

Who's slapping whom? Strategic lawsuits against public participation, a growing threat to freedom of speech or dividends for hard-nosed law firms representing unpopular clients?

What are Slapps?

Strategic lawsuits against public participation – known as SLAPPs. SLAPPs are generally recognised to be lawsuits intended to censor, intimidate, and silence critics by burdening them with the cost of a legal defence until they abandon their criticism or opposition. These legal actions, mostly pursued by wealthy claimants, are directed against individuals and organisations that speak out on matters of public interest or public participation. And that is the difference between an ordinary libel action in common law and SLAPP.

Defendants generally include journalists, whistleblowers, activists, academics, media outlets and NGOs. SLAPPs have one common purpose, to remove information from the public domain, to prevent publication or whistleblowing altogether.

Claims of defamation or invasion of privacy are the causes of action most associated with SLAPPs, but other causes of action, such as breach of confidence, can also be used for this purpose. The primary objective of a SLAPP is generally to harass or intimidate the investigative reporter or whistleblower and to discourage public criticism of the claimant who brings the action. To date it is difficult to define a SLAPP in law and most of the legal actions I will present to you today were settled out of court.

Who is doing the slapping? Conduct that might indicate abusive SLAPP litigation

It was the UK Parliament's intention with the *Defamation Act 2013*, that the London High Court would see fewer foreign libel tourists. But London continues to attract foreign authoritarian governments and other international litigants. Present lawsuits are largely filed by Russian billionaires and oligarchs. The most recent SLAPP action involves former President Donald Trump who is suing a former MI6 officer and the intelligence consultancy he founded, at London's High Court, which began on 16 October 2023. Trump is bringing a data protection claim against Orbis Business Intelligence and its founder Christopher Steele, who previously ran the secret intelligence service's Russia desk.

SLAPP statistics

A report from the Foreign Policy Centre (FPC) published in November 2020, which surveyed 63 investigative journalists in 41 countries, working to uncover financial crime and corruption, found that 73% of all respondents stated they had received legal threats because of information they had published, 48% identifying as having the most impact on their ability to continue working. 22% reported psychosocial or physical and digital threats.

Crucially, the UK was found to be by far the most frequent country for legal threats to journalists (31%), compared with 24% of all EU countries and 11% in the United States,

The following examples show behaviour by powerful litigants indicating such abusive SLAPP conduct.

The Wagner Group Slapp: Yevgeny Prigozhin

Investigative reporter and founder of Bellingcat, Eliot Higgins, faced a SLAPP action by Yevgeny Prigozhin in late 2021. British citizen and Leicester resident, Eliot Higgins, is a citizen journalist and blogger – also writing under the pseudonym Brown Moses. Bellingcat is a Netherlands-based investigative journalism platform that specialises in fact-checking and open-source intelligence.

Higgins exposed that Prigozhin's Wagner mercenaries had been fighting for Russia in Ukraine since 2021.¹ Prigozhin's Russian lawyers, Capital Legal Services (CLS) built a detailed legal plan against Higgins personally, rather than as part of a legal case against the media platform Bellingcat. In December 2021, Prigozhin instructed London-based Discreet Law to sue the British journalist for reporting that Prigozhin was the private army's founder. Discreet Law, founded and headed by Roger Gherson, specialises in representing wealthy foreign clients. Discreet Law relied on tweets Higgins had sent to promote the investigations on social media. Prigozhin launched his legal attack *in the UK* where Higgins resides knowing that UK libel laws were claimant friendly, rather than in the Netherlands, where Bellingcat is headquartered. The case collapsed in May 2022, but Higgins was left with estimated costs of £70,000. Prigozhin died when his business jet crashed on 23 August 2023,

¹ 'Wagner Mercenaries With GRU-issued Passports: Validating SBU's Allegation', Bellingcat January 30, 2019: <https://bit.ly/2MZcIgK>

two months after he staged an aborted mutiny against Russian military commanders in which his Wagner mercenary troops briefly took control of the southern city of Rostov and advanced towards Moscow.

