

## **CIRCULAR FROM THE MINISTER FOR PRODUCTION ACTIVITIES**

### **concerning "national indicative targets for the consumption of electricity produced from renewable energy sources over the period 2003-2012 and measures taken or planned at national level to achieve those targets", in accordance with Article 3(2) of Directive 2001/77/EC**

#### **1. Introduction**

Article 3(2) of Directive 2001/77/EC of the European Parliament and of the Council of 27 September 2001 on the promotion of electricity produced from renewable energy sources in the internal electricity market stipulates that, not later than 27 October 2002 and every five years thereafter, Member States must adopt and publish a report setting national indicative targets for future consumption of electricity produced from renewable energy sources in terms of a percentage of electricity consumption for the next 10 years. The report must also outline the measures taken or planned, at national level, to achieve these national indicative targets. The Directive also indicates that, in setting these targets until the year 2010,<sup>1</sup> the Member States must:

- (a) take account of the reference values set out in the Annex to the Directive;
- (b) ensure that the targets are compatible with any national commitments accepted in the context of the climate change commitments accepted by the Community pursuant to the Kyoto Protocol to the United Nations Framework Convention on Climate Change.

It should be borne in mind that the Directive defines "consumption of electricity" as meaning national electricity production, including autoproduction, plus imports, minus exports.

#### **2. National indicative targets**

When Directive 2001/77/EC was being put together, the Community indicative target for increasing the consumption of electricity produced from renewable sources by 2010, and thus the reference values for each Member State, as set out in the Annex, were

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<sup>1</sup> For the sake of consistency with the Directive and with other national instruments, this document will sometimes refer to 2010 and sometimes to the period 2008-2012. This is because, on the one hand, the Directive provides for targets to be set for the "next 10 years", while also referring to 2010 as the timeframe for taking account of national commitments to reduce greenhouse gas emissions. The Kyoto Protocol, however, sets targets to be achieved by the period 2008-2012.

determined with reference to the Commission's White Paper on renewable energy sources.<sup>2</sup>

The White Paper noted that "the role of Member States in implementing the [Community White Paper] action plan is considered crucial. They must decide upon their specific goals within the area of a more general framework and develop proper national strategies for achieving them." Italy followed these recommendations by producing its own White Paper for the Valorisation of Renewable Energy Sources, as approved by Decision No 126 of 6 August 1999 of the Interdepartmental Committee for Economic Planning (CIPE).

The compatibility of this with Italy's national commitments accepted in the context of the climate change commitments accepted by the Community pursuant to the Kyoto Protocol is examined below in the light both of the progress of international negotiations on implementation of the Protocol and of the relevant measures taken in Italy.

Law No 120 of 1 June 2002 on "ratification and implementation of the Kyoto Protocol to the United Nations Framework Convention on Climate Change done in Kyoto on 11 December 1997" stipulated *inter alia* that, with a view to formulating national policies and measures to achieve the emission reduction targets at least cost, a national action plan for reducing greenhouse gas emissions and increasing their absorption was to be submitted to the CIPE, along with a report on the implementation of, and a proposal for the review of, CIPE Decision No 137/98 (guidelines for national policies and measures to reduce greenhouse gas emissions), identifying policies and measures to:

- 1) achieve optimum emission reduction results by making the national economic system more energy-efficient and through greater use of renewable energy sources;
- 2) increase the absorption of greenhouse gases by means of land use activities, land use change and forestry activities, in accordance with Article 3(3) and (4) of the Kyoto Protocol;
- 3) make full use of the flexible mechanisms of joint implementation and clean development introduced by the Kyoto Protocol;
- 4) speed up research and experimentation on introducing hydrogen as a fuel for national energy and transport systems and on building plants to produce energy from biomass, plants to exploit thermal solar energy, wind-power and photovoltaic plants to produce energy and plants to produce energy from fuel derived from solid municipal waste and biogas.

In December 2002 the CIPE did indeed approve a Decision on "reviewing the guidelines for national policies and measures to reduce greenhouse gas emissions (Law No 120/02)". This Decision provides that the contribution made by national production of electricity from renewable energy sources towards reducing greenhouse gas emissions should rise to 75 TWh by the period 2008-2012, thus substantially reconfirming the targets set earlier in the White Paper.

