

ITALY

KEY FACTS AND FIGURES

Key Facts and Figures in Italy						
Overview	Total procurement 157,230,000,000€		Procurement % GDP 10%		2013 GDP 1,609,462,200,000€	Contracting authorities 30,000
Procedures applied	Open 76%	Restricted 5%	Negotiated procedure with call 6% no call 9%		Competitive dialogue 0%	Direct award 3% Other 2%
Share of contract notices by buyer	National 8%		Regional/local 40%		Body governed by public law 21%	Other 31%
Contract type	Services 58%		Works 6%		Supplies 36%	Framework agreement 13%
Ex ante conditionality criteria as of 2014	EU rules Partially met		Transparency Partially met		Training Partially met	Admin. capacity Partially met
E-procurement adoption	E-notification Mandatory		E-access Mandatory		E-submission Partially mandatory	Uptake rate 2%
Perceived corruption	Corruption widespread in society			Corruption widespread in procurement		
	Businesses 97%		Individuals 97%		At national level 70%	At local/regional level 69%
TED indicators	Value of tenders 30,716,039,658€		Of total procurement 20%		# contract notices 8,733	# contract awards 7,214
Other indicators	Received single bid 31%		# days for decision 183.2		Price only criteria 45%	MEAT criteria 55%
	Won by foreign firms 1%		Related to EU funds 6%		Joint purchase 10%	Central purchasing Yes, Consip

For more detailed descriptions and links to sources for the above data, please see Section 4 of the report

Summary of public procurement system

Procurement in Italy is carried out at all levels of government by a pool of over 30,000 contracting authorities including national ministries, national agencies, and publicly-owned companies. At the national level, centralisation of procurement occurs through the main purchasing body, Consip. Some of the larger regions have also set up their own central purchasing bodies. In fact, most expenditure occurs at the sub-national level. Over 60% of public works contracts are commissioned by territorial entities. Also supply and services are largely procured locally.

More than three quarters of all procurement contracts are awarded through the open procedure, comprising more than 50% of the total value. Italian contracting authorities also make comparatively heavy use of the negotiated procedures, in particular in its form without publication of contract notice, which accounts for about 25% of procurement value.^{xiv}

The procurement system is prone to corruptionⁱ and inefficiency, due in part to the lack of administrative capacity of the public administration and to weaknesses in the legislative frameworkⁱⁱ. On an annual basis, the Italian public administration procures close to EUR 90 billion, thereby underscoring the high financial stakes involved.ⁱⁱⁱ

Another element of the Italian procurement system is the presence of state-owned 'in-house' corporations. These in-house firms are used extensively to provide public goods and services, but are generally exempt from procurement rules.

DESCRIPTION OF FEATURES

Legal features of public procurement system

The EU Directives 2004/18/EC and 2004/17/EC have been transposed into Italian law by Legislative Decree 12 April 2006 n. 163, the 'Code of Public contracts of works,

services and supplies' (hereafter the 'Code'). Procurement above and below the EU threshold is regulated by this single legislative act, including for the utilities sector. The same procedures apply regardless of the threshold, yet a number of exceptions for both the classical and utilities sectors are listed in the Code. For instance, in the classical sectors direct purchasing is permitted below EUR 20,000 for supply and services and below EUR 40,000 for public works. Furthermore, below EUR 500,000 contracting authorities may perform a negotiated procedure without publication of contract notice.

EU directive 2007/66 on the review procedure was introduced by Legislative Decree 20 March n. 53 2010. Procedural rules have been transposed by the Administrative Justice Code, Decree 2 July 2010 n. 204.

In addition to the national Code, regions have the competency to legislate over public procurement according to the Constitutional Court (judgement 303/2003). However, the role of regional legislation is limited apart from the five regions that are granted special autonomy (Sicily, Sardinia, Valle d'Aosta, Trentino Alto Adige, Friuli Venezia Giulia).

