NORWAY

PARLIAMENTARY ELECTIONS
13 September 2021

ODIHR NEEDS ASSESSMENT MISSION REPORT
15-18 June 2021

Warsaw
26 August 2021
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ODIHR Needs Assessment Mission Report 

I. INTRODUCTION 

Following an invitation from the Norwegian authorities to observe the 13 September parliamentary elections, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 15 to 18 June. The NAM included Ana Rusu, ODIHR Senior Election Adviser, and Keara Castaldo, ODIHR Election Adviser.

The purpose of the NAM was to assess the pre-electoral environment and preparations for the elections. Based on this assessment, the NAM should recommend whether to deploy an ODIHR observation activity for the forthcoming elections and, if so, what type of activity best meets the identified needs. Due to the global health emergency and consecutive introduction of restrictions on cross-border travel throughout the OSCE region, the NAM was conducted remotely, using the means of information and communication technologies. Meetings were held with officials from state institutions and with representatives of political parties, media, and civil society. A full list of meetings is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs and Ministry of Local Government and Modernisation for their assistance and co-operation in organizing the NAM. ODIHR would also like to thank each of its interlocutors for taking the time to meet with the NAM and for sharing their views.

II. EXECUTIVE SUMMARY 

The 13 September parliamentary elections are for all 169 seats of the unicameral parliament (Storting). Limited changes to the electoral legal framework have been introduced since the previous parliamentary elections, including measures to regulate adjustments to electoral processes during the pandemic, as well as some new provisions which addressed prior ODIHR recommendations, including revisions to the citizen’s duty to accept candidacy and extended rights for voters requiring assistance in polling stations. Some prior ODIHR recommendations remain unaddressed, including on the possibility for independent candidates to stand and judicial review of all election-related decisions.

A multi-partisan Election Act Commission, created in 2017 with the mandate to propose changes to the Election Act, issued a report in 2020 with numerous recommendations that are expected to be considered by the incoming parliament. Stakeholders met by the ODIHR NAM, including among political parties and civil society, generally approved of the current legal framework and supported the inclusive work of the Commission.

Several government institutions and independent commissions are responsible for the administration of parliamentary elections, in which all ODIHR NAM interlocutors expressed a high degree of confidence. Preparations for early and advance voting and for election day are underway and on schedule. Electoral authorities have commenced extensive efforts to inform voters and contestants about the electoral process, including adjustments pertaining to the safe conduct of voting and
campaign procedures during the COVID-19 pandemic, and this information is available in several languages.

All citizens aged at least 18 years in an election year can vote. Voters can verify the accuracy of their records and electoral contestants may request copies of the voter list for the constituency they are contesting. ODIHR NAM interlocutors did not raise any concerns related to the accuracy or inclusiveness of voter lists. The Constitution retains discriminatory provisions that authorize the parliament to limit the voting rights of citizens with intellectual or psycho-social disability, but the Election Act guarantees the rights of citizens with any type of disability to participate and to request assistance.

Registered political parties and groups of citizens can nominate candidates to open lists, and following recent amendments nominated candidates now have the right to an exemption from candidacy, in line with prior ODIHR recommendations. ODIHR NAM interlocutors generally described the candidate registration process as inclusive and accessible, although no possibility exists for independent candidates, contrary to international standards. No requirements exist on the inclusion and placement of each gender on candidate lists, but several parties reported internal policies related to gender parity in the nomination process and women represented 41 percent of the outgoing parliament. Some interlocutors noted an underrepresentation of citizens from minority groups on candidate lists.

Election campaigns are largely unregulated and there is no legally defined campaign period. Political parties met by the ODIHR NAM expected the campaign to be active and substantive, and did not anticipate any obstacles in freely conveying their messages to voters. Some representatives noted that, amid the pandemic, parties would rely increasingly on social media for voter outreach, and several raised concerns related to potential intolerant and violent rhetoric in online political discourse.

Political parties receive state funding proportionate to the results of the previous parliamentary elections, which constitutes the majority of parties’ funding. No legal limits are imposed on private campaign income and expenditures, although certain sources are prohibited. Political parties met by the ODIHR NAM generally approved of the current system of oversight and regulation of campaign finance, though some noted an increasing potential for excessive influence from private donors.

