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# Regional Baseline Assessment

Region III: Albania, Bosnia and Herzegovina, Israel, Montenegro and Turkey

September 02, 2020  
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This report includes a baseline assessment of enabling conditions for green and circular businesses environment in the region that includes Albania, Bosnia and Herzegovina, Israel, Montenegro, and Turkey. It contains a brief overview of the policy and regulatory framework, market demand, and socio- and cultural factors. As presented below, these countries differ largely in size, population size, and GDP per capita. Nevertheless, many of these countries face similar issues when it comes to enabling green and circular business environment next to differences. The concept of the circular economy (CE) is still relatively new to the countries in this region and incentives for companies to transition to green and circular practices are limited. Nevertheless, recent developments in the regulatory and policy framework, as well as factors external to the region could have the potential to accelerate the integration of CE principles across the business sector and the regional economies.

Characteristics countries group III

| Country                | Size                    | Population    | Population        | GDP per capita |
|------------------------|-------------------------|---------------|-------------------|----------------|
| Montenegro             | 13,812 km <sup>2</sup>  | 622,359       | 5.504 billion US  | 8,832.0        |
| Bosnia and Herzegovina | 51,197 km <sup>2</sup>  | 3.324 million | 20.16 billion USD | 6,073.3        |
| Albania                | 28,748 km <sup>2</sup>  | 2.846 million | 15.1 billion USD  | 14,495.1       |
| Israel                 | 22,145 km <sup>2</sup>  | 8.884 million | 370.6 billion USD | 148,401        |
| Turkey                 | 783,562 km <sup>2</sup> | 82 million    | 771.4 billion USD | 21,063         |

# 02 Policy and regulatory framework



## General

Policy and regulatory framework in the region to stimulate green business development differ significantly, but enforcement and integration of these instruments is not guaranteed as a result of various reasons: lack of sub-legal frameworks, lack of proper monitoring, low number of inspectors, lack of experienced and skilled manpower, corruption, and insufficient financial capacity. Entities that are responsible for the integration and control of policy compliance exist in Turkey and Israel but are limited in the Western Balkan countries. Despite the legal mandates in place, businesses are operating without environmental permits in several countries in this region. Turkey, Albania, Bosnia and Herzegovina are currently candidate countries for EU membership, where the first three have started the negotiations on EU Chapter 27 on Environment and Climate Change.



## National Strategies and Action Plans for Circular Economy

The definition, implementation, and integration of the concept of CE and its principles in strategies and action plans are still in early stages in this region. Most early developments have been taking place in the area of waste management, frequently based on EU directives and policies, where several (national) policies focus on the improvement of waste management through CE principles. Nevertheless, the current situation of waste management in these countries still faces numerous challenges.

The application of CE principles into other sectors is approached differently across the region. In the Western Balkan countries, specific references to CE in strategies and action plans - outside of waste management - have remained rather absent. Nevertheless, several strategies and programs that currently are under development could generate momentum to integrate CE at a wider span. Examples are the CE roadmap in Montenegro and programs under the UNDP in Bosnia and Herzegovina.

Turkey has mainly extended its CE initiatives to the energy sector, focusing on strengthening energy efficiency practices, while Israel has developed a national action plan for CE in various industrial sectors.<sup>1</sup>



## Fiscal and Financial Instruments

In the Western Balkan countries, tax policies related to the environment seem to be poorly integrated. On the other hand, Turkey<sup>2</sup> and Israel<sup>3</sup> raise above average revenue from environmentally related tax policies in comparison to the 39 OECD economies. Subsidies or fiscal benefits for green or CE business development are close to absent across this region.

The concept of ecolabelling has been introduced under various strategies across the region, frequently connected to the food sector and organic produce. In the Western Balkan countries, attempts to introduce eco-labelling into other sectors have been minimal or unsuccessful at this stage.<sup>4</sup>

<sup>1</sup> In order to achieve circular economy on a wider scope in Israel, the Ministry of Economy has created an action plan focusing on the construction and infrastructure sector, the packaging sector, and the chemistry and the pharmaceutical sector, since they have the highest potential to become circular. Innovation and recycling are horizontally applied to these sectors.