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<sup>2</sup> COM(97) 599 of 26 November 1997: Energy for the future: Renewable sources of energy – White Paper for a Community strategy and action plan.

*It follows that the indicative targets set out in the Italian White Paper are compatible with the national commitments accepted in the context of the climate change commitments accepted by the Community pursuant to the Kyoto Protocol to the United Nations Framework Convention on Climate Change, as required by the Directive (see point b in the Introduction).*

The Italian White Paper sets indicative targets for the development of each energy source for 2002, 2006 and 2008-2012. The electricity sector targets, expressed as power and as electrical energy, are given in Table I. For the sake of completeness, Table I also gives the consumption figures for 1997 (the base year in the White Paper) and for 2001.<sup>3</sup> It should be noted that the item "Biomass, biogas and waste" includes a forecast contribution from waste, including the non-biodegradable fraction, estimated at 4 TWh in 2008-2012.

	1997	1997	2001	2001	2002	2002	2006	2006	2008/12	2008/12
<b>Source/technology</b>	<b>MWe</b>	<b>TWh</b>	<b>MWe</b>	<b>TWh</b>	<b>MWe</b>	<b>TWh</b>	<b>MWe</b>	<b>TWh</b>	<b>MWe</b>	<b>TWh</b>
Hydro > 10 MW	13942	33.47	14493	38.15	14300	34.32	14500	34.8	15000	36
Hydro ≤ 10 MW	2187	8.12	2233	8.66	2400	8.88	2600	9.62	3000	11.1
Geothermal	559	3.9	573	4.5	650	4.78	700	5.14	800	5.9
Wind	119	0.12	664	1.18	700	1.4	1400	2.8	2500	5
Solar	16	0.01	16	0.01	25	0.03	100	0.11	300	0.3
Biomass, biogas and waste	281	0.82	740	2.58	730	4.03	1300	7.3	3100	17.8
<b>Total</b>	<b>17104</b>	<b>46.44</b>	<b>18719</b>	<b>55.08</b>	<b>18805</b>	<b>53.44</b>	<b>20600</b>	<b>59.77</b>	<b>24700</b>	<b>76.1</b>

Table I – Current status of electricity generation from renewables, and forecast development up to 2008-2012

In respect of the foregoing, certain assumptions need to be made regarding the trend in gross national consumption in order to assess the indicative targets in the manner stipulated by the Directive, i.e. in terms of "consumption of electricity from renewables as a percentage of gross national consumption". In addition, account needs to be taken of consumption of imported electricity from renewable sources.

In 2001, Italy's gross national electricity requirement (final consumption + losses) was 305 TWh. It is assumed that this will grow by an average of 2% a year, as shown in Table II below.<sup>4</sup> Similarly, it is assumed that national production of electricity from renewable sources will rise to 76 TWh in 2012. This trend, also shown in Table II, is based on measures already in force and measures still at the planning stage. These are discussed below.

With regard to the contribution of imported electricity produced from renewable sources, certain components of existing measures need to be anticipated. These are considered in greater detail below.

Article 11 of Legislative Decree No 79/99 stipulates that, as of 2002, producers and importers of electricity produced from non-renewable sources must feed into the electricity grid a minimum quota of electricity produced by plants which use renewable sources and which came into operation after 1 April 1999 (the date on which Legislative

<sup>3</sup> N.B. The forecast figures for hydroelectric refer to a standard water year.

<sup>4</sup> Assumption taken from the CIPE Decision on "reviewing the guidelines for national policies and measures to reduce greenhouse gas emissions (Law No 120/02)".

Decree No 79/99 entered into force). This quota, calculated on the basis of production and imports in the previous year, was initially set at 2%. The rules imposing the minimum quota were enacted by Ministerial Decree of 11 November 1999, which also introduced "green certificates"; certain additions were made by Ministerial Decree of 18 March 2002.

Amongst other things, the latter Ministerial Decree establishes the arrangements whereby importers of electricity may apply for exemption from the minimum quota of imported electricity produced from renewable sources. Applications must be accompanied by the following documents:

- a) a statement by the foreign operator indicating the quantity of electricity sold and identifying the production plant;
- b) a statement issued by the grid system manager of the country in which the production plant is located, attesting to the fact that the electricity has been produced from renewable sources and identifying the production plant. Where the foreign manager is also the owner of the production plant, the statement must be submitted by the authority designated in accordance with Article 20(3) of Directive 96/92/EC or an equivalent public body.