Catherine Belton Putin's People

Since 2020, publishing house, HarperCollins, has been fighting an assortment of Russian and Soviet-era oligarchs in libel actions, defending, for example, authors such as Catherine Belton (*Putin's People*),² and Tom Burgis (*Kleptopia*).³

The SLAPP defamation action brought against Catherine Belton and her publishers, HarperCollins, was brought by oligarch and successful businessman, then owner of Chelsea FC, Roman Abramovich. London law firm, Harbottle & Lewis, acted for Abramovich. *Putin's People* was first published in April 2020. The book covers the emergence of Putin's regime and the renaissance of the KGB. Belton, for years a Moscow correspondent for the *Financial Times*, meticulously revealed how the old KGB, with help from 'mobsters' and politicians, seized back power in Russia. Belton describes how the Kremlin tamed the oligarchs, the politically connected tycoons who in the 1990s had seemed more powerful than the state. But far from bringing plutocrats to heel, the Kremlin and its cronies simply looted their business empires and turned their media holdings into propaganda outlets for the regime.

Abramovich claimed that the book contained a 'number of false and defamatory claims'.⁴ The judge, The Honourable Mrs Justice Tipples, determined in 2021 that 26 passages in *Putin's People* were potentially defamatory, allegedly stating that the claimant Israeli-Russian businessman, Abramovich, was the cashier of Russian President Vladimir Putin.

Given that the book was about the current totalitarian regime in Russia, it was impossible for the defendants, author Catherin Belton and publishes HarperCollins, to claim that the passages in the book were *not* defamatory of the claimant, Roman Abramovich. The defendants maintained that all statements in the book were matters of fact and substantially true. For example: how the claimant, Abramovich, had acquired his extraordinary wealth before President Putin came to power. That Abramovich had purchased Chelsea Football Club in 2003

² Belton, C. (2020) *Putin's People: How the KGB Took Back Russia and Then Took On the West*. London: HarperCollins.

³ Burgis, T. (2021) *KLEPTOPIA: How Dirty Money is Conquering the World*. London: HarperCollins.

⁴ *Abramovich (Roman) v (1) HarperCollins Publishers Limited (2) Catherine Belton* [2021] EWHC 3154 (QB) para 4 (The Honourable Mrs Justice Tipples DBE).

at the direction of President Putin, so that Russia could gain acceptance and influence in the UK. That Abramovich had split most of the \$13 billion cash he received on the sale of Sibneft to Gazprom with the associates of President Putin. That Abramovich had moved to New York at the direction of President Putin, so that Russia could influence the family of Donald Trump, and that Abramovich had acted as the cashier to the former Russian President Boris Yeltsin and his family.

In December 2021 publishers HarperCollins and Abramovich reached an out of court settlement, with an agreement that Catherine Belton amend sections in the book, *Putin's People*, and that the publishers make a donation to charity. *Putin's People* was serialized in *The Times* in March 2022, and became a 'must read' following the invasion of Ukraine by Russian forces on 24 February 2022.

Tom Burgis *Kleptopia*

In 2021, SLAPP proceedings were brought against the Financial Times and its journalist Tom Burgis, author of *Kleptopia*, by the Kazakh state-owned oil mining company, Eurasian Natural Resources Corporation (ENRC) and its three billionaire founders: Belgian-Uzbek oligarch, Patokh Chodiev, Kazakh oligarch, Alijan Ibragimov, who died in February 2021 shortly after the legal action started, and Israeli-Kazakh businessman, Alexander Mashkevich. Burgis had exposed how two UK Serious Fraud Office members, investigating the \$20billion ENRC mining company, were found dead under suspicious circumstances at a motel in Missouri in May 2015. A year later, a South African geologist, working for the African arm of ENRC, had also died in mysterious circumstances.⁵ In March 2022 Mr Justice Nicklin in London's High Court dismissed the SLAPP action with costs awarded against ENRC of £50,000. Permission to appeal was refused.

Arron Banks v Carole Cadwalladr

Arron Banks, a prominent donor for the Leave.EU campaign in 2015, sued Carole Cadwalladr, an Observer Journalist and blogger, over her Ted Talk comments in April 2019.⁶ TED

⁵ Source: 'Silent witnesses: what do three corpses have to do with a corruption case? Deaths of potential witnesses have alarmed investigators, looking into ENRC, the mining house that operates in a dangerous world', by Tom Burgis, FT 1 October 2020: <https://rb.gy/9sjbn>

⁶ Video: 'Facebook's role in Brexit and the threat to democracy', Journalist Carole Cadwalladr digs into one of the most perplexing events in recent times: the UK's super-close 2016 vote to leave the European Union, April 2019 (this is the edited version after the CA ruling in 2023): <https://rb.gy/lhbkp>

(technology, entertainment and design) Conferences or ‘TED Talks’, is an American-Canadian non-profit media organisation that posts international talks online for free distribution under the slogan ‘ideas worth spreading’.⁷ Cadwalladr said on Ted Talk: “And I’m not even going to go into the lies that Arron Banks has told about his covert relationship with the Russian government.”

