

Deliverable 1.2: Consolidation of access policies and legal framework for atmospheric research infrastructures

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Lead beneficiary	F. CEAM	
Author(s)	M. Ródenas, A. Muñoz	
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1 Introduction

This document has been prepared within the ATMO-ACCESS project and, in particular, in the framework of Work package 1 (WP1): "Developing the concept and guidelines for access to distributed atmospheric Research Infrastructures". The main objective of WP1 is to define a synergistic framework with guidelines and cost scheme for access to atmospheric Research Infrastructures (RI) to enhance user-friendly and easy access to services provided by atmospheric research facilities in ATMO-ACCESS.

Developing a unified legal framework is essential for establishing fair and effective access conditions for the whole atmospheric research community. This Deliverable aims to give recommendations on "Consolidation of access policies and legal framework for atmospheric research infrastructures", named Task 1.2.

A review of access policies from different RIs has been used as the foundation to elaborate a common policy and legal framework for accesses. That review was carried out in ATMO-ACCESS Milestone 2: *Analysis of Access policies and legal framework regulating the Access provision*, where the policy on access and data policies from a total of 19 RIs was examined, It was observed that some RIs present an advanced legal maturity and have developed extensive regulation in their internal policies, while regulation is scarce in others, As one of the RIs with the most developed access policy, ACTRIS has provided substantial input to this document. Additionally, policies from other RIs (IAGOS, ICOS, NFFA-Europe, INTERACT, ENVRI, etc) have also been incorporated in this document.

2 Purpose

The purpose of this document is to compile a series of **recommendations** that will define a common legal framework for access provision, data access and use of services. It also considers the requirements for common user policy and/or user service agreements to address the scope of rights and responsibilities between facility operators and users for synergistic use of atmospheric facilities, including terms and conditions, access data management, publications, ethical and liability issues and intellectual property rights for different kinds of users.



3 European legal frameworks and policies

This access policy aligns with the overall European legal framework related to environmental data, information and databases, health and safety at work. In particular, the related normative considered can be found in the following directives and guidelines:

- Aarhus Convention (access to environmental data),¹
- The General Data Protection Regulation (GDPR), 2016/679, is a Regulation in EU law on data protection and privacy in the EU and the European Economic Area (EEA). for the protection of natural persons with regards to the processing of personal data and on the free movement of such data²,
- Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work³,
- Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 on establishing an Infrastructure for Spatial Information in the European Community (INSPIRE) (sharing of the spatial information among public sector organisations and access to the spatial data)⁴,
- Directive 96/9/EC of the European Parliament and of the Council of 11 March 1996 on the legal protection of databases⁵,
- Directive 2009/24/EC of the European Parliament and of the Council of 23 April 2009 on the legal protection of computer programs⁶,
- Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019
 on open data and the re-use of public sector information⁷

¹ https://unece.org/environment-policy/public-participation/aarhus-convention/text

² https://eur-lex.europa.eu/eli/reg/2016/679/oj

³ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31989L0391

https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32007L0002

⁵ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31996L0009

⁶ https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32009L0024

⁷ https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1024



- European Charter for Access to Research Infrastructures (principles and guidelines for access policies)⁸,
- OECD Principles and Guidelines for Access to Research Data from Public Funding⁹.

This access and service policy acknowledges the ongoing work of the European Commission and the European Strategy Forum on Research Infrastructures - ESFRI fostering the following principles:

- FAIR (findable, accessible, interoperable and re-usable)¹⁰ principles for data access,
 sharing and use.
- Open access and open science strategy promoted by the European Commission¹¹, aiming to democratize access to research data and encourage transparency and collaboration. It also promotes the development of data management plans.
- Personal data are handled in compliance with the EU General Data Protection Regulation (GDPR)¹² and that commercial interests are protected by ensuring that intellectual property rights are respected. Overall, the Data Policy aims to ensure that research infrastructures promote the use and reuse of data, while respecting ethical, legal, and commercial considerations.

