



## QORTI TAL-APPELL

IMĦALLFIN

**S.T.O. PRIM IMĦALLEF MARK CHETCUTI  
ONOR. IMĦALLEF GIANNINO CARUANA DEMAJO  
ONOR. IMĦALLEF ANTHONY ELLUL**

**Seduta ta' nhar il-Ħamis, 16 ta' Diċembru, 2021.**

**Numru 2**

**Appell numru 269/2021/1**

***Consolidated Packaging Limited (C-32596)***

**v.**

***Central Procurement and Supplies Unit;  
Mint Health Limited (C-55603), għa Medical  
Logistics Limited; Spectra Limited  
(C-35757) għal kull interess li jista' jkollha***

1. Dan huwa appell ta' *Consolidated Packaging Limited* ["CPL" jew "l-appellanti"] minn deċiżjoni tat-3 ta' Awissu 2021 tal-Bord ta' Revizjoni dwar Kuntratti Pubbliċi ["il-Bord ta' Revizjoni"], imwaqqaf taħt ir-Regolamenti dwar l-Akkwist Pubbiku ["L.S. 601.03" jew "ir-Regolamenti"], li ċaħad oġġezzjoni magħmula mill-appellanti kontra deċiżjoni tas-*Central Procurement and Supplies Unit* ["CPSU" jew "l-awtorità kontraenti"] illi ma tin-

tlaqax proposta tagħha għal “*over-labelling services of medicinal products*” għax tqieset “*not technically compliant*”.

2. Il-fatti rilevanti seħħew hekk: kienet saret sejħa mill-awtorità kontraenti għal “*request for participation (negotiated) for over-labelling services of medicinal products*”. L-appellanti u oħrajn għamlu offerti iżda b’ittra tas-7 ta’ Mejju 2021 l-awtorità kontraenti għarrfet lill-appellanti illi:

»... .. the procurement proposal submitted by your company was not technically compliant.

»The main reasons why your procurement proposal was non-compliant are as follows:

»Reasons –

»for requirements 1, 1.1a, 2, 2.1a, 3 and 3.1a<sup>1</sup> – recommended bidder proposed shorter lead times;

»for requirements 1.1b, 2.1b and 3.1b – no offer was submitted.

»The evaluation committee recommended that this RfP process will continue with further negotiations with the sole compliant interest submitted by *Messrs Medical Logistics Ltd* for requirements 1, 1.1a, 2, 2.1a, 3 and 3.1a and *Inspectra Ltd* for requirements 1.1b, 2.1b and 3.1b.«

3. B’ittra tat-12 ta’ Mejju 2021 l-appellanti talbet lill-awtorità kontraenti tagħtiha tagħrif dwar il-proposti li ntgħażlu u fejn dawn kienu aħjar minn tagħha, iżda ma ngħatalhiex dan it-tagħrif sakemm għalaq iż-żmien li fih setgħet tressaq oġġezzjoni quddiem il-Bord ta’ Revizjoni.

4. Imbagħad b’ittra tas-17 ta’ Mejju 2021 l-appellanti ressqet oġġezzjoni quddiem il-Bord ta’ Revizjoni u l-bord bid-deċiżjoni tat-3 ta’ Awissu 2021 li minnha sar dan l-appell iddeċieda hekk:

»The board ... ..

»a) upholds the contracting authority’s decision in the recommendation for the award of the tender,

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<sup>1</sup> Il-kontenut ta’ dawn il-partiti huwa muri fl-iSkeda A mehmuża ma’ din is-sentenza.

»b) directs that the deposit paid by Appellant be reimbursed.«

5. Ir-raġunijiet li wasslu lill-bord għal din id-deċiżjoni ġew imfissra hekk:

»This board, ... .. having noted the objection filed by *Consolidated Packaging Ltd* (hereinafter referred to as the Appellant) on 17<sup>th</sup> May 2021, refers to the claims made by the same Appellant with regards to the tender ... .. whereby, the Appellant contends that:

»a) The rejection letter states that the Appellant's proposal was "not technically compliant". Reasons stated are the shorter lead times proposed by the preferred bidder and the fact that the Appellant did not submit any offer for the second set of sub-sections. Neither the short lead times nor the decision not to submit any offer for the above-mentioned sub-sections amounts to technical non-compliance.