Banks sued Cadwalladr in the London High Court in 2022, which ruled that her statement was libellous. But the court also ruled that she could rely on the public interest defence under s. 4 of the Defamation Act 2013⁸:

Publication on matter of public interest

(1) It is a defence to an action for defamation for the defendant to show that—

- (a) the statement complained of was, or formed part of, a **statement on a matter of public interest**; and
- (b) **the defendant reasonably believed** that publishing the statement complained of was in the public interest.

Banks appealed the High Court judgment. In 2023 the Court of Appeal ruled that Banks was caused serious harm by the Ted Talk’s continuing publication after 29 April 2020 (s. 1 DA 2013), and that Banks was entitled to damages from the journalist. Lord Justice Warby (with whom Lord Justice Singh and Dame Victoria Sharp agreed), held that: “The Ted Talk conveyed a serious allegation, involving dishonesty and breach of electoral law, which was inherently likely to cause serious reputational harm.”⁹

The Claimant, Arron Banks, was the successful party in this appeal. He had established that the defendant journalist, Carole Cadwalladr, was responsible for the unlawful publication to 100,000 or more people in the UK jurisdiction of a serious imputation, which caused serious

⁷ The TED organization was founded by Richard Saul Wurman, and the TED (technology, entertainment and design) conference was co-founded by Harry Marks in February 1984. Since then, TED has broadened its focus to include big ideas on a wider range of topics such as global issues, business, education and health. Over the years, presenters of TED speakers have included notables, such as, Al Gore, Bill Clinton, Bill Gates, Bono, Jane Goodall, Malcolm Gladwell, Gordon Brown, Richard Dawkins, Mike Rowe, Larry Page, Sergey Brin and Vint Cerf, among many others. See: <https://www.ted.com>

⁸ *Banks (Arron) v Cadwalladr (Carole)* [2022] EWHC 1417 (QB) before The Hon. Mrs Justice Steyn DBE.

⁹ *Banks (Arron) v Cadwalladr (Carole)* [2023] EWCA Civ 219 before Dame Victoria Sharp, President of the King’s Bench Division, Lord Justice Singh and Lord Justice Warby.

harm to his reputation. The court ordered Cadwalladr to pay substantial compensation in the sum of £35,000 plus a public published apology in form of an acknowledgment of the falsity of the meaning complained of in the TED Talk, and the removal of some Tweets with similar allegations.¹⁰ The Ted Talk organisation removed any reference to Arron Banks after the CA judgment.

Other Slapp examples include:

In 2017 a SLAPP litigation was filed by legal allies of the Malaysian Prime Minister, Najib Razak, against investigative journalist, Clare Rewcastle Brown, who had published *The Sarawak Report*, following a trail of corruption which led to the collapse of the Malaysian government in 2018.¹¹ Her reporting – exposing the shady dealings of international politicians, finance powerhouses, prominent PR firms, and Hollywood glitterati – convulsed Malaysian politics and reverberated around the world. To fight her legal action in the English courts, Clare funded the litigation against her by crowdfunding, cashing in her pension and putting her family home up as collateral. The SLAPP action against Rewcastle Brown was settled out of court in her favour in 2019.

A SLAPP defamation claim was filed in the London High Court in November 2020 by Swedish entrepreneur investor, Svante Kumlin, resident in Monaco with business interests in the UK, including the second claimant, EEW Eco Energy World plc, of which he is the founder, chairman and chief executive officer. His law suit against the Swedish business news website, *Realtid*, available worldwide (at www.realtid.se) alleged eight defamatory articles, written and published in Swedish. The defendants to the proceedings were:

- the website publisher, Realtid Media AB;
- its editor-in-chief, Camilla Jonsson; and

¹⁰ *Banks (Arron) v Cadwalladr (Carole)* [2023] Cost hearing 17 May 2023 (QB-2019-002507).