4 Feedback from the ATMO-ACCESS community

ATMO-ACCESS encompasses diverse communities, ACTRIS, IAGOS and ICOS, each with its own specificities. Additionally, there are various types of access provided by ACTRIS. The opinion of the whole community is crucial for refining and optimizing a recommended common legal framework for access provision that takes into account such diversity. The existing access policies from different RIs were first discussed in dedicated WP1 meetings and then presented to the ATMO-ACCESS community during the annual meeting in 2023 and in 2024, where they were

https://op.europa.eu/en/publication-detail/-/publication/78e87306-48bc-11e6-9c64-01aa75ed71a1/

 $^{^{9} \ \}underline{\text{https://www.oecd-ilibrary.org/science-and-technology/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding} \ 9789264034020-en-fr$

¹⁰ https://www.go-fair.org/fair-principles/

¹¹ https://research-and-innovation.ec.europa.eu/strategy/strategy-2020-2024/our-digital-future/open-science en

¹² https://gdpr-info.eu/



discussed. The community provided feedback through discussions, questionnaires and Slido polls.

- A Slido poll was conducted in the context of the ATMO-ACCESS annual meeting in 2023, and it was left accessible for one more week after the meeting to collect additional inputs, therefore 27th March 7th April. The questions were related to the key questions discussed after the presentation of Rl's access policies, i.e. types of licenses for the data, access to data, the need to implement special policy for the industry, the need to regulate and include additional aspects.
- A questionnaire targeting ATMO-ACCESS access providers was open between 23rd February 8th March 2024. The form consisted of several questions focusing on the main project components (access organization, terms of use of the data, publication co-authorship...). The main aim of this action was to gather feedback that could help shape recommendations on access to the RI of the atmospheric domain. The feedback gathered was presented during the ATMO-ACCESS annual meeting on 19th-21st March 2024.

Regarding **data licensing**, the general preference observed in RI policies reviewed in the ATMO-ACCESS Milestone 2 and exposed to the community in the meeting is for the CC BY license, although some RIs also use CC BY NC to restrict commercial use. Nevertheless, of the 21 replies received, 62% favored CC BY with restrictions on commercial use, while 29% felt CC BY was adequate. Both options are recommended in this document. As for the need to revisit and discuss the existing special policies for **the industry sector** (e.g. data sharing, intellectual property rights, etc) 52% of the replies were N/A, and an equal percentage of 24% said Yes and No. Comments were about regulating authorship and when data would be made public. The live discussion showed interventions that agreed with being flexible in the case of involving the industry to engage them. Besides, replies reflected a 48% that agreed about the existing level of coverage of policies regulating the access, while comments within the 14% voting NO actually stated that the policy should guarantee that it covers all the particularities of the different members.

Another major topic of discussion was the level of **co-authorship** for access providers and users in publications resulting from access projects. Among the 33 responses from the questionnaire,



48.5% of the access providers stated that co-authorship should depend on the level of involvement of access providers in the research project, 45.5% believed both users and providers should be co-authors, and 6% indicated that the decision depends on the type of access (physical/remote vs. virtual). None of the respondents replied that access providers should only be acknowledged. The consensus was that acknowledgment alone is neither fair nor sufficient. Co-authorship should be offered for physical and in remote access, while acknowledgment might suffice for virtual access. In any case, each case should be evaluated individually and agreed between users and access providers.

The idea of drafting a general template for the Terms of Use Agreement, to be completed prior to access, was also discussed during the 2024 annual meeting. Surprisingly, very few research institutions have their own facility-specific Terms of Use agreements. Even some access providers commented that in their experience, companies had shown little interest in signing confidentiality agreements, citing the excessive workload and additional paperwork involving legal services and administration. A member of the ATMO-ACCESS Scientific Advisory Board, coming from the EMBRC ERIC, participated in the discussion noting that establishing a common access policy is challenging due to the specific requirements of different facilities and countries. For these reasons, the existing Terms of Use Agreement (see Annex A) developed in ACTRIS IMP D7.2 is an example of a document that has been considered to include sufficient terms to regulate access. Finally, 91% of the replies agreed on the aspects covered in the policies exposed and that there was no other point to be regulated. The only comment received by the remaining 9% was not actually related to the question but to cost calculations.