For the year 2001, the documents specified in point b) are sufficient.

Under these rules, the national transmission system manager (hereinafter the "System Manager") has received documents certifying, in respect of 2001, imports of electricity produced from renewable sources totalling 21.4 TWh, on the basis of contracts which do not enable any firm statement to be made regarding what proportion of such imports will continue to be produced from renewable sources over the next ten years. It is not currently possible, therefore, to predict accurately what proportion of imported electricity over the next ten years will come from plants which use renewable sources. Overall electricity imports are certainly forecast to rise, from 49 TWh in 2001 to around 60 TWh over the next ten years. However, it is cautiously assumed that only around 50% of current imports from renewable sources will continue to come from such sources, providing a constant contribution of around 12 TWh throughout the period.

On the basis of these assumptions, the annual indicative targets for consumption of electricity from renewables for the ten-year period 2003-2012, expressed as a percentage of gross consumption, are given in Table II.

*These indicative targets are consistent with what is stipulated in the Annex to the Directive, which means the provision of the Directive corresponding to point a) in the Introduction above has also been complied with.*

Should the assumptions which underlie these targets prove incorrect, we would refer to footnote 1 to the Annex to the Directive, which indicates that "Italy states that 22% would be a realistic figure, on the assumption that in 2010 gross national electricity consumption will be 340 TWh. When taking into account the reference values set out in this Annex, Italy has assumed that gross national electricity production from renewable energy sources will attain up to 76 TWh in 2010. This figure includes the contribution of the non-biodegradable fraction of municipal and industrial waste used in compliance with Community legislation on waste management. In this respect, the capability to reach

the indicative target as referred to in this Annex, is contingent, *inter alia*, upon the effective level of the national demand for electric energy in 2010."<sup>5</sup>

The indicative nature of the targets referred to above must be stressed, particularly given a number of uncertainties regarding Italy's potential actually to exploit certain sources. We refer in particular to biomass. According to the Commission White Paper of 1997, biomass should supply 230 Mtoe by 2010. The Italian White Paper sets biomass, biogas and waste an electricity production target of 17.8 TWh in 2008-2012, of which 8 TWh from biomass. Experience is showing how difficult it is to meet the aforementioned targets. By way of example, the following data relate to a plant of around 20 MW net electrical power, built using the technology currently available and operating in a typical agricultural area in Italy.

- Expected production: 0.14 TWh;
- Annual biomass requirement: 200 000 t;
- Land area to be given over to production and harvesting of biomass (assuming a mixed input of dedicated crops and waste): 80 000 hectares;
- Transport of biomass: 15 semi-trailers, each carrying 200 tonnes three times a day, 220 days a year;
- Area directly occupied by the plant, including biomass processing and storage sections and safety/security systems: around 22 hectares.

These are large figures, and they point to the need to create sufficient production chains to meet the aforementioned targets. This in turn requires an effort to be made to organise the agro-forestry sector, which is very considerable in Italy and is characterised by highly fragmented land ownership. This effort could produce the significant results suggested above after a minimum of ten years.

Year	Gross consumption of electricity (TWh)	National production from renewable sources (TWh)	Imports from renewable sources (TWh)	Consumption of electricity from renewables (% of gross consumption)
2003	317	55	12	21.1
2004	324	56	12	21.0
2005	330	57	12	21.0
2006	337	59	12	21.1
2007	343	61.5	12	21.4
2008	350	63.5	12	21.6
2009	357	66.5	12	22.0
2010	364	70	12	22.5
2011	372	73	12	22.8
2012	379	76	12	23.2

Table II – Indicative targets for consumption of electricity from renewable sources for the ten-year period 2003-2012

<sup>5</sup> N.B. 2001 is the first year for which certification of the 'renewable origin' of imported electricity is available, which means the latter's potential contribution was still unknown when the Directive was being drawn up.

It must be noted, however, that our ability to meet these indicative targets depends not only on the problems referred to above but also on how Italy's gross national consumption of electricity actually develops. The figures given for this parameter in the Table are no more than estimates, used purely in order to calculate the targets for consumption of electricity from renewable sources as prescribed by the Directive.

It must also be borne in mind that production of electricity from hydroelectric and wind-power sources depends on climate conditions, a circumstance which could result in appreciable differences between the figures given above and the actual annual values.

