



ori**G**In



Study on the protection of geographical indications for products other than wines, spirits, agricultural or foodstuffs tendered by DG Trade

Draft Outline of the study

Table of contents

Results of the identification phase	page 3
Proposed list of priority products to be studied in depth in the 2nd phase	page 8
• A list for EU products	page 9
• A list for non EU products	page 11
• B list for EU products	page 12
• B list for non EU products	page 13
• Our proposed list of case studies EU products	page 14
• Our proposed list of case studies non EU products	page 15
Proposed methodology for the next phase	page 16
Draft table of content of the final study	page 20

Results of the identification phase

Reminder: the aim of the first phase of the study is to identify the most significant non-agricultural products from the EU as well as from relevant third countries (mainly Brazil, China, India, Russia and Switzerland) protected at national level in order to propose a comprehensive list of products to the European Commission.

You will find hereinafter a report concerning the work that has been carried out by the experts to fulfill the first phase of the study, including the challenges they have faced, as well as the method we have adopted to process the information received.

a. How has the information been obtained?

As explained in our proposal, our 17 local experts covering 21 Member States and 13 third countries have been, for the past month, active researching information to identify as many non agricultural GI products as possible. They have performed this task via desk research (databases, publications and studies) and by contacting via phone calls and e-mails producers and/or local authorities and/or intellectual property organizations in their respective countries.

b. What have been the main challenges in identifying the economically most significant registered non agricultural GIs?

Our experts in the various countries identified nearly 400 non agricultural GI products. However, considering the very short timeframe allocated to this task (1 month) and the limited budget available, our experts encountered several problems in gathering detailed information on each of the identified product. In some countries, there are a lot of products registered, e.g. in India 79 non agricultural GI products are protected. We also found a lot of geographical indications protected by bilateral agreements such as between Austria and Spain or France and Switzerland. In light of this, we decided to focus on the products considered as the most important/relevant by our local experts.

The gathering of economic data has proved very difficult for a number of reasons. In many cases, such as for lace making, it is largely amateur pursuits' activity and data are not collected. We also met with the opposition of private companies and owners of collective trademarks who are not ready to share economic information that they consider to be confidential. Finally, it would appear that in several countries a large majority of these products are sold at fairs and producers are not willing to disclose any sales information due to taxation issues!

All identified products (even the ones for which we found limited information) are included in the database in annex I (Non-agricultural GIs from EU member States) and II (Non-agricultural GIs from third countries).

Finally, it should be mentioned that in the Baltic countries, our local expert identified several products but none are currently registered.

c. How has the information been processed?

The experts reported the information collected to the team leader which reviewed the data. The information was put on a database by the junior consultant – Fanny Lossy. Some experts were asked to gather additional information.

1 – Fiches:

A fiche has been established for each product identified. It includes information in particular on the country, the product identified, the geographical origin, the legal protection and the economic significance of the product.

In some case, considering the very large number of products identified, a detailed fiche has been prepared only for the economically most significant products. The other products have been listed in a separate document with limited information on their legal protection and economic value.

The fiches have not been included in this report but are available upon request.

2 – Database:

All the information gathered has been put in a database which contains two parts:

- one relating to the EU
- one to third countries

The database which is sub-divided by countries includes a reader-friendly and comprehensive presentation of the information provided by the experts (see below).

In each country, the products identified are listed in an alphabetical order, except for the Indian products. For India, we have put the products in the chronological order of registration in order to highlight the success of the Indian sui generis system.

After an accurate analysis, we decided to highlight the most important products in the database to make it more user-friendly:

- in yellow: products of the A lists
- in blue: products of the B lists.

d. Results of the screening process in numbers

We have included in the database most of the products that have been identified by our experts (we have excluded the ones that either did not meet the GI definition or fell outside of the non-agricultural products' scope). In some countries, products are not registered (e.g. in the Baltic States) or are in the process of being registered locally (e.g. some Portuguese products). We have kept these products in the database as we felt it could be of interest to the European Commission to know of the existence of these products.

Our 17 experts have identified 397 non agricultural GI products in 28 countries.

EU Member States: 248 products in 21 Member States:

➤ Austria: 62 products

Our expert has identified a large number of products that are protected through bilateral agreements between Austria and Czechoslovakia, France, Greece, Hungary, Italy and Spain in the 1970s. There are a lot of question marks as to the effective present production of many of these products or as to the effective use of the geographical denominations. Most of these Austrian GIs are related to one single firm, which may enjoy a registered TM (but, in some cases, it is used also for products not coming from the designated area).