The media environment is pluralistic and media are largely self-regulated. Media representatives met by the ODIHR NAM described a generally safe and conducive working environment for journalists and reasonable access to public information and officials. Most interlocutors, including among political parties, expressed confidence in the editorial balance and professionalism of broadcast media in covering electoral campaigns.

The ODIHR NAM noted a high degree of confidence in the work of the election administration at all levels. Interlocutors generally remarked on the value of an external assessment but expressed the view that an observation activity for these elections would be unnecessary. Some interlocutors pointed to potential areas of improvement to the regulatory framework for campaign financing, and several raised concerns related to potential intolerant and violent rhetoric directed at politicians, particularly on social networks, and possible implications of this on the participation of women and minority groups in political debate. Authorities and party representatives described planned revisions to the electoral legislation, based on long-term consultations among political parties and other stakeholders, to take place following these elections. Based on the findings of this report, ODIHR does not recommend the deployment of an election observation activity for these elections. However, ODIHR encourages the authorities to consider and implement previous ODIHR electoral recommendations,
and stands ready to assist the authorities in implementing these recommendations during the planned revision process.

III. FINDINGS

A. BACKGROUND

Norway is a constitutional monarchy with parliamentary representation. The King heads the executive branch, although executive power is wielded in practice by a Council of State (cabinet) comprised of ministers selected by the prime minister and formally appointed by the King. Legislative authority is vested in the unicameral parliament (Stortinget or Storting).

Nine parties were elected to the Storting in the 2017 parliamentary elections, namely the Labour Party (49 seats), Conservative Party (45 seats), Progress Party (27 seats), Centre Party (19 seats), Socialist Left Party (11 seats), Christian Democratic Party (8 seats), Liberal Party (8 seats), Green Party (1 seat), and Red Party (1 seat). The coalition between the Conservative Party and the Progress Party remained in government, ultimately receiving support from the Christian Democrats and the Liberal Party.1 Some 41 per cent of members of the outgoing Storting are women, including the prime minister, and several parliamentary parties are led by women.

ODIHR has previously observed three elections in Norway.2 Most recently, ODIHR deployed a Election Expert Team to the 2017 parliamentary elections. The final report issued in December 2017 contained eight recommendations on improving the electoral process to bring it in line with OSCE commitments.3

B. ELECTORAL SYSTEM AND LEGAL FRAMEWORK

The King sets the date for parliamentary elections on a Monday in September of the final year of the term of the outgoing Storting. The legal framework does not provide a possibility for the dissolution or self-dissolution of the Storting prior to the end of its term.

The Storting comprises 169 members directly elected for four-year terms through a system of proportional representation. A total of 150 members are elected from among 19 multi-member constituencies, and the remaining 19 members are elected at-large from among parties that receive at least 4 per cent of votes nationwide. ODIHR NAM interlocutors generally approved of the current threshold but described an ongoing debate on lowering or raising it, and noted that such a change would likely impact the electoral viability and parliamentary representation of several parties.4

The number of members elected from each constituency is determined according to a formula based on electoral population and geographic surface area, and is calculated every eight years. Some

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1 The Progress Party later left the government in 2020.
2 See previous ODIHR election-related reports on Norway.
3 In paragraph 25 of the 1999 OSCE Istanbul Document, OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”.
4 The 2020 Report of the Election Act Commission recommended that the “electoral system should be more proportional” and “the most appropriate measure is to reduce the electoral threshold for seats at large to three per cent”.

ODIHR NAM interlocutors noted significant discrepancies in voting power across constituencies. A reorganization of regional boundaries, adopted by the Storting in 2019 and implemented in January 2020, reduced the number of counties in Norway from 19 to 11, and the 19 electoral constituencies no longer align directly to the counties. Interlocutors described only limited administrative repercussions of this change on the conduct of elections (see also Election Administration). Candidates within open party lists are subject to preferential voting, and voters may also cross off a candidate on the list when marking the ballot. However, preferential votes are only successful if the same selection is made by at least half of the party’s voters.

