

**REPORT OF THE NATIONAL  
ADVOCACY SEMINAR**

**A Pilot Project on “Capacity Building on  
Electricity Reforms in  
Bangladesh, India and Nepal (RESA Project)”**

Jaipur, Rajasthan, India, November 13, 2009



## OPENING SESSION

### **Pradeep S Mehta, Secretary General, CUTS International, Jaipur, India**

While welcoming the participants **Pradeep S Mehta**, Secretary General, CUTS International, briefly spoke about CUTS evolution, mission, approach, key programmatic areas, interventions in the power sector, RESA project, objective of the advocacy seminar and also set the direction for further discussion.

**Mehta** stated that CUTS evolved from a wall newspaper for consumer awareness called '*Gram Gadar*' (Village Revolution) to an international organisation working on issues such as international trade, competition, regulation, investment and consumer rights to achieve consumer sovereignty in more than 20 countries. Further, he elaborated that CUTS' first major intervention in the power sector was a project to involve consumers in power sector reform process in Rajasthan supported by Friedrich Ebert Stiftung (FES), which was recognised by the World Bank as one of the best model to ensure consumer participation. It was further asserted when CUTS got 'India Power Award 2008'.

Speaking about the RESA project he said that the project adopted a bottom up approach with an objective to promote consumer participation in regulatory reforms through building the capacity of civil society organisations (CSOs) and consumers. The objective of the seminar is to spread the key advocacy messages to relevant policymakers to enhance consumer participation in power reforms.

Setting the direction of discussion, he stressed on the need for making provisions of a dedicated fund for building capacity of electricity consumers to promote their participation in the ongoing regulatory reform process.

### **Sunil Mitra, Secretary to the Government of India, Department of Disinvestment**

Addressing the opening session, **Sunil Mitra**, Secretary to the Government of India, Department of Disinvestment applauded CUTS for its innovative approach under RESA project. He spoke about the history of power sector reform process in India, especially in West Bengal, major issues in the reform process and the way forward.

**Mitra** stated that both internal and external environment should be conducive for the success of reforms. Before opening up any sector/institute for reforms its internal capacity should be built and mindset of the people working in it required to be changed. He stressed that ensuring accountability in the power sector reform process is the key to protect consumer interests and it cannot take place without effective consumer participation. He told that it is quite evident from consumer surveys that they are concerned only about the quality of service at affordable prices and not the structure of the service provider companies.

### **R G Gupta, Chairman, Jaipur, Ajmer and Jodhpur Discoms**

**R G Gupta**, Chairman, Jaipur, Ajmer and Jodhpur Discoms, addressing the opening session said that the main objective of the reform should be to provide better quality of services to consumers and not be confined to the financial turnaround of Discoms. He also disclosed various initiatives taken by Discoms in Rajasthan in this regard. He shared that 8 lakh rural consumers were added in last two years for accessing electricity but still 35 lakh households do not have access to electricity. Quality and quantity of supply is a major issue in rural areas, so the investment should be shifted to rural areas.

He further stated that despite technical and other interventions, losses in rural areas are still very high and frustration due to not getting quality of services may be one of the reason behind this. He also admitted that there are political interferences affecting effective service delivery, as the companies are not working independently on economic principles. There is lack of manpower due to ban on new recruitments, so Discoms are trying to improve management efficiency by introducing new IT and ITES initiatives.

**VS Dave, Former Justice and President, Rajasthan State Consumer Disputes Redressal Commission**

Former Justice and President, Rajasthan State Consumer Disputes Redressal Commission **VS Dave** said that in a country like India, where still large numbers of people are BPL, illiterate and only a microscopic percentage have access to Internet, creating awareness at the grassroots consumers is the need of hour. He stated there is need of introspection of ongoing power sector reforms the need of the society or is there need to strengthen/review conventional method of power.

**SESSION I: PROJECT ON CAPACITY BUILDING ON ELECTRICITY REFORMS IN BANGLADESH, INDIA AND NEPAL**

**Overview:** Rajesh Kumar, CUTS International

**Chair:** P N Bhandari, Former Chairman, RSEB

**Discussants:**

- Shanti Prasad Joshi, Former Chairman, RERC
- Dilip Samajpati, Senior Manager, Customer Relation, CESC

In his presentation **Rajesh Kumar** highlighted different aspects of the project objectives, execution, activities, outputs, expected outcomes, approach, rationale, key findings and the way forward.