Institutional system

Responsibility for public procurement is shared among two main bodies at national level. The Department of European Union Policies is in charge of relations between the Italian government and EU institutions, including for procurement policy. It has the primary responsibility for the coordination of public procurement policies at the national, regional, and local level, in particular with respect to elaborating the Italian position in procurement matters vis-à-vis EU institutions. The Ministry of Infrastructure and Transport is mainly in charge of proposing draft legislation and performs a consultative function for contracting authorities regarding the correct implementation of EU rules.

In addition, the Department of Development and Economic Cohesion (DPS) is charged with balancing economic and social development of underdeveloped areas in the country. This includes translating and implementing EU cohesion policy objectives and EU Directives into the national policy framework. It is also in charge of managing and assessing national investments made through the use of EU Structural Funds.

In 2014, under the coordination of Department of European Union Policies, an inter-institutional working group was set up to reform public procurement processes and improve the capacity of the public administration. This working group is composed of the main procurement stakeholders at ministerial level, including the Department of European Union Policies, the Ministry for Infrastructure and Transport, the Ministry of Justice, Ministry of Economy and Finance, and the Ministry of Economic Development.

Consip, a publicly owned stock company, acts as the central purchasing body on behalf of the state. It was created to implement the so-called Programme for Rationalisation of Public Expenditure. In 2013, Consip's role was strengthened to include a greater focus on e-procurement.

Until 2014, Italy's independent Authority for the Supervision of Public Contracts (AVCP) was mandated with supervising compliance with procurement rules and procedures. The AVCP had extensive functions with respect to procurement including dispute resolution, identifying and reporting potential illegal conduct to the Criminal Court and to the Court of Auditors, and reporting to the Parliament and to the Government. It also carried out an advisory function, as it could propose legislation to the Ministry of Infrastructure. Since 2014, the responsibilities of the AVCP were transferred to the National Anti-Corruption Authority (ANAC). Importantly, the ANAC is also responsible for collecting data on procurement through the Public Procurement Observatory.

Italy's Court of Audit also oversees public procurement. According to the Group of States against Corruption (GRECO), the Court of Audit performs high quality work^{iv}, however, it must be noted that the Court cannot perform checks without prior warning.^v

Key issues that have a bearing on administrative capacity

Human resources: Administrative capacity has been identified as a key area of weakness in Italy's public procurement, as contracting authorities often lack the professional skills to draft procurement documentation and manage tendering procedures. Traditionally, the skillset of procurement practitioners has been limited to administrative and legal curricula, and therefore lacks an important economic focus.

While agencies such as Consip and other regional central purchasing bodies perform procurement exclusively and are therefore quite specialised, this is not the case for the majority of contracting authorities, where procurement is fragmented among state, regional and local authorities. Consip has a staff of 340.

Thus, the lack of specialised competencies, both technical and administrative, is a potential source for irregularities. Furthermore, given the limited capacity and expertise of the public administration, in many cases part of the contractual procedure, notably the design and supervision of works, is outsourced, which limits the contracting authority's ability to oversee the quality of contract execution.^{Error!}
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Structures: The National School for Public Administration (SNA) and Formez PA are the two key education and training institutions for civil servants, and both offer coursework specifically on procurement.

The Public Contracts Service set up by the Ministry of Infrastructure and Transport supports contracting authorities and economic operators with legal counselling. It also serves as an e-notification portal as all contracts above threshold must be published there and are searchable by registered users.

The Department of Development and Economic Cohesion also offers technical assistance to contracting authorities using ESI Funds covering legal issues related to the application of public procurement regulations.

A system of support offices for enterprises has been set up by Consip in cooperation with various territorial associations in order to facilitate the use of e-procurement tools.

Training: The SNA offers a Diploma on Public Procurement for civil servants and managers as well as to private sector professionals composed of 19 training sessions plus a training session focused on collusion in public procurement. Consip collaborates with the SNA on public procurement training. Formez also offers training on procurement as well as several trainings on the management of ESI Funds.

Public administrations at regional level are largely autonomous in formulating and implementing their own training plans including on aspects related to public procurement.