5 Recommended policies

From the review of access policies and legal framework for RIs in the ATMO-ACCESS Milestone 2, several regulated key topics were identified. With higher or lower detail, the visited policies promote the same principles in general, i.e. FAIR, open access, and compliance with GDPR, with no relevant discrepancy. The document also collected detailed policies from different RIs related to those topics, which have also been included or summarized here. This deliverable is structured over the same topics.



5.1.1 General requisites for users

The requisites for users are designed to ensure that the infrastructure is used safely, efficiently and effectively, and that the research conducted using the infrastructure is of high quality and has the potential to make a significant contribution to the scientific community and complies with ethical and legal requirements.

- Users must comply with all applicable national, regional, and local laws, as well as host institution regulations and health and safety requirements.
- Access providers are obligated to offer on-site support and advice to users regarding project
 preparation, feasibility studies, training, travel and subsistence support, logistics, space, and
 data analysis. They might also provide details about the host institution's policy if applicable.
- Users must secure their own insurance. Hosting institutions can require specific insurances and proof of such.
- There must be an agreement on the dissemination of research outcomes and open data, with flexible requests when users from the private sector are involved.
- Specific eligibility conditions depending on funding stream.

In the case of transnational access financed by EU projects, the leader of the user group and the majority of users must work in a different country from where the installation is located. Transnational access (TNA) cannot be granted to an infrastructure/installation within the same country where the leader of the user group and most of the groups work. Thus, applicants are ineligible for TNA to their national infrastructures. ACTRIS IMP Deliverable 7.2 collects the terms of use agreement, which state that after acceptance of a user project, a specific agreement summarizing the rights and obligations of both access providers and users should be signed. An example of an outline of these terms of use agreement can be found in Appendix A of this deliverable. Additionally, users and providers can incorporate additional agreements.

If RIs choose to create a Terms of Use Agreement, when signing it users are requested to accept the access conditions. The document should address the following points:

- Compliance with the RI Data Policy and the access and service policy.
- Compliance with the applicable legislation, institute' regulations, hygiene and safety rules, local data management process, etc.



- Confirmation of the users' responsibility to provide their own insurance.
- Confirmation to disseminate the results (via open access).
- Recognition of the facility and personal contributions in the agreed terms.
- Confirmation to provide data related to the DC.
- Other aspects (if applicable): e.g. specific protocols concerning transport and access to the facility.
- Confirm the avoidance of double financing (different from cofinancing) by signing a user acknowledgment statement. They are then requested to contact the access provider to plan their access.

5.1.2 Policy on data storage

The Data Policy aims at setting the principles to govern the collection, storage and management of research data. It aims at ensuring the FAIR principles for data: findable, accessible, interoperable, and reusable, and that data are collected and managed ethically, and in compliance with relevant laws, regulations, and ethical guidelines. The data policy of the RIs consulted in the Milestone 2 are aligned with these principles. Considering the already approved ACTRIS Data Policy, some of its general recommendations valid also for other research infrastructures in atmospheric domain are listed above:

- Data need to be preserved and archived for long term.
- All the steps of the data lifecycle (e.g. collection, curation, data production, preservation, publishing and use) need to be traced and documented.
- The details of the data lifecycle and data management needs to be outlined in the RI Data Management Plan (DMP).
- Data generated through accesses will be stored in a RI Data Centre (DC), which compiles, archives, and provides access to well-documented and traceable measurement data and data products. This might include digital tools for data quality control, analysis, visualization, and research.
- The RI will be responsible for tracking all public data produced and will manage the front-end website and applications that display the data.
- RI data and products should adhere to the principles of being findable, accessible, interoperable, and reusable (FAIR).



- The RI will define which level of data will be made public, and might restrict access in lower data levels, e.g. raw data.
- The Data Repository should contain datasets and associated metadata. The RI data policy will
 describe the points addressed in the metadata and may include descriptive, structural, and
 contextual information that describes the context, content, and structure of research data
 and/or datasets and their management over time.
- RIs will assign a Persistent Digital Identifiers (PID) or Digital Object Identifier (DOI), in general to the final data.
- Due to technical reasons, and depending on the type, volume of data, and economic impact of long-term data storage, access to data through machine-to-machine (M2M) interfaces may be limited for a certain period of time. Consequently, the RI reserves the right to set a retention period in consultation with the beneficiaries involved.
- The data and metadata will remain confidential for a given period of time and will be made openly accessible afterwards. This period may be extended if adequately justified, for instance, data being used for an ongoing publication. This process goes from the drafting process to the publication itself, however, the embargo after the data were produced will be limited. These periods will be declared in the RI policy and in the Terms of Use Agreement.

