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EUSurvey

## EU-wide protection of geographical indications for non-agricultural products

Fields marked with \* are mandatory.

### Introduction

Geographical indications (GIs) are names of products linked to products' geographical origin and producers' know-how, and have the status of intellectual property (IP) rights (e.g. Murano glass, Solingen cutlery, Donegal tweed, Halas lace, Macael marble, Boleslawiec ceramics, Gablonz jewellery). They identify a good as originating in a specific place (national, regional or local) where a particular quality, reputation or other characteristics are essentially attributable to its geographical origin.

There is currently no EU-wide system for protecting the geographical indications of non-agricultural products (such as handicrafts and industrial goods). The IP action plan adopted on 25 November 2020 announces that the Commission will, on the basis of a thorough impact assessment of its potential costs and benefits, consider the

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feasibility of creating an efficient and transparent EU GI protection system for non-agricultural products.

This public consultation invites citizens and organisations, and national and regional public authorities to contribute to the assessment of a geographical indications' system for non-agricultural products. The aim is to gather views on the major challenges identified that would need to be addressed in the assessment, the set of policy options that can be envisaged to address these challenges and the impacts stemming from these different options. The results of the consultation will feed the impact assessment on the best way forward.

## About you

\* Language of my contribution

French

\* I am giving my contribution as

Non-governmental organisation (NGO)

\* First name

EMMANUEL

\* Surname

BAUD

\* Email (this won't be published)

ebaud@jonesday.com

\* Organisation name

**255 character(s) maximum**

APPRAM is an international Association grouping together Intellectual Property legal experts. It is composed of in-house lawyers, Attorneys-at-law and Industrial Property Attorneys participating via various means in the evolution of IP law.

240 / 255

**\* Organisation size**

Large (250 or more)

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Check if your organisation is on the transparency register (<http://ec.europa.eu/transparencyregister/public/homePage.do?redi=false&locale=en>). It's a voluntary database for organisations seeking to influence EU decision-making.

**255 character(s) maximum**

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**\* Country of origin ?**

Please add your country of origin, or that of your organisation.

France

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

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\*

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## GENERAL QUESTIONS

\* 1. How familiar are you with the rules for the protection of geographical indications?

- Very familiar
- Somewhat familiar
- Not at all familiar
- No opinion

2. Could you name a non-agricultural product bearing a protected geographical indication?

porcelaine de limoges (but tricky question since by definition non-agricultural products do not (yet) bear a EU PGI.

3. Which of the characteristics do you associate with non-agricultural products protected by a geographical indication?
- The product is more expensive
  - The quality of the product is higher
  - The raw materials for the product come from a specific region
  - The product is hand made
  - The product is based on the local knowledge/ skills
  - The product is not counterfeit/fake
  - Other

### QUESTIONS FOR PRODUCERS OF NON-AGRICULTURAL PRODUCTS

*Please only reply to questions in this section if you are a producer of non-agricultural products.*

4. In which sector do you operate?
- Cutlery
  - Furniture
  - Glass
  - Jewellery/Gems
  - Lace
  - Natural stones
  - Porcelain/Ceramics
  - Textiles
  - Other
5. Does the name of your product(s) include its geographical origin?
- Yes
  - No
  - In case of more products, please specify

:

6. Do you currently use any intellectual property rights to protect your product(s)?

- Collective trade mark
- Certification mark
- Copyright
- Design
- Patent
- Geographical indication
- None of the above
- I do not know
- Other

7. Do you sell your product(s) outside your region?

- No, I sell my product(s) only in my region
- Yes, I sell my product(s) in my country of origin
- Yes, I sell my product(s) in my country of origin and other EU countries
- Yes, I sell my product(s) in EU countries and non-EU countries
- Yes, I sell my product(s) only in non-EU countries
- No answer

## CHALLENGES RELATED TO FRAGMENTATION WITHIN THE SINGLE MARKET

The current regulatory framework for the protection of GIs for non-agricultural products in the EU is fragmented.

While over half the Member States have established specific national protection systems with different characteristics, others use only trade marks and/or rules on unfair competition. Within the single market, there is also

no cross-border system of (mutual) recognition of national protection systems.

A geographical name can constitute, under certain circumstances, an individual or collective trade mark. However, in contrast to geographical indications, these trade marks aim at indicating the commercial origin of a good or service, not the geographical origin.

Certification marks certify the compliance of a product or service with specific quality criteria. However, the EU certification trade mark does explicitly not allow for certifying the geographical origin.

