



iTSCi joint industry traceability and  
due diligence programme

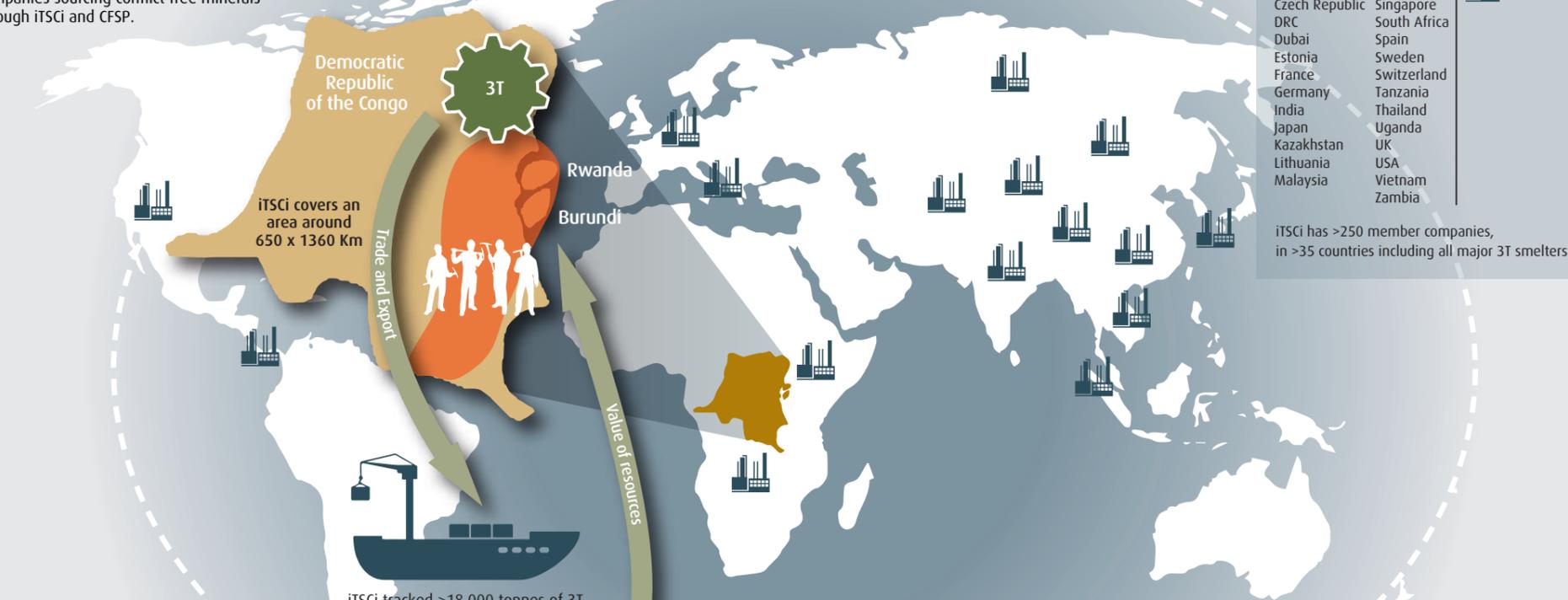
# iTSCi JOINT INDUSTRY TRACEABILITY AND DUE DILIGENCE PROGRAMME Contents

- 3 Large scale implementation
- 4 iTSCi joint industry programme
- 5 Foreword
- 6 Multi-stakeholder participation
- 7 How we work with stakeholders
- 8 Identify the supply chain - iTSCi mine and company approval - step 2
- 9 Identify the supply chain - iTSCi traceability- step 2
- 10 Gallery
- 11 Identify and manage risks - iTSCi incident management - step 3
- 12 Accessing and using iTSCi information
- 13 Information available for companies - step 4 & 5
- 14 Moving beyond conflict; social & economic opportunity
- 15 Working with others to bring benefits
- 16 How iTSCi is funded and our expenses
- 17 The first five years of iTSCi
- 18 Plans for the future
- 19 iTSCi information sources



## iTSCi Large scale implementation of the global iTSCi Programme supports the central African region

iTSCi assists >1,300 mine sites in Burundi, DRC and Rwanda and >80,000 miners. With perhaps an equal number of other associated workers, and 5 dependents per worker, the Programme is relied on by ~1 million people. They do not face threat, force, or abuse and the tin, tantalum and tungsten they produce does not fund conflict. This is possible due to international downstream companies sourcing conflict free minerals through iTSCi and CFSP.



iTSCi provides a unique opportunity for companies, governments, civil society and donors to unite in support of a joint mechanism which delivers results. The presence of an overarching organisation is key to implementation of standards, through enabling resources and systems to achieve a common vision, while avoiding multiple certifications, variations and costs.

