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Member State questionnaire on new genomic techniques to contribute to a Commission study requested by the Council

Fields marked with * are mandatory.

Questionnaire on new genomic techniques to contribute to the study requested by the Council

endorsed in the Joint Working Group of GMO competent authorities on new genomic techniques on 15 January 2020

Introduction

With this questionnaire the Commission is collecting contributions from Member States competent authorities to respond to the Council's request[1] for "a study in light of the Court of Justice's judgment in Case C-528/16 regarding the status of novel genomic techniques under Union law" (i.e. Directive 2001/18 /EC, Regulation (EC) 1829/2003, Regulation (EC) 1830/2003 and Directive 2009/41/EC). The scope of the study goes beyond new mutagenesis techniques, as there are other new techniques, for which the Council seeks clarification. Therefore, the study covers all new genomic techniques, which have been developed after 2001.

For the purpose of the study, the following definition for new genomic techniques (NGTs) is used: techniques, which are capable to alter the genetic material of an organism and which have emerged or have been developed since 2001[2].

Unless specified otherwise, the term "NGT-products" used in the questionnaire covers plants, animals, micro-organims and derived food and feed products obtained by NGTs for agri-food, medicinal and industrial applications and for research. GMO competent authorities are invited to seek input from other competent authorities when appropriate.

The questionnaire is meant to provide information primarily, but not exclusively, at national level. Please substantiate your replies with explanations, data and source of information as well as with practical examples, whenever possible. If a reply to a specific question only applies to a specific NGT, please indicate this in the reply. With regard to agri-food applications, replies may include considerations on specific sectors, such as the organic sector.

Please indicate which information should be treated as confidential in order to protect the commercial

interests of a natural or legal person. Personal data, if any, will be protected pursuant to Regulation (EU) 2018/1725 [3].

[1] Council Decision (EU) 2019/1904, OJ L 293 14.11.2019, p. 103-104, https://eur-lex.europa.eu/eli/dec/2019/1904/oj
[2] Examples of techniques include: 1) Genome editing techniques such as CRISPR, TALEN, Zinc-finger nucleases, mega nucleases techniques, prime editing etc. These techniques can lead to mutagenesis and some of them also to cisgenesis, intragenesis or transgenesis. 2) Mutagenesis techniques such as oligonucleotide directed mutagenesis (ODM). 3) Epigenetic techniques such RdDM. Conversely, techniques already in use prior to 2001, such as Agrobacterium mediated techniques or gene gun, are not considered NGTs.
[3] Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39–98

Instructions

Please note that the survey accepts a maximum of 5000 characters (with spaces) per reply field. You might be able to type more than 5000 characters, but then the text will not be accepted when you submit the questionnaire. You will also receive a warning message in red colour below the affected field.

You have the option to upload supporting documentation in the end of each section. You can upload multiple files, up to the size of 1 MB. However, note that any uploaded document cannot substitute your replies, which must still be given in a complete manner within the reply fields allocated for each question.

You can share the link from the invitation email with another colleague if you want to split the filling-out process or contribute from different locations; however, remember that all contributions feed into the same single questionnaire.

You can save the draft questionnaire and edit it before the final submission.

You can find additional information and help here: https://ec.europa.eu/eusurvey/home/helpparticipants

Participants have until 30 April 2020 (closure of business) to submit the questionnaire via EUsurvey.

QUESTIONNAIRE

* Which Member State are you representing?

Italy

A - Implementation and enforcement of the GMO legislation with regard to new genomic techniques

* **1. Have you been consulted by companies/organisations/research institutes for regulatory advice or another issue on products developed or to be developed by NGTs ?**

- (●) Yes
- ( ) No

* Please provide details on the request

In 2017 the Italian Ministry of the Environment and of the Land and Sea Protection, national competent authority pursuant to directive 2001/18/EC, has been consulted by the University of Milan Department of Biosciences regarding the procedure to follow in order to start a field trial with several varieties of rice obtained through point mutation (genome editing technique). To respond to the request received there was an exchange of notes with the European Commission. Following the ruling of the European Court of Justice, the Ministry of the Environment informed the University of Milan of the need to submit a notification pursuant to Title II of legislative decree 8 July 2003, no. 224, implementing directive 2001/18/EC.