Three economically most significant non agricultural GI products have been analyzed in more details.

➤ Belgium: 2 products

Our expert has identified only two non agricultural GI products that are protected.

➤ Bulgaria: 13

Our expert has identified 13 non agricultural GI products that are protected, including at the international level (Lisbon Agreement). However, following the end of the communist regime, it seems that most of these products are no longer produced. Only two products could be of interest for the study.

➤ Czech Republic: 17 products

Our expert has identified 17 products some of which have a significant economic importance to the local economy.

➤ Estonia: 1 (non registered) product

Our expert has not been able to identify a registered non agricultural GI product but has informed us of the existence of a non registered one.

➤ France: 13 products

Our expert has identified 13 products. However, many of them are of very limited economic importance. Only a handful of them are of interest for the next phase of the study.

➤ Germany: 11 products

Our expert has identified 11 products. He has provided us with detailed information on 8 which are of economic significance for the local economy. However, some of these 8 are not protected and one – music instruments from Vogtland - covers many products that are covered by several private trademarks.

➤ Hungary: 7 products

Our expert has identified 7 products. We have limited economic data.

➤ Ireland: no product

Our expert has not been able to identify non agricultural GI products that are registered. Several products do bear the name of a region or a place in Ireland but the production of these goods is no longer linked only to these areas.

➤ **Italy: 39 products**

Our expert has identified a large number of products. They are in general protected by trademark law after a decision taken by local authorities and/or companies. We have received a limited number of data but it is clear that some products are of significant economic importance.

➤ **Latvia: 10 (non registered) product**

Our expert has not been able to identify registered non agricultural GI products but has informed us of the existence of several products that could qualify as a GI.

➤ **Lithuania: 1 (non registered) product**

Our expert has not been able to identify a registered GI non agricultural product but has informed us of the existence of a non registered one.

➤ **Luxembourg: no product**

Our expert did not find any non agricultural registered GI products.

➤ **The Netherlands: 5 products**

Our expert has identified 5 products which belong to different categories. Most of them can qualify as a GI but several are not currently enjoying intellectual property protection.

➤ **Poland: 6 products**

Our expert provided 6 fiches of products that can be considered as non agricultural GI products. A couple of them are of significant economic importance.

➤ **Portugal: 10 products**

Our expert identified 10 products. She insisted on the fact that data is difficult to gather. It would appear that there is a great potential for non agricultural GIs in Portugal in particular with regard to the development of local economies and employment opportunities.

➤ **Romania: no product**

Our expert did not find any non agricultural registered GI products.

➤ **Slovakia: 4 products**

Our expert found 4 products but did not get a lot of data as to their economic importance.

➤ **Spain: 35 products**

Our expert provided us with 9 detailed fiches on non agricultural registered GI products. Several are of economic importance to the local economy. In addition, we have listed the other non agricultural GI products that are protected in the context of the bilateral agreement between Spain and Austria. We have no data on these products.

➤ **Sweden: 7 products**

Our expert has identified the 7 non agricultural GI products, some of which are of economic significance to the local economy.

➤ **United Kingdom: 5 products**

Our expert has identified several products but only 5 met the definition of GI and have been retained on the database. A lot of products have totally lost the link to the area of production. We have not been able to collect precise data on these products.

Third countries: 149 products in 7 countries

➤ Brazil: 6 products

Several non agricultural products are under consideration for registration at the National Institute of Industrial Property: “Vale dos Sinos Finished Leather” is at a final stage of analysis; other projects are being developed (all listed in the database). Two of the products listed are registered as part of the intangible cultural heritage in the book of knowledge registered at the National Institute of History and Artistic Heritage – IPHAN. There is a discussion in the Ministry of Agriculture to change the legislation of Geographical Indications in Brazil. Our expert focused on 6 products.

➤ China: 23 products

Our local expert focused on the non-agricultural GI Products registered under the AQSIQ system (sui generis) as there are quite a lot of products protected under this specific GI scheme. She did not look into the trademark system run by SAIC. She prepared a fiche on the 6 economically most important products.