»b) The rejection letter was not sufficiently clear to assess whether its offer was rightly rejected by CPSU. The letter should have contained at least some of the information requested by way of the letter dated 12 May 2021 in order to enable it to claim an effective and rapid remedy. In particular, confirmation that the recommended bidder's offer was not cheaper than that of the Appellant and an indication of the recommended bidder's lead times. The Appellant's rights have been breached as a result of the evident lacuna in the rejection letter. For this reason alone, the deposit paid upon filing of this objection should be refunded.

»c) As stated in Section 5.1 of the RfP, the sole criterion for the award of the contract for each subsection is the price. The operative part of the criterion is however made subject to the ability of the recommended bidder to "ensure least delay in making the medicinal product available to users within the Government Healthcare Service". The appellant's offers were rejected in part because the recommended bidder proposed shorter lead times. The appellant is deducing that its offer was cheaper than that of the recommended bidder. The Appellant submits that the lead times it proposed in its own offer were "maximum" timelines based on a "worst case scenario" basis. This in fulfilment of the requirement of ensuring least delay in delivery to the end user.

»This board also noted the Contracting Authority's reasoned letter of reply filed on 26<sup>th</sup> May 2021 and its verbal submission during the virtual hearing held on 27<sup>th</sup> July 2021, in that:

»a) The sole award criterion clearly stated "the contract for each respective work order sheet will be awarded to the economic operator submitting the cheapest offer; provided that the offer reflects the minimum timelines which ensure least delay in making the medicinal product available to users within the Government Healthcare Service. In this regard, due consideration will also be given to those applicants who offer tangible advantages in terms of shorter timeframes and overall reduction of logistical delays.

- »b) The RfP clearly outlined that the cheapest technically compliant offer will be chosen, provided that the offer reflects the minimum timelines.
- »c) The offer as submitted by the preferred bidder did in fact provide the more advantageous lead times, and due to this their offer was chosen for the sub-types in question. As a result of this, it is irrelevant for the objector to request whether the offer of the preferred bidder was more expensive and such an argument cannot be used by the objectors in seeking to justify their offer.
- »d) Referring to the rejection for requirements 1.1b, 2.1b and 3.1b, the objectors were not considered any further for the sole reason that they did not submit any offers with regard to these sub-types.

»This board, after having examined the relevant documentation to this appeal and heard submissions made by all the interested parties including the testimony of the witnesses duly summoned, will consider Appellant's grievances, as follows.

- »1. With regards to the Appellant's first grievance, reference is made to the rejection letter issued by the CPSU to the Appellant company of 7<sup>th</sup> May 2021, whereby it states "The main reasons why your procurement proposal was non-compliant are as follows:
  - »a. It is to be pointed out that the choice of wording used is certainly not the most diligent.
  - »b. The Appellant offer was not "non-compliant" *per se* but did not present the best offer as requested by CPSU. Other bidders proposed better lead times. Hence; the Appellant could have ranked 2<sup>nd</sup>, 3<sup>rd</sup> or in other positions for the different sub-sections.
  - »c. It is being noted that nobody present at the hearing challenged this point.
  - »d. However, this board opines that should proper wording have been used by the contracting authority, this would not have changed the outcome of this RfP. The recommended bidders would still have been *Medical Logistics Ltd* and *Inspectra Ltd* (for the different sub-sections where they proposed the best offer in line with the sole award criteria).
  - »e. This board takes this opportunity to emphasise the importance of the responsibility being placed on contracting authorities to properly and diligently draft the tender dossier, award letter, rejection letters, clarification notes and all other documentation pertaining to a specific tender whatever they may be. The choice of wording in line with Public Procurement Regulations, manuals, notices issued and other jurisprudence material is crucial for this "system" to be availed of in an efficient and equitable manner by all users of the "system". Contracting authorities being the representatives of Government of Malta should be at the forefront of this!
- »2. With regards to the Appellant's second grievance, this board notes the following:

- »a. The full and complete bids / tender offers of the Appellant and the recommended bidders are within the acts of the PCRB, whereby a thorough assessment can be done on whether the evaluation committee proceeded with its assignment in a diligent and professional manner while observing their rights, duties and obligations.
  - »b. Reference is also made to the testimony under oath of Dr Richard Despott whereby he confirmed that the time lines were the reason why Appellant's offer was declined. This due to the fact that since we are referring to medicinal products, which include documents requiring translations for the benefit of users, speed is therefore of the essence.
  - »c. On the comment made by the witness being "no marks were awarded in assessing the bids" when asked *by* Dr Antoine Cremona, this board opines that where the award criterion is making reference to "multiple" variables, *i.e.* "cheapest offer" and also the "minimum timelines", more specific ways and tools, *e.g.* with the use of scorecards of how the assessment was carried out, would have aided in no small way with the transparency policy which is one of the pillars of public procurement.
  - »d. Finally, this board is of the opinion that the evaluation committee did however assess accordingly in line with the tender dossier and the concept of "self limitation" was adhered to in no uncertain terms.
- »3. With regards to the Appellant's third and final grievance, this board notes the following:
- »a. Reference is made to Dr Antoine Cremona's verbal submission that the unit of measurement between the price and the lead times criteria was not properly defined, making the tender a "mess". This as it did not define which aspect is the more important.
  - »b. This board already made reference to this in note 2 (c) and (d) above.
  - »c. However, the board also notes that the Appellant company did not make use [sc. of] or seek clarification on the matter before presenting its bid. Moreover, other remedies are in place should the Appellant have felt that the tender dossier, and more specifically the award criterion, were drafted in an ambiguous manner or lacked transparency. Specific reference hereby is made to regulation 262(d) of SL 601.03. It is also humbly pointed out that when a tenderer submits its proposal, it is also accepting the general terms and conditions of the tender dossier.
- »Finally, when considering all the above, this board upholds the appellant's grievance that its offer was compliant even though it did not offer the best lead times.«

6. *CPL* ressqet appell minn din id-deċiżjoni tal-Bord ta' Revizjoni b'rikors tal-20 ta' Awissu 2021. Għal dan ir-rikors *Inspectra Limited* ["*Inspectra*"] wiegħbet fit-30 t'Awissu 2021, l-awtorità kontraenti wiegħbet fit-3 ta' Settembru 2021 u *Mint Health Limited* ["*Mint*"] wiegħbet ukoll fit-3 ta' Settembru 2021.
7. Qabel ma nqisu l-aggravji tal-appell ta' *CPL* nibdew b'eċċezzjonijiet preliminari mressqa mill-awtorità kontraenti u minn *Mint*.
8. L-awtorità kontraenti tgħid illi l-appell ma sarx kif irid ir-reg. 285 tal-L.S. 601.03 għax ma kienx indirizzat kontra l-partijiet kollha interessati għax ma kienx indirizzat ukoll kontra *Pharmadox Healthcare Limited* ["*Pharmadox*"] li wkoll kienet għamlet offerta.
9. Ir-reg. 285 igħid hekk:

»285. Ir-rikors tal-appell għandu jkun indirizzat kontra l-awtorità responsabbli għat-tmexxija tas-sejħa, l-awtorità kontraenti, l-offerent rakkomandat, jekk ikun hemm, u kull parti oħra involuta fil-proċeduri quddiem il-Bord ta' Revizjoni dwar Kuntratti Pubbliċi, li jistgħu jippreżentaw risposta bil-miktub fi żmien għoxrin jum mid-data tan-notifika:«
10. Mill-minuti tal-Bord ta' Revizjoni jidher illi l-partijiet involuti fil-proċeduri quddiem dak il-bord kienu l-awtorità kontraenti, *Mint* (dak iż-żmien *Medical Logistics Limited*) u *CPL*. Ir-rikors tal-appell huwa indirizzat kontra dawn kollha u għalhekk ma jidherx li hemm in-nuqqas li qiegħda tara l-awtorità kontraenti.
11. L-eċċezzjoni hija għalhekk miċħuda.
12. L-eċċezzjoni preliminari ta' *Mint* tgħid illi r-rimedju li qiegħda titlob l-appellanti kellha titolbu qabel l-għeluq tas-sejħa, taħt ir-reg. 262 tal-

L.S. 601.03. Billi, biex tkun tista' tqis din l-eċċezzjoni, lill-qorti jeħtiġilha qabel xejn tara x'nhu r-rimedju li qiegħda titlob l-appellanti, din l-eċċezzjoni nqisuha aktar 'il quddiem.