¹¹ *The Sarawak Report* describes how journalist, Clare Rewcastle Brown, uncovered the world's biggest theft which, in 2018, brought down the Malaysian government. Investigating the deforestation of Sarawak, Borneo, and the dispossession of its people. The journalist followed a trail of corruption that led her to the heart of Malaysian politics and to Prime Minister Najib Razak himself. Determined that the public should know the truth, she started a blog, which became Malaysia's go-to news outlet for information that the government was trying to suppress – and whistleblowers wanted to get out. She was soon running a radio station too. To nail down absolute proof, Rewcastle Brown criss-crossed the globe and, defying danger, pieced together the evidence of the 1MDB scandal – the theft of billions from the country's sovereign wealth fund.

- two Realtid journalists, Per Agerman and Annelie Östlund, who together wrote the majority of the articles.

Kumlin complained that the articles published in 2020, falsely suggested that he and his company were fraudulently marketing bogus ethical investments; that they lied about marketing shares in Sweden; and they dishonestly sought to cover the tracks of their misconduct by deleting material from the internet and issuing false denials, as well as other fraudulent, dishonest and dubious activities. Kumlin claimed serious harm to his and his company's reputation, asserting that it suffered serious financial loss. The High Court judge ruled that most of Kumlin's libel claims were unsuitable for trial in an English court due to the fact he was resident in Monaco. There was, however, potential damage to his reputation in relation to three out of the eight articles which might have been read in the UK, limiting Kumlin to damages only arising from publication in England and Wales. Realtid's editor-in-chief and one of the defendants, Camilla Jonsson, said the paper welcomed the court's decision.¹²

What are the common hallmarks of a SLAPP?

Strategic lawsuits against public participation or SLAPPs are generally based on defamation law; though an increasing number of such lawsuits also invoke other laws such as invasion of privacy, data protection, confidentiality or harassment. There is generally an imbalance of power and wealth between the claimant, such as an oligarch or rich business tycoon, and a journalist or whistleblower. The claimant usually engages in procedural manoeuvres or exploits resource-intensive procedures such as disclosure to drive up costs.

SLAPPs generally target individuals instead of the organisation they work for. There follows legal intimidation by well-known media law firms to facilitate their SLAPPs, accompanied by disproportionately large amounts of compensation from the defendant if they refuse to comply with the claimant's demands.

Slapps aim to prevent publication of matters of public importance. This could include:

- academic research
- whistleblowing

¹² *Kumlin & Anor v Jonsson & Ors* [2022] EWHC 1095 (QB).

- campaign or advocacy material
- investigative or campaigning journalism.

Do SLAPP law suits contravene free speech?

It can then be argued that SLAPPs are a form of retaliatory lawsuit intended to deter freedom of expression on matters of public interest. Since SLAPPs are now routinely used against public watchdogs, investigative journalists and political authors with an active role in the protection of democracy it can then also be argued that they contravene the rule of law.

There is now increasing public concern, supported by the solicitors' regulator, the Solicitors' Regulation Authority (SRA) that some UK solicitors and law firms are pursuing a type of abusive litigation in form of such strategic SLAPP litigation on behalf of their clients.

Charlotte Leslie, for example, Director of the Conservative Middle East Council, was sent scores of legal letters from a famous media and libel law firm after challenging Tory donor Mohamed Amersi. Like other whistleblowers who have challenged the moneyed oligarchical elite, Leslie has been landed with – in her own words - “a world of legal pain”. Together with the *Guardian* and the BBC, Leslie reported in January 2022, that the Pandora Papers showed that Mohamed Amersi was involved in the structure of a deal for the Swedish firm Telia, that was later found to include a \$220m (£162m) bribe for the daughter of the then president of Uzbekistan. Despite this information being publicly available, Amersi has tried legal bullying tactics in form of SLAPPS to silence Charlotte Leslie.¹³

UK law firms have been warned by the SRA, that they should not act as ‘hired guns’ to silence critics of the wealthy and powerful. In its thematic review in February 2023, the SRA investigated 40 cases of alleged SLAPPs, expressing significant concerns about solicitors making meritless claims on behalf of oligarchs to stifle public discourse about corruption or

¹³ Source: ‘No one is safe from the rich elite’s abuse of British law. Just ask Charlotte Leslie’, by Nick Cohen, *The Guardian*, 22 January 2022.

money laundering.¹⁴ Following the review, the SRA sent a warning notice concerning law firms accepting and dealing in SLAPPs in November 2022.¹⁵

So far, the Bar Council has remained silent on the issue of SLAPPs and is maintaining the ‘cab rank rule’ that every barrister must take on a case he is presented with by a firm of solicitors.