<sup>2</sup> Organisation for Economic Co-operation and Development, Environmentally Related Taxes on Energy Use, Paris: OECD, 2014

<sup>3</sup> Organisation for Economic Co-operation and Development, Environmentally Related Taxes on Energy Use, 2016.

<sup>4</sup> In Israel and Turkey, the use of eco-labelling is more widespread.



The countries in the region have policies related to the polluter pays principle or extended producer responsibility, however, the enforcement and integration of these concepts could be improved or is still to be desired.<sup>5</sup>

Although policies to increase the share of green public procurement can be found across the region, the regulatory and practical translation of these incentives varies and seems to be deficient. As shown in the table below, the countries are using different selection criteria for tenders which necessitates in a different strategy to integrate green procurement criteria in each country:

| Public Procurement     |                     |      |   |
|------------------------|---------------------|------|---|
| Country                | Size                | Year | Selection Criteria  |
| Montenegro             | 12.33%              | 2017 | Lowest price offered or economically most favorable bit   |
| Bosnia and Herzegovina | 7.84% <sup>6</sup>  | 2016 | The most economically advantageous tender (MEAT), with as sub criteria the lowest price. <sup>7</sup>   |
| Albania                | 7% <sup>6</sup>     | 2017 | Lowest price (Most economically advantageous tender only a fraction of the time). <sup>8</sup>  |
| Israel                 | 14.23% <sup>9</sup> | 2015 | Price and quality of the bid; reliability of the bidder, the bidder's skills and experience in the relevant field of expertise, recommendations on its behalf and expressions of satisfaction from previous contracts. Many government tenders have started to include environmental criteria to achieve targets. <sup>10</sup> |
| Turkey                 | 10.85% <sup>9</sup> | 2015 | Most economically advantageous tender (MEAT).   |

Data on the share of green public procurement is absent across the region which implies a lack of monitoring. The current public procurement mechanisms are frequently prone to corruption. Nevertheless, recent developments are in favour of the increase of green public procurement.

<sup>5</sup> The application of the polluter pays principle, the extended producer responsibility (EPR), in Turkey is mainly organized under the Regulation of Packaging and Waste Control, which has set specific targets for recycling and recovery. Israel focuses for its EPR on five different waste types (beverage containers, tires, packaging waste, electric/electronic equipment and batteries, and plastic bags), however, the EPR policies leave room for improvement in comparison with international standards. Although the polluter pays principle is mentioned by law in the western Balkan countries, the integration of this principle is still to be desired.

<sup>6</sup> Organisation for Economic Co-operation and Development, SME Policy Index Western Balkans and Turkey 2019 Pocketbook, 2019. <https://www.oecd.org/south-east-europe/programme/SMEPI-Pocketbook-2019.pdf>

<sup>7</sup> Regional Anti-Corruption Initiative, Law on Public Procurement Bosnia and Herzegovina, 2015. <http://rai-see.org/wp-content/uploads/2015/08/BiH-Law-on-public-procurement-en.pdf>

<sup>8</sup> Dobra, Emalita, Progress of the Public Procurement System in Albania and in the European Union, 2016. Link: [http://journals.euser.org/files/articles/ejms\\_jan\\_apr\\_16\\_nr2/Emalita.pdf](http://journals.euser.org/files/articles/ejms_jan_apr_16_nr2/Emalita.pdf)

<sup>9</sup> Organisation for Economic Co-operation and Development, Government at Glance, 2017. <https://stats.oecd.org/Index.aspx?QueryId=78413>. Accessed on August 24 2020.

<sup>10</sup> Israel Ministry of Environmental Protection, Green Public Procurement, 2014 [http://www.sviva.gov.il/English/env\\_topics/Sustainable%20Development/Sustainability-in-the-Public-Sector/Pages/Green-Procurement.aspx](http://www.sviva.gov.il/English/env_topics/Sustainable%20Development/Sustainability-in-the-Public-Sector/Pages/Green-Procurement.aspx). Accessed on August 25 2020.