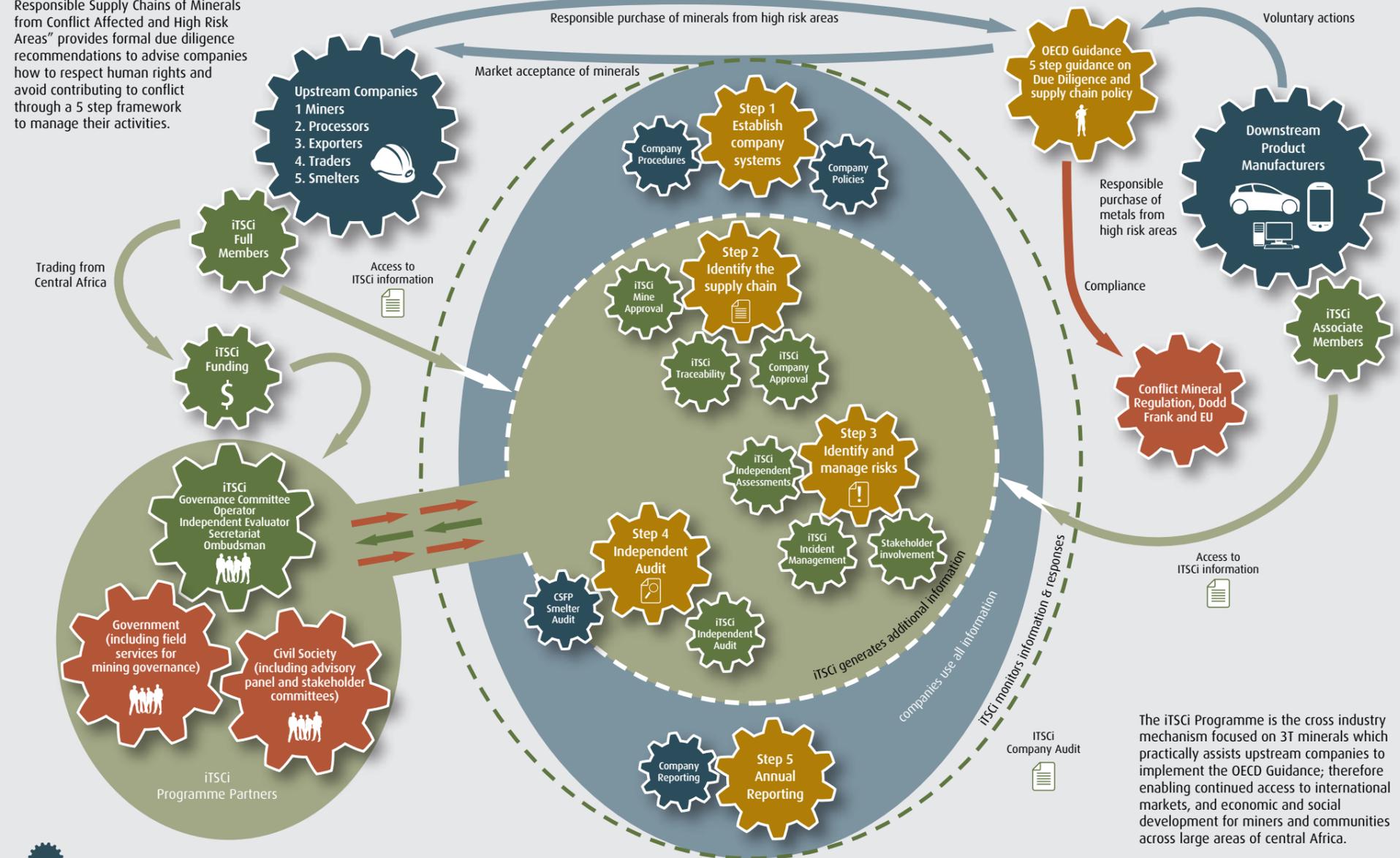
List of Members Countries		No. of Smelters	
Austria	Mauritius	Africa	3
Belgium	Mexico	Asia	18
Burundi	Panama	Europe	4
Canada	Romania	North America	4
China	Rwanda		
Cyprus	Seychelles		
Czech Republic	Singapore		
DRC	South Africa		
Dubai	Spain		
Estonia	Sweden		
France	Switzerland		
Germany	Tanzania		
India	Thailand		
Japan	Uganda		
Kazakhstan	UK		
Lithuania	USA		
Malaysia	Vietnam		
	Zambia		

iTSCi has >250 member companies, in >35 countries including all major 3T smelters

iTSCi has 3 phases, collecting documents, implementing due diligence and traceability, and finally improving the circumstances of artisanal mining. The Programme is enabling new investment in the mining sector, and is now moving beyond conflict on to address child labour and health and safety issues.

- iTSCi creates many positive impacts such as;
- Improved governance and formalisation
  - Increased formal tax revenues
  - Fair international prices for minerals
  - Unique statistics on artisanal mining
  - Opportunities to address safety
  - Economic multiplier effects in the community

The "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas" provides formal due diligence recommendations to advise companies how to respect human rights and avoid contributing to conflict through a 5 step framework to manage their activities.



# FOREWORD

## Enabling responsible trade of 3T minerals from high risk areas – creating opportunity for economic growth through improved governance

The iTSCi Programme is the joint industry solution for conflict issues related to the '3T' minerals (tin, tantalum and tungsten). Initiated prior to many international policies and regulations such as Dodd Frank, we benefit from extensive practical experience but remain flexible and to adapt to new circumstances and expectations.

