

EGDF – ISFE response to the European Commission call for feedback: a New European Strategy for a Better Internet for Children

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[EGDF](#) and [ISFE](#), representing Europe's video game sector, welcome the opportunity to respond to the European Commission Consultation on a **New European Strategy for a Better Internet for Children** and agree that every child has the right to be respected, protected and empowered online and offline. With more than 51% of the European population playing video games across all age groups, the industry continuously strives to ensure a safe online gameplay environment.

Europe's video game industry welcomed the publication of the 2014 Better Internet for Kids (BIK) strategy, which recognises the importance of ensuring wider availability and use of parental controls tools, age ratings and content classifications. The video games industry has long since been committed to ensure a range of easy-to-use parental control tools together with accessible information to enable parents to make an informed choice on whether and how to use these tools. The industry's self and co-regulatory minor protection framework "Pan European Game Information" (PEGI) system, used in 38 European countries, continues to evolve ¹.

Europe's video games sector can support and importantly enhance the European Commission's objectives regarding **the respect, the protection and the empowerment of children in the online space**. We welcome a new strategy that will focus on establishing a positive child perspective in today's digital world, and would like to contribute to the European Commission's reflection around the following three themes:

1. Children's right be empowered by education, leisure and culture: the right to play, the right to create and the right to education
2. Children's right to actively participate in the community through digital inclusion and accessibility, promoting diversity
3. Children's rights to protection

We also believe that parents, caregivers and educators need to be properly empowered to accompany children in their digital activities, just as they do in the offline world. This will require a shift in generational thinking and a change in behaviour and is an important societal aspect that the strategy should consider.

This contribution outlines our more detailed comments and suggestions. We would also like to invite the European Commission to consult our contributions to the consultations related to [Digital Principles](#), [Rights of the Child](#), Child Sexual Abuse Online, [Digital Education Action Plan](#), [Digital Services Act](#).

¹ [PEGI Age Rating System Officially Adopted in Portugal | Pegi Public Site](#)

1. The new strategy should empower children and young people in the online space and support their right to play, their right to create and their right to the “right” education

Children’s right to leisure and right to participate in artistic and cultural life

- 1.1. Because of video games’ artistic, creative and technological features, a number of countries, such as Germany, Spain, France and the Nordic countries, have over the last decade acknowledged video games as an important cultural medium. At global level, UNESCO included video games in its statistical framework for cultural domains back in 2005. EGDF and ISFE welcome the acknowledgement that video games can be part of the positive online experience through the uptake of video games to support formal and informal education.
- 1.2. **The right to play and the right to create.** Children’s rights to play and to create in the digital environment are important and many children acquire digital skills, discover coding and artistic creation and expression through video games. The right to leisure and to full participation in the cultural and artistic life of the 21st century must also mean access to and freedom to play video games. In the modern digital age of connection and participation, video games are the natural medium of entertainment. Only games offer the ability to both experience a work and to truly influence it. No other medium has such advanced possibilities for participation.
- 1.3. In addition to playing video games, children are also creating them. Consequently, children’s right to freedom of expression and their right to participate in artistic and cultural life in the context of their digital rights need to co-exist alongside other important policies such as minor protection.
- 1.4. Supporting education through video games and video games development as a hobby is a way to nurture local industry talent. As in any other field of arts, the route to success often starts early. Summer camps, games development youth clubs or junior games jams exist today where children are creating games². Their numbers are likely to increase in the near future as video games development tools become increasingly accessible.

Right to education: learning by playing

- 1.5. **The right to the “right” education:** Digital skills are today as vital as literacy and numeracy. They encompass not only technical abilities to apply ICT, but also digital literacy, safety, collaboration, and content creation. Digital skills are part of the European Framework of Key Competences for Lifelong Learning, which defines the competencies that each European citizen needs for personal fulfilment and development, employment, social inclusion and active citizenship.
- 1.6. Skills such as critical thinking, problem solving, teamwork, communication and negotiation skills, analytical skills, creativity, and intercultural skills are embedded throughout these Commission’s Key Competences³. Video games can help acquire these key competencies and skills. While they enable players to immerse themselves in rich imaginative worlds, collaborate or compete with friends or other fellow gamers around the world, they pose significant intellectual challenges. Specifically in terms of processing information, solving problems, devising strategies and plans, and interpreting information from a range of different media, both verbal and visual. Video games can also be seen as a means of

² See for example [Helsinki model for games industry talent building and https://gamestalent.de/](https://gamestalent.de/)

³ [Revised Council Recommendation on Key Competences for Lifelong Learning](#), p 14.

developing conceptual understanding or as a way of building logical or critical thinking abilities.