➤ India: 79 products

India has registered a large number of non agricultural GI products since April 2004. Our expert has provided us with an exhaustive list of all non agricultural GI products registered. He also prepared a fiche for the 6 economically most important products.

➤ Russia: 8 products

According to our experts, more than 40 non agricultural GI products have been registered in Russia. She has focused on the 8 economically most significant non agricultural registered GI products and provided with a short update on the legal framework for GI registration and on the products registered in Russia and its neighbouring countries. **In both Uzbekistan and Turkmenistan: 1** economically significant non agricultural registered GI product has been found.

➤ Switzerland: 31 products

The products identified by our expert mostly come from bilateral agreements signed by Switzerland in the 1970s. There is a question mark as to the present GI status and economic importance of many of these products. The Swiss legislation (law on TM and indications of source) provides a general protection to all indications of source, especially the Swiss ones with criteria related to the place of production.

We would like to point out that our study covered the 5 first key countries listed above as well as some other countries close to Russia. There are many other non agricultural GI products in other third countries but they were not part of the scope of this study.

The selection process: the lists of proposed priority products

Reminder: the selection of the most interesting products is to be determined by the European Commission and the tenderer. The aim is to identify 15 to 20 EU products and 5 to 10 third country products to launch case studies on these products.

As explained in our proposal, we have established two lists of products that we recommend to study in detail: the A list includes a priority list of 30 EU products and 15 products from third countries, the B list covers 10 additional EU products EU and 5 products from third countries.

How did we establish the list of proposed case studies?

The lists have been drafted with the support of the local experts which have provided the team leader with some useful information as to the economic value, legal protection and reputation of the products identified. The final selection process has been made by the team leader, the legal consultants of Agridea and oriGIn, as well as by the economic consultant of Agridea who has reviewed the economic data provided by the experts.

As you will see below, we propose balanced lists of products that cover a wide spectrum of countries and legal situations regarding the protection of the non-agricultural GI products. We used in particular the following criteria:

- **Origin of the product:** we propose a list of products covering the new Member States, as well as the countries from the South of the EU which have a long GI history. We also propose to analyze products from the North of Europe which benefit from a protection system which is not a sui generis GI system. As for third country products, we propose case-studies on products from the five key countries identified (Brazil, China, India, Russia and Switzerland) as well as from one additional country (Turkmenistan).
- **Type of protection enjoyed:** we have tried to strike a right balance between the different protection systems that are being used in order to provide a good basis for the comparative analysis that will be carried out at a later stage of the study
- **Economic and trade value of the product:** we have analyzed the economic value of each of the products entered into the database and ranked them accordingly.
- **Reputation:** when drafting our proposed lists, we have taken into consideration the international reputation acquired by some of the products.

We are pleased to submit to the European Commission lists A and lists B below. In accordance with the terms of reference, these lists should be the basis for the discussion, with the European Commission, on the identification of the products to be studied in detail in the next phase of the study

List A - EU products

- **Austria:**
 1. **Ferlacher Waffen (firearms)**: protected via bilateral agreements
- **Belgium:**
 2. **Pierre Bleue de Belgique Arduin** (stone): Sui generis and trademark protection
- **Bulgaria:**
 3. **Trojanska Keramika** (Ceramic objects): specific law, sui generis
- **Czech Republic:**
 4. **Český křišťál** (Crystal): Sui generis and trademark protection
 5. **Jablonecká bižuterie** (jewellery): Sui generis
 6. **České sklo** (Glass): Sui generis and trademark protection
- **France:**
 7. **Dentelle de Calais** (lace): trademark protection
 8. **Monoï de Tahiti** (special oil): specific law, sui generis
 9. **Couteaux de Thiers** (knives): trademark protection
- **Germany:**
 10. **Solinger Schneidwaren** (knives): specific law
 11. **Schwartzwalduhr** (Cuckoo-clock): trademark protection
 12. **Meissener Porzellan** (porcelain): trademark protection
- **Hungary:**
 13. **Herend** (porcelain): sui generis
- **Italy:**
 14. **Marmo di Carrara** (marble): trademark protection
 15. **Vetro Artistico di Murano** (glass): trademark protection
 16. **Cardato Pratese** (textile): trademark protection
- **The Netherlands:**
 17. **Texel Quilt** (duvet): trademark protection
 18. **Leerdam Glass** : trademark protection
- **Poland:**
 19. **Koniakow Laces**: Specific Law
 20. **Banded Flint** (stone): Specific Law
- **Portugal:**
 21. **Bordado da Madeira** (embroiderie): sui generis and Collective mark
 22. **Lenços de Namorados do Minho** (handkerchiefs with particular embroideries): sui generis and trademark
- **Slovakia:**
 23. **Piešťanské bahno** (silt): sui generis