5.1.3 Data access

The policy on the management of research data refers to guidelines and regulations on research data and metadata collected in the access. The goal of such policies is to ensure the integrity, accuracy, and reliability of research data and to facilitate their accessibility for future use.

ACTRIS has formerly developed extensive legislation on data policy. More details can be found at ACTRIS – PPP D2.3. The following statements, which could be used as recommendations for other atmospheric-related RIs, are promoted:

- Users will register in the RI's data portal to access data
- The data policy shall be implemented in compliance with the RI access and service policy.
- The principles of FAIR and Open Science for data access are promoted, with reasonable restrictions in line with open access principles for specific datasets, particularly when access



- could jeopardize potential industrial/commercial use, violate personal data protection rules, or confidentiality for security reasons.
- Restrictions may also be applied based on specific agreements or other justified reasons
 agreed upon with data originators, making some data, digital tools, and services available
 only after a certain period or requiring authentication and separate permission.
- Data and digital tools shall be available according to license conditions.
- Users are encouraged to make data from TNA projects available for archiving and access via the RI Data Centre (DC). Tools developed in the framework of EU-funded initiatives, (such as ATMO-ACCESS) allow submission of TNA data via the "homeless data portal," ensuring long-term curation and visibility. This service is handled according to the FAIR principles as far as possible and includes DOI minting for datasets if requested. The portal is open to past TNA project PIs and can be accessed free of charge at the link https://www.atmo-access.eu/virtual-access/#/.
- All proceedings related to access and sharing must be compliant with national and European legislation such as the GDPR which includes a Code of Conduct (Article 40).
- Users shall give to the RI a worldwide, free of charge, perpetual, transferable, non-exclusive
 right to use for any purpose the data and related documents generated by them within the
 Physical, Remote or Virtual access. This right includes, but is not restricted to, the right to
 modify, reproduce, sublicense, incorporate to other data, other databases or other tools as
 well as produce new developments.
- Reasonable limitations and restrictions, still in line with the principle of open access, may be
 applied to protect potential industrial or commercial use, personal data, confidentiality, or
 the protection of human subjects or endangered species.
- Depending on the type of user (ie: industrial), limitations may also occur in order to respect
 potential Intellectual Property Rights, trade secrets, commercial sensitivity or the
 confidentiality of certain information not accessible for research.

5.1.4 User's personal data

The policy on retention of user's information sets guidelines and regulations on individuals' right to access and correct their personal information that has been collected and used as part of the access to the RI, i.e. before or during the access.



The EU implemented the General Data Protection Regulation (GDPR) in 2018, which is a comprehensive data protection regulation setting out the rules for the collection, use, handling, storage, deletion and processing of personal data of individuals within the EU. It applies to any organization, whether located within or outside the EU, that processes personal data of individuals within the EU and the failure to comply with it can result in significant fines and penalties.

Under the GDPR, organizations that handle personal data must comply with certain principles, including transparency, purpose limitation, data minimization, accuracy, storage limitation, and confidentiality. They must also obtain explicit consent from individuals for collecting and using their personal data, and provide them with the right to access, correct, and delete their data.

RIs have designed the access management process in order to protect the privacy and confidentiality of research participants and helps to guarantee privacy and confidentiality informing the individuals about their right to access and correct their personal information, accordingly to GDPR:

As an example, and in line with the other RIs that regulate this aspect, ACTRIS follows the Regulation (EU) 2016/679 of the European Parliament and of the Council, 27 April 2016¹³ on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, personal data shall be processed according to the following principles. Personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').