ITRI, the global tin industry association, became aware of conflict related issues in the Democratic Republic of the Congo (DRC) during the mid-2000's and committed to address these concerns through formation of an ITRI Working Group in 2008. This resulted in the formalisation of the iTSCi Membership Programme for due diligence and traceability in 2011, which is now implemented together with the Tantalum-Niobium International Study Center (T.I.C.). Both ITRI and T.I.C. are non-profit organisations and iTSCi is implemented at cost.

Our joint approach ensures effective application of common standards based around OECD guidance for due diligence which helps prevent multiple audits and visits to operators by customers from different tiers in the supply chain, and avoids confusion and administration of multiple systems. iTSCi also provides a mechanism

for supply chain information exchange and transparency that recognises business confidentiality, while encouraging continued sourcing by downstream companies, and continued access to international markets, economic and social development for miners in developing regions. Minerals traded by members of iTSCi are received by smelters participating in the Conflict Free Smelter Program CFSP with whom we work closely.

We hold a number of Memoranda of Understanding including with the Governments of Burundi, the Democratic Republic of the Congo, and Rwanda, as well as the International Conference of the Great Lakes Region (ICGLR). All our activities are carried out in partnership with governments and in co-operation with local partners, including NGO's, whenever possible in order to contribute to improving long term governance, as well as the circumstances

of mining, which will lead to stability and opportunity for investment and growth.

The diagram opposite (iTSCi programme overview) illustrates how iTSCi co-operates and co-ordinates with governments (red), OECD guidance (yellow), upstream and downstream companies (blue) and iTSCi members (green).

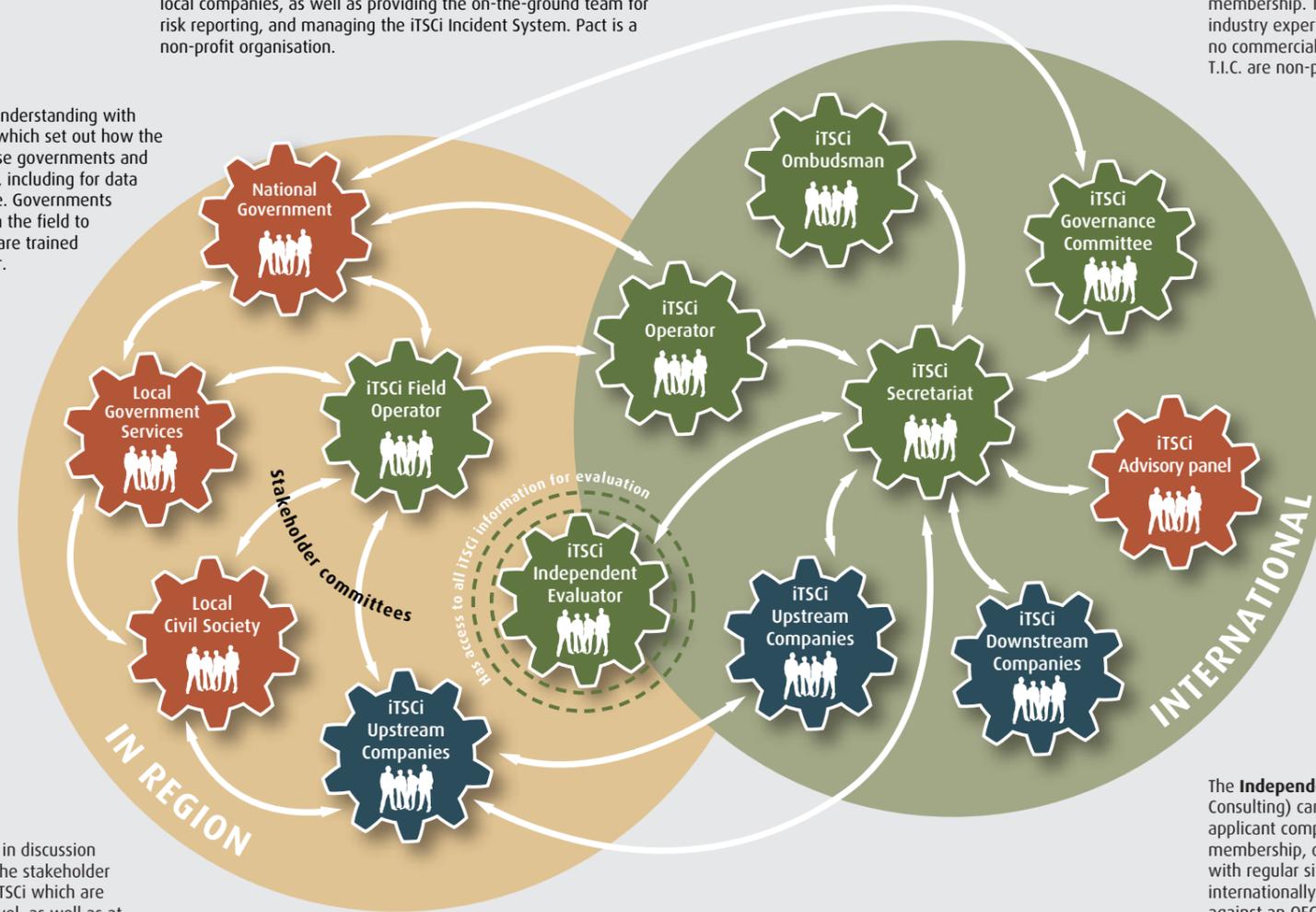
The **iTSCi Operator** (Pact) provides technical expertise on mining and capacity building which enables them to work as, or manage activities of the **iTSCi Field Operators** locally. The Operator trains local stakeholders, including government agents, and liaises with local companies, as well as providing the on-the-ground team for risk reporting, and managing the iTSCi Incident System. Pact is a non-profit organisation.