Allegations without merit and overly aggressive letters by law firms

What does typical correspondence from ‘slapping’ law firms look like? Characteristically, letters sent by law firms to a potential defendant journalist, author or NGO activist, tend to be overly aggressive, intimidating or threatening, including threats intended to intimidate a potential defendant into changing their intended course of action or avoiding seeking their own legal advice. Sending excessive correspondence, such as emails, letters or phone calls, which is disproportionate to the issues in dispute and an equivalent high number of responses is another way to intimidate a potential defendant. Threatening imprisonment or making claims of high cost consequences should ring alarm bells.

According to *Guardian* lawyer, Gill Phillips, SLAPPs tend to make claims that have no basis in law or would stand no chance of being successful if heard in court, because exaggerated claims and threatening letters are not legally valid. Neither is the labelling of correspondence with 'strictly private and confidential', 'not for publication' or 'without prejudice'. The aim is not only to intimidate but also to mislead the recipient of a SLAPP action, leading the defendant into believing that if you tell anyone about the correspondence, there will be adverse consequences.

In his book just published, *Buying Silence*, veteran libel lawyer, David Hooper, explores how money has enabled the super-rich to use strategic lawsuits against public participation (SLAPPs) to intimidate and silence critics. Hooper who acted in cases against the likes of oligarch, Boris Berezovsky, and needed an armed bodyguard while collecting evidence in Moscow, examines the “truly scandalous” tactics used by billionaire oligarchs who have tried

¹⁴ SRA Thematic Review February 2023: https://www.sra.org.uk/sra/research-publications/conduct-disputes/?mc_cid=5854ba35ed&mc_eid=19a3249803

¹⁵ SRA - Strategic Lawsuits against Public Participation (SLAPPs). Warning notice, issued 28 November 2022: <https://www.sra.org.uk/solicitors/guidance/slapps-warning-notice/>

to launder their reputations in the UK by suing for libel, and found lawyers only too happy to pocket their roubles. Hooper suggests in his book that “at the heart of Slapps is the tremendous pressure on law firms to increase their turnover and profitability”. A “large element of greed,” he argues, has meant that law firms have increasingly backed away from representing defendant media and publishing organisations in favour of acting for corporate clients and wealthy people who bring in the money.¹⁶

Is it then unethical for a law firm acting on behalf of a ‘slapper’ to using legal blackmail to suppress something which ought to be in the public domain? Does it amount to a breach of freedom of expression? Should legal professionals disassociate themselves from law firms providing SLAPP litigation?

SLAPPs are a growing concern in the UK jurisdiction. We only have limited evidence as I have outlined for you, whether or not SLAPPs are of increasing prevalence, and that consequently there is a need for some reform to ensure that such litigation does not become more of a problem. I will now outline legislative proposals concerning SLAPPs and a possible reform of defamation laws.

What should SLAPP legislation look like?

No-one has yet found a legal definition for a SLAPP, so that a lawyer could reasonably know when they are *not* to act. Is it a claim in defamation or one in privacy? Should existing harassment legislation in form of the *Harassment Act 1997* be amended to include ‘slapping’? Would it be a genuine claim under the *Defamation Act 2013*, if the claimant has been libelled and would their solicitor then be suppressing free speech under Art 10 of the European Convention on Human Rights? Proposed legislation is making its way slowly through both houses of the Westminster Parliament. The Council of Europe issued a statement on ‘The Need for a Council of Europe Recommendation on Combating SLAPPs’ in March 2021, promoting, inter alia, freedom of expression under Art 10 of the Convention.¹⁷ No one has as yet found a workable legal definition for ‘slapping’.

¹⁶ David Hooper (2023) *Buying Silence: How oligarchs, corporations and plutocrats use the law to gag their critics*. Bitewell Publishing.

¹⁷ Council of Europe (2022) Draft Recommendation CM/Rec(20XX)XX of the Committee of Ministers to member states on countering the use of SLAPPs. MSI-SLP(2022)07.