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¹³ This can be found in ACTRIS PPP Deliverable 2.2: ACTRIS Ethical Guidelines



- Accurate and, where necessary, kept up to date; every reasonable step must be taken to
 ensure that personal data that are inaccurate, having regard to the purposes for which they
 are processed, are erased or rectified without delay ('accuracy').
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data, including
 protection against unauthorised or unlawful processing and against accidental loss,
 destruction or damage, using appropriate technical or organisational measures ('integrity
 and confidentiality').
- Users have the right to have access to their personal information held by the RI, request a copy and to have this information corrected and amended.
- Personal data shall be processed on the basis of the consent of the data subject concerned or some other legitimate basis, laid down by law. The basis of data collection and processing shall be clearly stated.
- Personal data will be retained for a given period of time from the latest access. However, the user can ask at any time to interrupt the processing of the data or have data canceled.

5.1.5 Reporting and Publications Policy

Reporting and publication refer to the guidelines and rules that researchers and publishers must follow when reporting and disseminating scientific findings to the scientific community and the general public. These policies are designed to ensure that scientific research is conducted and reported in an ethical, transparent, and rigorous manner.

Users are generally expected to make their publications available through open-access repositories as well as to disseminate the results from their access (except for users from the private sector). The following principles are promoted:

- Access data via the RI DC, based on open access principles.
- Publications available in open-access repositories.
- Publications in peer-reviewed online journals (open access).
- Dissemination of results in conferences and other venues as openly as possible.



Users are expected to communicate publication references resulting from access projects to and they must ensure proper citation and acknowledgment. In fact, users must acknowledge the RI's support and especially the use of facilities and the contributions of personnel. The intellectual investment of investigators involved in creating data or tools should always be acknowledged, following copyright laws and scientific norms. Furthermore, following good scientific practice, users should offer co-authorship to those people working at RIs facilities who made significant contributions to their work. The terms of acknowledgment and co-authorship will be agreed between users and providers.

An activity report summarizing the access must be reported by the user within a reasonable timeframe after the end of the access.

5.1.6 Intellectual Property

Intellectual property rights (IPR) refer to the legal protections afforded to scientific discoveries, inventions, and other forms of intellectual property. It can include patents, trademarks, copyrights, etc.

Ownership

Ownership and intellectual property rights to any data or data-related tools, databases, software, prototypes, new tools or methodologies or any other products that are generated in relation to the access shall belong to those who have generated them in accordance with the applicable legislation. Those who have jointly generated work shall have joint ownership and they shall agree separately upon the conditions of the joint ownership. Joint ownership should be agreed on in specific contractual arrangements (joint ownership agreement)

Ownership and IPR to the data generated within the RI belongs to that/those having generated it, in accordance with national legislations. Jointly owned RI's data is defined by joint ownership. The RI should aim at getting access rights to data from all its components.

Third party rights

Third party rights are intellectual property rights which the RI, the RI components have not generated themselves and do not own. If any of them use such third-party rights as part of their own intellectual property, they must ensure that the intellectual property rights of the third



parties are respected and that they have the authorisation of the right holders to grant access rights in accordance with this policy.

No warranties are given by the RI and its components, and they disclaim any express and implied warranties of non-infringement of third-party intellectual property rights, patentability, safety, industrial or commercial suitability or fitness for a particular purpose of the data, tools, products or services provided in accordance with this policy.

Access rights for the RI

The users have ownership of their own works. If the users submit their data resulting from the access to the RI's DC, the users shall give to the RI access rights to data and related documents generated. It can be considered that, as stated in the ACTRIS Access and Service policy, the access right is a worldwide, free of charge, perpetual, transferable, non-exclusive right to use for any purpose the data and related documents generated by them within the physical, remote or virtual access. This right includes, but is not restricted to, the right to modify, reproduce, sublicense, incorporate to other data, other databases or other tools as well as produce new developments. However, all use of data must be in line with the RI's ethical guidelines and scientific integrity must always be followed and respected. The RI shall not give any guarantees or warranties for the results gained by using the access services.

For justified and legitimate reasons, the RI may allow exceptions to the expected access rights, for example, when the use of the results by the RI could jeopardize a potential industrial/commercial use, violate the rules on personal data protection or on confidentiality for security reasons, or for any other legitimate reason to be agreed upon in writing case by case basis. Such exceptions are agreed upon with the RI. More information on legal issues is provided in the background document to the ACTRIS data policy (ACTRIS PPP D6.1), which can be applicable to other RIs.