iTSCi has memoranda of understanding with **in-region governments** which set out how the cooperation between those governments and the Programme will work, including for data and information exchange. Governments provide mining services in the field to perform traceability who are trained by the iTSCi Field Operator.

The **Governance Committee** (ITRI and T.I.C.) makes high level decisions on the direction of the Programme, including any improvements or sanctions, suspending mines or companies from membership. The Committee is made up of industry experts from the 3T industry who have no commercial or conflicting interests. ITRI and T.I.C. are non-profit organisations.

The **Secretariat** (ITRI) contracts appropriate organisations with the expertise required to perform a range of necessary roles relevant to aspects of the OECD Guidance. This includes the Operator, and the Independent Evaluator. The Secretariat also communicates with the **Advisory Panel** of international NGO's and experts, and the **Ombudsman** (Foley Hoag) in cases of dispute.

The **Independent Evaluator** (Synergy Global Consulting) carries out preliminary audits of applicant companies and recommends iTSCi membership, or otherwise, and follows up with regular site visits in-region and internationally to audit member companies against an OECD based checklist. The Evaluator also makes periodic visits to the region to provide reports on the political and security developments of the area and any change in mineral sector governance or related issues.



**Civil Society** are involved in discussion and resolution of risks in the stakeholder committees arranged by iTSCi which are held both at local mine level, as well as at provincial or national level depending on the size of implementation area. The committees also include security services such as police, and industry, and are chaired by Government.

## HOW WE WORK WITH STAKEHOLDERS

### Encouraging progress to OECD recommended due diligence by providing information, traceability, on the ground monitoring and audits

Any small or large company committed to help break the link between mineral trading and conflict, both in the great lakes region and globally, can participate in iTSCi. We help identify actors in the supply chain and explain due diligence to participants, reporting on progress of the supply chain against those recommendations.

Companies aiming to demonstrate that they are responsible become members of the Programme after submission of information on their trade history, potential links to conflict, and due diligence policies and plans, and a preliminary assessment by our independent evaluator (Step 2: company approval). Conflict-free mining areas and transport routes are confirmed by our field teams who visit and report on the situation at every mine site prior to potential inclusion in the traceability system as well as continually thereafter (Step 2: mine approval).

Field teams also train local authority staff to implement a tagging and record keeping system to ensure traceability from the selected mine sites, including transport routes, processors and exporters. These teams provide transaction information to the central data centre where it is evaluated for errors, repeated patterns of anomalies, or

possible incidents that require investigation. Traceability information on the supply chain is made available to smelters purchasing the minerals (Step 2: traceability).

Many improvements in the field are brought about through a continuous incident reporting and mitigation process managed by the field teams who play an important role in facilitating incident resolution by local stakeholders directly via local Steering Committees. In cases of the highest concern, such as involvement of armed groups or human rights abuses, either the mine itself, or the member company, can be suspended or expelled (Step 3: managing risks). iTSCi also has an Advisory Panel of international experts providing input.

