

Brussels HOME.E.1/AF

NOTE FOR THE ATTENTION OF THE MEMBERS OF THE COMMITTEE FOR THE HOME AFFAIRS FUNDS

Ref.: HOME-Funds/2024/02

Subject: Launch of the call for expression of interest under the Specific Action

"Validating new technologies to prevent, detect and investigate organised crime - NTOC" under the Internal Security Fund (ISF) –

Reference ISF/2024/SA/3.4.2

1. INTRODUCTION

Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund provides that Member States may receive funding for specific actions in addition to their initial allocations in their respective programmes.

Specific actions aim to fund transnational or national projects that bring Union added value in accordance with the objectives of the Fund for which one, several or all Member States may receive an additional allocation to their programmes.

They will be implemented as one of the components of the Thematic Facility in line with Art. 8 ISF of the above-mentioned Regulation and in accordance with the relevant financing decisions and work programmes for the Fund (1).

By the present note, the Commission launches a call for expression of interest for Specific Action "Validating new technologies to prevent, detect and investigate organised crime - NTOC", in line with the actions listed in the above-mentioned Commission's financing decision and work programme.

⁽¹⁾ Internal Security Fund (2021-2027) (europa.eu)

2. GENERAL PRINCIPLES

Specific actions will be implemented by one or more Member States participating in the Internal Security Fund via funding received in addition to the allocation under their ISF programmes.

Funding for specific actions is added to the Member States' programme allocations by means of a programme amendment. That additional funding is earmarked for the specific action concerned and shall not be used for other actions in the Member State's programme, except in duly justified circumstances and as approved by the Commission through the amendment of the programme.

Whereas the regular EU co-financing rate under the Member States' programmes will not exceed 75% of total eligible expenditure, projects implemented under specific actions may benefit from an increased co-financing rate of up to 90% of total eligible expenditure.

The specific action must be implemented by the Member States in accordance with the ISF (²) Regulation and the Common Provisions Regulation (EU) 2021/1060 (CPR) (³). This includes compliance with fundamental rights.

Your attention is drawn to one provision of the CPR. As regard the value added tax ("VAT") eligibility regime, Article 64 (1)(c) of the CPR provides that VAT is not eligible, except:

- (i) "for operations the total cost of which is below EUR 5 000 000 (including VAT);
- (ii) for operations the total cost of which is at least EUR 5 000 000 (including VAT) where it is non-recoverable under national VAT legislation".

3. CALL FOR EXPRESSION OF INTEREST

3.1. Indicative Budget available

The 2023-2025 ISF Thematic Facility work programme indicates that for all specific actions under the Fund EUR 16,5 million are available.

The indicative amount envisaged for this call ISF/2024/SA/3.4.2 is EUR 2 million.

The requested amount (i.e. the Union contribution to the Member State's ISF programme under the Specific Action):

should ideally not be lower than EUR 300.000 per application, should ideally not be higher than EUR 700.000 per application.

(2) Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund.

⁽³⁾ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

Should many applications be received and successful, the final amount to be allocated to a Member State's programme may be lowered.

The Commission encourages project proposals by groups of Member States in consideration of the potential transnational impact.

In case of a transnational project, the Commission recommends, for the sake of efficiency, the choice of Option 1 as presented in the Note HOME-Funds/2022/07(Ares(2022)1060102) of 14 February 2022 on Transnational specific actions under the Asylum, Migration and Integration Fund (AMIF), the Instrument for Financial Support for Border Management and Visa Policy (BMVI), and the Internal Security Fund (ISF) – Arrangements between partners.

Any proposal submitted by a single Member State still must demonstrate its transnational impact by its transferability, as well as dissemination activities, trainings, or others.

3.2. Background for the specific action

The EU Security Union Strategy 2020-2025 (4) highlighted protecting Europeans from organised crime (OC), due to its huge negative impact on individuals, society and economy. The Strategy names the main, most profitable activities of the OC including the following three, which are at the focus of this call: illegal firearms trafficking, environmental crimes, and trafficking in cultural goods.