<sup>11</sup> In Turkey and Israel higher levels of consumer awareness tend to be more prevalent, but still leave room for improvement

### Consumer Awareness

Levels of consumer environmental awareness are considered to be “low” across the Western Balkan countries, connected to low demand for sustainable consumer goods.<sup>11</sup> Across the whole region, financial means are frequently mentioned as a barrier to the consumption of sustainable consumer goods. Low purchasing power causes the price of a product to be the main variable for consumption considerations. Sustainable consumer behaviour is linked to status in various ways across the region. In BiH, for example, purchasing second-hand goods is linked to a lower socioeconomic status. In Israel, however, sustainable consumption behaviour is frequently connected to the left elite. In Turkey, consumer behaviour is been regarded as a political instrument. Awareness campaigns related to this topic have remained limited and are mainly to be found related to waste disposal and recycling (e.g. in the form of clean-up sessions).

### Human Resources

All countries are facing challenges in the area of human resources needed for professional development in the green sectors. These challenges are characterized by the following two factors; a high number of (skilled) individuals that is leaving the region and or an existing mismatch between labour supply and demand due to gaps between educational institutions and the industry.

### Circular Business Models and Sectoral Approaches

Companies that are currently working with CE principles but are unaware of the fact that they are doing so, and therefore are unaware of the opportunities to accelerate this potential, do exist in this region. Across the Western Balkan countries, the (agri)tourism sector has been frequently mentioned as the most promising sector to accelerate the integration of CE principles on its own as well as in other sectors - thanks to its connection with sectors such as mobility and food. Construction, food, energy, and waste management are the priority sectors in Turkey. Based on the Israeli government’s analysis, the sectors that have the highest potential to become circular in Israel are construction and infrastructure, packaging, and chemistry and pharmaceuticals.

### Funding Mechanisms

Funding opportunities for green and circular businesses tend to be limited across the region. Reasons for this vary, but common denominators are a lack of economic and political stability and longer periods of return on investment in environmental projects which limit the appeal for investors and state funds. In the Western Balkan countries, entrepreneurs seem to be limited to finite sources such as bank loans, investment of foreign bodies, or their own network. Israel and Turkey are both facing a different financing obstacle - funding the “scale-up phase”.

### Support from External Organisations

Embassies and international bodies have increased their activities related to the implementation of CE and green business development. Examples are activities of the Embassy of Sweden and the UNDP in Bosnia and Herzegovina and Israel,

the Embassy of the Netherlands in Israel, EBRD in Turkey, the EU COSME program in Montenegro, and Albania. These activities have stimulated, amongst other strategies, the interaction between the public and private sector, especially in the Western Balkan countries.

### Levels of Innovation

The region countries are characterised by different levels of innovation in environmental and circular business development. While Western Balkan countries are characterized by less complex business structures and a lower level of innovation, Israel has a welldevelopment innovation climate with a large number of cleantech entrepreneurs but suffers from a lack of investor attention to the non-high-tech solutions. In Turkey, the green business industry is considered to be more product-based and there is little innovation relating to new business models or replacements of products with services.

### Incubators, Accelerators, and Training Programs

In the Western Balkan countries, there is a common belief amongst experts that general entrepreneurship skills should be developed before or next to the development of green and circular businesses. Therefore, incubators and accelerators that specifically focus on green on circular businesses are not widely available. Entrepreneurs in this region that are operating in this domain have expressed their need for mentors, models, and the opportunity to establish a network. In Turkey and Israel incubators and accelerators that focus on green business development are more widespread, but the concept of CE could receive more focus under these programs. One example of training programs that are focusing on CE business models, are the programs of CIRCO in Turkey and (the still-to-be conducted seminars) in Israel. Seminars by CIRCO have been on the agenda in Israel as well, but these sessions have been cancelled due to measures caused by the pandemic.

### Competitiveness

The level of competitiveness of the economies in this region varies. Recent activities, mainly initiated by external organizations (e.g. COSME), have aimed to increase the competitiveness of the economies of Turkey, Albania, Montenegro, and BiH.

<sup>12</sup> World Economic Forum, The Global Competitiveness Report 2019, 2019.

Global Competitiveness Index (2019 Rankings)<sup>12</sup>

| Country                | Score | Rank/141 |
|------------------------|-------|----------|
| Montenegro             | 60.8  | 73       |
| Bosnia and Herzegovina | 54.7  | 92       |
| Albania                | 57.6  | 81       |
| Israel                 | 76.7  | 21       |
| Turkey                 | 62.1  | 61       |

## Research and Development

As shown below, investment in Research and Development varies across the region. Amongst the 141 countries analysed in the Global Competitiveness Report, Israel spends the largest percentage of its GDP on R&D. On the other hand, R&D expenditure in the Western Balkan countries is low.