Elaborating the need for taking up the project, **Kumar** told that it was conceptualized keeping in view the importance of public participation in power sector reforms and new regulatory environment where consumers are supposed to take proactive action to protect their interests. But there is poor representation of consumers' view due to lack of capacity and absence of any formal mechanism.

Speaking about the key findings of the research and interactions during the project so far in the state of Rajasthan and West Bengal, he said that communication gap exists between the policy makers/regulators/utilities and the consumers and the grassroots interface meetings objective is to bridge this communication gap and create a platform for the stakeholders to engage effectively. The regulators need to play proactive role in protecting consumers' interest and in making the redressal mechanism more consumer friendly.

He further explained the way forward for the project to advocate for the required policy changes, ensure effective implementation of regulations, create an enabling environment for better consumer participation, replicating the project in other parts of the region or intensify in the same territories and create a regional network for the sustainability of project goals.

After the presentation both the discussants shared their views. Shanti Prasad Joshi stated that in Rajasthan consumer participation is not coming up as envisaged. Consumers are mainly concerned about grievance settlement and tariffs, especially retail. Consumers do not

understand that retail tariffs are part of a long chain of generation tariffs and transmission tariff determination, where consumer participation is almost zero. This is due to their lack of capacity so the regulatory commissions should make provisions for providing financial support to active consumer organisations to represent consumers in the regulatory process.

Dilip Samajpati expressed that electricity tariffs and other connected issues are very complex and common consumers are not able to comprehend these, so building capacity is the need of hour. He also shared initiatives taken by Calcutta Electric Supply Corporation (CESC) and West Bengal Electricity Regulatory Commission (WBERC) in this regard. WBERC provided instruction to Discoms to have interaction/interface meetings with consumers. A consumer survey conducted by CESC revealed that 40 percent consumers in Kolkata are aware of the regulatory commission; tariff process etc. and gradually the awareness in the rural areas will also increase.

## Open Discussion

- Lack of competition in power sector and monopolistic nature of Discoms.
- Provisions for Discoms to lay down certain percentage of budget for consumer advocacy.
- Need to mobilise CSOs to work in the power sector as per Karnataka Electricity Regulatory Commission (KERC) model.
- Consumer Grievance Redressal Forum (CGRF) should be independent of Discoms.

While summing up the discussion, Bhandari stated that there is need to change the mindset of service providers. The decisions of CGRFs in Rajasthan are pro-utilities, i.e. mainly in revenue related matters, so there is a need to make CGRF independent of utilities. The regulatory authorities are not acting in an independent manner as expected so need to be sensitised towards consumer concerns. State Electricity Regulatory Commissions (SERCs) could earn the public respect such as judiciary only by acting in an independent and fair manner.

## SESSION II: RESA PROJECT: POLICY AND ADVOCACY MESSAGES

**Presentations:** Deepak Saxena and Keya Ghosh, CUTS International

**Chair:** Sunil Mitra, Secretary to the Government of India, Department of Disinvestment

**Discussants:**

- R G Gupta, Chairman, Jaipur, Ajmer and Jodhpur Discoms
- Prititosh Ray, Former Member, WBERC
- K C Modi, Chairperson, Consumer Grievance Redressal Forum, BSES Yamuna Power Ltd.

The objective of the session was to highlight the key findings of the project. The joint presentation for Rajasthan and West Bengal were divided into the followings four issues:

1. Policy
2. Administrative
3. Capacity Building
4. Research

## **Presentation I: Key Findings and Advocacy Message: Policy and Administrative Issues – Deepak Saxena**

**Deepak Saxena** briefed about major activities and key outputs such as territorial base papers, policy briefs etc. concluded in both the territories. He stated that various stakeholders – policymakers, regulators, utilities, media, CSOs have participated effectively in the activities conducted under the project.

The availability of electricity in both the states is not satisfactory and respective state governments should make efforts to increase the per capita availability. Further, the government should also ensure adequate infrastructure facilities, i.e. in rural areas to provide access to power at affordable rates in rural as well as remote areas.

Presently, due to the lack of required capacity, consumer participation in the regulatory decision-making process is very poor. Regulatory bodies need to be pro-active to protect the interest of electricity consumers. There is also a need to make public hearings more effective and participatory involving various stakeholders. These should be held on all important matters including Annual Revenue Requirement (ARR) and tariff issues.