Norway is a party to major international and regional instruments related to the conduct of democratic elections. Limited changes to the electoral legal framework have been introduced since the previous parliamentary elections, including temporary measures to adjust electoral processes during the pandemic as well as some new provisions which address prior ODIHR recommendations, including revisions to the citizen’s duty to accept candidacy and extended rights for voters requiring assistance in polling stations. A multi-partisan Election Act Commission, created in 2017 with the mandate to propose changes to the Election Act, issued a report in 2020 with numerous recommendations that are expected to be considered by the incoming parliament. Stakeholders met by the ODIHR NAM, including among political parties and civil society, generally approved of the current legal framework and supported the inclusive work of the Election Act Commission. Some prior ODIHR recommendations remain unaddressed, including on the possibility for independent candidates, extended controls on campaign financing, and judicial review of election-related decisions.

C. ELECTION ADMINISTRATION

Several public institutions and commissions are responsible for the administration of parliamentary elections, in which all ODIHR NAM interlocutors expressed a high degree of confidence. The Ministry of Local Government and Modernisation (MoLGM) is responsible for the overall organization and conduct of elections. An independent Directorate of Elections manages the implementation of election processes, including through the operation of an integrated electronic administration system for elections (Elektronisk Valgadministrativt System; EVA), and provides trainings and extensive practical guidance to county- and municipal-level election committees. These election committees, with support from the respective municipal or county administration, are responsible for implementing key stages of the electoral process, including elaborating certain procedures, determining voting hours and locations, training election and polling staff, and establishing municipal results (Municipal Election Committees, MECs) and approving candidate lists, printing ballots, tabulating votes and allocating seats (County Election Committees, CoECs). Some 30,000 election officials will be responsible for the election day procedures. A temporary National Election Committee, comprised of members from all parliamentary parties, is appointed by the King, to hear complaints related to candidate lists or election results and to allocate compensatory

The Election Act Commission recommended a “fairer allocation of seats among the constituencies” by reducing the weight of geographic surface area while ensuring a minimum number of representatives in smaller constituencies.


Primary functions of EVA include the management and approval of candidate list proposals, the maintenance of electronic voter registers, the optical scanning of ballots, and the management of results data.

The Directorate offers detailed and comprehensive information for election officials and the public on its website.
seats.\(^9\) Election officials met by the ODIHR NAM described effective coordination and communication across different election management bodies.

Following the administrative reorganization in 2020, which reduced the number of counties from 19 to 11, the 19 electoral districts no longer align directly to the respective county administrations. Election officials met by the ODIHR NAM did not anticipate any negative impact on the effective administration of electoral preparations in each district, including in CoECs responsible for up to three electoral districts, and that \textit{EVA} provides for clear, secure and separate management of each district by committee staff. However, officials noted a necessary increase in workload and associated human resources, particularly for the registration of candidate lists and counting.

Preparations for early, advance and election-day voting are underway and on schedule.\(^{10}\) The parliament, on the basis of recommendations from the MoLGM, introduced temporary measures to ensure safe voting procedures amid the COVID-19 pandemic and to enable the participation of affected voters, such as those in isolation or quarantine.\(^{11}\) Electoral authorities have commenced extensive efforts to inform voters and contestants about the electoral process, including adjustments pertaining to the safe conduct of voting and campaign procedures during the COVID-19 pandemic, and this information is available in several minority languages.

**D. Voting Technologies**

Most municipalities, constituting some 80 per cent of registered voters, use optical ballot scanners for the counting of votes. MECs may determine whether votes in the municipality will be counted manually or both manually and by optical scan; if optical scanning is used, the municipality must use the scanning program developed in connection with the \textit{EVA} system, which is subject to centralized testing, auditing and quality control. In line with a prior ODIHR recommendation, the source code and other system documentation for the scanning program and other components of the \textit{EVA} system are published on the Directorate of Elections website. All ODIHR NAM interlocutors expressed confidence in the integrity of optical scanning, noting the manual controls in the counting and tabulation processes.

**E. Voter Registration**

All citizens who reach at least 18 years of age in an election year are eligible to vote, except those whose voting rights have been suspended by a court for certain grave crimes.\(^{12}\) The Constitution retains discriminatory provisions that authorize the parliament to introduce restrictions on the voting rights of citizens with intellectual or psycho-social disabilities, but the Election Act permits citizens with any type of disability to participate and, following recent amendments, to request assistance from a person of their choice.\(^{13}\) Some 3,876,200 citizens are currently registered to vote in the upcoming elections.

