



# FINAL IMPLEMENTATION REPORT (D.T 2.8.5)

Italy

6<sup>th</sup> Decembe r 2018

# A. Overall Pilot Aproach

## a. Pilot Phase Summary

The pilot action in Italy focuses on the identification of modal shift potentials and benefits for the selected chemical companies taking part to ChemMultimodal project, and in particular to the pilot phase, on a voluntary basis.

For this reason, the Italian approach has been characterized since the beginning as oriented to involve companies in the project activities using all the possible ways to get useful information to work on and build up the pilot phase as outlined below:

- 1. During summer 2017, face to face meetings and phone calls were held with chemical and logistic companies to start collecting information on logistics of the analysed chemical sites;
- 2. On the basis of the feed-back collected through the dialogue with companies' logistic managers, it was possible to prepare a "Survey data sheet" useful to collect data and information to start the preliminary analysis: routes, flows of goods in/out, current ways of transport, spread of relevant costs, delivering time, reliability, weaknesses and strengths;
- Kick-off meeting held on December the 4<sup>th</sup>, 2017 with the aim to spread ChemMultimodal project and to reach the biggest possible number of chemical and logistic companies. About 80 people attended the meeting;
- 4. On the basis of data collected, Sviluppo Chimica and the Province of Novara made use of the elaborated Toolbox to make a "preliminary analysis" of modal shift feasibility;
- "Pilot of the Pilot": on 17th and 18th January 2018, at Sviluppo Chimica premises, a roadshow meeting was held gathering Nuova Solmine spa and some carriers and LSPs like Getras, CEMAT-Mercitalia, Chemoil Logistics, Captrain, DB Cargo;
- 6. On the basis of the previous experience, Sviluppo Chimica and the Province of Novara decided to organize the "Mid-term Pilot Workshop" held March the 5<sup>th</sup>, 2018 as a sequence of bilateral talks among the remaining 5 chemical companies and the transport companies and LSPs available to take part to the Pilot project. These kind of road-show should offer in the upcoming future multimodal solutions for the identified routes;
- 7. The last Pilot Workshop Meeting was held on the 3<sup>rd</sup> of July, 2018 in Milan, on the occasion of Federchimica Logistics Conference to start analysing the results of the Pilot.



6 Chemical Companies and 9 LSPs have been involved in the Project. 10 Routes have been analysed and a total of 26 modal shift offers were delivered to the companies. Actually only 5 offers have the real potential to be implemented, even if some issues still need to be tackled. The other offers unfortunately were not competitive for many reasons that will be analysed in the following chapters. The Pilot phase was really useful for us because it allowed to highlight with real cases and not only from a theoretical point of view the obstacles that don't allow the modal shift.

## b. Pilot Phase Impact

The sites of the Chemical Companies involved in the pilot project are situated in the North-West part of Italy, not only in the Province of Novara.

Since the beginning, it was clear that the modal shift potentials of the 6 involved Chemical Companies that could be achieved during the Pilots couldn't impact significantly on the overall modal shift percentage. Nevertheless, it was very important to go on with the testing activities.

We decided to choose the routes for the modal shift focusing on two aspect: volumes and hazardous of the goods transported, in order to generate high benefits to area in terms on safety and environment. In this way, one of the first evidences was that the involved companies already exploited the full potential of multimodality offered at competitive conditions. For some companies, multimodality already covers more than 80% of their total transport volumes. As a result of this consideration the remaining modal shift potential were very challenging for many aspects, e.g. costs, delivery time, infrastructures, special equipment, type of goods and so on.

As we will suggest in details during the conclusions and in the next steps of ChemMultimodal Project, to improve the multimodal transport in the North-West of Italy it is necessary to significantly increase the offer of multimodality (also enhancing and improving infrastructure) in order to make it more competitive in comparison with road-only solutions.