Consumer redressal forums should be more independent and accountable. Presently, rural consumers do not have access to these forums. Respective regulatory commissions should generate awareness among consumers and also extend the service of these forums to rural areas.

Theft of power is a major concern in the power sector. All possible efforts should be made to curb the pilferage of power. Community based organisations should also help curb power theft. Utilities should also initiate some concrete steps such as constitution of special police stations etc. to curb the theft of power.

Consumer friendly care centres should be established in urban as well as rural areas. Trained staff should be deployed to handle consumer grievances to ensure consumer satisfaction. Billing and metering should be efficient with reasonable degree of accuracy. Introduction of IT applications is essential to ensure more accountable and plug corrupt practices in the fields.

## **Presentation II: Key Findings and Advocacy Messages: Capacity Building & Research Issues – Keya Ghosh**

**Keya Ghosh** highlighted that National Electricity Policy (2005) and regulations notified by respective regulatory commissions require initiatives to be taken for building capacity of consumers/CSOs. Therefore, efforts should be made to educate consumers about their role and responsibilities in the sector.

Consumers are required to participate in the decision-making process to protect their interest in the sector. However, lack of adequate capacity of consumers is a major barrier in promoting consumer participation in the regulatory process and complaint redressal mechanism. Media is also not providing adequate focus on consumer related problems in the electricity sector. Therefore, apart from educating consumers, there is an urgent need to sensitise the media about consumer related issues in the power sector.

There is a need to conduct more research to improve service delivery at consumer ends. Research should be conducted focusing on best practices in various utility sectors across the world. How active involvement of consumer groups can be a better tool for improving service delivery, should be examined in the sector.

In the changing context, the concept of green energy is very important for India. Given that India is one of the largest producers of electricity, energy from renewable sources should be promoted to address the issues in climate change. Focus should also be laid down to promote low cost technologies to make the service affordable to all sections of the society.

## **Discussants**

### **R G Gupta, Chairman, Rajasthan Discoms**

**R G Gupta** stated that more and more consumer satisfaction is the key objective of reforms. In the same process, distribution companies in Rajasthan are taking various steps such as constitution of consumer friendly, web posting of useful consumer information.

He further shared that among various complaints raised by consumers, the issues related to poor metering, incorrect billing and quality of services are the major problems. The respective utilities should make redressal of consumer complaints in the earliest possible time. In the new scenario, consumers also need reliable information about the supply schedule so that they can adjust their day to day schedule accordingly.

Distribution companies in the state are making efforts to improve the quality of service. *Vidyut Chaupals* (Community Meetings) at the divisional level are being conducted by the utilities regularly to ensure more consumer participation in the power sector reform process. Consumer problems are listed with patience and solutions are provided accordingly during the meetings.

### **Prititosh Ray, Former Member, WBERC**

**Prititosh Ray** focused on more consumer empowerment through awareness and education programmes. The Electricity Act 2003 specifies the consumer rights such as grievance redressal, accuracy in metering and billing to protect the interest of consumer. The responsibility of utility is to ensure reliable supply of service to consumers.

Presently, the grievance redressal mechanism is not very effective. Due to lack of awareness, only a few consumers are able to register their complaints. Further, the number of complaints filed before the Electricity Ombudsman was negligible.

Steps should be taken to ensure more and effective consumer participation. Respective regulatory commissions/utilities should build the capacity of various stakeholders to make the regulatory process more transparent and accountable. He further stated that consumer groups such as CUTS should also participate in the consultation process followed by SERC.

He also raised concerns about the effectiveness of State Advisory Committee (SAC) constituted under the Electricity Act 2003. He stated that law does not require commissions to follow the recommendations made by respective SACs.

He also emphasised on the need for consumer empowerment through various tools such as availability of bills in local language, easy redressal of complaints, providing reliable information etc.

**K C Modi, Chairman, Consumer Grievance Redressal Forum, BSES Yamuna Power Ltd., New Delhi**

**K C Modi** focused on the issue of independence and autonomy of the grievance redressal forums. He stated that in most of the states these forms are not functioning independently from the interest of utilities. Consequently, consumers' interest in the business is unprotected.