The Strategy states that EU needs to step up its work against organised crime, including at international level, with more tools to dismantle organised crime's business models. Fighting organised crime also requires close cooperation with local and regional administrations as well as civil society, which are key partners in preventing crime as well as providing assistance and support to victims.

Further development of this approach is part of the EU Strategy to tackle organised crime 2021-2025 (5). The Strategy sets out priority work strands and actions to tackle the organisation and business model of criminal networks. It aims at boosting law enforcement and judicial cooperation, disrupting organised crime structures and tackling high priority crimes, eliminating the profits generated by organised crime and making law enforcement and the judiciary fit for the digital age. Further actions to dismantle organised crime were also proposed in the EU Roadmap on the fight against drug trafficking and organised crime of 18 October 2023 (6). Drugs are not the focus of this call, but the Roadmap proposes relevant general actions to map high risk criminal networks, establish a network of judicial authorities and support law enforcement during financial and digital investigations.

Misuse and trafficking of firearms has long been identified by the EU as a major threat for citizens. The availability of illegal firearms is a key enabler for serious violence and the threat from violent incidents has been augmented by the frequent use of firearms in public, generating a sense of insecurity and undermining public confidence in national authorities.

⁽⁴⁾ COM(2020) 605 final

⁽⁵⁾ COM(2021) 170 final

⁽⁶⁾ COM(2023) 641 final

This had led the Commission to define a specific policy to address this issue since 2013. It is nowadays part of the current EU Security Union Strategy (⁷) and one of the priorities for the Member States within the European Multidisciplinary Platform Against Criminal Threats (EMPACT) for the period 2022-2025 (⁸).

Based on the threats and weaknesses identified, the European Commission published the **EU Action Plan on firearms trafficking 2020-2025** (9), with a focus on the strengths and opportunities of the different stakeholders identified as essential. It sets out 4 priorities:

- to safeguard the legal market for firearms and avoid diversion of firearms from the legal to the black market,
- to build a better intelligence picture, improving knowledge of the threat and addressing the lack of comparable statistics on firearms events and seizures across the EU,
- to improve law enforcement crack-down on firearms-related crime and,
- to increase international cooperation, reinforcing law enforcement international cooperation with a strong set of activities focusing on South-Eastern Europe.

The last report on the application of the Firearms Directive (¹⁰) published in October 2021 included two points on the effect of new technologies as an opportunity to improve the tracing, the safety and security of the acquisition and possession of weapons, and the threats related to it, as well as the use of 3D printers for the illegal manufacture of essential components.

The EU action plan against trafficking in cultural goods (¹¹) aims to effectively deter evolving security threats and protect cultural heritage within and beyond the EU. The action plan builds on existing EU activity and addresses ongoing challenges through:

- improving prevention and detection of crimes by market participants and cultural heritage institutions,
- strengthening law enforcement and judicial capabilities, and
- boosting international cooperation, including with source and transit countries of cultural goods in conflicts and crises.

Environmental crime deserves attention due to its harmful effects on biodiversity and on the environment, health and social cohesion within the EU and in third countries. The key documents for this area are the EU Waste Shipments Regulation (12) and the Action Plan against Wildlife Trafficking (13), as well as the Environmental Crime Directive (14), all subject to ongoing Commission review.

Relevant for all three above mentioned challenges is also the work of the Council of the European Union in the framework of **European Multidisciplinary Platform Against**

⁽⁷⁾ COM (2020)605 final

⁽⁸⁾ https://home-affairs.ec.europa.eu/policies/law-enforcement-cooperation/operational-cooperation/empact-fighting-crime-together_en

⁽⁹⁾ COM(2022) 800 final

⁽¹⁰⁾ COM (2021) 647 final

⁽¹¹⁾ COM(2022) 800 final

⁽¹²⁾ Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste

⁽¹³⁾ COM(2022) 581 final

⁽¹⁴⁾ COM(2021) 851 final

Criminal Threats (**EMPACT**) (¹⁵). Further information on trends, key facts and their assessments are available in professional law enforcement analysis like Europol's **Serious and Organised Crime Threat Assessment (SOCTA)** (¹⁶).