- **Spain:**
 - 24. **Cuero de ubrique** (leather): trademark protection
 - 25. **Calzado de Elche** (shoe): trademark protection
 - 26. **Marmol de Macael** (marble): trademark protection

- **Sweden:**
 - 27. **Glasriket** (Crystal glass): trademark protection
 - 28. **Morakniv** (Mora knife): trademark protection

- **United Kingdom:**
 - 29. **Shetland Woolen Outwear** (textile): trademark protection
 - 30. **North Staffordshire Pottery**: trademark protection

Total: 30 products

List A - products from third countries

- **Brazil**
 1. **Finished Leather of Vale dos Sinos**, sui generis GI system, specific law
 2. **Mud Pans of Goiabeiras**, register of intangible cultural heritage
 3. **Irish Lace of Divina Pastora**, register of intangible cultural heritage

- **China**
 4. **Liuyang Fireworks**: sui generis and trademark
 5. **Nanjing Brocade**: sui generis and trademark
 6. **Xuan Paper**: sui generis

- **India**
 7. **Kashmir Pashmina, Kashmir Sozani Craft, Kani Shawls** (textile): sui generis
 8. **Pochampally Ikat** (textile): sui generis
 9. **Lucknow Chikankari** (embroidery): sui generis

- **Russia**
 10. **Gzel** (ceramics) – sui generis
 11. **Tula Samovar** (metal container) - sui generis
 12. **Chochloma** (wood painting handicraft) – trademark protection

- **Switzerland**
 13. **Swiss Watches**: protected by a specific law
 14. **Dentelles de Saint-Gall**: provisions on the indications of source in the law on trademark

- **Turkmenistan**
 15. **Turkmen carpets** – specific law

Total: 15 products

List B - EU products

- **Austria:**
 1. **Schladminger Loden** (textile): Bilateral agreements -
- **Bulgaria:**
 2. **Vracanski Varovik** (Calcareous stone - limestone): specific law, sui generis
- **France:**
 3. **Faïences de Quimper** (porcelain): trademark protection
- **Germany:**
 4. **Erzgebirgisches Holzkunst** (wooden puppet toys and Christmas items): trademark protection
- **Hungary:**
 5. **Hollohaza** (porcelain): sui generis
- **Italy:**
 6. **Biella the art of excellence** (textile): trademark
- **The Netherlands**
 7. **Makkumer** (ceramics): trademark protection
- **Slovakia:**
 8. **Modranská majolica** (pottery): sui generis
- **Spain:**
 9. **Cuchilleria de Albacete** (knives): trademark protection
- **Sweden:**
 10. **Svensk Slöjd** (Swedish handicraft): specific Law + trademark protection

Total: 10 products

List B - products from third countries

- **China**
 1. **Jingdezhen Porcelain**: trademark protection

- **India**
 2. **Kullu Shawl** (textile): sui generis protection

- **Russia**
 3. **Palekh** (handicraft of miniature painting): sui generis protection
 4. **Pavlov Posad** (lace): sui generis protection

- **Switzerland**
 5. **Langenthal (porcelain)**: protected in a bilateral agreement

Total: 5 products

Proposed list of products to be studied in depth in the second phase

Based on the information we received and taking into account the objective of the study, we propose to undertake case studies on the following list of products that covers both a wide spectrum of countries in the EU and outside the EU, as well as different legal frameworks.