# **B.** Participating companies

Name of company	Profile)	SME or large enterprise	Location (subject to pilot)
BASF	Products	Large enterprise	• Fino Mornasco (IT) - Vienna (AT)
Lamberti	Products	Large enterprise	Albizzate (IT) - Onda (ES)
Mapei	Products	Large enterprise	• Mediglia (IT) - Kiev (UA)
			• Mediglia (IT) - Sagstua (NO)
			• Mediglia (IT) - Apeldorn (NL)
			• Genova (IT) - Villadossola (IT)
			• Mediglia (IT) - Latina (IT)
Nuova Solmine	Products	Large enterprise	<ul> <li>Scarlino (IT) - Sannazzaro dei Burgondi (IT)</li> </ul>
Radici	Products	Large enterprise	• Novara (IT) - Huesca (ES)
SIAD	Products	Large enterprise	• Bergamo (IT) - Ludwigshafen (DE)
Captrain	Services	Large enterprise	• Fino Mornasco (IT) - Vienna (AT)
			<ul> <li>Scarlino (IT) - Sannazzaro dei Burgondi (IT)</li> </ul>
Chemoil	Services	Large enterprise	• Scarlino (IT) - Sannazzaro dei Burgondi (IT)
DB Cargo	Services	Large enterprise	<ul> <li>Scarlino (IT) - Sannazzaro dei Burgondi (IT)</li> </ul>
			• Mediglia (IT) - Apeldorn (NL)
			• Mediglia (IT) - Sagstua (NO)
			<ul> <li>Genova (IT) - Villadossola (IT)</li> <li>Bergamo (IT) - Ludwigshafen (DE)</li> </ul>
Den Hartogh	Services	Large enterprise	• Fino Mornasco (IT) - Vienna (AT)
Hoyer	Services	Large enterprise	<ul> <li>Fino Mornasco (IT) - Vienna (AT)</li> <li>Novara (IT) - Huesca (ES)</li> <li>Bergamo (IT) - Ludwigshafen (DE)</li> </ul>
Mercitalia	Services	Large enterprise	• Mediglia (IT) - Apeldorn (NL)
Rail Intermodal			• Mediglia (IT) - Latina (IT)
interniodut			• Mediglia (IT) - Sagstua (NO)
			<ul> <li>Albizzate (IT) - Onda (ES)</li> <li>Scarlino (IT) - Sannazzaro dei Burgondi (IT)</li> <li>Bergamo (IT) - Ludwigshafen (DE)</li> </ul>
Rail Cargo Italia	Services	Large enterprise	<ul> <li>Fino Mornasco (IT) - Vienna (AT)</li> <li>Mediglia (IT) - Kiev (UA)</li> </ul>



			• Mediglia (IT) - Sagstua (NO)
			• Bergamo (IT) - Ludwigshafen (DE)
Trans Italia	Services	SME	<ul> <li>Albizzate (IT) - Onda (ES)</li> <li>Novara (IT) - Huesca (ES)</li> </ul>
Transmec	Services	SME	• Fino Mornasco (IT) - Vienna (AT)

# C. Transport routes addressed

		ENERAL DATA		BEFORE PILOT LAUNCH			
#	Chemical company addressed	Shipped materials or goods	Quantity (estimate; per month)	Logistic service provider(s)	Transport distance and mode(s)	Modal split (in %)	CO2 emitted (per month; calculated)
1	BASF Fino Mornasco (IT) - Vienna (AT)	NON ADR bulk liquid	850 ton	Captrain Den Hartogh Hoyer Rail Cargo Italia Transmec	866 km Road only	100% Road	46.02 tons of CO <sub>2</sub>
2	Lamberti Albizzate (IT) - Onda (ES)	Packed goods, only 5% ADR	240 ton	Trans Italia Mercitalia Rail Intermodal	1294 km	100% Road	19.47 tons of CO <sub>2</sub>
3	<b>Mapei</b> Mediglia (IT) - Kiev (UA)	Packed goods both ADR (Class 3) and NON ADR.	160 tons	Rail Cargo Italia	2061 km	100% road	20.48 tons of $CO_2$
4	<b>Mapei</b> Mediglia (IT) - Sagstua (NO)	Packed goods both ADR (Class 3) and NON ADR.	160 tons	Rail Cargo Italia Mercitalia Rail Intermodal DB Cargo	2141 km	210 km by road 1319 km by train 745 km by Short shipping sea	8.64 tons of CO <sub>2</sub>
5	<b>Mapei</b> Mediglia (IT) - Apeldorn (NL)	Packed goods both ADR (Class 3) and NON ADR.	~ 3000 tons	DB Cargo Mercitalia Rail Intermodal	1034 km	100% Road	191.27 tons of CO <sub>2</sub>