EU funding is necessary for this specific action given the <u>uptake</u> challenges for innovation, new knowledge, technologies and methods in the field of fighting organised crime. Much of the research and innovation (R&I) effort undertaken so far on civil security, and supported by EU funding, led to excellent findings and outcomes, promising technological prototypes and organisational solutions. However, barriers and challenges often hinder the uptake of innovation in the civil security sector and its deployment to front line practitioners. Examples of these challenges include:

- the lack of funding, and development paths dedicated to innovative technologies and methods,
- a limited understanding of how public procurement can be used as a catalyst for innovation uptake or,
- the limited visibility and traceability of successful research outcome.

Furthermore, there is a strong EU added value in **promoting European innovation**, as they lead to reinforcement of existing and development of new civil security practitioners' capabilities (¹⁷).

Synergies between Union-funded research and innovation with the Internal Security Fund can hence facilitate funding to security practitioners and authorities to build on successful research results, support testing, validating or deployment of new methods and technologies stemming from R&I actions. These instruments can support technology suppliers in the industrialisation and commercialisation of innovative products, as well as the business creation and scale-up, and security practitioners in further testing or validating, and acquiring innovative solutions.

3.3. Scope and purpose of the specific action

The objective of this specific action is to provide financial support to Member States to test, validate, further pilot and/or deploy innovative technologies, and/or methods for preventing, detecting and investigating organised crime. The support will focus on cofunding technical, organisational and/or societal solutions with **compulsory innovative elements** at least at European level.

Purchase of off-the-shelf technology is not eligible under this specific action, as it is planned under other strands of ISF or other EU funding instruments (e.g., ISF Member States Programmes, ERDF, ISF PROTECT call for the topic of firearms).

Projects proposals must build on outcomes of security research and innovation, especially taking up results of EU-funded activities (18), in order to ensure some of the following:

• improved prevention, detection and investigation of firearms trafficking

⁽¹⁵⁾ https://home-affairs.ec.europa.eu/policies/law-enforcement-cooperation/operational-cooperation/empact-fighting-crime-together_en

^{(16) &}lt;a href="https://www.europol.europa.eu/publications-events/main-reports/socta-report">https://www.europol.europa.eu/publications-events/main-reports/socta-report

⁽¹⁷⁾ COMMISSION STAFF WORKING DOCUMENT Enhancing security through research and innovation, Brussels, 15.12.2021 SWD(2021) 422 final.

⁽¹⁸⁾ https://home-affairs.ec.europa.eu/policies/internal-security/innovation-and-security-research_en

- improved prevention, detection and investigation of trafficking in cultural goods,
- improved prevention, detection and investigation of organised environmental crime,

and, in all instances, involve training and guidance for law enforcement agencies.

When addressing the above-mentioned areas of impact, added value for a proposal would be to offer **in addition** tools also applicable to other forms of organised crime, as specified in the EU Security Union Strategy 2020-2025.

Proposed actions must build on results of previous research and innovation projects. Examples of such initiatives include, but are not limited to, the EU funded projects: COPKIT (H2020), MAGNETO (H2020), CREST (H2020), ANITA (H2020), Ceasefire (HE), PERIVALLON (HE), EMERITUS (HE), BORDERSENS (H2020), PROTAX (H2020) TRACE (H2020), ROXANNE (H2020), RITHMS (HE); ANCHISE (HE) or ENIGMA(HE). Further information on Union-funded research and innovation in security technologies and methods can be found on:

- the EU Funding & Tenders Portal (for past, current and forthcoming topics and calls) (19),
- the Common Research and Development Information Service (CORDIS) (for ongoing and past projects) (20),
- the Horizon Dashboard (for aggregated search by country, partner, topic)(21),
- through the Community for European Research and Innovation for Security (CERIS) (22), and
- from the National Contact points (NCPs) for EU security research in each Member State,
- from DG HOME's Innovation and Security Research Unit (²³).