13. Naraw mela xi jgħidu u xi jridu l-aggravji tal-appell. L-ewwel aggravju ġie mfisser hekk.

»... .. il-kontenut tar-*rejection letter* kien skorrett *stante* li l-offerta tas-soċjetà appellanti kienet *technically compliant*, u dan anke skont l-ammissjoni tal-awtorità appellata u tas-soċjetà appellata *Mint Health qua* l-offerent magħżul. Dan mhux kontestat u għalhekk l-offerta tas-soċjetà appellanti kienet *technically compliant*.

»... ..

»Il-kostatatazzjoni tal-bord li l-offerta tas-soċjetà appellanti kienet *technically compliant*, (b) id-dikjarazzjoni *ex admissis* tal-awtorità appellata u tas-soċjetà appellata *qua* l-offerent magħżul li l-offerta tas-soċjetà appellanti kienet *technically compliant*, (ċ) id-deċiżjoni li tordna r-rifużjoni tad-depożitu, u (d) l-enfasi ripetut fuq l-obbligu tal-awtorità appellata li d-dokumenti tal-akkwist, inkluż *rejection letters* ... .. għandhom ikunu miktuba b'lingwaġġ ċar u mhux ambigwu, huma kollha fatturi li jissottolineaw l-inadempjiment tal-awtorità appellata li tipprovdni raġunijiet ċari biżżejjed sabiex is-soċjetà appellanti tkun tista' teżerċita d-dritt tagħha għal *effective and rapid remedy* kif provdut taħt il-liġi ewropea u dik nostrana.

»Fl-umli fehma tas-soċjetà appellanti l-bord ma messux waqaf hawn. Il-bord messu mar *oltre* u ordna lill-awtorità appellata, *seduta stante* jew b'komunika miktuba, tagħti l-informazzjoni li s-soċjetà appellanti talbet rigward l-offerta rebbieħa.

»Kienet din l-informazzjoni mitluba mis-soċjetà appellanti li setgħet tagħti lis-soċjetà appellanti raġuni biżżejjed ċara għall-iskwalifika tal-offerta tagħha. Mingħajr din l-informazzjoni dwar il-prezz u t-*"timelines / timeframes"* tal-offerta rebbieħa, ir-*rejection letter* ma tiswa xejn u s-soċjetà appellanti, kif jgħidu l-Ingliżi, *"is none the wise"*.

»Is-soċjetà appellanti tikkontendi li kemm il-liġi kif ukoll il-każistika jagħtuha l-jedd li tingħata din l-informazzjoni ... ..

». ... ..

»Is-soċjetà appellanti tissottometti li l-informazzjoni fuq l-offerta finanzjarja u t-*"timelines / timeframes"* tal-offerta rebbieħa messha ntgħatat mill-awtorità appellata mal-ewwel fir-*rejection letter qua* "sommarju tar-raġunijiet rilevanti li jirrigwardaw ir-rifjut tal-offerta" skont ir-regolament 270 tar-Regolamenti. Fi kwalunkwe każ, u sabiex jiġi eliminat kull dubju, din l-informazzjoni ġiet mitluba espressament mis-soċjetà appellanti bl-ittra tat-12 ta' Mejju 2021 u b'hekk tinkwadra perfettament f'regolament 242(2)(a) u (ċ) tar-Regolamenti.

»Huwa ċar u manifest li l-awtorità appellata naqset fid-doveri tagħha skont il-liġi. Dan ippreġudika r-rimedju spettanti lis-soċjetà appellanti għaliex hija ma setgħex tgħarbel jekk id-deċiżjoni tal-awtorità appellata kinetx tajba jew le u kellha tintavola l-appell minkejja dan. Dan huwa bażat fuq prinċipji stabbiliti mill-Qrati tal-Ġustizzja tal-Unjoni Ewropea.

»... ..

»Għal dawn ir-raġunijiet is-soċjetà appellanti tissottemetti li din l-onorabbli qorti għandha tagħmel analiżi sostantiva tad-diċitura tar-*rejection letter* u anke tas-silenzju assolut min-naħa tal-awtorità appellata wara l-ittra tat-12 ta' Mejju 2021.«

14. Jingħad qabel xejn illi r-rimedju li qiegħda titlob hawnhek l-appellanti ma huwiex wieħed li seta' ntlab qabel l-għeluq tas-sejha taħt ir-regolament 262 tar-Regolamenti dwar l-Akkwist Pubbliku għax jolqot l-ittra li biha l-appellanti giet mgħarrfa li l-offerta tagħha ma ntlagħgetx, li, naturalment, setgħet tintbagħat biss wara l-għeluq tas-sejha. Għalhekk, għallinqas safejn toqot dan l-aggravju, l-eċċezzjoni preliminari ta' *Mint* hija miċħuda, u nistgħu nipproċedu biex inqisu l-aggravju.