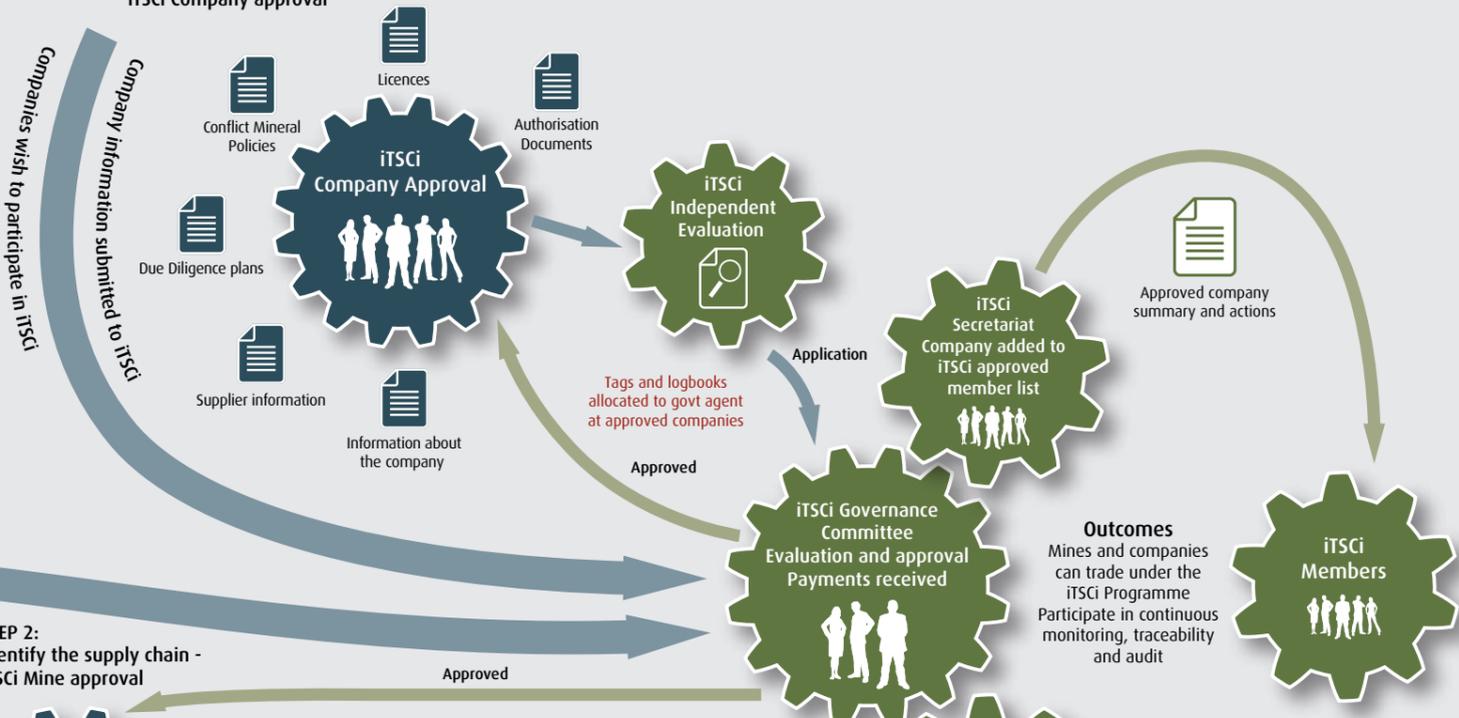
Progress of mine sites and members is evaluated against suggested recommendations relating to OECD related themes for example by governance

assessments and audits performed from time to time by our independent evaluator which helps to bring about improved due diligence practices of companies.



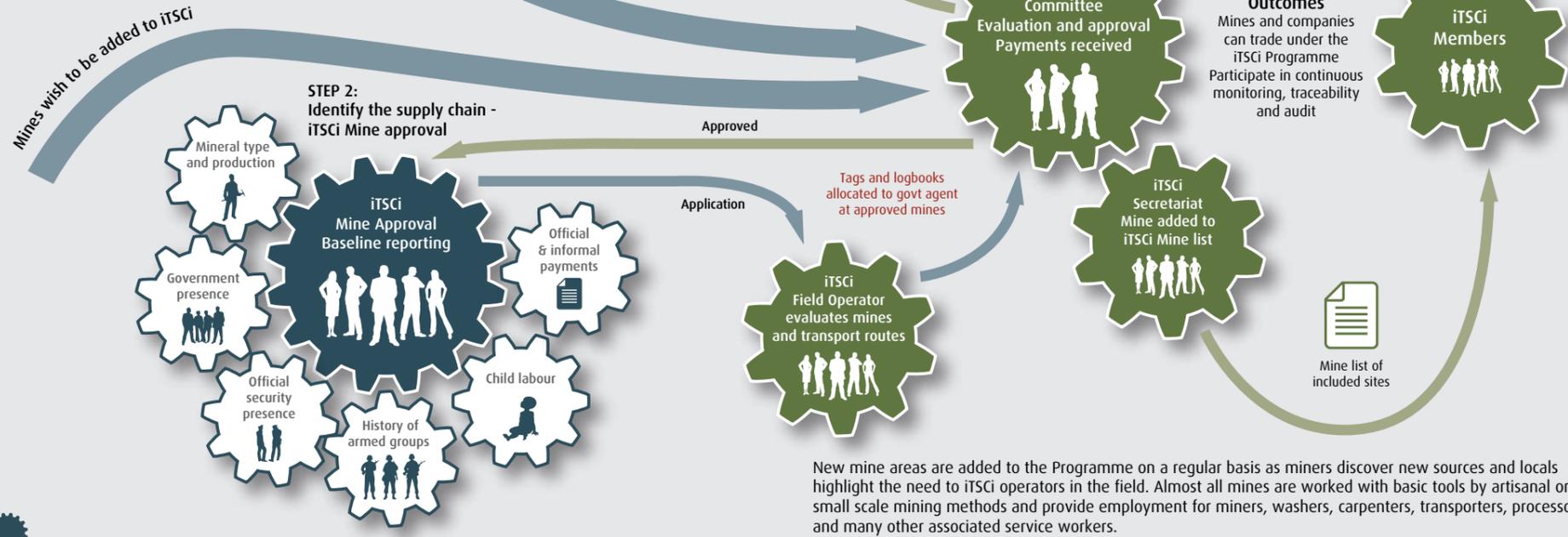
The iTSCI Programme is open to all companies in the supply chain, from local mining cooperatives in central Africa, through small or large trading companies, to international smelters, including some of the largest 3T processing companies in the world. Members are expected to recognise the OECD Guidance and to act responsibly in the supply chain. A small joining fee covers the application process, and an annual fee covers the continued membership. Member companies fairly compete for mineral within the defined due diligence standards.