A recent survey on the professionalisation of public procurement by the University of Rome II found that training is available and useful, but it is not sufficient to fill the procurement practitioners' self-identified skills gaps. In fact, 85% of respondents said they had attended training courses over the past three years, and virtually all found them useful or very useful. Nevertheless, surveyed practitioners consider themselves in need for improvement in what they consider the key competencies to perform their

job, namely legal knowledge, strategic and organisational competency, and analytical skills.^{vi}

Systems/tools: The portal OpenCoesione¹ publishes information on projects co-financed by EU Funds as part of Italy's OpenData and OpenGovernment initiative. Information related to the tender process is included on the portal as an integral aspect of project implementation.

Internal monitoring systems are not well developed, particularly in the south of the country, and at the municipal and regional levels. In fact, the majority of public bodies conduct no performance monitoring of staff or offices responsible for procurement.^{vi}

E-procurement

Despite the fact that Italy launched its e-procurement strategy at the beginning of the decade, the overall e-procurement system is fragmented and shows diverging levels of advancement. At the national level, contracting authorities are required to buy via framework contracts managed by Consip, which is also responsible for the online platform² as its operations centre. Furthermore, there are significant differences among the regions, too. For instance, Lombardy, Emilia Romagna, and the Province of Bolzano have introduced mandatory e-procurement requirements, while in the remaining regions e-procurement is still performed on a voluntary basis and uptake lags behind.

As a further instrument for e-procurement, the Electronic Marketplace of the Public Administration (*MEPA*), also run by Consip, is the most successful electronic market and is used by 50% of contracting offices.^{vi}

Overall, e-procurement is used by approximately half of contracting authorities and mostly for standardised goods, indicating a clear path for future improvement. Lack of IT skills among contracting authorities are cited as one of the reasons for the low level of take-up^{vii}.

Corruption

Public procurement in Italy is considered a risk area for corruption and organised crime, notably in the domain of public works^v. The analysis of the judiciary proceedings published in the 2013 Implementation Report of the Anti-Corruption Authority shows the following: 68 corruption convictions were linked to public procurement. That is roughly 22% of the total corruption convictions, thereby confirming the high vulnerability of procurement to corruption.^{viii} Furthermore, it must be noted that the average time span between the corrupt activity and the conviction lasts over 10 years.^{viii}

Public works are at particularly high risk, as 49% of the above mentioned convictions are related to this area.^{viii} It is estimated that the average km of high speed railway track in Italy costs EUR 61 million to build, compared to approximately EUR 10 million/km in France, Spain or Japan.^v This divergence may serve as an indicator of the scale of mismanagement and irregularities in the procurement process.

Recent corruption scandals have uncovered a vulnerable area in Italy's legal framework. Specifically, cases where a single company is assigned both to design and execute a works contract frequently result in cost overruns and corruption risks. EC audits have confirmed these findings.

¹ <http://www.opencoessione.gov.it/>

² www.acquistinretepa.it

However, Italy has made some progress in the fight against corruption with the passing of the 2012 Anti-corruption law. This legislation is based on four pillars: transparency, education, codes of conduct, and risk assessment. Furthermore, the Anti-corruption law introduced the National Anti-Corruption Plan for 2013-2016, which coordinates the various anti-corruption strategies of public administrations. The National Plan promotes integrity pacts as an important tool for combating corruption in public procurement. According to the Anti-Corruption Law, contracting authorities may determine in contract notices or letters of invitation that non-compliance with Integrity Pacts is grounds for exclusion. So far, Milan is considered an example for the implementation of integrity pacts. Furthermore, Transparency International-Italy is working with the Public Works Authority, the Ministry of Infrastructure, the ALER (Lombardy Utility for Residential Construction) and a number of local authorities to further promote the use of integrity pacts.^{ix}

An earlier law introducing the traceability of public funds is another important tool for the prevention of corruption.^v

Finally, ANAC has a mandate to prevent and oversee corruption in the public administration and state-owned subsidiaries through the implementation of transparency and the oversight of public procurement and other corruption-prone domains. The transfer of procurement oversight to ANAC has brought about a stronger focus on corruption, while maintaining the same functions of the previous authority in terms of oversight. On the other hand, the terms of the reorganisation require ANAC to generate savings of 20% in terms of personnel and operational costs, which could limit its capacity to perform those functions.^x