Purchase of products and services that are commercially available, unless being a minor and complementary part of the integration effort in an innovative solution, are not supported by this action.

Furthermore, solutions built around AI technologies at its core, will not be addressed by this call.

The specific action can include but should not be limited to activities such as:

- testing, validation, and/or further piloting (including in groups of Member States) in real environment,
- procurement,
- installation and integration in legacy systems,
- deployment, hands-on training on the use of the new solutions.

⁽¹⁹⁾ Funding & tenders (europa.eu)

⁽²⁰⁾ CORDIS | European Commission (europa.eu)

⁽²¹⁾ Funding & tenders (europa.eu)

⁽²²⁾ CERIS - Community for European Research and Innovation for Security (europa.eu)

^{(23) &}lt;u>Innovation and security research (europa.eu)</u>

Cooperation with Europol in any of these elements is strongly encouraged especially utilisation of the Europol's repository tool, as it should leverage proposals' quality and impact.

Article 5(5) of the ISF Regulation provides that is not eligible:

- (a) actions limited to the maintenance of public order at national level;
- (b) actions with a military or defence purpose;
- (c) equipment of which the primary purpose is customs control;
- (d) coercive equipment, including weapons, ammunition, explosives and riot batons, except for training purposes; (...).

If expenditure is planned for purchase of equipment or means of transport or construction of security-related buildings or facilities and the project proposal is selected, the ISF Managing Authority should ensure that the expenditure will be included in the calculation under the ISF Programme for the 35% threshold stipulated in Article 13(7) of the ISF Regulation.

Proposals should explain the plans for future deployment and/or scale-up of the new technologies, and/or methods, should the activities funded by this specific action be successful. Further operational deployment, use and/or scale-up can be planned with support with national funding, Member States' ISF programmes, and/or other public or private funding. Project proposals that have a credible and committed plan for further uptake will be particularly welcomed, as they will ensure impact on the capabilities of national security practitioners.

The call for expression of interest is open for both national and transnational projects proposals. However, in both instances, proposals must clearly and convincingly demonstrate the **transnational impact of their efforts**.

In case of a transnational project proposal, the lead Member State will have to make sure that the ISF Managing Authority of each participating Member State duly signs the "Partnership Declaration Form". In the Application form, each project beneficiary in each participating Member State should be listed and the share that each Member State will receive from the additional amount allocated, if the project proposal is successful, should be indicated. Based on this common agreement, each partner will have a role and resulting responsibilities in the implementation of the project and delivering on its objectives.

The specific action proposed **should not include activities related to research** but must rather support the uptake and use of innovative solutions stemming from past research. As such, new technologies addressed in the project proposals (which are not necessarily the only technologies involved but should be the main ones) should be of Technological Readiness Level not lower than 8.

This specific action falls specifically under points (c), (e) and (j) of Annex III of the ISF Regulation, regarding support to:

- (c) "EU policy cycle/EMPACT operational actions";
- (e) "actions developing innovative methods or deploying new technologies with a potential for transferability to other Member States, in particular projects aimed at testing and validating the outcome of Union-funded security research projects";

(j) "actions empowering communities to develop local approaches and prevention policies, and awareness-raining, and communication activities among stakeholders and the general public on Union security policies".

3.4. Expected results following the call

Member States can propose both projects implemented entirely at national level and projects implemented transnationally by a group of Member States. In the former case, the proposing Member States should explain the specific added value of their transnational approach.

As outcome of the present call for expression of interest, three to four projects are expected to be selected, targeting the three issues listed under Section 3.3.

Examples of activities to be included in the proposed actions:

- uptake and testing of tools stemming from EU funded research programmes,
- validation and dissemination of such tools,
- cross-border operational actions,
- mechanisms to exchange information across borders,
- awareness raising campaigns,
- increased public-private partnerships to prevent / detect / investigate specific form of organised crime,
- schemes to assist victims.