### **3. Measures taken or planned**

#### ***3.1 Measures taken: economic incentives and how they operate***

Initiatives to inject new momentum into the development of renewable sources in Italy date back to the early 1980s, with the introduction of the 1981 Energy Plan and Law No 382/82. Initiatives with greater impact resulted from the implementation of the 1988 Energy Plan, from Laws No 9/91 and No 10/91 and, above all, from the related measure Cip 6/92, which lent considerable impetus to the development of renewables: renewable-source plants of a total estimated power of around 2500 MW have already been built or are in the process of being built as a result of that instrument. However, implementation of the measure also revealed serious limitations, leading to incentives only being awarded for initiatives proposed by 30 June 1995.

A new instrument to encourage electricity production from renewable sources was introduced by Legislative Decree No 79/99 transposing the European Directive on the internal market in electricity, and by various implementing provisions. The Legislative Decree ushered in a major restructuring of the electricity sector, based on the principles of competition and the free market, in accordance with energy policy guidelines.

Consistently with this, a measure based on market criteria was introduced to encourage the use of renewable sources: it consists in an obligation, starting in 2002, for major producers and importers of electricity produced from non-renewable sources to supply the electricity grid with a minimum quota of electricity produced by plants which use renewable sources and which started operating after 1 April 1999 (the date on which Legislative Decree No 79/99 entered into force). The quota is calculated on the basis of production and imports in the previous year, net of co-generation output, internal power plant consumption and exports, with an "excess" of 100 GWh. The quota was initially set at 2%, but is due to increase in future. The rules imposing the minimum quota were enacted by Ministerial Decree of 11 November 1999, which also introduced green certificates. Certain changes and amendments were made by Ministerial Decree of 18 March 2002. There follows a description of the way the new incentive mechanism operates, which, as stated, applies to plants which started operating after 1 April 1999.

Generated electricity is fed into the grid and enters the electricity market, where it is given precedence in dispatching.<sup>6</sup> In addition, the System Manager, upon request and

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<sup>6</sup> Anticipating the launch of the electricity market, in which renewable sources are granted precedence in dispatching, the System Manager introduced a market regulation and dispatching rules: the former stipulates the arrangements for precedence in dispatching and governs the functioning of green

following corroboration that the plant is a "plant using renewable sources", issues the producer with green certificates, which are the means by which entities subject to the minimum quota obligation have to prove their compliance with that obligation. Green certificates can be traded in a parallel market independent of the electricity market, either through the special trading facility set up by the company which manages the market or through trading among the entities which hold the certificates and the producers and importers subject to the obligation. To provide operators with information to help them assess the possible selling price of their green certificates, it has been established that Cip 6/92 plants which entered into service after 1 April 1999 are entitled to green certificates: however, the certificates are the property of the System Manager, which places them on the market at a fixed price, based on the difference between the cost of acquiring the electricity in question (with recognition also of the incentive quota of the Cip 6/92 rates) and the proceeds from the sale of that electricity.

For entities which fail to meet their obligations, penalties have been set which consist in restricting their access to the electricity market as a whole.

The transparency of the system is ensured by periodic communications from the System Manager, which publicises the available data on the level of demand for green certificates (corresponding to the minimum quota) and of supply, both of green certificates for non-Cip 6/92 plants and of green certificates in its possession: for the latter, the anticipated market selling price is also made known.

Since one of the purposes of the mechanism is to achieve the minimum quota objective at the lowest cost to electricity consumers, there is competition not just among operators, but also among the various renewable source technologies: it is expected, therefore, that plants will be built using the technologies closest to being competitive. However, a number of instruments are operating which support the more costly technologies: these include capital incentive programmes in various regions, as well as certain government initiatives such as the one supporting the development of photovoltaic energy incorporated into building structures.

For its part, the System Manager has taken steps to put everything in place to ensure the mechanism functions properly. In addition to the abovementioned periodic communications on the demand, supply and selling price of its green certificates, the System Manager has established the procedure for the prior qualification of plants as plants using renewable sources. The procedure covers the designation of plants already in operation, plants not yet in operation and thermoelectric plants carrying out co-combustion of non-renewable fuels and fuels derived from renewable sources.