### R&D expenditures % GDP (2019 figures)

| Country                | Value | Rank/141 |
|------------------------|-------|----------|
| Montenegro             | 0.4   | 73       |
| Bosnia and Herzegovina | 0.2   | 93       |
| Albania                | 0.2   | 98       |
| Israel                 | 4.3   | 1        |
| Turkey                 | 0.9   | 40       |



The countries in this region are recognized by a lower level of female entrepreneurship and relatively high levels of corruption (as shown in the table below). Successful activity in the entrepreneurial ecosystems is relatively low in the region (except in Israel), when compared to European standards. Individuals in these countries consider a stable job as a favourable career choice. Albania and BiH in particular obtain a low ranking when looking at performance in the entrepreneurial ecosystem. Autonomous entrepreneurial thinking is not necessarily endorsed in Turkey<sup>13</sup>, while in Israel, an entrepreneurial mentality is very prevalent. In Montenegro there is a cultural bias according to which hard work is not seen as a badge of honour but rather as a sign of lack of capacity to succeed in life.

<sup>13</sup> Recently, crisis management has sparked the entrepreneurial mentality causing the entrepreneurial activity to increase

<sup>14</sup> Transparency International, Corruption Perceptions Index, 2019. [https://images.transparencycdn.org/images/2019\\_CPI\\_Report\\_EN\\_200331\\_141425.pdf](https://images.transparencycdn.org/images/2019_CPI_Report_EN_200331_141425.pdf)

#### Corruption levels in the public sector by country<sup>14</sup> (2019 figures)

| Country   | Rank   |
|-----------|--------|
| Jordan    | 45/100 |
| Egypt     | 36/100 |
| Lebanon   | 35/100 |
| Libya     | 60/100 |
| Palestine | 39/100 |

The perceived levels of public sector corruption in 180 countries/territories around the world (scale 100 – 1, where 100 is seen as very clean and 1 as highly corrupt).

Unemployment rates in the western Balkan countries and Turkey are far above the European average (6.3 % as of 2019). Entrepreneurs in the region have shared that the lack of job opportunities could form a motivation to explore entrepreneurial activity.<sup>15</sup>

<sup>15</sup> Personal Interview with Salko Užičanin (CEO of Solheat), 6 July 2020.

<sup>16</sup> The World Bank, Unemployment, 2019. <https://data.worldbank.org/indicator/SL.UEM.TOTL.NE.ZS>. Accessed August 23 2020.

#### Unemployment Rate\* (2019 figures)<sup>16</sup>

| Country                | Rate   |
|------------------------|--------|
| Montenegro             | 15.1%  |
| Bosnia and Herzegovina | 15.7%  |
| Albania                | 11.5%" |
| Israel                 | 3.8%   |
| Turkey                 | 13.7%  |

For the purpose of creating a synthesis for the region, a SWOT analyses has been conducted to explicate Strengths, Weaknesses, Opportunities, and Threats.

Strengths are defined as factors currently enabling green and circular businesses to develop. Weaknesses are defined as factors currently preventing the development of green and circular economy businesses. Opportunities are defined as future developments that could enable green and circular economy businesses to flourish. Threats are defined as potential future developments that could threaten green and circular economy business development.

## Strengths

- The countries in this region are currently working on the integration of different EU legislation frameworks, which are contributing to the reinforcement of measures for green/CE business development.
- The inclusion of various stakeholders from the private sector in the creation of policies and development has been promoted under various strategies creating a potential for increasing public private partnerships.<sup>17</sup>
- Foreign bodies are increasing activities related to the integration of CE principles in business sectors in the region (e.g. UNDP, EBRD, embassies, CIRCO).<sup>18</sup>
- The region is recognized by a large potential for renewable energy sources (besides hydro plants).
- Countries in this region tend to have agile businesses (small and without complicated structures) that could transform without much effect to sustainable practices with the right tools and resources.<sup>19</sup>
- Availability of grants for the voluntary adaptation of ISO 14000 – Environmental Management standardization.<sup>20</sup>