- 1.7. In primary education, teachers that have used games in the classroom observed a significant improvement in several key skills such as problem-solving and analytical, social, intellectual, spatiotemporal (hand-eye coordination, reflexes) skills, as well as an increase in concentration⁴. Games also contribute to the development of skills in creativity and innovation, such as the ability to cooperate and explore, self-management, independence, responsibility, initiative and enterprise. The Polish government included in the academic year 2020/2021, the video game “*This War of Mine*” by 11 bit Studios on the official reading list for high school students in Poland. It is made available for free to support the teaching of sociology, ethics, philosophy and history⁵. As part of the [Games machen Schule](#) initiative, the German states of Berlin and North Rhine-Westphalia are testing the use of videogames in schools in a model project and a study, respectively.
- 1.8. **Upskilling of teachers.** Education and training systems are crucial to ensure that every European is equipped with key competencies and basic skills for lifelong learning. Teachers and trainers therefore require adequate preparation and training themselves. Across the EU, there remains a high need for pedagogic training which empowers teachers with the required skills to help their students become digitally competent and guide them towards a more exploratory and creative interaction with technology. Only 39.4% feel well or very well prepared for the use of digital technologies for teaching⁶. Video games can help support this educational reform.
- 1.9. Since 2006, ISFE, in partnership with European Schoolnet (the network of 34 Ministries of Education), has explored how commercial video games can be used in schools. The initial research project under the name “[Games in Schools](#)” consisted of a survey of more than 500 teachers in 8 European countries, several case studies and interviews with policy makers. It revealed that games are increasingly used as a teaching tool although some teachers still encounter difficulties in integrating them into the curriculum, accessing equipment, and reservations of parents and their colleagues about the use of games.
- 1.10. On a bi-yearly basis, the project organises [Massive Online Open Courses](#) (MOOCs) to train teachers across Europe on online collaboration and the use of commercial video games as pedagogical support in the classroom. The course provides for 6 weekly workshops which mix multimedia content (like tutorials and video support materials) and simulation exercises with written documentation and reference materials. Participants interact through blogs and fora and at the end of each course teachers are asked to come up with a tailored lesson plan to do "in-class" activities. A record of 4,282 educators from 73 countries participated in the 2019 edition. As part of this project, a [Handbook for Teachers](#) offers appropriate training enabling teachers to combine digital with more traditional teaching tools.
- 1.11. The research literature and case studies show that digital video games-based approaches provide adaptable, motivating and engaging techniques that can be used to empower individuals and communities in ways that lead to social inclusion.⁷ In 2018, about 10.6% of people in the EU aged 18-24 were considered early leavers from education and training. The Commission has recognised⁸ that there has been little or no progress in this field over the past two years. People with low levels of education are particularly vulnerable as they are more likely to fall into poverty. They run an increased risk of unemployment, lower lifetime earnings, lower participation in learning later in life, and less adaptability to change. Keeping virtually everyone in education at least until they complete upper secondary

⁴ [How are digital games used in schools?](#) Games in Schools Project, Final Report, 2009, p. 10.

⁵ <https://www.gamesindustry.biz/articles/2020-06-18-this-war-of-mine-will-be-added-to-polish-schools-reading-list>

⁶ [Education and Training Monitor 2019](#), p. 32 and 88.

⁷ <ftp://ftp.jrc.es/pub/EURdoc/JRC78777.pdf> Pages 27-92

⁸ [Education and Training Monitor 2019](#), p. 51

schooling is therefore an objective that has been high on the EU's political agenda for many years.

1.12. Video gameplay has the ability to bring the school environment closer to pupils' everyday digital reality. Teachers regularly observe that pupil motivation is significantly greater when video games are integrated into the educational process⁹. This increased motivation is sometimes linked to the greater self-confidence that some pupils develop when using games in the classroom. Their previous knowledge of games gives them the opportunity to guide and help less experienced pupils.

