footing as regards proving that one of them is dependent on the other or that one is the head of the family (at present the husband is presumed to be). However, this development could also lead to this concept being abandoned altogether in the longer run.

Social assistance benefits are not covered by the Directive as such but only in so far as they are intended to supplement or replace social security benefits. This is the case, in particular, in the United Kingdom, where the Directive will have notable repercussions on this type of benefit. At the moment, a married woman cannot claim these benefits since it is the husband who is responsible for providing proof of the conditions required for their grant. A solution will therefore have to be found and the Government is already looking into the matter. In Ireland special conditions are laid down for women requesting unemployment assistance allowances, such as proving that they have at least one person dependent upon them. Since these conditions do not apply to men they will have to be abolished. In the Netherlands, too, in the field of unemployment assistance a married woman can acquire entitlement to benefits only if she is the head of the household: this discrimination will have to be ended. In the other countries and in respect of various benefits the spouses will have to be placed on an equal footing as regards proving that one is dependent upon the other or that one of the spouses is the head of the family.

It can be seen, then, that the Directive will have repercussions on national legislations. The fact that a relatively long period of time (six years) has been fixed at the request of some countries (Netherlands, United Kingdom, Ireland) before it comes into effect indicates, moreover, that for them these repercussions will be far from negligible.

The above examples show also that there was good reason for the Directive to call into question not only direct discrimination based on sex but

also indirect discrimination relating in particular to marital or family status. One cannot help in fact being struck by the number of cases in which examples of discrimination relate less to the situation of women compared with men than to the subordinate condition of married women compared with other persons under social insurance. Nevertheless, the notion of indirect discrimination has not been clearly defined and its field of application will pose problems of interpretation which will have to be studied more closely. A case in point might be a married woman who is not formally excluded but where she is *in fact* excluded because of the legal conditions placed on the grant of benefits.

These positive results have, however, only been achieved at the cost of an abnormally long period for their coming into effect. This testifies to the extent of the resistance encountered in connection with what are after all quite modest achievements. True, they have been called for at a time of considerable economic difficulty, but the results have even so not come up to expectations. However, and this is worth repeating, the initial step has been taken; other Community measures should follow in due course so that equal treatment is progressively and genuinely ensured in matters of social security. These measures will concern in particular the eventualities which it was not possible to cover in these initial arrangements. They should also cover schemes other than statutory ones.

2. Equal treatment in occupational social security schemes

Existing inequalities

Occupational schemes fall into a category situated between the statutory social security schemes, on the one hand, and purely individual insurance contracts, on the other. Unlike that of the statutory schemes, their substance is not defined by law and, unlike that of individual contracts, it is not determined by free negotiation between individuals and insurance companies. These characteristics apply to various types of schemes: works schemes, those based on collective agreements, schemes set up by self-employed workers in a given branch, etc. As a rule their aim is to supplement the benefits of the statutory schemes, particularly in regard to retirement pensions, but sometimes also in the fields of sickness, unemployment, invalidity or death.

Inasmuch as these schemes are organised in the light of the existence of statutory ones, it will come as no surprise that they include quite a number of the inequalities mentioned above: no widowers' pensions, different retirement ages, etc. However, they also contain a number of inequalities which are all their own.

First of all, there are frequently no occupational schemes in undertakings mainly employing women workers. Similarly, the rule that only full-time

workers may benefit from occupational schemes will result in the exclusion of part-time workers, the majority of whom are women.

But even in undertakings employing full-time workers of both sexes there are inequalities in protection which most of the time adversely affect women.

For example, some occupational schemes (especially pension schemes) are open only to men; women are excluded. In other cases, only married women are excluded although there are no "technical" or other reasons specific to the occupational schemes which could justify such exclusions. Without going to such extremes, other schemes provide for optional affiliation for women when it is compulsory for men. Or again, they lay down higher age or seniority conditions for women clearly aimed at dissuading them from joining, particularly young women who might stop work to get married.

There are also some schemes which fix different conditions on the grounds of sex either for entitlement to benefits (for example retirement age), or for the refunding of contributions when the insured person leaves the scheme.