**STEP 2: Identify the supply chain - iTSCI Company approval**



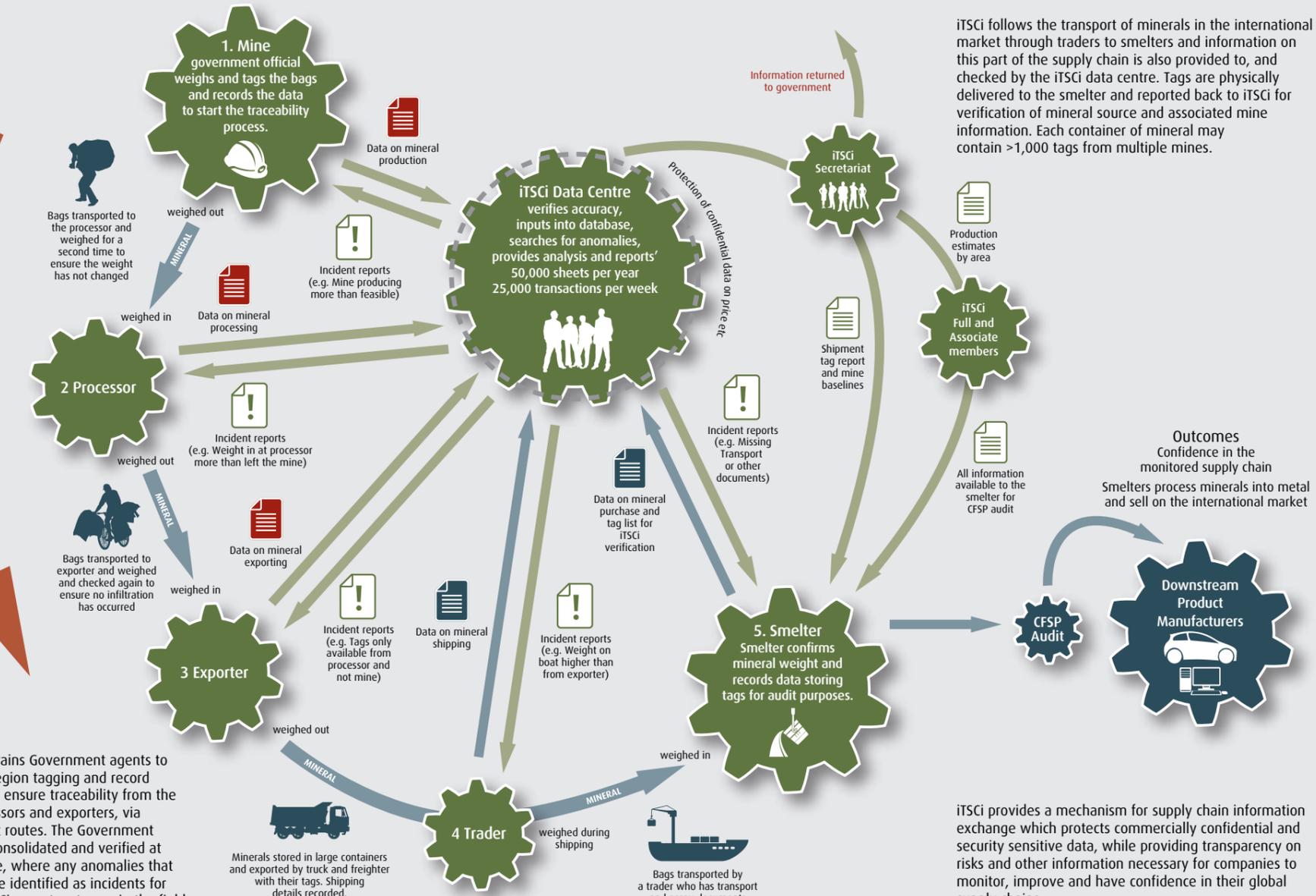
**Outcomes**  
Mines and companies can trade under the iTSCI Programme  
Participate in continuous monitoring, traceability and audit

**STEP 2: Identify the supply chain - iTSCI Mine approval**



New mine areas are added to the Programme on a regular basis as miners discover new sources and locals highlight the need to iTSCI operators in the field. Almost all mines are worked with basic tools by artisanal or small scale mining methods and provide employment for miners, washers, carpenters, transporters, processors and many other associated service workers.

iTSCI Field operator training - Government agents  
Government responsible for collecting data



The iTSCI operator trains Government agents to implement the in-region tagging and record collection system to ensure traceability from the mine sites to processors and exporters, via monitored transport routes. The Government generated data is consolidated and verified at the iTSCI data centre, where any anomalies that may indicate risk are identified as incidents for follow up by the iTSCI operators teams in the field.

iTSCI follows the transport of minerals in the international market through traders to smelters and information on this part of the supply chain is also provided to, and checked by the iTSCI data centre. Tags are physically delivered to the smelter and reported back to iTSCI for verification of mineral source and associated mine information. Each container of mineral may contain >1,000 tags from multiple mines.