The Italian Ministry of Agricultural, Food and Forestry Policies has not been consulted by companies /organisations or research institutes.

The Italian Ministry of Health Directorate-General for Food Safety and Nutrition has not received requests regarding foods or feed produced with NGT.

The Italian Ministry of Economic Development Patent and Trademark Office can be consulted for information if the company/organization/research institute is evaluating the patent protection of techniques that can be included in NGT. Clearly information is related to patentability requirements (novelty, inventive activity, industrial application) and to exclusions from patentability, as indicated in the Industrial Property Code (https://uibm.mise.gov.it/index.php/it/normativa/codice-della-proprieta-industriale).

* **2. Have you taken specific measures (other than inspection) related to the application of the GMO legislation to NGT-products?**

- ( ) Yes
- (●) No

* Please explain why not

In Italy specific measures for the application of the GMO legislation to NGT-products have not be taken because no clarity has yet been made on their regulatory framework, in particular as regards the placing on the market and the compliance with the requirements of traceability.

* 2 bis. Have you encountered any challenges or limitations, including administrative burden or costs?

- ( ) Yes
- (●) No

* Please explain why not

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* **3. Have you adapted your inspection practices to cover all NGT-products and to ensure the enforcement of traceability requirements?**

- ○ Yes
- ◉ No

* Please explain why not

The Italian Ministry of the Environment, national competent authority pursuant to directive 2001/18/EC, has not provided specific inspection practices because in Italy there are no field trials pursuant to part B of the directive 2001/18/EC with NGT-products.
The Italian Ministry of Health, national competent authority for the implementation of regulations (EC) n. 1829 and n. 1830 and of regulation (UE) n. 625/2017, has not provided for different inspection practices for NGT-products for food and feed production as they are not declared.
The Italian Ministry of Agricultural, Food and Forestry Policies, national competent authority for seed controls, has not provided specific inspection practices because currently no seed varieties obtained with NGTs are registered in the National Register (see also answers 6 and 7).

* 3 bis. Have you encountered challenges or limitations, including administrative burden or costs?

- ○ Yes
- ◉ No

* Please explain why not

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* **4. Do you have experience or information on traceability strategies, which could be used for tracing NGT-products?**

- ○ Yes
- ◉ No

* 4 bis. Have you encountered any challenges or limitations, including administrative burden or costs?

- ◉ Yes
- ○ No

* Please describe

The development of traceability strategies needs detection and identification techniques with physical checks and specific analytical methods based on the availability of reference materials. NGT-products can have phenotypic and sometimes genotypic characteristics similar or identical to the respective natural progenitor organisms, therefore their detection is particularly difficult and their identification in some cases is impossible. In any case, two scenarios can be distinguished: 1. modifications inserted are known “a priori” with precise information from the developer; 2. modifications inserted are not known “a priori”, there is no information in databases, such as in those ones for authorized GMOs. Whatever the organism subjected to genetic modification (plants, animals or microorganisms) without “a priori” information on the changes inserted in the genome, the detection becomes complex and the differentiation between organism obtained with specific molecular techniques and organism obtained spontaneously in nature is generally impossible.

Some of the NGTs (e.g. epigenetic techniques such as DNA methylation) do not provide modifications of the DNA and, even in the case of “a priori” information, the detection is complex and not standardized. With the techniques that introduce modifications of the genome with genetic insertions, the size of the insert must be considered: in fact only if the insert exceeds a certain size, which is a function of the overall size of the modified genome, it is possible to identify the sequence as a result of an intentional genetic modification. Identification is possible only in the case of the site direct nuclease type 3 (SDN3), intragenesis and in some cases of the cisgenesis, always having “a priori” information on the insert sequences and on the insertion region in the host genome.

* How could these challenges or limitations be overcome?

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* **5. What other experience can you share on the application of the GMO legislation, including experimental releases (such as field trials and clinical trials), concerning NGT-products in the:**

- [ ] **Agri-food sector?**
- [ ] **Industrial sector?**
- [x] **Medicinal sector?**

Medicinal sector

No field trials pursuant to part B of directive 2001/18/EC are in progress in Italy with NGT-products.
An experiment involving the contained use of genetically modified mosquitoes obtained with gene drive system is underway at the Innovation Hub of Genomics Genetics and Biology (Polo d’innovazione di Genomica Genetica e Biologia (Polo GGB di Terni) in Terni as part of the "Target Malaria" international project (https://www.pologgb.com/portfolio_page/target-malaria/).