As a result, selected projects should achieve one or more of the following objectives:

- Improve the security of EU citizens and economy,
- Enhance situational awareness, intelligence picture and operations capabilities of law enforcement and relevant services,
- Reinforce the resistance of European society against organised crime,
- Uptake relevant new technologies and solutions, especially from Union-funded, security research and innovation programmes,
- Empower society to co-responsibility for security, and deeper involvement of citizens,
- Increase European open strategic autonomy in security technologies.

4. PROCEDURE FOR APPLICATION

4.1. Admissibility and assessment aspects

All EU Member States participating in the ISF are eligible.

The Specific Action proposed should not start before 1st September 2024 and should ideally be completed by 31st December 2026 at the latest.

DG HOME will assess the proposals submitted by the Member States.

To be considered admissible a proposal must:

1. be submitted within the deadline (see below) to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu,

- 2. consist of the official ISF/2024/SA/3.4.2 Application form attached to this note together with its annexes, which must be readable and complete (all fields necessary for assessment are filled in),
- 3. be submitted by the Managing Authority on behalf of the entity in the Member State that will be responsible for the implementation of the specific action,
- 4. identify a project beneficiary (an entity) that will be responsible for the implementation of the specific action in the Member State (in the lead for the action),
- 5. in case of a transnational project: include partnership declaration forms signed by the Managing Authorities of all participating Member States (²⁴).

DG HOME will assess admissible proposals based on the following criteria (25):

A. Relevance (30 points – minimum score : 15 points)

- 1. **Clarity** of the proposed solution, **its correspondence** with the objectives and scope of this call for expression of interest, and **its contribution** towards the output and results indicators listed in Annex VIII of the ISF Regulation (see Annex 4).
- 2. **Innovation** of the proposed solution (of min. TRL 8) in comparison with available state-of-the-art tools.

B. Quality and content (30 points – **minimum score: 15 points**)

- Maturity of the proposal; appropriateness of the design and planned implementation, considering the envisaged activities; methodology (including operational and financial management); organisation of work and strategy for project management and monitoring; measures undertaken or envisaged to mitigate the identified risks.
- 2. Cost effectiveness, complementarity and sustainability: the proposal should present the distribution of the financial support requested, and its appropriateness in relation to the scale and type of the planned activities (personnel, travel, training, etc.). It should also demonstrate the overall cost effectiveness and value for money, and the complementarity with other EU funding sources (Member States' ISF programmes, ISF calls for proposals under Union Actions, EUROPOL EMPACT grant schemes, etc.). Finally, the sustainability model should be explained, including a credible plan for future deployment(s) and/or scale-up after this action lifetime.

C. Impact (40 points – minimum score : 20 points)

1. **Impact** of the proposed solution on **capability development** for preventing, detecting and investigating organised crime, and meeting the needs and gaps identified by Member States.

2. **Involvement of and cooperation with** competent entities from Member States (law enforcement authorities, private and public entities – e.g. research organisations, industry – involved in preventing, detecting and investigating organised crime, or organisations bringing assistance to victims) and relevant EU entities (e.g. Europol,

⁽²⁴⁾ Please refer to the note HOME-Funds/2022/07 on the arrangements between partners to be sought when submitting proposals for transnational specific actions.

⁽²⁵⁾ Proposals not meeting the 'pass score' of criterion A (15 points) will not be further assessed. Only proposals scoring at least the 'pass scores' defined for each criterion (A, B and C) can be proposed for funding, depending on their overall ranking and budget availability.

- CEPOL, Frontex) whenever appropriate, and explanations on how this will be achieved. Links to EMPACT should be demonstrated, if appropriate.
- 3. **Dissemination and communication** strategy, including **transferability of the solution to other Member States**, and its relation and/or contribution to **European strategic autonomy.**

Member States must ensure respect for the horizontal principles described in Article 9 of Regulation (EU) 2021/1060(²⁶), including respect for fundamental rights and compliance with the Charter of Fundamental Rights of the European Union, as well as Regulation (EU) 2016/679 and Directive (EU) 2016/680 (²⁷).