15. It-tagħrif li għandu jingħata lill-oblatatur li l-offerta jew proposta tiegħu ma tintlaqax huwa regolat bir-reg. 242 tal-L.S. 601.03:

»242. (2) Fuq talba mill-kandidat jew offerent ikkonċernat, malajr kemm jista' jkun, u f'kull eventwalità fi żmien ħmistax-il jum mir-riċevuta ta' talba bil-miktub, l-awtorità responsabbli għat-tmexxija tas-sejha għandha tinforma:

»... ..

»(ċ) lil kull offerent li għamel offerta ammissibbli bil-karatteristiċi u l-vantaġġi relattivi tal-offerta magħżula kif ukoll l-istess tal-offerenti jew il-partijiet għall-ftehim qafas li ntagħżlu;«

16. Għalkemm l-appellanti kienet mgħarrfa illi l-proposta tagħha kienet "*not technically compliant*", ma huwiex kontestat illi fil-fatt ir-raġuni għala ma ntgħażlitx il-proposta ma kinitx dik. Il-fatt li proposta ta' ħaddieħor tqieset aħjar ma jwassalx għall-iskwalifika tal-proposta anqas vantaġġuża iżda li tintgħażel il-proposta l-oħra. Ukoll, il-fatt li l-appellanti ma għamlitx



proposta għal kull partita ma jfissirx li l-proposta kollha taqa' għax fit-*technical specifications* jingħad illi "*Bidders can submit their proposals / offers for any combination of scenarios or all of the requested services. Each of the requirements ... .. will form a separate lot and will be awarded to the cheapest technically compliant bidder*". Taħt il-*criteria for award* jingħad ukoll illi "*preference will be given to the bidder offering the complete portfolio of nine sub-titles / works*". Dan ifisser li, għalkemm tingħata preferenza lil min jagħmel offerta għall-partiti kollha, min jagħmel offerta għal xi wħud biss minnhom ma jigix skwalifikat għalhekk biss, għalkemm ma jitqiesx favorevolment daqs min jagħmel offerta għall-partiti kollha. Kien leċitu għalhekk li ssir proposta għal uħud biss mill-partiti, bla ma dan iwassal biex din il-proposta titqies *not technically compliant*.

17. L-appellanti għalhekk għandha titqies li għamlet "offerta ammissibbli", u, konsegwentement, ladarba bl-ittra tagħha tat-12 ta' Mejju 2021 talbet lill-awtorità kontraenti t-tagħrif li jagħtiha dritt għalih ir-reg. 242(2)(ċ), l-awtorità kellha tagħtiha dak it-tagħrif.
18. Fil-fatt iżda dak it-tagħrif ma ngħatax lill-appellanti tempestivament. Li tkun mgħarrfa biss illi l-proposta ta' ħaddieħor kienet aħjar ma huwiex biżżejjed, għax kellha tingħata wkoll tagħrif dwar "il-vantaġġi relattivi tal-offerta magħżula", biex tkun tista' tara u tifhem għala l-offerta ta' ħaddieħor tqieset aħjar u tressaq quddiem il-Bord ta' Revizjoni r-raġunijiet tagħha kontra jekk ma taqbilx.