1.13. Video games can be useful for pupils who encounter difficulties in cognitive, methodological, or social learning (slow learning, lack of organisation in work, resistance to rules and evaluation, etc.). The ways in which mistakes and different learning rhythms are managed in a game takes the drama out of learning. Video games can reconcile the pupil with school learning as they allow repetition, identify errors in a non-traumatising way, make rules easier to accept, and help the pupil to understand his or her own way of learning. For example, video games competitions (esports) have been used to engage and motivate children and young people who cannot access a place in a mainstream school or are at risk of permanent exclusion from school, and act as a vehicle to facilitate the development of positive personal attributes. Since 2018, the British Esports Association has been organising the AP Championships with the participation of Alternative Provision schools. The case stories consistently highlight improved attitude and communication skills, and better attendance levels.¹⁰

2. The strategy should support children's rights to actively participate through digital inclusion, and accessibility

Accessibility

2.1. The digital environment provides unprecedented possibilities in ensuring access to education, culture and leisure for disabled children. Video games have considerable potential to enable a hugely diverse range of people to play and interact at an equal level.¹¹

2.2. The psychological benefits for disabled children and also adults to interact at an equal level in this area are multiple. The industry is increasingly adding accessibility features to its hardware and within games themselves. These include chat transcription for online in-game chat and in-game difficulty customisation settings that accommodate a physical or mobility disability.¹² For hardware, console manufacturers such as Microsoft with its adaptive controller further facilitate access and enjoyment of video games by the disabled population. Video game publishers are incorporating more features to make their games accessible and Electronic Arts recently committed royalty-free access to its patents related to game accessibility.¹³ Video game companies work with the disabled community to better understand their need and how content and devices can be further adapted to support the disabled community. Game Awards now increasingly include an "accessibility category" which is an important step toward taking into account accessibility in the development phase of a video game¹⁴ and guidelines are available to the developers' community¹⁵. Games Weeks and trade shows are increasingly making sure that their events are also a place where everybody, regardless of their condition, can come and enjoy gameplay, together. Finally,

⁹ [How are digital games used in schools?](#) Games in Schools Project, Final Report, 2009, p. 9.

¹⁰ [AP Championships Report](#), British Esports Association.

¹¹ <https://www.bbc.com/news/disability-47064773>

¹² <https://blog.playstation.com/2020/06/09/the-last-of-us-part-ii-accessibility-features-detailed/>

¹³ <https://www.playstation.com/en-gb/support/hardware/ps5-accessibility-settings/>

¹⁴ [INNOVATION IN ACCESSIBILITY AWARD ADDED TO THE GAME AWARDS | News | The Game Awards](#)

¹⁵ [Xbox Accessibility Guidelines - Game Stack | Microsoft Docs](#) and [Game accessibility guidelines | Basic](#)

the industry increasingly seeks to reflect diversity in character portrayal and narratives of its games illustrating once again how video games can reflect and influence society, attitudes and culture.

- 2.3. Accessibility should continue to be a key priority for the updated BIK strategy as it is crucial for disabled children to enjoy a digital past time with other children, to socialise, to learn and to participate on equal conditions.

Diversity and gender balance

- 2.4. Diversity and gender balance in education, industry and culture are directly linked to a diverse digital inclusion. The video games sector and its trade associations work with governments to ensure that young girls are encouraged to take STEM courses, leading to more gender balance within the sector, which currently has a female workforce of 20 %, similar to the overall proportion of women in ICT in Europe which is 18 %, according to European Union data. According to research from the University of Surrey by Professor Anesa Hussein, video game playing girls are three times more likely to enrol in STEM programmes¹⁶. Hence it is paramount that teachers have the ability to identify girls who have video game play as a hobby in order to encourage them towards a STEM programme. The “Games in Schools” project, by the European Schoolnet and ISFE, which brings video games into the classroom, can support this goal, and in addition be part of the blended learning criteria that Member States will increasingly integrate into their educational systems to respond to future challenges.
- 2.5. Video games themselves offer diversity through the game play. The interactive features allow player to choose their character according to gender, skin, personality etc. This drives choice and diversity in video game play which can be an important mirror of the society around us.
- 2.6. Increasingly children are participating in dialogues regarding the future of society and their rights, online and offline. Work undertaken by UNESCO in particular puts children’s focus and participation high on the agenda, and children are increasingly listened to and considered. Video games have a unique feedback feature in the form of their vibrant and vocal communities. These communities provide constant feedback to the video game companies about their game, about the play, about the device etc. Hence the voice of players and those of children (on the condition that they are allowed by their parents to participate in the online community) already play a very important part of the video game eco system. These communities constitute an important and constant feedback loop to the video game company. If a company does not take community feedback seriously players may abandon the game. Of course, these in-game communities are moderated to ensure they remain inclusive in accordance with community codes of conduct.