Moreover, Member States must also ensure that the envisaged actions are not affected by a reasoned opinion delivered by the Commission in respect of infringement proceedings under Article 258 of the Treaty on the Functioning of the European Union (TFEU) that put in doubt the legality and regularity of expenditure or the performance of the actions (Article 8(5) of Regulation (EU) 2021/1149).

4.2. Application procedure

Deadline for the application: Member States are invited to submit their proposals by **20 September 2024** at the latest, using the official ISF/2024/SA/3.4.2 Application form attached to this Note, together with its annexes. Proposals can be submitted in any official EU language (project abstract/summary should however always be in English). For reasons of efficiency, it is strongly advised to use English for the entire proposal.

To ensure equal and fair treatment of the proposals and allow the Commission to allocate at the same date all the available funding, DG HOME will assess all proposals simultaneously. Therefore, proposals submitted after the deadline will not be admissible.

The Members of the Committee for the Home Affairs Funds will be informed at the latest 10 working days before the deadline for the submission of the proposals in case the deadline for the submission of proposals is extended.

E-mail address for the application: The proposals should be submitted to the ISF specific actions functional mailbox <u>HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu</u>. Member States may submit additional documentation if necessary.

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant/ lead Member State during the

(26) Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial

Support for Border Management and Visa Policy.

⁽²⁷⁾ Directive (EU) 2016/680 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA. Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data.

evaluation process. A reply should be provided by the Member State within 3 working days from the request date.

Any requests for clarification of the Member States on this call for expression of interest may be sent by 30 August 2024 at the latest, to the ISF specific actions functional mailbox HOME-ISF-SPECIFIC-ACTIONS@ec.europa.eu.

Requests for clarifications should be sent only <u>by the Managing Authority</u>. The Managing Authority has an important role to play in explaining to potential beneficiaries the applicable rules and specificities of the ISF programme and the Specific Actions scheme, as well as helping them to prepare their applications. The Managing Authority should be their sole contact point and has the responsibility to review and reply to any questions received from applicants. It may, however, address these questions to the Commission services if further clarification is needed. As projects under specific actions are managed at national level, according to national rules, specific questions on eligibility of costs should be addressed first to the Managing Authority.

To respect the equal treatment and transparency, the replies to the written requests for clarification received will be sent to all Member States, via HOME-AFFAIRS-FUNDS-COMMITTEE@ec.europa.eu.

DG HOME will inform Member States of the outcome of the assessment of the proposals towards December 2024.

5. AMENDMENT OF THE ISF PROGRAMMES AND ELIGIBILITY OF EXPENDITURE

After having been informed of the outcome of the call for expression of interest, each successful Member State should submit to the Commission a request to amend its ISF programme via SFC. The amended programme should include a short description of the specific action, adjust the output and result indicators, and include the costs and codes linked to this specific action (respectively in the description and under tables 1, 2 and 3 of Specific Objective 3, and table 6 of the programme).

When amending an ISF programme of a Member States, two situations may arise regarding the eligibility of expenditure $(^{28})$:

- For Member States that have included all the types of interventions listed in Annex VI table 2 of the ISF Regulation that are relevant for the Specific Action "Validating new technologies to prevent, detect and investigate organised crime NTOC" ISF/2024/SA/3.4.2" in table 2.1.3 of Specific Objective 3 in their *initially approved* ISF programme: expenditure for the Specific Action will be eligible as of 1st September 2024.
- 2. For Member States that have *not* included all the types of interventions listed in Annex VI table 2 of the ISF Regulation that are relevant for the Specific Action "Validating new technologies to prevent, detect and investigate organised crime NTOC" ISF/2024/SA/3.4.2" in table 2.1.3 of Specific Objective 3 in their *initially approved* ISF programme: expenditure for the Specific Action will be eligible from

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⁽²⁸⁾ Art. 63(7) of Regulation (EU) 2021/1060.

the date of submission by the Member State of its request for amendment of the ISF programme that will add the respective types of interventions in the programme.

Yours faithfully,

Silvia MICHELINI

Encl.: Annexes 1-4