6	<b>Mapei</b> Genova (IT) - Villadossola (IT)	Packed goods both ADR (Class 3) and NON ADR.	~3000 tons	DB Cargo		243 km	100% Road	45 tons of CO <sub>2</sub>
7	<b>Mapei</b> Mediglia (IT) - Latina (IT)	Packed goods both ADR (Class 3) and NON ADR.	~1700 tons	Mercitalia Intemrodal	Rail	641 km	100% Road	$69.6$ tons of $CO_2$
8	Nuova Solmine Scarlino (IT) - Sannazzaro dei Burgondi (IT)	ADR bulk liquid	2500 tons	Captrain Chemoil DB Cargo Mercitalia Intermodal	Rail	365 km	100 % Road	56.8 tons of $CO_2$
9	<b>Radici</b> Novara (IT) - Huesca (ES)	Packed goods NON ADR	50 tons	Hoyer Mercitalia Intemodal Trans Italia	Rail	1201 km	100% Road	3.72 tons of CO <sub>2</sub>
10	SIAD Bergamo (IT) - Ludwigshafe n (DE)	Bulk gas ADR	480 tons	DB Cargo Hoyer Mercitalia Intemodal Rail Cargo Ita	Rail alia	635 km	100% road	18.96 tons of $CO_2$



# D. Planned and Realized Multimodal Shifts

	Number of	ANTICIPAT	ED OR REAL SITUA	TION AFTER PIL	OT PHASE	CHANGE
	small face-	Logistic	Transport	Modal split	CO <sub>2</sub> emitted	CO <sub>2</sub> reduction
#	to-face meetings	service	distance and	(in %)	(per month; calculated)	(anticipated or real)
		provider(s)	mode(s)		Calculated)	Teal)
1	7	None of the	Road :866 km	Road 100%	46.02 tons of	-
		LSPs involved			CO <sub>2</sub>	
		was able to				
		find a MM solution.				
2	4	Trans Italia	Road: 257 km	Road: 21,6%	19.47 tons of	11.99 tons of $CO_2$
			Sea: 930	Sea: 78,4%	CO <sub>2</sub>	per months (- 61.5%)
3	6	DB Cargo	Rail: 243 km	Rail 100%	45 tons of $CO_2$	29 tons of $CO_2$ per months ( -64%)
4	6	Mercitalia Rail	Road: 63 km	Road: 9%	69.6 tons of	38.4 tons of $CO_2$
		Intemrodal	Rail: 630 km	Rail: 91%	CO <sub>2</sub>	per months (-55%)
5	6	Captrain	Road: 3 km	Road:1%	56.8 tons of	37.5 tons of $CO_2$
		Chemoil	Rail: 362 km	Rail:99%	CO <sub>2</sub>	per months (-66%)
		DB Cargo				





## Route #1: BASF: Fino Mornasco (IT) - Vienna (AT)

The multimodality potential was not exploited for the following reasons:

- Captrain: they could perform the multimodal transport from Milano to Vienna, but they don't have the necessary rail permissions.
- Den Hartogh: they decline to make any offer for own commercial reason/policy;
- Hoyer: they introduced an offer concerning an intermodal shift, but transit time was too long (4 days);
- Rail Cargo Italia: there isn't a rail connection inside the departing location nor the destination plant, so the cost of a train solution would be too high, and consequently they refused to make an offer;
- Transmec: they explained their difficulty because their route should pass through an hub in Germany so the transit time and the costs would be not competitive. According to them there is no rail cargo route connecting directly Milano to Vienna.

Moreover, the product has specific physical characteristics so that its temperature cannot decrease under a certain limit during the transport. If it should happen, the product must be warmed up before the unloading using hot water at a certain temperature, and no other mean. So, the transit time must be quick enough to avoid the warming up, and if it is too long (more than 2 days) the unloading time will significantly increase, and its cost too.

## Result of the Pilot (by 06 December 2018)

 ${\rm X}$  proposed transport reorganisation discarded because found solutions are not competitive

## (Un)Success Factors

In this case the product specificity and needs prevents the shift from road to multimodal. Also the lack of direct connection between Milano and Vienna would increase the transit time and cost in a non-competitive way.