3. The strategy should support children’s right to protection

Long standing safety by design commitment and the Pan European Game Information System

- 3.1. With more than 51% of the European population playing video games across all age groups, the industry continuously strives to ensure a safe online gameplay environment. ISFE is at the forefront of raising the bar in harmonised self-regulation and founded PEGI (the Pan-European Game Information system) in 2003, which is now used in 38 countries across Europe. EGDF and ISFE and their affiliated members have a strong commitment to minor protection and a long history of positive action to ensure a safe gameplay environment as detailed below

¹⁶ [Girls' video gaming behaviour and undergraduate degree selection: A secondary data analysis approach - ScienceDirect](#)

- 3.2. The **PEGI System** is supervised by national authorities and comprises a [Code of Conduct](#), a complaints board and an enforcement committee. The industry has invested considerably and continue to invest in parental control tools and various tools and safeguards to keep in-game communication features free from illegal and harmful content¹⁷. In fact, these commitments pre-date **the 2014 Better Internet for Kids (BIK) strategy** which recognised the importance of ensuring wider availability and use of parental controls tools, age ratings and content classifications. The industry's tools are in line with the Commission's recommendations, "*simple to configure, user-friendly, and accessible for all on all internet-enabled devices available in Europe*".
- 3.3. To supplement the PEGI system, **parental control tools, and family settings**, allow parents to manage their children's online interaction, while promoting parental autonomy¹⁸. Parents can set up accounts for their children providing them with a significant degree of control over their children's online activities, including consenting to the processing of their children's data and managing with who and how the child communicates and whether user-generated content can be shared or viewed. Parental control tools provide a high level of assurance for age verification and is a typical example of how the industry provides safeguards for underaged users. Parents can, for example, disable online interaction with others, limit online interaction, or to pre-approve friend requests etc. In addition, child account tools allow parents to set time limits for play supporting them in ensuring a healthy balance as regards their child's digital activity. Parents can also limit access to age-appropriate games and disable or limit any in-game spending. These various options allow each family to choose the settings that work best for them. Many platforms provide parental control apps so that parents can set controls and monitor their child's play time and spend on the parent's mobile phone.
- 3.4. **Information to parents.** We fully agree with the Commission that "*the tools should be promoted so as to ensure the widest possible awareness of their existence and take-up*". Our industry is conducting public awareness campaigns across Europe¹⁹ informing parents about the tools they have access to in order to set fair rules, and importantly to inform parents on how to start a dialogue and how to take an interest in their child's online activities, such as to play video games with their children and attend events together. The video games sector partners with relevant institutions such as family organisations, media literacy organisations, and public authorities, to ensure that the right audience is reached, and that the information is relevant. **ISFE, EGDF, and our national trade associations would welcome a close collaboration with European's Safer internet Centres to make sure that the availability of tools and the national information initiatives are widely communicated.**

Protection of children from all forms of violence and exploitation

- 3.5. For the video game sector there is a strong incentive to provide a positive and safe environment in online gameplay, because many children enjoy and interact with video games, but also because of the highly competitive nature of the sector. Communication features in online games are typically heavily restricted, existing to support gameplay, which makes them not suited for long-term or widespread sharing of harmful content. Because of a longstanding safety by design approach as we explain below, illegal and harmful content is rare in in-game communications. The [Ofcom Online Safety Report](#) dated 2020, which surveyed 2000 adults and 2000 children aged 12-15, stated that 62% of adults in the UK have experienced potential online harms in the past 12 months, and 81% of children aged 12-15.

¹⁷ The PEGI system, used today in 38 European countries, informs parents about the age appropriateness of a video game, the content and the features present in the game so that an informed choice can be made prior to play and/or purchase. The PEGI App has been developed to further facilitate access to the right information so that parents can consult the age rating and content features present in a video game from their phone or tablet.