* **6. Have plant varieties obtained by NGTs been registered in national catalogues?**

- ( ) Yes
- (•) No

* **7. Do you require specific information in national catalogue when registering plant varieties obtained by NGTs?**

- (•) Yes
- ( ) No

* Please specify

No. The registration procedure in the National Register of Plant Varieties and the application procedure for the authorization for the placing on the market of seed varieties in course of registration require the electronic compilation of a technical questionnaire by the breeder of the new variety. In this questionnaire, genealogy, morphological description, agronomic and qualitative characteristics, methods of obtaining, characteristics of differentiation from other similar known varieties must be reported. In the section dedicated to how to obtain the new variety the breeder must declare if the variety is to be considered a genetically modified organism as defined by article 2 of directive 2001/18/EC or if it is intended to be used as food falling within the scope of regulation (EC) no. 1829/2003. In both cases, the references of authorization decision for the placing on the market pursuant to directive 2001/18/EC or to regulation (EC) no. 1829/2003 must be reported.
(https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/13836;

https://www.crea.gov.it/web/difesa-e-certificazione/-/%20registration-al-registro-nazionale-di-nuov-variet%C3%A0)

To date, the Ministry of Agricultural, Food and Forestry Policies, Italian competent authority for registration in the National Register of varieties, has not received applications for registration of varieties to be considered genetically modified organisms.

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

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B - Information on research and innovation

* **8. Have you supported with national funding programmes NGT-related research projects/programs (ongoing or finalised in the last 5 years), including on identification or traceability?**

- (●) Yes
- ( ) No

* Please provide an overview of the project/program including title of project, a brief summary with scope and objectives, the amount of national funding received and possibly specify if the receiving entity is public or private

The BIOTECH project (Sustainable biotechnology for Italian agriculture), for which 21 million euros have been allocated, spread over three years (2018-2020), involving some public research bodies, led by CREA (Research Council in agriculture and the analysis of the agricultural economy). The project was divided into several transversal sub-projects, listed below:
• Citrus-Biotech.
• BioSOSfru (new generation biotechnological approaches to improve productivity, qualitative-nutritional aspects and sustainability of fruit species).
• CISGET (Cisgenesis and genome editing in tomato).
• QUALIMEC (improvement of the quality properties in aubergine and artichoke through genome editing and cisgenesis approaches).
• GEO (Genome editing to improve the resistance of Ocimum basilicum to Peronospora belbahrii).
• Wh-ITALY NBT (NBT- New Breeding Techniques) for the sustainable improvement of wheat.
• SusRice (Creation of a new ideotype of rice plant with improved resilience and sustainability through the insertion of characters that influence the adaptability of culture).
• VITECH (Biotechnology applied to the genetic improvement of the vine to increase the sustainability and competitiveness of the supply chain).
• GenOliCS (in vitro regeneration of olive cultivars for the use of second biotechnology).
• PIOPPINGENE (innovative genetic improvement of poplar clones for use in production chains).
Another project is ALISAL, improvement of the sanitation, health and functional properties of commodities for human and / or animal nutrition; project financed by the Ministry of Agricultural, Food and Forestry Policies. Period: 2010-2012, amount € 45,000.

The Italian Ministry for Economic Development Patent and Trademark Office (UIBM) did not directly support national funding programs, research projects and/or programs, related to NGT. However, the patent legislation provides that patent applications from research institutions / universities are exempt from paying

patent fees. Furthermore, economic incentives are periodically recognized for the economic enhancement of patents in terms of profitability, productivity and market development. These incentives, however, are intended to support the enhancement of patents in any technological sector and not only those relating to NGT.

* 8 bis. Please highlight the potential challenges encountered when supporting/funding NGT-related research and any consequences from these challenges.