Finally, the actual level of benefits can differ. All conditions being equal, moreover, a woman can in some cases be granted the right to a pension which is smaller than that of her male colleagues. The reason for this is that different actuarial data have been taken into consideration. The average life expectancy of the female population of a country being higher than that of men, it is considered that in order to offset the longer period of payment of the pension, its amount should be less. This case arises in particular when a capital sum is being built up by the accumulation of contributions and then transformed into a pension. Practices of this nature are sometimes observed also in the payment or financing of other benefits (e.g. sickness and invalidity) in which different morbidity rates are applied.

There are certainly other inequalities, and the above-mentioned have only been cited as examples. It should not be concluded, however, that all occupational schemes contain an accumulation of literally every possible inequality. Some are no more discriminatory than the corresponding statutory scheme; there are also some which are less so and others which have already corrected certain imbalances which the law continues to tolerate.

The case law of the Court of Justice

The link that exists between the benefits granted to workers under occupational schemes and the "emoluments" which Article 119 of the Treaty of Rome includes in the concept of remuneration has already been discussed. What now has to be done is to see how Article 119 should be interpreted in the light of the rulings given by the Court of Justice of the European Communities in response to requests for interpretations of that Article made on various occasions by courts of the member States.

The particular significance of the Defrenne ruling (Case 80/70) has already been sufficiently stressed not to need further emphasis, but that case had a number of repercussions. In another ruling (Case 43/75), the Court came down in favour of the direct applicability of Article 119 (i.e. even in the absence of national legislation arising therefrom) at least as regards direct and overt discrimination. In regard to indirect or disguised discrimination national legislation is necessary. Finally, in a third ruling (Case 149/77) in response to the question whether Article 119 is applicable to conditions of employment having pecuniary implications (clause fixing termination of the employment contract at 40 years of age for women and not for men), the Court held that it was not.[3]

More directly concerning the question of occupational schemes, mention must also be made of Case 69/80 concerning actions brought by two women workers against Lloyds Bank of London. The Court was asked to rule whether the contributions paid by the employer to an occupational retirement benefit scheme and the rights and benefits of a worker under such a scheme should be considered as "remuneration" within the meaning of Article 119. In the light of the facts of the case, the Court was able to reply merely that a contribution paid by an employer on behalf of his employees by means of a sum supplementing the gross wage constitutes remuneration within the meaning of that Article. It thus came down in favour of the plaintiffs and against Lloyds Bank but avoided giving a ruling on the over-all problem posed by occupational schemes.

More recently the Court has ruled (Case 12/81) that it is not compatible with Article 119 for an employer to grant advantages (free rail travel) to his retired male employees and their families while no such facilities are granted to the families of retired women employees. The Court therefore rejected the argument based on the fact that the employment relationship had been terminated.

At almost the same time it was asked for a ruling (Case 19/81) in the case of a worker who regarded it as discriminatory that his employer, British Railways, should fix the minimum age for obtaining voluntary redundancy benefit (comparable to early retirement) at 60 for men and 55 for women. The Court ruled that the very fact that access to the voluntary redundancy scheme was open only to workers in the five years preceding the minimum retirement age stipulated by the national social security legislation and that this age was not the same for men and women could not be considered as discrimination based on sex. It appears to have considered that the fixing of a "different" age by the employer was not the result of a free decision taken by him but had simply been based upon the existing difference in the statutory scheme.

Towards Community standards

The above review of its case law gives some idea of the important contribution already made by the Court of Justice in the field covered by

Article 119. It also reveals its limitations. This is fairly clear in regard to the occupational schemes where frequently discrimination is neither direct nor overt nor, let it be added, totally independent of the provisions of the statutory schemes, which make it all the more difficult to give blanket rulings for or against.

The increasing number of cases being referred to the Court also show that the time is past for decisions that play for time. Legal security, both for employers and for workers, demands that Community standards should provide appropriate responses in the field of occupational schemes. These responses should first of all cover elementary questions: definition of occupational schemes, persons covered, substance of the principle of equal treatment, rights of appeal in cases of infringement of the principle, and period of time before coming into effect. They should also cover more complex questions in which various options are possible.

One option concerns the matters covered. Would it be enough to transpose the provisions of the directive on statutory schemes, which excludes some contingencies or, on the other hand, should all benefits be covered without discrimination? The first solution would make it possible to set aside for the time being the difficult question of survivors' pensions (i.e. the legitimacy of granting such pensions solely to widows). The second has the advantage of being more in accord with the terms of Article 119.