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\(^9\) In this election, the NEC received six complaints related to candidate lists. Decisions of the NEC may not be appealed to the court; decisions on election results are forwarded to the Storting (see \textit{Complaints and Appeals}).

\(^{10}\) Voters could cast early votes at any municipal office beginning on 1 July. Advance voting at extended locations begins on 10 August, or from 1 July on Svalbard and Jan Mayen, and completes on the Friday prior to election day. Voters abroad may submit advance votes by post if unable to submit directly with a returning officer.

\(^{11}\) The MoLGM has also introduced an \textit{Infection Control Guide} for municipal electoral authorities.

\(^{12}\) The MoLGM informed the ODIHR NAM that no citizens have been revoked of suffrage rights in recent years.

\(^{13}\) The Constitution provides that “[r]ules may be laid down by law concerning the right to vote of persons otherwise entitled to vote who on election day are manifestly suffering from a seriously weakened mental state or a reduced level of consciousness”.

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The Directorate of Elections maintains a centralized electronic voter register based on citizen data from the Population Register and the Directorate of Taxes. A preliminary register of eligible voters is prepared by 2 January in an election year, and municipal voter lists are updated by 30 June. Voters can verify the accuracy of their records and request changes until election day. However, changes to residential addresses after 30 June are not reflected in the voter lists, and the voter must vote in the municipality of their previous residence. Electoral contestants may request copies of the voter list for the constituency they are contesting. ODIHR NAM interlocutors did not raise any concerns related to the accuracy or inclusiveness of voter lists.

Voters may cast a ballot in any polling station within their municipality. Identification is required if the voter is not recognized by polling staff. Electronic voter registers in polling stations, managed within the EVA system, facilitate the check-in processes across the municipality. In case of a failure of the electronic register, ballots are placed in individual contingency envelopes until the register can be accessed.

F. CANDIDATE REGISTRATION

Any registered voter is entitled to contest the elections. New to this election, and in line with a prior ODIHR recommendation, nominated candidates could decline their nomination by submitting a written notice to the respective CoEC, without requiring special justification.14

Registered political parties and groups of voters could submit candidate lists to CoECs by 31 March, and CoECs decided on the registration of lists by 1 June.15 Citizens cannot stand for election independently, contrary to international standards and OSCE commitments.16 For these elections, CoECs registered a total of 5,174 candidates across the country, of which some 40 per cent are women.17 Each list must include a number of candidates equal to the number of seats in the constituency and up to six alternates. No legal requirements exist related to the number or placement of candidates of each gender, although some parties met by the ODIHR NAM noted internal policies related to gender parity in the nomination process. A candidate may run on only one list per constituency, but may run in multiple constituencies. In order to submit lists, registered parties that received at least 500 votes in the county or 5,000 nationwide in previous parliamentary elections, only need to have their lists signed by two local branch committee members. Other lists require at least 500 signatures in the respective constituency in addition to the signatures of two local branch committee members. A voter may sign in support of only one list.

ODIHR NAM interlocutors generally described the candidate registration process as inclusive and accessible. However, several noted an underrepresentation of citizens from minority groups on candidate lists, including in areas with significant minority populations.

G. ELECTION CAMPAIGN AND CAMPAIGN FINANCING

14 The electoral authorities must inform all nominated candidates of the fact that they have been placed on a proposed list and of their entitlement to apply for an exemption.

15 Parties or groups of voters needed to be registered by the authorities by 2 January to participate in the elections.

16 Many ODIHR NAM interlocutors described the registration process as inclusive despite the lack of possibility for independent candidates, given the ease of registering political parties for elections. Still, several parties described formal or de facto membership requirements, varying from three weeks to over one year of tenure and paying dues, for a member to be eligible to stand on a party list, and many parties indicated that in practice potential candidates are identified more than one year before the scheduled election day.

17 Figure does not exclude individuals running for more than one seat.
Election campaigns are largely unregulated and there is no legally defined campaign period. Political parties met by the ODIHR NAM expected the campaign to be active and substantive, and did not anticipate any obstacles in freely conveying their messages to voters.