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*** 9. How do you see NGT-related research evolving?**

As regards the deliberate release into the environment for experimental purposes of NGT-products, no particular research evolving is expected, unless the approval of the technical operational protocols for risk management (technical sheets that identify the characteristics of the species considered, the operating procedures and the measures to be adopted during the GMO experimental release aimed at the protection of agrobiodiversity, agricultural systems and the food supply chain) as required by the decree of the Ministry of Agriculture 19 January 2005 "Requirements for risk assessment for agrobiodiversity, agricultural systems and the agri-food supply chain, relating to the release of GMOs into the environment for any purpose other than placing on the market ", pursuant to article 8, paragraph 6, of the legislative decree of 8 July 2003, implementing directive 2001/18/EC. There may be experimental notifications for gene therapy with NGT-products.

At the moment there are no specific data on patenting of NGT-product. The UIBM of the Ministry of Economic Development makes general data on deposits in the biotechnology sector available on the thematic website www.uibm.gov.it/biotech.

*** 10. Have you identified any NGT-related research needs from private or public entities?**

- (●) Yes
- ( ) No

* Please specify which needs and how they could be addressed

No public body has represented needs related to NGT research, nevertheless we think that, where the EU and the Member States plan to apply provisions on traceability and labeling of NGT-products, the control system must have the necessary technical-scientific tools. This can only be achieved through a new season of research programs aimed at developing new methods for the molecular characterization of these products, as happened for "traditional" GMOs between the end of the 1990s and the first decade of this century.

*** 11. Could NGT-related research bring opportunities/benefits to science, to society and to the agri-food, medicinal or industrial sector?**

- ( ) Yes
- (●) No

* Please explain why not

At present we cannot provide concrete examples or data to support an affirmative answer or specific reasons to assert that research relating to NGTs may not bring opportunities or benefits. However, we believe to propose the following general considerations:
• as regards the medicinal sector, testing of gene therapies with NGTs seems to offer numerous possibilities for the treatment of genetic or degenerative diseases.
• as regards research in the agri-food sector, some specific sectors see these techniques as an additional opportunity for agri-food production but this position is not shared homogeneously by all the operators involved.

* **12. Could NGT-related research bring challenges/concerns to science, to society and to the agri-food, medicinal or industrial sector?**

- ○ Yes
- ◉ No

* Please explain why not

At present we cannot provide concrete examples or data to support an affirmative answer or specific reasons to assert that research relating to NGTs may not involve challenges or concerns. However, even for this question, we believe to propose some general considerations: probably in the medicinal or industrial sector there are signs of challenges rather than of concerns from the scientific world and from the society in general, because of the greater precision of these new techniques and, therefore, of the lower risk of unexpected effects. In the agri-food sector, however, as for "traditional" GMOs, there are major concerns from the society and the agri-food operators regarding the issue of loss of biodiversity and of the defense of the national agri-food assets. Furthermore, from an environmental safety point of view, major challenges can be foreseen for the environmental risk assessment. As highlighted in different frameworks, there are doubts and concerns if the assessment procedures and methodologies developed for GMOs are adequate and can be applied to organisms developed by NGTs.

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

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C - Information on public dialogues and national surveys

* **13. Have you or other institutions/bodies/entities organised national dialogues concerning NGTs?**

- ◉ Yes
- ○ No

* Please describe briefly the content, methodology and conclusions

a. The Ministry of the Environment and the Ministry for Agricultural, Food and Forestry Policies in collaboration with the National Committee for Biosafety, Biotechnology and Life Sciences, the Ministry of Health and the Ministry for Economic Development, have organized the workshop "Technical-scientific meeting on new breeding techniques in agriculture" in February 2018. The meeting was attended by representatives of central and regional administrations, from the scientific and academic world, from trade and environmental associations and representatives of civil society. The first session of the workshop was

aimed to present the new techniques, describing their characteristics, and to attempt a comparison between the products obtained with the new breeding techniques (NBTs) and those obtained through conventional breeding techniques and through classical genetic engineering techniques. Some relevant issues were then addressed, such as the use and regulation of NBTs in non-EU countries, their possible classification in the regulatory context on genetically modified organisms, the possibility of detection and traceability of NBT-products and their possible effects on human health and on the environment. The applications and perspectives of the NBTs in the research sector and their potential applications in agriculture were then taken into consideration. The second session was dedicated to the opinion of the stakeholders (National Association for the Development of Biotechnologies (ASSOBIOTECH), National Cerealists Association (ANACER), National Association of Zootechnical Food Producers (ASSALZO), Environmental Associations (Greenpeace and WWF), Consumer associations, Italian Seed Association (ASSOSEMENTI), National Confederation of Direct Growers (COLDIRETTI), General Confederation of Italian Agriculture (CONFAGRICOLTURA), Italian Federation of the Food Industry (FEDERALIMENTARE)) and to a debate on the perspectives for NBTs in the Italian agriculture.