¹⁸ [Player and parental control tools - ISFE](#)

¹⁹ <https://www.isfe.eu/responsible-gameplay/responsible-gameplay-in-your-country/>

Online harms were the least present in “gaming” compared to other online platforms, as 2 % of adults experienced harm via video game play with online interaction features, and 3% of children aged 12-15. Further, in those cases where illegal and harmful content has been encountered, 96% of parents claim that they take action ²⁰.

3.6. In addition to the PEGI system, and the availability of parental control tools, members have in place additional tools to keep in-game communication features free from illegal and harmful content.

- **Reporting systems** are in place for all chats and online functionalities to report any abuses that are against the terms of use and/or codes of conduct which prohibit terrorist and racist content or comments and activities (among other types of harmful and illegal content).
- **Moderation:** Affiliated video games platforms employ moderators, sometimes in very large teams, that review reports of breaches of codes of conduct and then take down the offensive content, and may act on the offender’s account such as by suspension or banning. Sometimes moderation alone is not enough. Determined bad actors can learn to circumvent it. Consequently, in addition to reporting mechanisms, video games companies are increasingly investing in hiring staff whose role is to build self-sustaining, healthy, non- toxic communities that moderate themselves.
- **Filtering software:** many video games companies also use advanced word filtering and URL filtering tools to block damaging content. These are automated but dynamic systems which are constantly under review by human moderators and subjected to categorisation changes. Some platforms have policies obliging developers to pass all chat and/or game text through their filtering system where chat communication and player inputted text are scanned for the safety of users and legal compliance reasons.
- **Muting tools:** these allow players and moderators to mute players that are not respecting the terms of use and codes of conduct.
- **Investment in technology** is an ongoing part of video games companies’ work to prevent illegal and harmful content. Innovations in the use of AI and machine learning tools to identify potential grooming behaviours, tag and remove CSAM, and more effectively remove inappropriate language from chat rooms, are being trialled in various parts of the sector, always with a consideration of the privacy of users. Technology such as Photo DNA allows reliable identification and removal of known CSAM from online services. Increasingly, technology is being developed to detect new child sexual abuse, i.e. Thorn deploys a grooming detection technique that helps identify potential instances of child online grooming for sexual purposes in historical , text-based conversations, making it a valuable and preventive tool to combat child sexual abuse online.

3.7. The industry increasingly seeks way of encouraging safe and inclusive behaviour online such as by rewarding players for positive behaviour. For example, on PlayStation Network, players can give other players positive accolades to encourage or congratulate other players on a multiplayer match well played. The accolades received are displayed in the player’s profile.

PEGI age ratings

3.8. We also share the Commission’s ambition is to have a “*generally applicable, transparent, and consistent approach to age rating and content classification EU-wide, for a variety of services, including apps*”. While the BIK strategy recognises the PEGI age rating system as “*a successful*

²⁰ Ipsos MORI Survey on use of in-game communication features 2020, commissioned by ISFE.

initiative on which an EU approach to age rating and content classification applicable across services can be built”, PEGI has continued to enlarge its scope to provide parents with understandable age ratings of mobile applications, including information about certain types of functionalities, such as in-app purchases, location data sharing, unrestricted internet access and the ability of users to interact.

- 3.9. In order to do this, PEGI, USK and ESRB, its US counterpart, founded IARC²¹, the International Age Rating Coalition, which comprises rating boards from Europe, North America, Brazil, Australia and South Korea who have joined forces to provide a global solution for digitally delivered games and apps. IARC allows the games publisher to obtain age ratings for a digitally-delivered game or app from all of those rating bodies via a single application via the IARC system eliminating the need to apply separately to each one. IARC has now been adopted by Google Play Store, Microsoft Windows Store, Nintendo® eShop, the Sony PlayStation® Store and the Oculus store which meet the costs of the age ratings. By integrating with the IARC system, these digital store fronts can automatically display the relevant age rating for a specific region, i.e. the store front will show a PEGI rating for the European consumer/parent, and an ESRB rating for the North American region. These age ratings work in tandem with the parental control tools on video game devices and platforms described above to ensure children play games appropriate for their age.