## Weaknesses

- The region is recognized by insufficient regulatory enforcement.
- The region faces challenges regarding workforce mainly caused by a high number of (skilled) individuals that are leaving the region and/or an existing mismatch between labour supply and demand due to gaps between educational institutions and the industry.
- In general, entrepreneurs in this region have limited access to funding.
- Countries in this region have relatively high levels of corruption which, amongst other things effects public procurement processes and prioritizing and pressuring sustainable production practices.
- In this region, a high number of businesses are operating without an environmental permit.
- Sustainable consumer products are not affordable for individuals across all deciles in this region. Low purchasing power causing the price to be the main consideration in consumption behaviour. There is a perceived lack of consumer demand for sustainable produce.
- Subsidy and tax benefits are close to absent in this region (e.g. investments in environmentally friendly business assets or technology or carbon taxes).
- Environmental taxes are currently not used as a revenue/policy in the Western Balkan countries.
- There is no clarity or knowledge on savings potential related to sustainable consumer goods among consumers.
- Currently, most countries in this region do not have a national action plan for the integration of CE in the business sector.
- The CE principles and practices are used to obtain targets in strategies under specific topics such as renewable energy and recycling.
- The countries in this region do not have specified

- KPI's on the transition to CE and it is therefore hard to manage progress.
- EU programs and projects related to green/CE business development in this region do not always receive a proper follow-up of capitalization.<sup>21</sup>
  - In this region, there is a limited number of entities in place that are responsible for the integration and control of policy frameworks.<sup>22</sup>
  - Long periods of return on investment are seen as an obstacle for investors in CE/Green businesses (e.g. cleantech).
  - There is a strong association of CE particularly with the waste sector, which causes other business transformation opportunities to remain unexplored.
  - Consumer awareness campaigns are mainly related to recycling and waste management.
  - Trade barriers (e.g. tariff and non-tariff barriers) mostly of political nature could prevent waste and secondary materials being channelled to destinations in the region where they could be reused or integrated in production.
  - The countries in this region suffer from a deficit in environmental monitoring, reporting, and comprehensive environmental publications.<sup>23</sup>
  - The focus on green employment has been limited across the region (in strategies, studies, and programs).<sup>24</sup>

## Opportunities

- The countries are working on EPR policies/Polluter Pays Principles that are currently addressed by law. The integration and enforcement of these policies could lead to environmental protection and could generate revenue streams to invest in green/CE business development.
- Currently, the business sector is not fully aware of the opportunities for green/CE business development, where some companies are already using CE principles without being aware of it. Informing the business sector on opportunities in this domain could lead to the acceleration of CE/green business development.
- Current public procurement policies do not always integrate non-price/environmental criteria in policies. The inclusion of these factors could lead to an increase in green public procurement and therefore bigger market potential for green solutions.
- Countries and costumers outside of the region that are characterized by a strong demand for sustainable

## Threats

- Increasing economic and political instability could cause unclarity regarding regulations and could increase investors' risk aversion.
- The transition to a CE demands 'future proof' skills from the labour market. The challenge for educational systems would be to keep up with this shift.
- A lack of willingness to be transparent could prevent cross-sector - /cross-industry collaboration or industrial symbiosis and could prevent much needed insights on supply- and waste chains.
- Increasing inflation could affect purchasing power and international trade relationships.
- Resource scarcity and an increase or fluctuation in prices of raw materials.
- Strong cultural and political divides.

consumer goods, sustainable production processes or criteria related to the protection to the environment could increase the demand for sustainable products from the region.

- The countries in this region are subject to increasing influx of refugees from neighboring countries that are undergoing civil conflict. The small population size of the countries (except Turkey) increases the impact of even small number of refugees entering their territories. While this is obviously a challenge, it could also be an urgent push to reshape the status quo and increase resource efficiency.
- Currently, CE principles are mainly integrated into waste management strategies. Integrating CE principles on a national level in different sectors could improve lifecycle and cross-sector performance.

<sup>17</sup> This is a recent development in the Western Balkan countries and is more common in Turkey and Israel

<sup>18</sup> E.g. the Turkey Materials Marketplace by the European Bank for Reconstruction and Development CIRCO (Netherlands) Circular Business design track, the UNDP pilot program for the development of circular business practices, and the Swedish embassy in Bosnia and Herzegovina.