b. In 2018 the Ministry of the Environment set up a study group on NBTs, in which the main Italian research bodies and institutions participated; the study group edited a "Study document on new breeding techniques".

c. A speech made by the Ministry of Agricultural, Food and Forestry Policies and by CREA (Research Council in agriculture and the analysis of the agricultural economy) during the Milan EXPO in 2015 entitled: "Agriculture of the future: which biotechnologies to use to guarantee food for everyone?"

*** 14. Have you or other institutions/bodies/entities organised national surveys, which assessed public opinion on NGTs?**

- (●) Yes
- ( ) No

* Please describe briefly the content, methodology and conclusions

With the aim of representing positions on new breeding techniques applied to the agriculture and of providing useful elements for an interpretation and legislative revision on the matter, the National Committee for Biosafety, Biotechnology and Life Sciences of the Presidency of the Council of Ministers conducted in 2017 a wide consultation with stakeholders identified among scientific associations, research bodies, trade associations and industrial associations.

Joined the consultation and provided their contribution: the Accademia dei Lincei, the Industrial Association of Meat and Salami (ASSICA), the Italian Seed Association (ASSOSEMENTI), the Italian Association of Agricultural Scientific Societies (AISSA), the National Cerealist Association (ANACER), the National Association for the Development of Biotechnology (ASSOBIOTEC), the National Association of Zootechnical Food Producers (ASSALZOO), the National Confederation of Direct Growers (COLDIRETTI), the National Research Council (CNR - Department of Bio Sciences-Agrofood), the Council for Agricultural Research and Agricultural Economy Analysis (CREA), the Italian Federation of the Food Industry (FEDERALIMENTARE), the Italian Federation of Life Sciences (FISV), the Italian Society of Plant Biology (SIBV), the Italian Society of Agricultural Genetics (SIGA), the National Union of Sugar Industrialists (UNIONZUCCHERO) and the National Union of Academies for Sciences Applied to the Development of Agriculture (UNASA).

During the consultation questions were asked on five topics:
1. The regulation of plant varieties produced through New Breeding Techniques (NBTs).
2. The traceability of the plant varieties produced by NBTs.
3. Imports and cultivation of plant varieties produced through NBTs.

4. The interest of Italian agriculture for the NBTs.
5. Benefits and risks of the NBTs.

The consultation allowed the Committee to gather the positions of the world of research and of a plurality of stakeholders in the agri-food chain. These positions and recommendations were summarized by the Committee as follows: (i) Many genome editing products could be obtained by conventional breeding techniques, by classical genetic engineering techniques or by spontaneous mutation. The main difference between these approaches concerns the greater precision of the new techniques and, therefore, the lower risk of unexpected effects. (ii) At the current state of scientific knowledge it can be stated that the risks associated with the main applications of NBTs are similar to those deriving from conventional techniques and they are therefore to be considered acceptable in the light of current legislation. (iii) The unanimous recommendation of the scientific world and almost unanimous of the other stakeholders is to examine the plant varieties, including those obtained through NBT and in particular with genome editing, based on the characteristics of the product and not according to the method used for obtaining. Examining the production method is irrelevant to food or environmental safety. (iv) In light of the rapid evolution and use of NBT technologies, directive 2001/18/EC is inadequate and should be widely reviewed on the basis of new knowledge acquired, making it purely product-oriented. Strong action is expected in order to reduce the revision times of this legislation to a minimum but, in the meantime, the directive 2001/18/EC has not to be applied to genome editing products, when the changes are completely similar to those obtained by conventional techniques or by spontaneous mutation. If this does not happen, several problems are foreseeable for the agri-food system: many vegetable products will be indistinguishable from those obtained with other methods, especially in the absence of information from the breeder, with consequent detection difficulties; it will be necessary to establish controls on imports with an increase in costs, less reliable inspections and probable disputes; increase the risk of worsening the raw material supply capacity of the agri-food chain; most companies that produce seeds or propagate plant varieties will not be able to compete with their foreign counterparts; obstacles to public and private research will increase. (v) Environmental and economic benefits are foreseeable following the cultivation of varieties produced by NBT, with particular reference to resistance to microbial diseases. Given the low cost, the NBT are accessible to many research bodies and development agencies, public and private, and are transferable to most of the typical crops of the national territory.