In order to support contracting authorities in the fight against corruption, ANAC has introduced an approach called 'collaborative supervision', whereby contracting authorities can request the ANAC to supervise the implementation of procurement procedures. Such intervention may be requested for high-value and strategic projects, 'major events' or EU co-financed projects.^{xi}

Europe 2020 Agenda

With respect to introducing strategic goals in public procurement, Italy is active in green public procurement, as it has adopted and revised the National Action Plan in 2008 and 2013 respectively. The plan targets an inclusion of environmental criteria for 50% of the total value and number of public tenders for targeted categories of goods.

At the national level, Consip is active in pursuing green goals as well, and has introduced environmental criteria in 75% of its active agreements. It also initiated studies on indicators for identifying products with better environmental performance. Lastly, Consip offers technical support for the introduction of green criteria to public administrations^{xii}.

Increasing SME participation in public procurement is also considered an important policy goal, which is pursued by Consip through the electronic marketplace MEPA. Inclusion of SMEs is facilitated through the low administrative requirements for participation in MEPA. Also, a network of support office was set up in collaboration with relevant trade associations in order to provide operational assistance for participating to MEPA and to disseminate information. So far, MEPA has been quite successful as SMEs account for 4,500 of the 5,000 companies registered in the electronic marketplace.^{xiii}

Irregularities and findings of national Audit Authorities

In its 2013 annual report, the AVCP outlines a number of recurring irregularities arising from public works contracts, most notably costs rising substantially due to variants after the beginning of the work contract. Other issues include splitting of

contracts to avoid transparency or procedural requirements, and delays or even suspension of works during the execution phase. These irregularities may be caused by poor design, which in turn is tied to the limited administrative capacity of contracting authorities, or may hide larger underlying problems of corruption and criminal activity.^{xiv}

The Supreme Court of Auditors echoes some of the findings of the *AVCP*, pointing to the lack of controls during the execution phase. Moreover, the Court draws attention to an important grey area in Italy's procurement system, the so-called 'in-house' companies, which are either partially or entirely publicly-owned. Their number fluctuates, but the most recent count indicates that 50 'in-house' companies are state-owned while 5,258 of them are owned by local entities.^{xv}

Furthermore, the inter-institutional working group on public procurement has conducted an analysis of common irregularities related to procurement using ESI Funds. It concluded that below threshold procurement presents greater irregularities, notably due to disregard of publication and transparency requirements and the absence of appropriate tender procedure.^{xvi}

Italy has a particularly low level of EU fund absorption, as slightly above 50% of fund expenditure has been certified by 2013.^{xvii} Furthermore, EU funded programmes have been subject to various audits in 2013, notably in Sicily, Campania, Calabria, and Sardinia, resulting in financial corrections of EUR 49 million. Irregularities were also found in L'Aquila, where fraud in procurement led to greater attention on the part of audit authorities.^{xviii}

Outlook

The Italian public procurement system has been affected by a number of changes in recent years, notably the Anti-corruption law and the enhanced transparency requirements. However, given the persistent shortcomings and weaknesses in public procurement, there are plans to implement further changes.

The mandatory transposition of the new EU public procurement Directives offers Italy the opportunity to review the entire procurement Code in order to simplify procedures, and the Parliament is considering legislation that would reduce the complexity of the Code from 650 articles to 250.^{xix}

Simplification of procurement from a legal and procedural perspective should substantially restrict the ability of contracting authorities to use exemptions and emergency measures to circumvent procedural requirements. Other aspects of reform aim at tackling the challenges in the execution of public works and increasing the professionalisation of procurement practitioners.

Furthermore, the Public Procurement Working Group is defining a national strategy to address shortcomings in procurement in order to address the *ex-ante* conditionalities of the 2014-2020 programming period. The Working Group is also involved with the transposition of the new directives, the simplification of legislation, as well as tackling general challenges in the procurement.