8. To what extent do you agree with the following statements?

*Please rate from 5 (strongly agree) to 1 (disagree).*

	5	4	3	2	1	No opinion
It is difficult for producers to protect their non-agricultural products nationally.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
It is difficult for producers to protect their non-agricultural products within the Single Market.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
At EU level, it is sufficient that producers can indicate the origin of their products using a collective or individual trade mark.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
It is not fair that non-agricultural GI products do not have similar level of protection as agricultural GI products.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. Which are the most important challenges resulting from the fragmentation of rules for the protection of the indication of the geographical origin for non-agricultural products in the EU?

*Please rate from 5 (most important) to 1 (least important).*

Producers have fewer incentives to invest in geographically linked products and to cooperate to create niche markets.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No opinion
Producers have fewer incentives to retain unique skills that would otherwise disappear.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The potential of the tourism sector in the regions where authentic products are manufactured remains untapped.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The potential of developing the cultural heritage of these regions remains untapped.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sellers pass off their products (often made in third countries) as authentic, thereby threatening the value of the collective goodwill.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consumers have more difficulties to identify authentic products.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other, please specify

## INTERNATIONAL AND TRADE-RELATED CHALLENGES

The international GI protection system is based in particular on the so-called Lisbon system administered by the World Intellectual Property Organization. There are currently 34 contracting parties to this system, including the EU and seven EU Member States (Bulgaria, Czech Republic, France, Hungary, Italy, Portugal and Slovakia). The latest revision of the 1958 Lisbon Agreement is the Geneva Act of 2015, which entered into force on 26 February 2020, three months after the EU acceded.



The Lisbon system offers a route to obtain protection of appellations of origins/geographical indications regardless of the nature of the goods to which they apply, including agricultural products, foodstuffs, wine and spirit drinks, handicrafts, industrial products and natural products.

10. In your view, which are the most important challenges resulting from international developments?

*Please rate from 5 (most important) to 1 (least important).*

	5	4	3	2	1	No opinion
Producers of EU GIs for non-agricultural products cannot benefit from the EU's accession to the Lisbon/Geneva Act to get protection in third countries using the Lisbon/Geneva route, as there is no EU registration to start with.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Producers of non-agricultural GI products from third countries cannot get protection in the whole of the EU using the Lisbon/Geneva route, as such protection is not available at EU level.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU cannot secure protection of non-agricultural GIs via bilateral trade agreements. This is because the EU cannot include non-agricultural GIs in the lists of GIs to be protected by such agreements, due to the lack of EU-wide protection for non-agricultural GIs.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify:

## NEED FOR EU ACTION

11. Do you believe there is a need for an EU-wide initiative to improve the protection of geographical names or indications for non-agricultural products?

- Yes
- No
- I do not know

12. What could be the incentives to participate in an EU scheme for protection of geographical indications for non-agricultural products?

- Better enforcement, combating misuse of protected name and fraud
- Strengthened position of producer groups in the value chain
- Useful marketing tool/better visibility for consumers
- Quality assurance signal for consumers
- Differentiation of product
- Traceability tool
- Increase own firm's reputation
- Access to new markets within/beyond EU Internal Market
- Increase credibility of product
- Higher price premium
- Increase/secure market share
- Limit competition on the market
- Affinity with the region
- Protection of traditions/cultural heritage
- Regional development and tourism
- Other

13. What could be the disincentives to participate in an EU scheme for protection of geographical indications for non-agricultural products?

- Higher production costs
- Higher marketing costs
- Administrative burden/Costs, for example relating to the application
- Stricter inspections
- A GI would prevent innovation in the production/commercialisation

- Uncertainty of market demand or low demand
- Lower productivity
- Uncertainty related to combatting misuse of protected name and fraud
- Missing regional roots (lack of local identity)
- No added value
- No need because we have an own trade mark
- No need because unfair competition law is sufficient
- No need because strong market position already
- Other

## POLICY OPTIONS

14. Which is your preferred overall policy approach regarding the possible creation of an EU-wide protection mechanism of geographical indications for non-agricultural products?

The Commission proposal on GIs may result in a mix of different options.

*Please rate from 5 (most preferred) to 1 (least preferred).*

	5	4	3	2	1	No opinion
No action – The EU would not act. The current situation will remain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Voluntary measures - a recommendation at EU level proposing both to Member States and producers to agree on voluntary measures in order to certify the origin of industrial and handcraft products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>



Impact on :	5	4	3	2	1	No opinion
Competition	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cultural heritage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Producers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tourism	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## SCOPE OF PROTECTION

16. In your opinion, an EU-wide protection mechanism of geographical indications for non-agricultural products should cover (provided they fulfil the requirements as to the link with a geographical place):

- All non-agricultural goods
- Only a limited list of categories of non-agricultural goods

17. How would you define the link that the non-agricultural goods originating in a specific place, region, or locality should have with their place of origin?