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

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D Information on ethical aspects

* **15. Have any national bodies or expert groups discussed or issued opinion on the ethical aspects of NGTs?**

- ○ Yes
- ◉ No

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

The maximum file size is 1 MB

E - Information on opportunities and benefits from the use of NGTs and NGT-products

* **16. Could the use of NGTs and NGT-products bring opportunities/benefits to the agri-food, medicinal or industrial sector?**

- ○ Yes
- ◉ No

* Please explain why not

No, because the answer to this question implies an in-depth analysis on the opportunities/benefits for the different economic sectors from the use of NGTs and NGT-products that cannot be done at the level of the single Member State.

* **17. Could the use of NGTs and NGT-products bring opportunities/benefits to society in general, such as for the environment, human, animal and plant health, consumers, animal welfare, as well as social and economic benefits, in the short, medium and long term?**

- ○ Yes
- ◉ No

* Please explain why not

No, because the answer to this question implies an in-depth analysis on the socio-economic impacts and on the potential effects on the environment and on human and animal health of the NGTs and NGT-products that cannot be done at the level of the single Member State.

* **18. Do you see particular opportunities for SMEs on the market access to NGTs?**

- ◉ Yes
- ○ No

* Please explain under which conditions

Yes, if patent protection is requested.

* **19. Do you see benefits/opportunities in patenting or accessing patented NGTs or NGT-products?**

- ◉ Yes
- ○ No

* Please describe and provide concrete examples/data

Yes. Patent protection and the resulting benefits can stimulate further research in the sector.

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

The maximum file size is 1 MB

F - Information on potential challenges and concerns of NGT products

* **20. Could the use of NGTs and NGT-products raise challenges/concerns for the agri-food, medicinal or industrial sector?**

- ○ Yes
- ◉ No

* Please explain why not

At present we cannot provide concrete examples or data to support an affirmative answer or specific reasons to assert that the use of NGTs could raise problems/concerns for the agri-food, medicinal or industrial sector.

* **21. Could the use of NGTs and NGT-products raise challenges/concerns society in general, such as for the environment, human, animal and plant health, consumers, animal welfare, as well as social and economic challenges, in the short, medium and long term?**

- ○ Yes
- ◉ No

* Please explain why not

At present we cannot provide examples, concrete data, conditions to support an affirmative answer or reasons to support a negative answer to the question.

From an environmental safety point of view, major challenges can be foreseen for the environmental risk assessment. As highlighted in different frameworks, there are doubts and concerns if the assessment procedures and methodologies developed for GMOs are adequate and can be applied to NGT-products. Several challenges can be foreseen also with respect to environmental monitoring, as environmental monitoring is strongly related to the development of detection/identification methods and of traceability strategies.

* **22. Do you see particular challenges for SMEs on market access to NGTs?**

- ○ Yes
- ◉ No

* Please explain why not

At present we cannot explain under which conditions we see particular challenges for SMEs on market access to NGTs or explain reasons to support a negative answer to the question.

* **23. Do you see challenges/concerns in patenting or accessing patented NGTs or NGT-products?**

- ◉ Yes
- ○ No

* Please describe and provide concrete examples/data

No, at present we cannot provide concrete examples/data to support an affirmative answer or explain reasons to support a negative answer to the question.

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

The maximum file size is 1 MB

G - Final question

* **24. Do you have other comments you would like to make?**

- ○ Yes
- ◉ No

Please upload any supporting documentation for this section here. For each document, please indicate which question it is complementing

The maximum file size is 1 MB

Contact

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