**Outcomes**  
Confidence in the monitored supply chain  
Smelters process minerals into metal and sell on the international market

iTSCI provides a mechanism for supply chain information exchange which protects commercially confidential and security sensitive data, while providing transparency on risks and other information necessary for companies to monitor, improve and have confidence in their global supply chains.

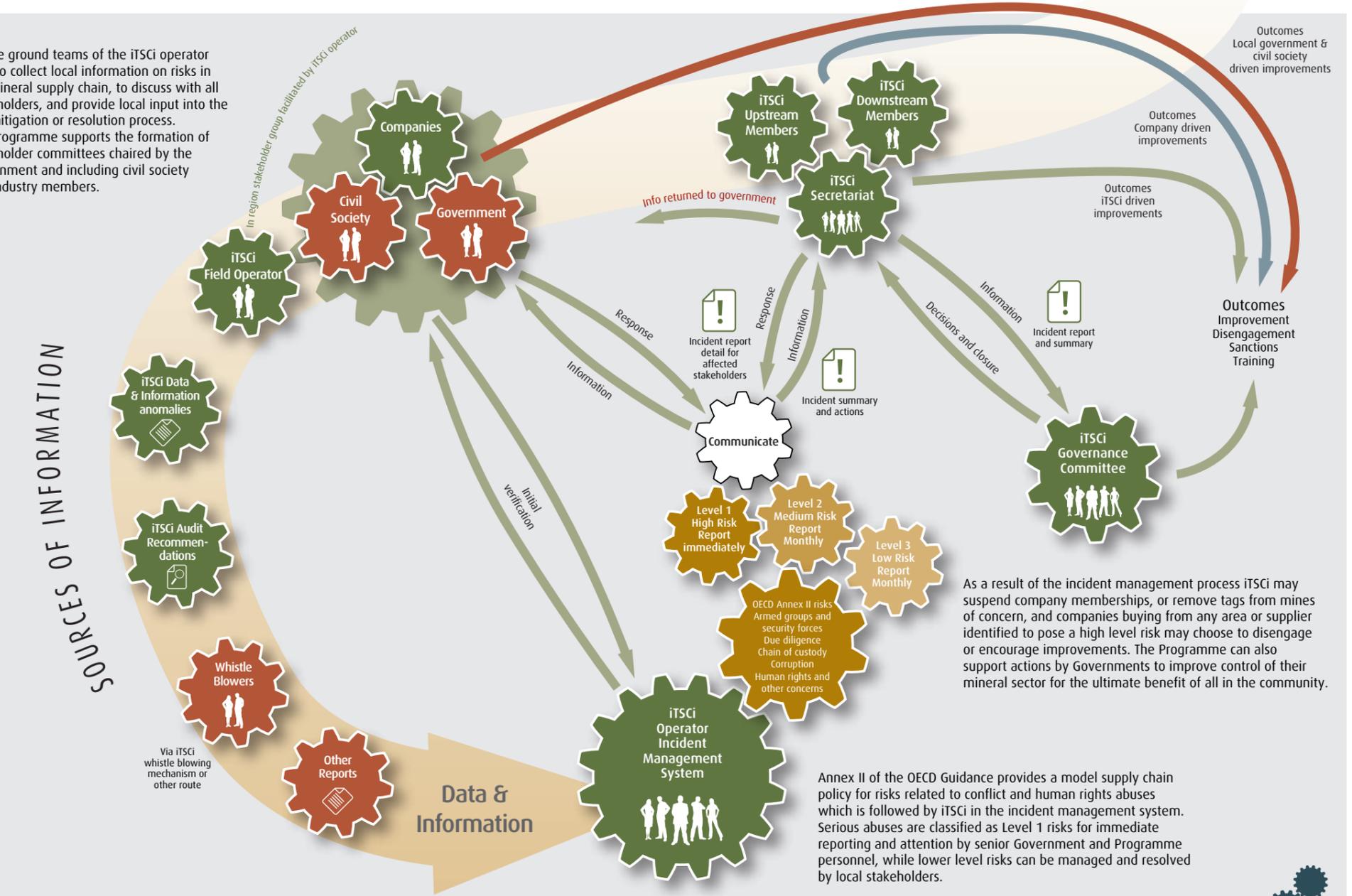


The iTSCI joint industry traceability and due diligence programme helps improve circumstances for miners.



### Step 3: Identify and manage risks- iTSCI incident management and stakeholder involvement

On the ground teams of the iTSCI operator help to collect local information on risks in the mineral supply chain, to discuss with all stakeholders, and provide local input into the risk mitigation or resolution process. The Programme supports the formation of stakeholder committees chaired by the Government and including civil society and industry members.