19. L-awtorità kontraenti tgħid illi dak it-tagħrif hu “kunfidenzjali” u jekk jinkixef ikun “detrimentali għall-kompetizzjoni”. Fil-fatt iżda l-kundizzjonijiet tal-proposti magħżula llum jinsabu fl-atti tal-kawża u għalhekk ma jidhirx wisq konvinċenti l-argument li huma kunfidenzjali. F’kull każ, il-liġi trid illi min jagħmel offerta ammissibbli, bħal ma għamlet l-appellanti, għandu jingħata tagħrif dwar “il-vantaġġi relattivi tal-offerta magħżula” meta mqabbla ma’ tiegħu, jekk jitlob dak it-tagħrif, kif talbitu fi żmien utli l-appellanti.
20. Tassew illi issa dak it-tagħrif huwa disponibbli għax huwa fl-atti, iżda jibqa’ l-fatt li ma kienx disponibbli fi żmien utli li fih l-appellanti setgħet titlob rimedju quddiem il-Bord ta’ Reviżjoni, u b’hekk ġiet imċaħħda minn rimedju effettiv.
21. Għal dawn ir-raġunijiet il-qorti hija tal-fehma illi l-ittra tas-7 ta’ Mejju 2021 li biha l-awtorità kontraenti għarrfet lill-appellanti illi l-proposta tagħha ma ntlaggħetx ma kinitx biżżejjed biex l-appellanti tkun tista’ tinqeda bir-rimedji kollha li tagħtiha l-liġi. Għalhekk l-appellanti għandha titqiegħad fl-*istatus quo ante* sabiex tkun tista’, jekk hekk jidhrilha wara li jkun ingħatalha t-tagħrif kollu li trid il-liġi, tagħmel mill-ġdid oġġezzjoni quddiem il-Bord ta’ Reviżjoni, b’dan li t-terminu għall-oġġezzjoni jibda għaddej minn dakinhar li jkun ingħata t-tagħrif kollu li trid il-liġi.
22. Billi dan hu biżżejjed biex jintlaqa’ l-appell u titfassar id-deċiżjoni tal-bord, ma huwiex meħtieġ li nqisu l-aggravji l-oħra tal-appellanti.
23. Il-qorti għalhekk tilqa’ l-appell, tħassar id-deċiżjoni tal-Bord ta’ Reviżjoni tat-3 ta’ Awissu 2021 u hekk tqiegħed lill-appellanti fl-istess posizzjoni li

kienet fiha qabel għalqilha t-terminu biex tressaq oġġezzjoni quddiem il-bord.

24. Naturalment, sakemm l-appellanti tinqeda, jekk ikun il-każ, bir-rimedji li tagħti l-ligi, jew sakemm ikun għadda t-terminu għall-oġġezzjoni wara li tkun ingħatat it-tagħrif minnha mitlub, l-awtorità kontraenti ma għandhiex tipproċedi bin-negozjati mal-oblaturi magħżula.
25. Billi wkoll issa l-għażla għadha miftuħa, it-tagħrif dwar il-vantaġġi relattivi tal-offerta magħżula għandu jingħata lill-oblaturi kollha li għamlu offerta ammissibbli, u mhux biss lill-appellanti.
26. L-ispejjeż ta' dan l-appell tħallashom l-awtorità kontraenti, ħlief dawk ta' *Mint* u ta' *Inspectra*, li jħallsu l-ispejjeż tagħhom stess.

Mark Chetcuti  
President

Giannino Caruana Demajo  
Imħallef

Anthony Ellul  
Imħallef

Deputat Reġistratur  
da

Skeda A qed tiġi annessa sabiex tiffirma parti integrali minn din is-sentenza.

### Skeda A

1.0	Over-stickering of Medicines with packaging in English language	Printing or labelling of details required for parallel importation / authorisation in line with article 126(a) of Directive 2001/83/E
1.1a	Over-stickering of Medicines with packaging in English language, and FMD safety features	As per 1.0 above including anti-tampering device but excluding serialisation
1.1b	Over-stickering of Medicines with packaging in English language, and FMD safety features	As per 1.0 above including anti-tampering device and also serialisation
2.0	Over labelling of Medicines outer packaging in foreign language including translation services	Translation of product literature, preparation of artwork and labelling
2.1a	Over labelling of Medicines outer packaging and FMD safety features in foreign language including translation services	As per 2.0 above including anti-tampering device but excluding serialisation
2.1b	Over labelling of Medicines outer packaging and FMD safety features in foreign language including translation services	As per 2.0 above including anti-tampering device and also serialisation
3.0	Over labelling of Medicines outer and immediate packaging in foreign language including translation services	Translation of product literature, preparation of artwork and labelling
3.1a	Over labelling of Medicines outer and immediate packaging and FMD safety features in foreign language including translation services	As per 3.0 above including anti-tampering device but excluding serialisation
3.1b	Over labelling of Medicines outer and immediate packaging and FMD safety features in foreign language including translation services	As per 3.0 above including anti-tampering device and also serialisation

Deputat Reġistratur  
da