In addition to the activities of the Working Group, a series of actions have been put forward as part of Italy's Action Plan to comply with the *ex-ante* conditionalities. The Action Plan includes the simplification of procurement rules during the course of the transposition exercise. Measures that aim at ensuring the effective application of procurement regulation include defining criteria for the selection of procedures, defining criteria for in-house procurement as well as providing guidance material. Furthermore, the Action Plan foresees the strengthening of e-procurement through appropriate instruments. At the regional level, guidelines for below threshold public procurement will also be provided. In terms of training and dissemination, two specific

training actions will be offered for Managing Authorities (MA) and an interactive forum will be set up within the *OpenCoesione* portal. Administrative capacity will be strengthened by supportive actions such as a help desk and a training programme for regional and state authorities. Finally, a network of dedicated procurement personnel within MA will be responsible for verification of correct interpretation of public procurement regulation.^{xx}

ANALYSIS

Strengths

In the context of tightening public budgets, greater attention is being paid to improving the functioning of the public administration, including public procurement. This has led to the introduction of a series of reforms over the last years that touch upon public procurement either directly or indirectly. Some encouraging results in terms of enhanced efficiency, transparency, and the prevention of corruption can already be listed.

Furthermore, efforts to strengthen Italy's performance with EU Funds are ongoing, notably the creation of a Public Procurement Working Group tasked with identifying challenges to the procurement system and proposing recommendations for reform. In addition to the output to be produced by the working group, knowledge transfer between key procurement stakeholders has already been registered as a positive outcome of the collaboration.

The strengthening of *Consip* through its rationalisation of purchases has brought about savings of EUR 4.69 billion.^{xxi} Further savings are expected to result from their ongoing work to further develop their e-procurement capacities. Rationalisation of demand is high on the government's agenda, as demonstrated by the substantial centralisation introduced by a 2014 reform, which foresees the creation 35 purchasing bodies, or so-called aggregators. These centralised purchasing bodies will be solely responsible for procurement of certain goods and services.^{xxiii}

With the 2012 anti-corruption law, Italy has aligned itself to international standards in public administration. While some weaknesses in the current framework still persist, the anti-corruption law represents an important step in the right direction, as it increases the accountability of the public administration.

Several initiatives have been taken in order to increase transparency. In addition to contracting authorities' obligation to communicate public procurement data to the Public Procurement Observatory, a 2010 law now demands the traceability of financial flows. Furthermore, the 2013 transparency law (decree law n. 33/2013) requires the introduction of a transparency portal for the public administration. Moreover, Italy collects significant data on public procurement, which is not the case in many other EU countries. Such data collection is a pre-requisite for monitoring of performance of procurement policy. A promising initiative of the Anti-Corruption Authority is the development of a system of indicators or 'red flags,' for the identification of risk areas in procurement.^{xxii}

Weaknesses

Italian public procurement law is strongly oriented towards formal elements without sufficiently taking into consideration the goals of public procurement, i.e. generating outcomes such as value for money for the public administration. This has resulted in a lengthy, complex and onerous procurement code, which contracting authorities and economic operators have difficulties to work with. The weakness of Italy's procurement legislative framework has a twofold detrimental effect on the country's performance. On the one hand, the complexity of the legal system has led to exemptions and loopholes, which in turn allow the infiltration of corruption and

organised crime. On the other hand, Italy has one of the most stringent regulations of procurement below the EU mandated thresholds.^{vi} Such cumbersome and inflexible rules are having a significant negative impact on procurement performance.

Additionally, given its complexity, public procurement generates a great amount of litigation, which results in lengthy and costly judicial proceedings and efficiency losses. Yet, the primary weakness of the legislative framework is the range of exceptions and loopholes that the Code provides. Exemptions from the Code for Civil Protection Agency or under the umbrella of “major events” can be exploited to circumvent public procurement rules.