*(one choice only)*

- A given quality, reputation or other characteristic of the goods is essentially attributable to their geographical origin
- A given quality, reputation or other characteristic of the goods is essentially attributable to their geographical origin; **and at least one of the production steps take place in the defined geographical area**
- Their quality or characteristics are essentially or exclusively due to a particular geographical environment with its inherent natural and human factors; and all the production steps take place in the defined geographical area**
- Their quality or characteristics are essentially or exclusively due to a particular raw material; and all the production steps take place in the defined geographical area

18. Do you think that an EU-wide protection mechanism of geographical indications for non-agricultural products should protect geographical indications or names already registered at national level?

- Yes
- No
- Other

## REGISTRATION PROCEDURE

19. How many steps should the registration of EU geographical indications for non-agricultural products involve (In any event, registration will be managed electronically) ?

- Only one: managed at EU level
- Only one: managed at national level
- Two: first a national, then an EU registration phase (as already exists in the agricultural area)
- No opinion

20. On the basis of which grounds should registration of an EU geographical indication for non-agricultural products be accepted (provided the products fulfil the requirements as to the link with a geographical place)?

- The GI-term should meet required conditions (for example, that it is not a customary name like 'eau de Cologne')
- The protection granted should not jeopardise pre-existing rights (e.g. homonymous GIs or trade marks likely to mislead the consumer as to the true origin of the product)
- Other



A description of the product, including the raw materials, if appropriate, as well as the principal physical, chemical, microbiological or organoleptic characteristics of the product	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No opinion
The definition of the geographical area delimited	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence that the product originates in the defined geographical area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence that the product uses raw materials from the defined geographical area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence that the product has a reputation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A description of the method of obtaining the product	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information concerning packaging of the product	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The name and address of the authorities/bodies verifying compliance with the provisions of the product specification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any specific labelling rule for the product in question	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other, please specify:

23. In an EU level system of protection for non-agricultural products, who should take care of verification, e. g. ensure that at the stage of production the product complies with technical specifications before it is placed on the market?

- Public authority
- Producers or producer associations
- Public authority and producers/producer associations
- Other



Please specify:

independent certifying entities

24. In an EU level system of protection for non-agricultural products, who should bear the costs of verification?

- Public authority
- Producers or producer associations
- Public authority and producers/producer associations
- Other

Please specify:

25. In an EU level system of protection for non-agricultural products, who should take care of monitoring, e.g. control the use of the name once the product has been placed on the market?

- Public authority
- Producers or producer associations
- Public authority and producers/producer associations
- Other

Please specify:

26. In an EU level system of protection for non-agricultural products, who should bear the costs of monitoring?

- Public authority
- Producers or producer associations

- Public authority and producers/producer associations
- Other

Please specify:

## ENFORCEMENT

For agricultural products, EU GI Regulations call Member States to take appropriate enforcement measures, in particular administrative and judicial steps, to prevent or stop unlawful use of protected names of products that are produced or marketed in that Member State. Besides that, Regulation 608/2013 on customs enforcement of intellectual property rights at the EU external borders empowers customs to stop (upon request or spontaneously) goods potentially infringing specific types of GIs from entering/exiting the EU territory. The current European framework delegates the responsibility of carrying out ex officio controls to Member States. Member States are free to determine the means to fulfil this requirement. In addition, the IPR Enforcement Directive 2004/48/EC (IPRED) applies to the civil enforcement of all intellectual property rights including GIs and trade marks. Other EU harmonization, such as unfair competition and consumer protection laws, provide for further legal tools for users of GIs and consumers to ensure national civil enforcement.

27. In an EU level system of enforcing rights in relation to non-agricultural products, there should be:

- A specific GI enforcement system
- A general system based on intellectual property enforcement (e.g. general civil law, IPRED and customs enforcement)
- Other enforcement (e.g. unfair competition law) rules
- No opinion

Please specify:

## DOCUMENT UPLOAD AND FINAL COMMENTS

28. Please indicate if there are other issues that should be considered.

*1000 character(s) maximum*

as to question 21, a specific EU body to monitor the new system could be a very interesting path to pursue but it would need to be independent (notably from the trademark system) and composed of highly skilled professionals, very proficient in the GI system which by nature, functions, etc is very different from the trademark one.

29. Please share any quantitative data, reports or studies to support your views.

*You can also upload a concise document, such as a position paper. The maximum file size is 1MB. Please note that the uploaded document will be published alongside your response to the questionnaire, which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.*

3. Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Select file(s) to upload

30. Would you agree to be contacted by the Commission for a possible follow-up?

Yes

No

Submit

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