Tool-Box Element	Who used this tool-box element?	How was the element evaluated?
IT-Visualization	project representatives	somewhat useful
Consulting services	project representatives	very useful
Planning Guideline	project representatives	not useful
CO <sub>2</sub> -Calculator	project representatives	useful





## Route #2: Lamberti: Albizzate (IT) - Onda (ES)

Multimodality was implemented in 3 steps:

- First step by road between Albizzate and Genova (188 km)
- Second step Genova Valencia by Ro-Ro ferry (~930 km)
- Third step by road from Valencia to Onda (69 km)

The total emission of the new multimodal trip is 7.48 tons of  $CO_2$  per months, with a saving of 11.99 tons of  $CO_2$  per months (-61.5%).

The toolbox was used during the meeting between Chemical Company and LSP to support the discussion.

These saving potential was tested in a pilot multimodal trip, but a problem arose because Grimaldi company (Italian ship owner) is transferring its route from Valencia to Sagunto (30 km far from Valencia)causing an increase of the transit-time. This ship owner decision will only delay the start of using multimodality from Italy to Spain.

## Result of the Pilot (by 06 December 2018)

X proposed transport reorganisation effectively approved

After 3 test under real-life conditions the modal shift is actual in place. All 240 ton per month has been shifted.

#### **Success Factors**

The possibility to increase the volume of the route drove the Chemical Company to the multimodality. In fact with this solution they can load up to 44 t, instead of the 40 t allowed by international road transport rules.

Tool-Box Element	Who used this tool-box element?	How was the element evaluated?
IT-Visualization	project representatives	somewhat useful
Consulting services	project representatives	very useful
Planning Guideline	project representatives	not useful
CO <sub>2</sub> -Calculator	project representatives	useful





## Route #3: Mapei: Genova (IT) - Villadossola (IT)

Mapei and DB Cargo are discussing about the actual implementation of rail transport modality directly from Genova harbour to Villadossola plant, that has an internal rail connection. This modal shift could save about 29 tons of  $CO_2$  per months (-64%).

The toolbox was used during the meeting between Chemical Company and LSP to support the discussion.

The environmental advantages offered by multimodal solution are evident and extremely interesting; the critical point is the economic value of the proposal to be compared with the truck only costs.

## Result of the Pilot (by 06 December 2018)

 ${\rm X}$  proposed transport reorganisation under evaluation by company decision-makers

#### **Success Factors**

Chemical Company site has an internal track, so modal shift is easier. The biggest barrier is provided by the economical issues.

Tool-Box Element	Who used this tool-box element?	How was the element evaluated?
IT-Visualization	project representatives	somewhat useful
Consulting services	project representatives	very useful
Planning Guideline	project representatives	not useful
CO <sub>2</sub> -Calculator	project representatives	useful





## Route #4: Mapei: Mediglia (IT) - Latina (IT)

Mapei and Mercitalia Rail Intermodal are discussing about the transfer to multimodality. The multimodal route will be:

- Mediglia Melzo by truck (20 km)
- Melzo Pomezia by train (630 km)
- Pomezia Latina by truck (43 km)

The total emission from this multimodal transport will be 31.2 tons of  $CO_2$  per months, with a saving of 38.4 tons of  $CO_2$  per months (-55%).

The toolbox was used during the meeting between Chemical Company and LSP to support the discussion.

The environmental advantages offered by multimodal solution are evident and extremely interesting; the critical point is the economic value of the proposal to be compared with the truck only costs.

## Result of the Pilot (by 06 December 2018)

 ${\rm X}$  proposed transport reorganisation under evaluation by company decision-makers

#### **Success Factors**

Chemical Company plant has an internal track, so modal shift is easier. The biggest barrier is provided by the economical issues.

Tool-Box Element	Who used this tool-box element?	How was the element evaluated?
IT-Visualization	project representatives	somewhat useful
Consulting services	project representatives	very useful
Planning Guideline	project representatives	not useful
CO <sub>2</sub> -Calculator	project representatives	useful





## Route #5: Nuova Solmine - Scarlino (IT) - Sannazzaro dei Burgondi (IT)

Nuova Solmine received offers from Chemoil, DB Cargo, GETRAS (which will work in close cooperation with <u>Captrain</u> or Mercitalia Rail Intermodal).