Following political pressure from David Davis MP in the House of Commons in November 2022, Conservative MP for the Isle of Wight, Bob Seely, tabled a Private Member's Bill at the end of January 2023. In his presentation to Parliament Seely attacked large law firms for 'legalised gangsterism' in their conduct of oppressive SLAPP litigation. The bill had its second reading in March 2023, named rather lengthily: *The Defamation, Privacy, Freedom of Expression, Data Protection, Legal Services and Private Investigators Bill*. The bill makes provision for several legal issues: defamation, provisions about costs awarded in civil cases, the rights to privacy and to freedom of expression in civil cases on matters of public interest. The bill also makes provision for the purpose of reducing the use of lawsuits for strategic purposes – namely SLAPPs. The government's proposals also introduce a three-stage test to allow judges to dismiss cases that lack merit in their early in proceedings, these include:

1. **CONDITION 1 – SLAPPs are disposed of as quickly as possible in pre-court hearings:** a statutory mechanism that will require claims targeting public participation (SLAPPs) to meet a higher threshold in order to advance to trial. Judges should have discretion to filter out cases that exhibit abusive qualities or would otherwise have a disproportionate impact on freedom of expression.
2. **CONDITION 2 – Costs for SLAPP-targets are kept to an absolute minimum**
3. **CONDITION 3 – Costs for SLAPP-filers are sufficiently high to deter further SLAPPS:** exemplary damages should be available for cases where the claimant has exhibited particularly egregious conduct, and where the time and psychological harm caused to the defendant needs to be compensated.

The House of Lords Select Committee on Communications and Digital has also been debating the proposed anti-SLAPP legislation in January 2023. The Lords recommended that the regulator, the Solicitors Regulation Authority (SRA), should have statutory powers to fine firms up to £250 million for abusive litigation in Slapps cases. The Lords' committee called for:

- The creation of a new SLAPPs defence fund paid for by wrongdoers;
- More statutory powers for the SRA to fine and deter abusive lawsuits;
- Greater oversight of law firms who use 'blackmail PR' and private intelligence agencies to harass journalists;
- Action to close loopholes around money laundering and legal advice;

It could be argued that the proposed UK anti-SLAPP legislation is too complicated and will create a complete lawyers' bean-feast.

An Anti-SLAPP Model Directive has been proposed as an EU legal instrument, taking in interests from journalism to environmental protection, the rule of law, and human rights more broadly. Article 3(1) of the Model EU Directive defines SLAPP as an “abusive lawsuit against public participation”.

Article 6(1) of the Model Directive states that “Member States shall take the measures necessary to ensure that the court or tribunal competent to hear the motion [for early dismissal], where it is satisfied with the evidence provided by the defendant that the claim arises from public participation on matters of public interest, shall adopt a decision to dismiss, in full or in part, the claim in the main proceedings if any of the following grounds is established: (i) the claim does not have, in full or in part, legal merits; (ii) the claim, or part of it, is manifestly unfounded; (iii) there are elements indicative of an abuse of rights or of process laws.”¹⁸

Conclusion

The key aim of proposed UK and EU anti-Slapp legislation then is to protect publication on matters of public importance such as academic research, whistleblowing, campaigning or investigative journalism. Both houses of the UK Parliament are agreed that a threat to the rule of law, free speech and a free press needs to gain wider legislative recognition. It could be argued that ultimately it is for courts and judges to slap down wrongful strategic litigation – as the draft EU Directive suggest – rather than involving regulators – such as the SRA. That said, the courts need suitable law upon which to base their rulings.

Of course, not all lawyers are ‘slappers’, but there is now a move, particularly in the UK, to stop such SLAPP litigation. For UK law firms SLAPPs remain a proactive and extremely lucrative business decision, enabling them to create a powerful niche. The lawyers who work at these firms tend to be hard-nosed and tough-skinned if and when they pursue this course of action. Being associated with unpopular oligarchical clients and being hard-nosed about it will in time bring the firm to the attention of other unpopular clients and therefore may well bring dividends.

¹⁸ See: ‘The Use of SLAPPs to Silence Journalists, NGOs and Civil Society’, a study requested by the JURI committee of the EU Parliament. Policy Department for Citizens’ Rights and Constitutional Affairs Directorate-General for Internal Policies PE 694.782- June 202.