Licenses

It is recommended to license publications and data using Creative Commons Attribution International Public License, Creative Commons Public Domain Dedication or equivalent. Open access licenses are encouraged. The most recommended license is *CC BY*: This license lets others distribute, remix, adapt, and build upon your work, even commercially, as long as they credit the



creator for the original creation. The license <u>CC BY NC</u>, similar to CC BY and in which only non-commercial uses of the work are permitted, can be also considered.

6 References

- ATMO-ACCESS Milestone 2: Analysis of Access policies and legal framework regulating the Access provision
- ACTRIS Access Management Plan
- IAGOS Data Management Plan
- ICOS Data license
- ICOS ERIC Privacy policy
- ACTRIS PPP Deliverable 2.2: ACTRIS Ethical Guidelines
- ACTRIS Access Management Plan
- ACTRIS PPP Deliverable D6.1: Recommendations for Data Policy–A background document
- ACTRIS PPP Deliverable D6.3: Report on access rules and modalities and recommendations for ACTRIS access policy
- ACTRIS IMP Deliverable 2.3: List of ACTRIS policies, internal rules and legal agreement templates
- ACTRIS IMP Deliverable 7.2: Recommendations for implementing access to ACTRIS services
- Websites of RIs studied in ATMO-ACCESS Milestone 2, especially:
 - o NFFA-EUROPE. https://www.nffa.eu/news/project-updates/pilot-nep/
 - o INTERACT. www.eu-interact.org
 - o ENVRI. https://www.envri.eu/
 - o ICOS. https://www.icos-cp.eu/
 - o IAGOS. https://www.iagos.org/



7 Annex A. ACTRIS Access Terms of use agreement



Facility To: TNA Project Leader

[Access Provider Name] [Name of TNA project leader]

[Name of Facility] [Home institution and address]

[Name of Service Provider] Cc.: SAMU samu.imaa@cnr.it

[Address of Service Provider]

Access Terms of use agreement

Your access project has been accepted [if applicable, add "and you are granted financial support by XXX to facilitate the execution of the project"]. Please find below the useful information you need to help you prepare your access project.

- User obligations: Your project must comply with the <u>ACTRIS Data Policy</u> and the <u>ACTRIS</u> access and service policy.
 - Remind the user of the steps needed to ensure an efficient access process:
 - Before your visit:

Fill in the Acknowledgement of access terms (including insurance policy) on PASS

· At the end of your visit (before you leave the facility):

Notify access completion through PASS

Within 2 weeks after the end of your TNA

The project PI is requested to provide all mandatory TNA reporting documents within a reasonable time frame after the end of the TNA. All documents will be submitted through <u>PASS</u> including the following documents:

- TNA feedback questionnaire
- Scientific activity report.
- Submit the TNA data to the ACTRIS Data Centre
- Additionally, any results from work carried out under this activity (e.g., publications, conference contributions) must be reporting to the SAMU (samu@imaa.cnr.it) and must acknowledge the project and support of the European Commission as follows: "This [infrastructure] [insert type of result] is part of a project that has received funding from [project details]."

Facility onsite support

- Description of the support offered to the users in terms of project preparation, feasibility study, training, travel and subsistence support, logistics, space, data analysis.
- Inform about specific local Data management plan procedure.

Specific procedures

- Inform of applicable legislation, institution' regulations, hygiene and safety rules
- Inform users in advance in case they need to apply for specific clearance and if ID
 /badges are needed to access the site.
- Insurance policies and responsibility.
- If applicable: specific protocols concerning transport and access to the facility.
- Include facility main contacts (email/phone) and emergency contacts (112...)

Logistics and accommodation

- Description of how to reach the facility including a map if feasible.
- · List accommodation options close to the facility
- [if applicable, add "Reimbursement procedures (in the frame of an EU project) in line with the hosting institute's administration procedures to ensure smooth use of the TNA grant:
 - · Information / paperwork needed before the visit.
 - Information / paperwork requested to justify the expenses]