Offers are under evaluation as some issues need to be managed to make the proposal attractive and feasible:

- 1. Sannazzaro dei Burgondi loading station is not connected with an electrified line; so locomotive need to be changed. Moreover, the pick-up and delivery track is shorten than standard ones, so the train will be composed by 13 wagons instead of 16.
- 2. All the LSPs proposed solutions from Sannazzaro to Scarlino yard. The handling of last mile remains on Solmine so the final cost increases a lot and is less competitive with road transport.
- 3. The transport required a significant investment in equipment (product specific swap bodies) that have a different impact on the final cost depending from the transport contract duration (1,3 or 5 years); so, guarantees from the supplier are required.

## Result of the Pilot (by 06 December 2018)

 ${\rm X}$  proposed transport reorganisation under evaluation by company decision-makers

## Success Factors

Chemical company has an internal track and by mission are very close to environmental themes.

Several issues arose during the pilot, and the lack of needed equipment on the market can seriously compromise the success of this shiftment.

Even if Nuova Solmine is still facing some problem to perfom the modal shift, thanks to the connection born within Chemmultimodal Project, it was able to get in touch with the Infrastructur manager and to access a funding program to electrify the "last rail mile". This funding will lead to even more modal shift, although probably not during Chemmultimodal lifespan.

Tool-Box Element	Who used this tool-box element?	How was the element evaluated?
IT-Visualization	project representatives	somewhat useful
Consulting services	project representatives	very useful
Planning Guideline	project representatives	not useful
CO <sub>2</sub> -Calculator	project representatives	useful





# E. Conclusion and further plans

## a. Task of the national project team

#### Partner 1:SC Sviluppo chimica & Partner 2: Provincia di Novara

#### Main tasks:

- Select participants in the Pilot Project (Workshop and other contacts);
- Provide consulting activity to all the companies involved in the Project (Chemical Companies/LSPs/HUBs).
- Find, together with the involved companies, suitable routes where shifting from monomodality to multimodality could be performed;
- Monitor the progress of pilot project activities and, in case, find the corrective actions;
- Analyse and elaborate results of the Pilot Project;
- Disseminate the Project results among the consortium and involved stakeholders;
- Share information between Project Partners.

Approximate project resources spent for local pilot (including personnel):

#### SC Sviluppo chimica:

~€48.000

Provincia di Novara

~€ 17.000

# **b.** Sustainabiltity and transferibility

All pilot analysed have a great sustainability outbound.

Chemical Sector produces a very wide range of products completely different one from the other. So, in our view it is very difficult to speak about transferability. In fact, one solution would fits for one kind of goods or company organization, and not for the others. Moreover, the peculiarities of the territory and the distribution of logistic infrastructures need to be taken into account considering transferability. For example, many parts of Europe are not connected (or their connections are antiquates) with rail tracks, so multimodality is impossible, e.g. middle of France and eastern Europe. Finally, through the pilot phase we learndt that each company, each product, each route have their own issues, specificity and needs. Multimodal shift can't be standardized and reproduced somewhere else. Simply it won't work.

## c. Lessons learned

As a conclusion of this Pilot project phase, we would like to highlight some issues related to the Italian/Central European/European Logistic System that emerged by the analysis and the confrontation with companies.



- Chemical companies are generally interested to increase multimodality, first of all for safety reasons but more and more if a cost reduction can be achieved;
- Difficulties to be faced regarding infrastructures (not possible to solve in the short period) and operational issues (e.g. not existing connections, transit time, reliability);
- Railways and MM routes between Italy and Germany (and Northern Europe) seems to work well considering of course the actual capacity and they are profitably used by companies;
- Potentials of improvement of MM seem to be existing with Eastern Europe (infrastructural and reliability need to be considered), France (very difficult railway connections for goods in that country) and Spain (by sea). There are common issues in modal shift: lack of infrastructures and equipments, exceeding costs and transit times;
- There are also product specific issues (e.g. special equipment needed, short transit time).

We also have some comment on the use of the toolbox in this pilot phase:

- **IT-Visualization**: Used by Sviluppo Chimica and Province of Novara to make a "preliminary analysis" of the feasibility of the modal shift. It was useful to check if the connections exist and which operators run the routes. Sometimes information is not exhaustive and needs to be integrated using other sources (e.g. the connection exists but it is not reported, the best solution is not found nor all the Logistic Operators are mentioned);
- **Planning guidelines:** unfortunately, the current version of this element of the toolbox doesn't seem to be useful at all;
- **CO<sub>2</sub>-Calculator**: Tool to estimate CO<sub>2</sub> emissions was used and it is helpful. When the modal shift is reached, it will be possible to calculate emissions reduction. It is to be stressed that normally CO<sub>2</sub> emissions are not the priority of chemical companies in choosing the modal shift. Infrastructural and operational feasibility and commercial aspect (e.g.costs, reliability, time delivering) are to be tackled before considering the benefits of CO<sub>2</sub> emissions reduction;
- **Consulting services:** This is the added value of the project. The facilitator role played by SC Sviluppo Chimica and Province of Novara helped chemical companies and logistic operators to work together and find a solution. On the one hand, this scheme is out of the usual logistic business activities; on the other hand companies trust SC Sviluppo Chimica as a company controlled by the Federation they are member of, and so they are positively encouraged to participate to the Pilot. This "consulting service" could be more appreciated by SMEs that in a half-day are able to speak with all operators about their routes of interest. Normally they can't have the opportunity to explore all the solutions available on the market. The question (and the challenge) is: who will/would/could play this role after the end of the Project? Are the actual Logistic Operators willing to accept this model with a "third player" that force commercial competition?

In conclusion, logistic market has its own rules and procedures that need to be taken into account.

We feel the need to make multimodality more competitive and attractive, and this can be achieved only increasing the offer of multimodal solutions. Infrastructures adjustment plays a key role in improving potential offer of multimodality.

For this reason, we welcomed the Protocol signed on 19th October 2017 by Piedmont, Lombardy and Liguria Regions for the improvement of the railway transport of goods through infrastructural intervention on North-Western railway network.

We also welcomed the Italian Government Strategy "La cura del ferro" that includes:





- Important investments in railway Infrastructures
  - Planning interventions to adjust freight corridors between the Alps and towards the Mediterranean Sea to European standards (750 m length of train - 4 meters - high load) including the Alpine Base tunnels- (€ 66 billion already funded);
- Incentives
  - Ferrobonus (€ 60 M in 2 years) at national level Art. 1 c. 648 Law n. 208 dated 28/12/15;
  - o regional initiatives to integrate national Ferrobonus Art.1 c. 240 Law n. 190 dated 23/12/14;
  - trein drivers training (€ 2M/year x 3 years) Art.47. c.11quinques DL 50 dated 24/4/17 (updated with L. 96 dated 21/6/17);
  - noise reduction actions on wagons (€ 20M) Art.47. c.10 DL 50 dated 24/4/17 (Actuative decree already sent to EU Commission for validation (2018-2020);
  - Tax reduction for port terminal operators (depending on the achievement of specific railway traffic targets) Art.47. c.11quinques DL 50 dated 24/4/17 (Updated with Law 96 dated 21/6/17).

## Annexes

Document	Cloud link
PILOT PHASE MID-TERM REPORT (D.T2.2.3)	https://ifsl50.mb.uni- magdeburg.de/owncloud/s/vECivs6xxAHmLWq/download?path= %2F04%20WPT2%20Pilot%20Implementation%2FItaly%2FDT%202.8.5%20Pilot %20Phase%20Final%20Report&files=18-02-21-ITALY-D.T2.2.3%20Pilot%20phase %20mid-term%20report-FINAL.pdf
PILOT PHASE MID-TERM REPORT 2 (D.T2.2.3)	https://ifsl50.mb.uni- magdeburg.de/owncloud/s/vECivs6xxAHmLWq/download?path= %2F04%20WPT2%20Pilot%20Implementation%2FItaly%2FDT%202.8.5%20Pilot %20Phase%20Final%20Report&files=18-05-31-D.T2.2.3%20Pilot%20phase %20mid-term%20report%202_def.pdf
Mr Del Ponte Presentation during the Policy Advisory Group Meeting	https://ifsl50.mb.uni- magdeburg.de/owncloud/s/vECivs6xxAHmLWq/download?path= %2F04%20WPT2%20Pilot%20Implementation%2FItaly%2FDT%202.8.5%20Pilot %20Phase%20Final%20Report&files=7.%20Delponte.pdf
Mr Legittimo Presentation during the Policy Advisory Group Meeting	https://ifsl50.mb.uni- magdeburg.de/owncloud/s/vECivs6xxAHmLWq/download?path= %2F04%20WPT2%20Pilot%20Implementation%2FItaly%2FDT%202.8.5%20Pilot %20Phase%20Final%20Report&files=9.%20Legittimo.pdf