<sup>19</sup> This is mainly applicable to the Western Balkan countries

<sup>20</sup> Absent in Albania and Bosnia and Herzegovina

<sup>21</sup> Currently a Green Agenda for the Western Balkans is being developed to mirror the European Green Deal by the European Commission which can profit from the potential of CE for the region, in all relevant areas such as raw material extraction or waste management, as well as for more sustainable consumption and production patterns. Dedicated CE national action plans and specific financial schemes supporting green businesses are envisaged to ensure this transition.

<sup>22</sup> This is mainly the case in the Western Balkan countries. Entities are in place in Israel and Turkey.

<sup>23</sup> Turkey provides annual Environmental Indicator Reports and Provincial State of the Environment Reports. TurkStat is an important data supplier together with the Ministry of Economy. Progress on environmental monitoring is especially low in Albania and Bosnia and Herzegovina.

<sup>24</sup> Israel focuses on Green Employment in its Green Growth Strategy. In Turkey, the ILO project "Decent Work in a Green Economy" focused on the employment aspects of national efforts to a transition to a green economy. ILO and UNEP also have established work-shops on green jobs in the recycling sector in Montenegro several years ago.

- Dobra, Emalita, Progress of the Public Procurement System in Albania and in the European Union, 2016. Link: [http://journals.euser.org/files/articles/ejms\\_jan\\_apr\\_16\\_nr2/Emalita.pdf](http://journals.euser.org/files/articles/ejms_jan_apr_16_nr2/Emalita.pdf)
- European Cooperation in Science & Technology, Sharing and Caring Cost Action CA16121. Link: <http://sharingandcaring.eu/sites/default/files/files/CountriesReport2018.pdf>
- JRC-MIGAL, Bioenergy & Bioeconomy Status and Perspectives, 2016. Link: [http://publications.europa.eu/resource/cellar/6264fce7-87a6-4d9b-933a-283c6c4a9a3a.0001.03/DOC\\_1](http://publications.europa.eu/resource/cellar/6264fce7-87a6-4d9b-933a-283c6c4a9a3a.0001.03/DOC_1)
- Organisation for Economic Co-operation and Development, Environmentally-related Taxes on Energy Use, 2016. Link: <https://www.oecd.org/tax/tax-policy/environmental-tax-profileisrael>.
- Organisation for Economic Co-operation and Development, Environmentally Related Taxes on Energy Use, Paris: OECD, 2014. Link: <https://www.oecd.org/tax/tax-policy/environmental-tax-profile-turkey.pdf>
- Organisation for Economic Co-operation and Development, SME Policy Index Western Balkans and Turkey 2019 Pocketbook, 2019. <https://www.oecd.org/south-east-europe/programme/SMEPI-Pocketbook-2019.pdf>
- Organisation for Economic Co-operation and Development, International Trade and the Transition to Circular Economy, 2018. Link: <https://www.oecd.org/environment/waste/policy-highlights-international-trade-and-the-transition-to-a-circular-economy.pdf>
- Regional Anti-Corruption Initiative, Law on Public Procurement Bosnia and Herzegovina, 2015. <http://rai-see.org/wp-content/uploads/2015/08/BiH-Law-on-public-procurement-en.pdf>
- Fernández, Y. & López, M. & Blanco, Blanca. Innovation for sustainability: The impact of R&D spending on CO2 emissions. Journal of Cleaner Production, 2017. Link: <https://www.sciencedirect.com/science/article/abs/pii/S0959652617326513>
- World Economic Forum, The Global Competitiveness Report 2019, 2019. Link: [http://www3.weforum.org/docs/WEF\\_TheGlobalCompetitivenessReport2019.pdf](http://www3.weforum.org/docs/WEF_TheGlobalCompetitivenessReport2019.pdf)
- International Labour Organization, Turkey: Towards a Green Job Strategy, 2013 Link: [https://www.ilo.org/global/topics/green-jobs/projects/europe/WCMS\\_463093/lang--en/index.htm](https://www.ilo.org/global/topics/green-jobs/projects/europe/WCMS_463093/lang--en/index.htm)



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