Another option: should exceptions to the principle of equal treatment be permitted? The main question here is that of the retirement age. Do the occupational schemes have to stay tied to the practices of the statutory schemes? Or should the principle be envisaged of a single statutory age, even if it means extending the period before it comes into effect?

A third option arises from the practice adopted by some occupational schemes in calculating benefits of taking into account actuarial or other data which differ for each sex. Should these practices based on population comparisons be recognised? But if so, why not do the same with other groups–occupational, ethnic or national–who from the actuarial point of view often have highly variable characteristics? Or should emphasis be placed on promoting the individual right to equal benefits (since the individual is never in fact entirely typical of the statistical picture of the group to which he belongs)?

Once the choice of these options has been made, in order to avoid any uncertainties it would be advisable also to specify certain concrete examples of discrimination which should be eliminated.

Such, broadly speaking, is the course adopted by the Commission in organising its preliminary consultations on this subject. These have now been concluded and the Commission is due shortly to adopt final proposals for submission to the Council of Ministers.

The outlook

Much remains to be done, and other action will be necessary to achieve equality of opportunity in all fields (and not solely in matters of social security). The Commission is well aware of this. In order to take stock of the past and to discuss what future action might be taken, it organised a conference in May 1980 in Manchester which was attended by representatives of national committees for women workers and equality of opportunity, among others. The conference's conclusions were taken up and developed by a women's rights commission of the European Parliament which was in session during the same period.

The Commission drew largely upon these ideas to draft a new programme aimed at promoting equality of opportunity during the period 1982-85.[4] This programme envisages two major series of measures. The first is aimed at neutralising or overcoming obstacles, other than legal ones, to equality of opportunity such as constraints and conditioned attitudes based on the traditional segregation of roles in society. Others are aimed at strengthening individual rights, and it is these which provide the framework for future action in matters of social security.

Specific attention is drawn to the fact that the 1978 Directive only covers statutory schemes; the second stage will therefore be aimed at solving the remaining problems in the occupational social security schemes. There is no need to place any further stress on this aspect, which we have already discussed in detail.

However, setting aside the occupational schemes, the persistence of discrimination in the sectors not included in the current scope of Directive 79/7, or which can be excluded from it, helps to justify inequalities of treatment in employment policies in general; this applies particularly to retirement age.

In addition, the application in several member States of the concept of head of the family often results in direct and indirect discrimination. A number of allowances are not paid, or are paid to only one of the spouses although both pay contributions. Despite developments in the field of civil law, the social security sector still reflects the traditional concept that the man is the family breadwinner: the legislation no longer corresponds to the current realities of female employment and working couples.

To tackle these two questions, and by inviting the member States to forge ahead independently, the Commission proposes, during the period 1982-85:

- to launch preparatory studies for the drafting of a legal instrument on the points not covered by Directive 79/7 or which can be excluded from its scope;
- to start looking into the consequences of the current system, particularly those arising from the concept of head of the family, with a view to drafting

Community proposals on the right of women, whether married or single, to enjoy social security benefits.

Finally, it intends to define the concept of indirect discrimination on the basis of an analysis of national interpretations.

The prospects opened up by this programme of action extend and confirm the whole orientation of European Community law in matters of equal treatment for men and women. This orientation is towards the granting of equal social rights to both sexes. It also aims at setting in motion an irreversible evolutionary process in which each of the spouses will be granted independent social rights, as in matters of civil and political rights, where such equality is already broadly achieved. We hope that this discussion of the activities undertaken in the field of social security will have shed light on these goals as well as on some of the problems and difficulties that arise.

Notes

[1] Case 80/70. Gabrielle Defrenne v. Belgian State. See also "Judicial decisions in the field of labour law", in *International Labour Review,* Jan. 1973, pp. 71-72.

[2] The proposition seems less evident as regards occupational schemes.

[3] For further details of this ruling see "Judicial decisions in the field of labour law", in *International Labour Review,* Jan.-Feb. 1979, pp. 43-44.

[4] A United Nations Programme of Action for 1980-85 reflects the same concerns.