Also, the poor execution of public contracts is troublesome. Again, the many issues pointed out by the Court of Audit, including increased costs after the beginning of works, variations, delays, or even non-completion, are often signals for criminal activity. Moreover, sanctions appear to have little effect in deterring sanctionable activity. The 2012 Anti-corruption report finds a clear relationship between the value of public work contracts and the occurrence of variations of the contract during execution. For contracts between EUR 150,000 and 200,000 variations in construction happen in 40.8% of cases, while contracts above EUR 5 million experience variations in 73.4% of cases.**Error! Bookmark not defined.**

Administrative capacity is a further area of weaknesses in Italy highlighted by the amount of ‘passive waste’ that Italian procurement is experiencing. In particular the lack of technical skills to carry out complex procurement projects, particularly public works, increases the vulnerability of the administration to inefficiency as well as irregularity.

As mentioned above, the grey area surrounding in-house companies constitutes a point of attention and further investigation. In addition to the lack of transparency in governance structures, these in-house companies are often exempted from public procurement procedures when providing services to the public entities.

Furthermore, weaknesses in procurement and an overly complicated legal framework have been recognised as part of the reason behind Italy’s low performance with ESI Funds, resulting in recurring errors and irregularities in the course of co-financed procurement procedures. In addition, public procurement is considered one of the most burdensome procedures, after fiscal policy, construction, and new firm creation.^{xxiii}

Lastly, Italy’s progress on the 2014 public procurement Country-specific Recommendation has been limited. While it has introduced some measures to streamline public procurement, more actions are needed to strengthen procurement as a whole, such as defining an e-procurement strategy.^{xxiv}

Recommendations

- **Formalistic legal framework:** Public procurement legislation is considered strongly formalistic, which has a detrimental effect on the procurement system by slowing down procedures and limiting flexibility.
 - Introduce outcome-based legislation that promotes economic efficiency leaving greater room for manoeuvre of contracting authorities to pursue “value for money”.
- **Close loopholes:** Current exemptions from the Public Procurement Code have often been misused to the benefit of corrupt players.
 - Eliminate all possibilities of derogation from the Public Procurement Code except major disaster.
 - Introduce strict ex post oversight of procedures carried out through an exemption of the Code.

- **Clear rules for in-house:** A sizeable amount of public goods and services are provided by in-house firms, which are often not subject to procurement regulations.
 - Enhance transparency when public goods and services are acquired through in-house firms.
 - Clarify the requirements and conditions for the use of in-house firms.
- **Crack down on abuse:** Italy faces persistent issues with corruption risk in procurement, particularly in the construction and public works.
 - Strengthen enforcement to reduce lag times between violations and convictions to reduce the perception of impunity.
 - Improve risk management tools to better target high risk projects for increased oversight.
- **Contract execution:** The limited oversight during the execution of public contracts leads to many problems such as cost overruns and unfinished works as well as the infiltration of corruption during this last phase of the procurement cycle.
 - Introduce strict limitations on additional works in order to reduce cost overruns.
 - Limit economic operators' ability to carry out both design and contract execution, as this practice bears higher risks for cost overruns.
 - Enhance legal liability for completion of projects.
- **Efficiency and simplification:** In addition to the formal nature of the Italian procurement system, the laws and regulations are generally considered overly complex and lengthy. Contracting authorities frequently add to the already burdensome process by requiring excessive documentation from bidders.
 - Follow through on ongoing reform efforts intended to substantially reduce the number of articles in the Public Procurement Code.
 - Apply LEAN methodology to review procedures and increase efficiency.
 - Introduce "winner-only habilitation" to reduce unnecessary administrative burden on economic operators.
 - Provide standardised tender documents in order to simplify the contracting authorities' work and reduce the requests for additional documentation.
- **Specialise review:** The complexity of the legal system generates large amounts of litigation with excessively long court proceedings.
 - Establish a specialised court on public procurement to develop a higher specialisation in public procurement and make review proceedings more efficient.
- **Define the procurement skills set:** Currently, most Italian procurement practitioners have a legal-administrative background, but lack business experience or an economics background necessary to effectively carry out their tasks.
 - Set up a curriculum of competencies in order to make sure that procurement practitioners have a better-rounded skillset.