18 products from the EU

- **Austria:**
 1. **Ferlacher Waffen (firearms)** : protected in bilateral agreements
- **Belgium:**
 2. **Pierre Bleue de Belgique Arduin (stone)**: Sui generis and trademark protection
- **Czech Republic:**
 3. **Český křišťál (Crystal)**: Sui generis and trademark protection
 4. **Jablonecká bižuterie (jewellery)**: Sui generis
- **France:**
 5. **Dentelle de Calais (lace)**: trademark protection
 6. **Monoï de Tahiti (special oil)**: specific law, sui generis
- **Germany:**
 7. **Solinger Schneidwaren (knives)**: specific law
 8. **Schwartzwalduhr (Cuckoo-clock)**: trademark protection
- **Hungary:**
 9. **Herend (porcelain)**: sui generis
- **Italy:**
 10. **Marmo di Carrara (marble)**: trademark protection
 11. **Vetro Artistico di Murano (glass)**: trademark protection
- **The Netherlands:**
 12. **Texel Quilt (duvet)**: trademark protection
- **Poland:**
 13. **Koniakow Laces**: Specific Law
- **Portugal:**
 14. **Bordado da Madeira (embroiderie)**: sui generis and Collective mark
- **Spain:**
 15. **Cuero de ubrique (leather)**: trademark protection
 16. **Calzado de Elche (shoe)**: trademark protection
- **Sweden:**
 17. **Glasriket (Crystal glass)**: trademark protection
- **United Kingdom:**
 18. **Shetland Woolen Outwear (textile)**: trademark protection

9 products from third countries

- **Brazil**
 1. **Finished Leather of Vale dos Sinos**, sui generic, specific law
 2. **Mud Pans of Goiabeiras**, register of intangible cultural heritage
- **China**
 3. **Liuyang Fireworks**: sui generis and trademark
 4. **Xuan Paper**: sui generis
- **India**
 5. **Kashmir Pashmina, Kashmir Sozani Craft, Kani Shawls** (textile): sui generis
 6. **Pochampally Ikat** (textile): sui generis
- **Russia**
 7. **Gzel (ceramics)**: sui generis
 8. **Tula Samovar (metal container)** - sui generis
- **Switzerland**
 9. **Swiss Watches**, protected by a specific law

Proposed methodology for the analytical requirements of the study

Reminder: In order to prepare a draft final study, we will aim at gathering clear and detailed information on the products identified with regard to the legal, economic and trade point of view (case-studies). Based on the case studies, we will analyze and compare the different protection systems.

As we have outlined in our proposal, once the products are selected by the Commission, the most qualified expert will be chosen to conduct the in-depth data gathering on the product (case-studies). As a general rule, we will ask the local expert to conduct the task. If this is not possible, the junior expert of the tenderer will be asked to do so under the supervision of the team leader.

In order to ensure that all experts gather all the information requested, the team leader will prepare a draft fiche that will have to be completed for each product. The fiche will be intended as a guide on how to collect the data and how to report on the key elements that are needed to complete the study. We will elaborate a fiche based on the model of the so-called single document used by the European Commission when registering GIs in the EU which will be completed with other specific questions raised in the tender (see general outline below).

From a practical point of view, experts will combine desk research and contact with producers' groups and other relevant national or regional administrations and/or institutions such as sector specific federations, chambers of commerce, etc. Contacts will be taken first and foremost via telephone calls and e-mails. Field visits will be organized if necessary.

All the information gathered by the experts will be inserted on the fiche (to be finalized in the context of the draft outline for the study) and send to the team leader who will centralize all the case studies' reports.

Each local expert will be contacted by phone by the team leader before the launch of this phase. Each expert will also receive a written briefing together with the fiche mentioned above and a clear timeframe for the tasks. Two weeks after the start of this process, the team leader will contact the experts to enquire about progress, offer to share information obtained by other experts as a way to facilitate the process and offer to help in the information gathering process, if needed.