The System Manager has also established the procedures for issuing green certificates, both for plants already in operation – on the basis of the production recorded the previous year – and for plants not yet in operation: in this latter case, the producer, in addition to supplying reliable data on anticipated production, is required to show that he holds the requisite permits for building the plant and to provide the System Manager with guarantees in terms of energy, relating to the production of other qualified plants already in operation, or in economic terms, in proportion to the cost of an equal amount of green certificates.

In both cases, there are mechanisms for compensation should actual energy production be different from what the issue of green certificates was based on.

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certificates; the latter deal *inter alia* with certain exemptions in favour of plants which use renewable sources, especially where they are not programmable.

Regarding the operation of the green certificates market, the System Manager uses a dedicated computer system to track the issue of green certificates and transactions involving them. The number of green certificates held by each operator is memorised in that operator's "*property account*", an "electronic portfolio" kept in the System Manager's computer system. Each *property account* is given a specific identification code. *Property accounts* are activated by the System Manager: a) for producers which operate qualified plants, when the green certificates are first issued, b) for producers subject to the obligation, upon reception of the self-certification regarding the production and importation of energy from non-renewable sources, and c) to entities which intend to trade in green certificates, upon the request of the operators themselves.

### ***3.2 Measures taken: establishing who is responsible for what***

The main regulatory issues, which are also covered by the Directive, relate to authorisation procedures and connection to the electricity grid.

Regarding the authorisation procedures, one factor is the diffuse nature of renewable sources and the fact that the plants in question, which are of small scale, have necessarily to be spread across the whole country. In the context of a more general process of decentralisation, this has meant entrusting a large number of administrative functions to the regional and local authorities for granting permits to build such plants.

Law No 10/91 already established that the use of renewable energy sources is considered to be of public interest and public utility, and related works are deemed to be non-deferrable and urgent under the laws on public works.

Law No 9/91, meanwhile, provided that the production of electricity from renewable sources be liberalised and that entities which intended to build such plants should simply notify the fact (though they still had to obtain building consent and environmental permits).

The Decree of the President of the Republic of 12 April 1996, supplemented by the Prime Ministerial Decree of 3 September 1999, required the Regions to establish whether, by virtue of their characteristics and on the basis of fixed evaluation criteria, certain types of plant involving renewable sources (e.g. thermal plants to produce steam and hot water with an overall thermal capacity of more than 50 MW, wind-power plants, non-thermal industrial plants to produce energy, steam and hot water, diversions and related works involving surface water diversions of more than 200 litres per second or groundwater diversions of more than 50 litres per second) need to be made subject to an environmental impact assessment. However, such assessment is always carried out where a facility is located, even partially, within a protected natural area.

The Regions have adopted measures implementing these Decrees, in some cases providing for environmental impact assessment to be carried out and in others for a simplified procedure referred to as screening.

Legislative Decree No 112/98 introduced a more complex distribution of powers between State, Regions and local authorities. As a result, the State is responsible for formulating and establishing the objectives and broad lines of national energy policy and for adopting measures to guide and coordinate energy programming at regional level. The Regions have been given administrative functions in respect of energy, including in relation to renewable sources. Local authorities have been given administrative functions in monitoring energy saving and the rational use of energy, plus the other functions provided for under regional legislation. In particular, the provinces have, following the guidance and coordination laid down in the regional energy plans, been entrusted with

devising and adopting action programmes to promote renewable sources and energy saving.

Constitutional Law No 3/01 subsequently upgraded the role played by the Regions in the production, transport and national distribution of energy, establishing that these matters are covered by concurrent legislation, i.e. that legislative power lies with the Regions, except for the establishment of the basic principles, which remains a legislative task for the State.

In this regard, the Italian Council of Ministers recently approved a draft law reforming and reorganising the energy sector, specifying more clearly the terms established by the aforementioned Constitutional Law. The draft law, which is currently before the Italian Parliament, also contains important provisions on renewable sources; being a measure not yet in force, it is referred to in the section on planned measures.

### ***3.3 Measures taken: connection to the grid***

Article 3 of Legislative Decree No 79/99 stipulates that the System Manager, which is responsible for managing the transmission grid, must connect all entities which so request to the grid, without compromising continuity of service and on condition that the necessary technical rules and the technical and economic conditions for access and interconnection laid down by the Electricity and Gas Authority are observed. Article 9 of the Legislative Decree places a similar obligation on distribution companies.