Some representatives noted that, amid the pandemic, parties might rely increasingly on social media for voter outreach, and several described concerns related to the increasing incidence of intolerant and violent rhetoric in online political discourse. The MoLGM informed the ODIHR NAM that it is preparing guidance for politicians and candidates on preventing and responding to intolerant rhetoric, and political stakeholders described satisfactory communication with and guidance from law enforcement authorities in reporting incidents of hate speech and in safeguarding electronic infrastructure from potential security threats. Several interlocutors raised concerns related to the potential dissemination of false information related to the elections, including on social media, with the intention of disrupting parties’ electoral campaigns (see also Media).

Political parties receive state funding proportionate to the results of the previous parliamentary elections, which constitutes the majority of parties’ funding. The 2005 Political Parties Act (amended in 2013) also permits donations to parties from private individuals and legal entities, and prohibits donations from anonymous, state, public or foreign sources. Political parties submit financial reports annually by 1 June. Parties are obliged to disclose any donations in excess of NOK 10,000 within four weeks of receipt, from the beginning of the election year to the Friday prior to election day. In-kind donations must be reported and valued at market price. The Act does not regulate donations made directly to candidates, but the Political Parties Act Committee informed the ODIHR NAM that any electoral spending by candidates should be treated as a donation to a political party campaign.

The Political Party Act Committee is the primary entity responsible for the oversight of campaign finance. The Committee’s sanctioning power includes formal warnings and revocation of up to all annual public funding, and these decisions can be appealed in court. Political parties met by the ODIHR NAM generally approved of the current system of oversight and regulation of campaign finance, though some noted an increasing potential for excessive influence from private donors, amid a lack of donation limits.

According to the Committee, a parliamentary working group on proposing technical amendments to political and campaign finance regulations, for which the Committee has been consulted, has largely paused its work during the pandemic. The Committee identified a possible need to review existing regulations to more directly address third party spending, including in relation to disclosure of political advertising on social networks.

H. MEDIA

The media environment is pluralistic and media are largely self-regulated. Television and online media are primary sources of objective political information, particularly the public Norwegian Broadcasting Corporation (Norsk riksringerkasting, NRK), funded through taxation, and the private...
TV2. Media representatives met by the ODIHR NAM described a generally safe and conducive working environment for journalists and reasonable access to public information and officials.20

The Constitution guarantees freedoms of expression and of the press, including access to public information. The Broadcasting Act requires broad and balanced coverage of election campaigns in broadcast media, on which paid political advertising is prohibited. A new Law on Responsibility of Media consolidated existing provisions on protecting editorial freedoms while introducing explicit provisions on online media, and ODIHR NAM interlocutors generally expressed satisfaction with this legislation.

The Norwegian Media Authority (NMA) oversees the activities of broadcast media and handles related complaints. The NMA does not conduct media monitoring during the campaign but produces annual reports on the compliance of broadcast media with applicable regulations, in which it evaluates the extent to which the NRK has fulfilled its obligation to provide broad and balanced election coverage. Most ODIHR NAM interlocutors, including among political parties, expressed confidence in the editorial balance and professionalism of broadcast media in covering electoral campaigns.

The NRK informed the ODIHR NAM of plans to cover the preparations for the elections and the election campaign and to encourage voter participation, including among youth. The NRK also plans to organize three debates among political party leaders and to produce educational content for voters and other electoral stakeholders, including on the voting process and on identifying and combatting misinformation. The NMA is likewise preparing an educational resource related to media literacy and source criticism in advance of the elections. The NRK and private broadcasters with at least 5 per cent of viewer share are obligated to provide information in accessible formats, such as with sign language interpretation, subtitles or audio descriptions.

I. COMPLAINTS AND APPEALS

Election dispute resolution is primarily regulated by the Elections Act. Voters, or citizens seeking inclusion to the voter register, can complain to the election administration within seven days of election day about the preparations for and conduct of the elections in the constituency in which they are registered. Election results can be appealed by any citizen to the NEC up to seven days after the results are determined by the CoEC. Decisions of the NEC are forwarded to the Storting and are not subject to judicial review. ODIHR previously recommended enhancing the election-dispute resolution process by providing the right to appeal on all election-related matters, including election results, to a competent court as the final authority, and by setting specific expedited time limits to adjudicate election-related complaints and appeals by all relevant authorities including courts, the NEC, and the Storting. The Election Act Commission also recommended the implementation of judicial review of these decisions in its 2020 report.21