The main objective of electricity reforms in the country was to ensure good governance in the power sector. Therefore, selections on all important posts such as chairman/members of regulatory bodies and managing directors of the utilities should be made on merit basis. The arbitration and undue political interference in the selection process needs to be plugged.

He also shared his experience as a chairman of the forum. He opined that forums are enjoying independent status in Delhi. Consumers are approaching these forums to avail justice. Independence functioning of the forums has also proved to be a good tool in forcing distribution companies to ensure more and more consumer satisfaction.

Towards the end of session, **Sunil Mitra** stated that the purpose of separation of generation, transmission and distribution functions was to ensure more transparency and accountability in the system. Improved quality of service at affordable price is the key objective of reforms. He also shared his experience as a Principal Secretary, Department of Energy in West Bengal.

### **SESSION III: CHALLENGES AND OPPORTUNITIES AT THE GRASSROOTS**

**Chair:** Malay Kumar De, CMD, West Bengal State Electricity Distribution Company Ltd. (WBSEDCL)

**Discussants:**

- Debashish Kumar, Councillor, Kolkata Municipal Corporation
- H D Charan, Former CMD, Jodhpur Discom

**CSO Representative:**

Dipak Chakraborty, Chanchal Janakalyan Samiti, Malda, West Bengal

The West Bengal partners outlined their experiences for different stages of the RESA project that they had undertaken during this two-year period. They said this was a first of its kind initiative and that neither they nor the grassroots consumers had any idea about the electricity reform process and the pro-consumer regulations that have been laid down. Their interaction with different categories of consumers, viz. domestic, agricultural, commercial and industrial made them feel that awareness levels were abysmal and the level of interest expressed to understand the issues was very high. They also felt that no sufficient efforts had been undertaken by the WBERC, utility or the government to build consumer capacity.

He also said that the territorial trainings greatly helped them in understanding the electricity sector in its present form and more so because officials from WBSEDCL, CESC, WBERC, including the Ombudsman, took sessions and enriched the participants with their expertise in the respective fields. He said that through the RESA activities and particularly the GIMs,

the grassroots consumers have gained a better understanding of the issues related to electricity.

Also a better communication channel has been established between the common consumer and the utility officials. Their organisation has now emerged as one that is considered to have expertise on electricity issues in the locality and consumers are turning to them for advice and directions. He concluded by saying that the initiative needs to be proliferated and reach maximum possible consumers.

## **Consumer**

### **Bharat Kumar Mandal, Murshidabad, West Bengal**

He said that having participated in both the GIM Phase I & II, his awareness of basic electricity issues raised. He especially mentioned that understanding the grievance redressal mechanism has been of immense help. Consumers should know about the Consumer Grievance Redressal Officer (CGRO) and his office, so that they can take up their grievances at a higher level. This would be of great help in solving issues that were not addressed at the local group electricity offices in spite of repeated requests/visits. He explained that due to a fault in his electricity metre he received very high bills amounting to Rs. 3600 for three months in the year 2006. Since then he had gone to the local office, consumer court and a number of such other forums but did not achieved any redressal. He came to know about the CGRO via GIMs and brought the issue before the office of CGRO. He was assigned a date of hearing within a fortnight of his applying. He is hoping that his issues will be solved. He concluded by saying that this initiative should be replicated in other regions so that more and more consumers could benefit.

## **Panellists**

### **Debashish Kumar**

**Debashish Kumar** said that till date the government has not been able to ensure electricity for all which is important for overall development. He put forth a few suggestions which are as follows:

- The Regulatory Commissions need to be more proactive and achieve the confidence of the consumers as an effective and pro-consumer regulatory body
- Electricity Act lacks mandatory provisions for public hearings and that should be included in the same.
- Theft control measures need to be more transparent and participatory with the utility giving prior intimation to the consumer. He cited the example of CESC in his locality saying that the process, at times, lacks transparency.
- Slum dwellers and economically backward sections should be treated as special cases and appropriate processes worked out.
- Application forms and bills need to be simple and in vernacular language
- Grievance redressal mechanism needs to be simpler. He said most of the times the marginalised, poor consumers' problems are not being given a proper hearing and attention.
- Consumer awareness programmes should be organised to help consumers deal better with electricity issues.

