

**From:** Hadrien Valembois - INTA

**Subject:** EMPACT-EU Policy Cycle 2022-2025 - Intellectual property crime and counterfeiting as a Priority

25 March 2021

Dear Ms. Seucan,  
Dear Mr. Mugurel Chivu,  
Dear Mr. Dobrogeanu,  
Dear Mr. Aprodu,  
Dear Ms. Nistor,

We hope this email finds you well.

**On behalf of:**

- [ABAC-BAAN](#)
- [Association of Commercial Television in Europe](#) (ACT)
- [Asociación para la Defensa de la Marcas](#) (ANDEMA)
- [Association des Praticiens du Droit des Marques et des Modèles](#) (APRAM)
- [Audiovisual Anti-Piracy Alliance](#) (AAPA)
- [European Brands Association](#) (AIM)
- [European Communities Trade Mark Association](#) (ECTA)
- [Federation of European Publishers](#) (FEP-FEE)
- [Federation of the European Sporting Goods Industry](#) (FESI)
- Global Anti-Counterfeiting Group (CACG)
- [Istituto di Centromarca per la lotta alla contraffazione](#) (INDICAM)
- [International Trademark Association](#) (INTA)
- [Independent Music Publishers International Forum](#) (IMPF)
- [Union des Fabricants](#) (UNIFAB)
- [Verein Anti-Piraterie](#) (VAP)

We are writing to ask you to consider raising **Intellectual Property (IP) crime as a priority** as you submit criminal priorities for **EUROPOL's [European multidisciplinary platform against criminal threats](#)** (EMPACT) for the EU Policy Cycle **2022-2025**.

We are fully supporting the attached document prepared by the [European Observatory on Infringements of Intellectual Property Rights](#) providing concrete and specific arguments as to why IP crime should feature among EUROPOL's list of priorities with regards criminal threats.

- **Background.** You may recall that IP crime -and specifically organized crime groups involved in the production and distribution of counterfeit goods violating health, safety and food regulations and those producing sub-standard goods- was a priority in the earlier policy cycle 2013-2017. However, the current EMPACT priorities for the period 2018-2021 do not include IP crime or counterfeiting.
- **Reasons to include IP crime:**
  1. Growing evidence, notably from EUROPOL itself, of **the involvement of organised crime groups in the infringement of IP rights and of the link between IP crime and other crimes;**

2. **Strong negative impact of counterfeiting and piracy on the EU economy**, translating in GDP loss, decrease in job creation and negative impact on SMEs notably;
3. Counterfeit/fake products present **serious risks to the health and safety of citizens** (e.g. toys, medicines, spare parts, cosmetics, etc.), **even more** after the **COVID-19** pandemic given the sale, notably by organized crime groups, of **fake masks, test, or even now vaccines**;
4. **Environmental damage** resulting from the production, use and disposal of counterfeit products.

For these reasons, further explained in the attached document, we would greatly appreciate if you could share this email and document with your representative to the Standing Committee on operational cooperation on internal security (COSI) of the Council of the European Union or put us in contact with him. This would allow to **include IP crime within the criminal priorities for the European multidisciplinary platform against criminal threats (EMPACT) for the period 2022-2025.**

We remain at your disposal for any further information that your office may need on the 2022-2025 EMPACT priorities. Please do not hesitate to reach out on this or any other issue.

Best regards,  
Hadrien

Hadrien Valembois  
Policy Officer - Europe  
**International Trademark Association (INTA)**