J. CITIZEN AND INTERNATIONAL OBSERVERS

The Elections Act provides for the accreditation of citizen and international observers and obliges municipal authorities to facilitate the presence of observers. ODIHR NAM interlocutors, including political parties, indicated that there is little perceived need to observe the elections due to the high

20 Reporters Without Borders currently ranks Norway first in its World Press Freedom Index (as of July 2021).
21 The Commission recommended changing the National Election Committee into an independent appeal body made up predominantly of judges appointed by the Storting, and mandating the Committee to deal with appeals against the “preparation and implementation” of elections. The Commission also recommended that decisions on the validity of elections should be subject to possible appeal to the Supreme Court.
level of public trust in their administration. Some noted plans by civil society organizations to follow particular aspects of the process, including the participation of women, minority groups, and persons with disabilities in the election administration and campaign and in relation to voter turnout.

IV. CONCLUSIONS AND RECOMMENDATIONS

The ODIHR NAM noted a high degree of confidence in the work of the election administration at all levels. Interlocutors generally remarked on the value of an external assessment but expressed the view that an observation activity for these elections would be unnecessary. Some interlocutors pointed to potential areas of improvement to the regulatory framework for campaign financing, and several raised concerns related to potential intolerant and violent rhetoric directed at politicians, particularly on social networks, and possible implications of this on the participation of women and minorities in political debate. Authorities and party representatives described planned revisions to the electoral legislation, based on long-term consultations among political parties and other stakeholders, to take place following these elections. Based on the findings of this report, ODIHR does not recommend the deployment of an election observation activity for these elections. However, ODIHR encourages the authorities to consider and implement previous ODIHR electoral recommendations, and stands ready to assist the authorities in implementing these recommendations during the planned revision process.
ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs
Merete K. Wilhelmsen, OSCE Coordinator, Section for Eastern Europe, Central Asia and Regional Organizations
Kristin Hefre, Policy Director, Section for Human Rights, Democracy and Gender Equality
Silje Fines Wannebo, Foreign Service Trainee, Section for Eastern Europe, Central Asia and regional organizations

Ministry of Local Government and Modernisation
Siri Dolven, Deputy Director General
Marie Svendsen Mjøsund, Senior Election Adviser
Cathrine Sørlie, Senior Adviser
Øyvind Kind Robertsen, Adviser

Directorate of Elections
Bjørn Berg, General Director
Cecilie Jacobsen Yri, Head of Department of Election Systems
Thor Herman Christensen, Senior Adviser

National Electoral Committee
Jette Christensen, Leader
Martin Engeset, Deputy Leader

Oslo Electoral Committee
Karina Miller
Astrid W. Biem
Petrus Granlund

Viken County Electoral Committee
Roger Ryberg, County Mayor and Leader of the County Electoral Committee
Rune Fredriksen, Member
Simen Nord, Member
Ole Kjendlie, Director of the County Council Secretariat
Trude Remme, Special Adviser

Political Party Act Committee
Eivind Smith, Leader
Daniel Giske, Head of Secretariat

The Storting, Constitutional Department
Ingrid Sand, Special Adviser

Norwegian Media Authority
Hanne Sekkelsten, Head of the Legal and Regulatory Department
Therese Thommessen, Senior Adviser

Norwegian Broadcasting Corporation
Aksel Helgheim, Project Manager
Per Arne Kalbakk, Editor
Political Parties
Ane Hansdatter Kismul, Head of Secretariat, Centre Party
Torkil Vederhus, Party Secretary, Green Party
Marianne Nordli, Progress Party
Thor Magne Bostad, Progress Party
Ola Elvestuen, MP, Liberal Party

Civil Society
Anne Hege Grung, President, Norwegian Association for Women’s Rights
Nina Solberg Nygaard, Norwegian Association for Women’s Rights
Berit Lindeman, Head of Policy Department, Norwegian Helsinki Committee
Lene Wetteland, Senior Advisor, Norwegian Helsinki Committee
Espen Brynsrud, Head of Department, Journalism and Organization, Norwegian Journalists’ Union
Eva Stabell, Project Manager for Internationalisation, Norwegian Journalists’ Union