ⁱ ANAC, *Corruzione sommersa, corruzione emersa in Italia: Modalità di misurazione e prime evidenze empiriche*

ⁱⁱ European Commission (2015), *Country Report Italy 2015 including In-Depth Review on the prevention and correction of macroeconomic imbalances*

ⁱⁱⁱ *Rapporto della Commissione per lo studio e l'elaborazione di proposte in tema di trasparenza e prevenzione della corruzione nella pubblica amministrazione* (2012) (Report from the commission for the transparency and the prevention against corruption in the public administration), *La Corruzione in Italia per una Politica di Prevenzione: Analisi del fenomeno, profili internazionali e proposte di riforma* (Prevention of Corruption in Italy: Analysis of the phenomenon and recommendations).

^{iv} GRECO (2008), *Evaluation Report on Italy*.

^v European Commission (2014), *DG HOME, EU anti-corruption report, Annex Italy*

^{vi} *Università degli studi di Roma Tor Vergata and Promo P.A. Fondazione, Come Acquista la P.A.: Il nuovo ruolo dei Responsabili acquisto per lo sviluppo del procurement nella Pubblica Amministrazione e per l'aumento dell'efficienza e dell'efficacia dell'azione amministrativa* (The procurement responsibilities in the public administration).

^{vii} *Ibid*

^{viii} ANAC (2013), *Rapporto sul Primo Anno di Attuazione della Legge n. 190/2012* (report on the first year of implementation of the law n. 190/2012)

^{ix} Chiara Putaturo, Project Officer Transparency International Italia (2014), Integrity Pacts best practices – Italy, available at: http://transparency.hu/uploads/docs/Chiara_Putaturo.939.pdf

^x ANAC Piano di riordino (ai sensi dell'art. 19, comma 3 del decreto legge 24 giugno 2014, n. 90 convertito in legge 11 agosto 2014, n. 114) (Reorganisation Plan)

^{xi} *Regolamento pubblicato nella Gazzetta Ufficiale n. 300, pagina 56, del 29/12/2014, in vigore dal 30 dicembre 2014* (Regulation published in the Official Gazette n. 300, page 56, of the 29/12/2014 and valid as of 30 December 2014), available at:

http://www.anticorruzione.it/portal/rest/jcr/repository/collaboration/Digital%20Assets/anacdocs/Comunicazione/News/20141215_II/Reg.Vig_ANAC.pdf

^{xii} *Consip, Il Green Public Procurement*, available at: http://www.consip.it/press_room/press_kit/

^{xiii} IDC (2013), Study on e-Procurement, EU Country Profiles

^{xiv} AVCP (2013), *Relazione annuale* (Annual report)

^{xv} *Corte dei Conti* (2013) (Court of Audit), *Requisitoria orale del Procuratore Generale presso la Corte dei Conti Salvatore Nottola nel Giudizio sul Rendiconto General dello Stato, Esercizio 2013* (note on the year 2013 from the attorney general for the Court of Audit)

^{xvi} Agenzia per la Coesione Territoriale (Agency for Territorial Cohesion), 12/05/2015, interview with PwC

^{xvii} OpenCoesione, available at: http://www.opencoessione.gov.it/media/files/pillola-1/Pillola_OpenCoesione_n.3_-_La_spesa_certificata_al_31_dicembre_2013.pdf

^{xviii} DG REGIO (2013), Annual Activity Report.

^{xix} *Il Sole 24 Ore* 07/04/2014, available at: <http://www.ilsole24ore.com/art/notizie/2015-04-07/appalti-rating-impres-e-pa-073714.shtml?uuid=ABwQPPLD>

^{xx} Dipartimento per lo Sviluppo e la Coesione Economica (2014) *Accordo di Partenariato 2014-2020 Italia*

^{xxi} Consip (2013), *Rapporto annuale* (Annual report)

^{xxii} *Autorità Nazionale Anticorruzione* (2014) (National Anticorruption Authority), *Relazione annuale sull'attività svolta 1 gennaio- 22 aprile 2014* (Annual report).

^{xxiii} Single market Forum acts 13/02/2015, available at:

<http://www.politicheeuropee.it/comunicazione/19231/appalti-pubblici-e-nuove-direttive-europee>

^{xxiv} European Commission (2015) Country Report Italy 2015 including an In-Depth Review on the prevention and correction of macroeconomic imbalances.