In-game purchases

- 3.10. Our industry also takes seriously concerns related to in-game purchases and online advertising as referenced in the strategy. Video game companies always inform consumers in a transparent and clear manner about the costs related to any purchase and of any in-game purchase, prior to purchase. Since 2015, for digital games only, and 2018, for packaged games too, PEGI descriptors include an in-game purchase descriptor that notifies the existence of additional purchasing options within a video game in line with the Commission’s recommendation. The industry has worked with the Consumer Protection Centre Cooperation Network to clarify the rules around the use of the word “free” and direct exhortations to children. As a responsible industry, our membership operates on the basis of GDPR-compliant privacy practices across Europe and does not engage in manipulative practices. Where virtual currencies are purchased, the display of the price of such currency is displayed in real currency before and at the point of purchase, as required by law, just as would happen with a purchase of any other type of digital content. We also make it clear, prior to a game being acquired for a payment or for free, whether a player can or will need to spend money within the game. Recent guidance has been published by the ASA, the UK regulator, on advertising in-game purchases, including virtual currencies.²²
- 3.11. Furthermore, parental control tools allow parents to set restrictions related to spending of money in the game so that children do not engage in any financial transactions without the consent of parents. Parents are encouraged to use these. For example, on the PlayStation Network, users under 18 may only have “Child Accounts” tied to family manager accounts and spending on those accounts created for those under 18 years are set to zero by default. In other words, accounts tied to users under 18 can only be used to make purchases if a parent or family manager authorises that. Further, where spending is permitted, the money comes from the parent account, not the child account. The parent receives and email notifying each transaction and can also go into the account information to see a transaction history. Similarly, teen users on EA’s Origin platform cannot spend in-game unless their account is linked to a parent’s that authorised spend.

Advertising

²¹ <https://www.globalratings.com/about.aspx>

²² [Guidance-on-advertising-in-game-purchases.pdf \(asa.org.uk\)](#)

3.12. Video games companies are obliged by legislation and regulatory codes to ensure that their advertising is not only legal, decent, honest and truthful (for all of their audience) but also does not exploit the credulity or inexperience of children who interact with their advertising content. Developer studios and publishers co-operate with advertising networks to ensure that their players will only see advertisements complying with European legal and regulatory standards.

3.13. In addition, our sector has undertaken initiatives that go beyond mere compliance with the law and has set self-regulatory standards to protect children from inappropriate advertisements. PEGI signatories must maintain a responsible advertising policy and ensure that advertisements about video games accurately reflect to the best extent possible both the nature and content of the game and the age rating associated with it. Ads must be created with a sense of responsibility towards the public and avoid all content that is likely to cause serious or widespread offence to the average consumer. Signatories may also not specifically target advertising for video games rated 16 or 18 to consumers for whom they are not rated as appropriate.

Conclusions

3.14. **Finally, we believe that parents, caregivers and educators need to be properly empowered to accompany children in their digital activities, just as they do in the offline world. This will require a shift in generational thinking and a change in behaviour and is an important societal aspect that the strategy should consider.**

About EGDF and ISFE

EGDF (European Games Developer Federation) unites national trade associations representing game developer studios based in 19 European countries: Austria (PGDA), Belgium (FLEGA), Czechia (GDACZ), Denmark (Producentforeningen), Finland (Suomenpelinkehittäjät), France (SNJV), Germany (GAME), Italy (IIDEA), Malta (MVGSA), Netherlands (DGA), Norway (VIRKE Produsentforeningen), Poland (PGA), Romania (RGDA), Serbia (SGA), Spain (DEV), Sweden (Spelplan-ASGD), Slovakia (SGDA), Turkey (TOGED) and the United Kingdom (TIGA). Altogether, through its members, EGDF represents more than 2,500 game developer studios, most of them SMEs, employing more than 35,000 people.
www.egdf.eu

ISFE (Interactive Software Federation of Europe) represents leading video game companies such as publishers, studios and console manufacturers, of which many also have esports activities, as well as national trade associations across Europe: Austria (Ovus), Belgium (BEA), France (SELL), Germany (game), Italy (IIDA), the Netherlands (NVPI Interactief), the Nordics (ANGI), Poland (Spidor), Portugal (AEPDV), Spain (AEVI), Switzerland (SIEA), and the UK (Ukie). The full list of ISFE members is available at www.isfe.eu

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