## **H D Charan**

**H D Charan** highlighted his own experience and put forward the following as the some of the most crying needs in the sector:

- Honest consumers are the ones who end up paying the price for erring ones and need to be protected.
- The efficiency and capacity of the officials at the grassroots is rather low in many cases. There is a need to build their capacity.
- A pro-consumer focus is lacking among the grassroots staff, which is extremely important to enhance consumer satisfaction.
- Senior officials need to visit the grassroots office regularly to ensure that appropriate work culture prevails at these offices. There is a lot of scope for administrative reforms as well as infrastructure enhancement.
- The role of the polity towards a more efficient service delivery by the utility.

## **M K De**

M K De highlighted the following facts:

- The processes in place in most of the distribution utilities in the country are not appropriate and enough to deliver the ambitious targets set for them.
- Lack of efficient/qualified staff, proper job description, monitoring and evaluation. He said governance is the key issue in this regard.
- On the technical side, factors such as transformer loading, feeder loading is also not being optimum.
- This scenario is a result of the fact that most of the utilities are monopolistic in nature and it is in this direction that CSOs such as CUTS can intervene and help build pressure to steer the system towards more accountability and efficiency. It is the pressure from the grassroots via bottom-up approach that will help in this regard.
- Regulators need to consider taking up system audits for the distribution utilities to understand how efficient the present processes are to deliver the service.

## **Open Discussion**

**Payal Malik** said that along with utilities and regulators, consumers also need to change their mindsets. They have to understand and internalise the fact that electricity is not a fundamental right and feel that they are an integral part of the whole reform process that are equally responsible towards the success of the reforms. Consumer groups also should also appropriately internalise the same spirit.

**Jayana Basu** flagged off the issue that consumers in any territory are heterogonous in nature and that should be appropriately reflected in policies and planning instead of having a blanket approach. He also requested that utilities should stop practices as the one highlighted by Kumar.

**Sunil Mitra** said that most of the everyday consumer issues identified through the project are administrative issues at the utility end and the utilities are the ones who probably need to ensure that the process started by projects such as RESA continues and helps in a greater

success of the reforms. He added that this will also help in correcting some of the internal administrative issues of the utility.

M K De welcomed Mitra's suggestions and concluded the session with the commitment that WBSEDCL would be extending support to CUTS to further the initiative.

#### **SESSION IV: ROUNDTABLE ON CONSUMER PARTICIPATION IN ELECTRICITY REFORMS: LESSONS AND WAY FORWARD**

**Chair:** T L Sankar, Advisor & Project Leader, ASCI

**Panellists:**

- K Ramanathan, Distinguished Fellow, The Energy and Resources Institute (TERI)
- Malay Kumar De, CMD, WBSEDCL
- Payal Malik, Associate Professor of Economics, University of Delhi
- Prititosh Ray, Former Member, WBERC
- Shirish Deshpande, Chairman, Mumbai *Grabak Panchayat*
- Y G Muralidharan, Director, Consumer Rights Education and Awareness Trust (CREAT)

**K Ramanathan** stated that there is a need to develop the concept of regulatory social responsibility such as corporate social responsibility. He said that apart from participation in regulatory process consumer can have a greater role as partner in project formulation, management and evaluation etc. He also shared the Kerala experience of energy clubs.

**Payal Malik** commented that consumer participation is a part of democratic process. It is not an end in itself but a means to enhance client power. It is a way to make society controlled state in place of state controlled society. She said that promoting competition in power sector is the key to better services and open access can be a key to competition in the sector. Ordinary consumers are interested in better service delivery rather than participation, so the consumer organisations should take up such issues instead of common consumers and media can also play important role in this.

**Prititosh Ray** stressed on the need to make the consumer aware of their responsibilities as well as their rights.

**Shirish Deshpande** expressed that the Electricity Act 2003 is still on trial and there are many lacunas in it. He said that consumer participation has to be on two levels: macro and micro. Micro level is mainly individual consumer complaints, while macro level participation is in policy issues and this needs expertise.

Flagging other issues of consumer concern he said that the policy to eliminate cross subsidies is soon going to be big advocacy issue for consumer organisations. He further said whether electricity trading is desirable or not should also be considered, as the traders are taking undue advantage of power shortage to sell electricity at exorbitant prices. He also mentioned that open access is operative in Maharashtra after long struggle by consumers.