Draft Case Study Fiche - to be completed for each product selected

COUNTRY

NAME OF THE EXPERT

CONTACT DETAILS OF THE EXPERT

DETAILED DESCRIPTION OF THE PRODUCT

- Name of the product
- GEOGRAPHICAL ORIGIN
- GEOGRAPHICAL AREA OF PRODUCTION

- Description of the product
 - Type of product
 - History of the product
 - Overview of production steps that take place in the geographical area
 - Specific rules concerning packaging
 - Specific rules concerning labelling
- Link between the geographical area and the reputation, quality or characteristics of the product
- LEGAL PROTECTION of the product
 - At national level
 - Protection enjoyed (choose one of the following systems):
 - GI sui generis system
 - Trademark system
 - Specific law
 - Case law
 - Other (please specify)
Relevant copies or extracts of the official text or decision to be provided in the annex
 - Cost relating to Duration of protection granted
 - Scope of the protection granted
 - Ex officio
 - In translation
 - Against “delocalizers”
 - Against use of the GI name with expressions (“like”, “type, ect)
 - Against genericity
 - Cost of registration
 - In third countries
 - Via International Agreements
 - Information on usurpations / counterfeiting on the national and/or international markets
- Certification system applied, if any
 - Type of certification: private or public
 - Cost of certification
- Existence of a collective organization of producers, legal status, roles and activities. Cost of membership to an organization for producers, if any
- ECONOMIC SIGNIFICANCE of the product
 - NUMBER OF PRODUCERS
 - ECONOMIC VALUE
 - PRODUCTION in VALUE and/or VOLUME (5 years up to 2007)
 - SALES in VALUE (5 years up to 2007)
 - National market
 - Third countries (main export markets)
 - Export value (for EC intra-EU and outside EU) (5 years up to 2007) (main export markets)
- Marketing strategy
 - Market segment
 - Distribution practice
 - Sale strategy with regard to IPRs (use of the origin as a marketing tool)
 - Promotion
 - Logos

Based on the information received from the experts on each of the selected products, the team leader will review all the reports to ensure that they all meet the quality expectations of the European Commission. He will also ensure that they respect the same format and assess the information provided on the product and the protection system it enjoys. The economist will review and evaluate the information on the market segment, the production, sales and exports. Should the information provided by some experts prove insufficient, the team leader will ask the experts to look for additional information. The team leader with the support of the economist and the junior consultant will finalize the case studies.

The team leader, in association with the legal consultants of Agridea and oriGIn and the economist, will conduct an in-depth and detailed comparative analysis of the main elements provided by the experts in the fiches. We will in particular assess:

- the cost-effectiveness of the legal protection enjoyed at national level and in third countries
- the economic performance of the selected products
- the importance and impact of the protection system when looking at the sales

To that end, we have drafted the following grid of evaluation that we submit to the Commission for discussion. The purpose of this grid is to help us analyzing each of the elements covered by the study. We propose to apply a coefficient to the different indicators as not all have the same value when measuring the strength and weaknesses of the different protection systems.

Proposed evaluation grid

Protection available	Yes / No	Coefficient
National		5
International		4
ex officio		5
in translation		5
against “delocalizers”		5
against use of the GI name with expressions (“like”, “type”, ect)		5
against genericity		5

Duration of the protection	Yes / No	Coefficient
Unlimited		5
Limited		2
➤ Less than 10 years		1

Cost of registration and/or protection	Yes / No	Coefficient
Cost of registration		1 to 5*
Cost of protection		1 to 5*

* depending on the costs

Certification	Yes / No	Coefficient
Public		4
Private		4
Cost of certification (to be specified)		1 to 5*

* depending on the costs

Existence of usurpations	Yes / No	Coefficient
National level		1 to 5*
International level		1 to 5*

* depending on the number of usurpations identified

Economic assessment	Yes / No	Coefficient
Use of the GI / origin in the sales strategy		5
If possible, positive impact of GI registration on sales and price		5

Based on this grid of analysis, the team leader and the economist will draw out conclusions on the different protection systems. These conclusions will also be included in a comparative table to facilitate the comparison between the systems.

DRAFT TABLE OF CONTENT OF THE FINAL STUDY

1. Non agricultural GIs in the EU and at the International level

1.1 Geographical Indications in the International Framework

1.1.1. Definition and legal protection of GIs

1.1.2. A long history of legal protection of GIs at the International level

1.1.3. A wide definition of GIs

1.2. Geographical Indications in the European framework: a fragmented approach

1.2.1. A European Protection System limited to some agricultural products

1.2.2. No European Protection System available to non-agricultural products

1.2.3. An increased interest for the origin of the products in the EU

1.3. The Development of GIs across the world and its consequence for the EU

2. A tentative assessment of the economic value and presentation of the legal protection systems of non agricultural GIs in the EU and in some key third countries

2.1. Non agricultural GIs in the EU

2.1.1. Overview

2.1.2. Case studies

2.2. Non agricultural GIs in third countries

2.1.1. Overview

2.1.2. Case studies

3. Comparative analysis of the protection systems available to non agricultural GIs

3.1. Overview of legal protection system available

3.2. Strengths and weaknesses of the different protection systems

3.2.1. Scope of the protection

3.2.2. Cost and duration of the protection

3.2.3. Effectiveness of the protection

3.2.4. Economic impact of the protection

4. Conclusions

5. Annexes