Pursuant to the Legislative Decree, the Electricity and Gas Authority issued Decision No 50/02 on "Conditions for granting connection to electricity grid systems with nominal voltage of more than 1 kV whose managers have an obligation to connect third parties".<sup>7</sup> This Decision initiated a process of redefining the rules for connecting users and facilities to the grid system. More specifically, the Decision provides that, within a set period, grid system managers must publish the detailed arrangements and contractual conditions for granting the connection service, establishing *inter alia* which parts of the connection facilities are to be considered as falling within the competence of the entity which is being connected and which are to be considered as falling within the competence of the grid system manager: for some types of the latter, provision is made for the conditions to be specified later, as the relevant works may be carried out directly by the entity requesting the connection. In any event, the cost of connection to the grid is borne by the requesting entity.

### ***3.4 Measures planned***

The current Parliament and Government have indicated their intention to provide realistic support for renewable sources, through the following main measures:

#### **A. Article 39 of Law No 39/02 (Community Law 2001)**

With this Law, the Government is delegated to issue one or more legislative decrees by September 2003 to implement Directive 2001/77/EC, in line with the following guiding principles and criteria:

a) setting indicative targets for the future consumption of electricity from renewable

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<sup>7</sup> In an earlier Decision (No 224/00), the Electricity and Gas Authority also stipulated the technical and economic conditions for the service of trading electricity produced from photovoltaic facilities with a nominal power not exceeding 20 kW.

energy sources on the basis of realistic forecasts which are economically compatible with the country's development;

b) making provision for the targets referred to at a) to be achieved through the production of electricity by plants located on Italian territory or through the importation of electricity from renewable sources exclusively from countries which adopt instruments to promote and encourage renewable sources similar to those which exist in Italy and which allow the same option in respect of plants located on Italian territory;

c) ensuring that support schemes are compatible with the principles of the electricity market and are based on mechanisms which favour competition and cost reduction;

d) simplifying the administrative procedures for building plants, while respecting the respective powers of the State, the Regions and local authorities;

e) including waste (including the non-biodegradable fraction) among the energy sources eligible under the renewable sources scheme;

f) making provision for application of the provisions of Article 43 not to give rise to new or greater burdens, or reduced revenue in the State budget.

B. The Economic and Financial Programming Document for 2003-2006 stipulates that "the objective of creating an adequate safety margin between the supply of and demand for electricity will be pursued, *as regards the diversification of sources, by developing the use of renewable sources...*"

C. Law No 120/02, referred to above, ratifying and implementing the Kyoto Protocol stipulates *inter alia* that, with a view to formulating national policies and measures to achieve emission reduction objectives at least cost, the review of CIPE Decision No 137/98 must provide for *greater use of renewable energy sources, including the construction of plants to produce energy from biomass, wind-power and photovoltaic plants to produce energy and plants to produce energy from fuel derived from solid municipal waste and biogas*. Reference has been made above to the contents of the CIPE Decision with regard to the production of electricity from renewable sources.

D. The draft law reforming and reorganising the energy sector recently approved by the Italian Council of Ministers indicates one general objective of energy policy to be *increased use of renewable sources*, ensuring the balanced use of each of these and giving preference to those with the least environmental impact. Pursuant to the provisions of Title V of the Constitution, as amended by Constitutional Law No 3/01, the administrative tasks and functions performed by the State are specified for the energy sector. In particular, provision is made for the State to be responsible for setting the minimum national objectives for renewable sources and energy saving and for quantifying the minimum quota of electricity from renewable sources. The draft law also includes a specific article for the promotion of electricity from renewable sources: this provides that, as of 2005 and up to 2012, the minimum quota of electricity produced by plants using renewable sources which, pursuant to Legislative Decree No 79/99, must be fed into the national electricity grid in the course of the following year is to increase by 0.35 percentage points each year, in accordance with the protection stipulated by Article 9 of the Italian Constitution. In addition, financial penalties are introduced for non-compliance, equal to 1.5 times the sum needed to acquire green certificates in quantities equal to the size of the non-compliance. It is estimated that, as a result of the provisions on the increase of the minimum quota alone, national production of electricity from renewable sources should rise to around 70 TWh (including the contribution from waste) by 2012.

The Minister for Production Activities

Rome,

*This circular will be published in the bulletin of the Ministry of Production Activities*