After the panel discussion floor was opened for discussion and T L Shanker summed up the discussion. He stated that providing electricity in rural areas should be seen as an inclusive practice of development. Inclusive growth leads to certain benefits and cannot be determined only on commercial aspects of cost of supply. He also stressed on the need to

calculate the carbon footprints of electricity consumption of different category of consumers to assess their climate impact. He also opined that to promote competition in the power sector, open access should be implemented at least at macro level and gradually at micro level also.

Thanking CUTS for the innovative project, he said that CUTS is competent and equipped to take forward the key advocacy issues emerged during the project.

### **Closing Remarks**

**George Cheriyan**, Director, CUTS International stated that the objective of the seminar is to bring together various stakeholders on a common platform to discuss the emerging issues of power sector, especially consumer concerns in both the states. The seminar is part of CUTS' earlier interventions started from CUTS FES project. He said that accountability is the key to reform process and most of the CUTS interventions are based on the accountability triangle to enhance client power. Consumers need to play key role in power reform and the RESA model can be a guide for this. He also congratulated the RESA team for success of the seminar and thanked the participants for their active participation.

## ANNEX I: PROGRAMME AGENDA

Time	Sessions
09:30 – 10:00	<b>Registration</b>
10:00 – 11:00	<p><b>Opening Session</b></p> <p>Pradeep S Mehta, Secretary General, CUTS International            Sunil Mitra, Secretary to the Government of India, Department of Disinvestment            R G Gupta, Chairman, Jaipur, Ajmer and Jodhpur Discoms            V S Dave, Former Chairman, Rajasthan Consumer Disputes Redressal Commission.</p>
<b>11:00 – 11:15</b>	<b>Tea Break</b>
11:15 – 12:10	<p><b>Session I:</b> Project on Capacity Building on Electricity Reforms in Bangladesh, India and Nepal: Overview, <i>Rajesh Kumar, CUTS International</i></p> <p>Chair: P N Bhandari, Former Chairman, RSEB</p> <p>Discussants:</p> <ul style="list-style-type: none"> <li>• Shanti Prasad Joshi, Former Chairman, RERC</li> <li>• Dilip Samajpati, Manager, Customer Relation, CESC</li> </ul>
12:10 – 13:20	<p><b>Session II:</b> RESA Project: Policy and Advocacy messages, <i>Deepak Saxena and Keya Ghosh, CUTS International</i></p> <p>Chair: R G Gupta, Chairman, Jaipur, Ajmer and Jodhpur Discoms</p> <p>Discussants:</p> <ul style="list-style-type: none"> <li>• Prititosh Ray, Former Member, WBERC</li> <li>• K C Modi, Chairperson, Consumer Grievance Redressal Forum, BSES Yamuna Power Ltd.</li> </ul>
<b>13:20 – 14:20</b>	<b>Lunch Break</b>
14:20 – 15:10	<p><b>Session III:</b> Challenges and Opportunities at the Grassroots</p> <ul style="list-style-type: none"> <li>• Presentation by two local CSOs and two consumers from Rajasthan and West Bengal</li> </ul> <p>Chair: Yaduvendra Mathur, Secretary to Government, PHED Department</p> <p>Discussants:</p> <ul style="list-style-type: none"> <li>• Debashish Kumar, Councillor, Kolkata Municipal Corporation</li> <li>• H D Charan, Former CMD, Jodhpur Discom</li> </ul>

<b>15:10 – 15:20</b>	<b>Tea Break</b>
15:20 – 16:20	<p><b>Roundtable: Lessons and Way Forward</b></p> <p>Chair: T L Sankar, Advisor &amp; Project Leader, ASCI</p> <p>Panellists:</p> <ul style="list-style-type: none"> <li>• K Ramanathan, Distinguished Fellow, TERI</li> <li>• Malay Kumar De, CMD, WBSEDC</li> <li>• Payal Mallick, Associate Prof. of Economics, Univ. of Delhi</li> <li>• Prititosh Ray, Former member, WBERC</li> <li>• Shirish Deshpande, Vice Chairman, Mumbai Grahak Panchayat</li> <li>• Y G Muralidharan, Director, CREAT</li> </ul>
16:20 – 16:30	<p><b>Closing Remarks</b></p> <p>George Cheriyan, Associate Director, CUTS International  Udai Mehta, Policy Analyst, CUTS International</p>

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