# ACCESSING AND USING iTSCI INFORMATION

## Providing appropriate information to stakeholders

iTSCI generates a wide range and large amount of information relating to the situation on the ground, as well as the operation of the supply chain. A great deal of this is available to the public on-line, while full details are provided to member companies to use for their own due diligence. iTSCI also protects sensitive information by holding it internally.

The most detailed information is provided by iTSCI to member companies to help them make their own due diligence assessments of their supply chain. Companies always remain responsible for making final decisions on purchasing, and for annual reporting, but benefit from the availability of information that would otherwise not exist. For example, iTSCI provides audit reports on suppliers which a purchaser can use and act on without the need for every potential mineral purchaser auditing that same potential mineral supplier. Other ways that members receive and can use information are illustrated in the diagram, as well which information governments and other stakeholders also receive (Step 4 & 5: information available).

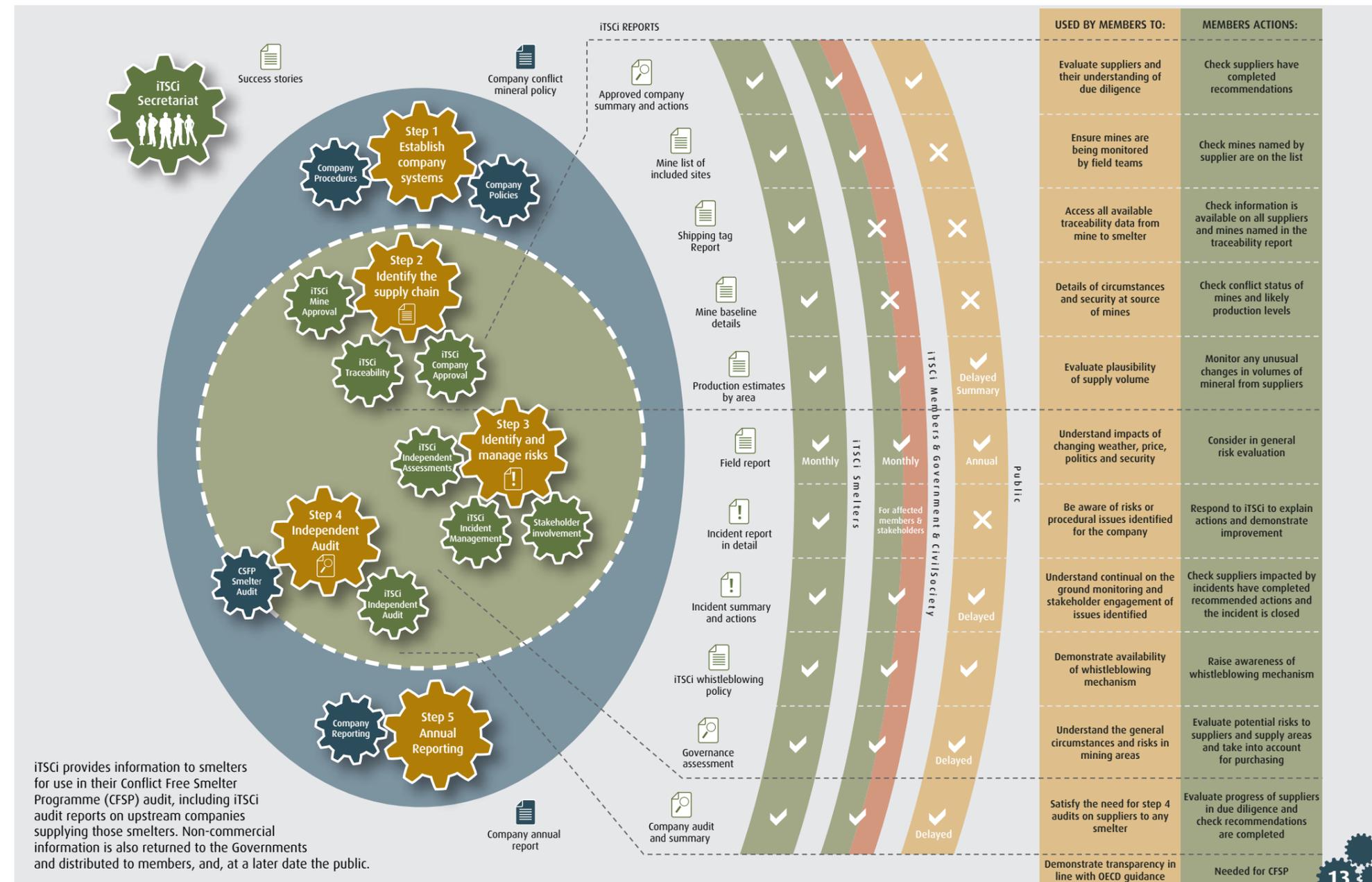
More sensitive information is stored only by iTSCI, including information on business and supplier relationships, contracts, pricing and other factors that may affect metal price. This includes commercially valuable information not appropriate to exchange within a supply chain, including for reasons of anti-trust or competition law, as well as other unverified or sensitive information relating to possible risks or sensitive sources of information, as well as that which may impact legal issues.

In general, more information is made available to the public than is expected by OECD guidance which recommends exchange of information only within the supply chain, together with an annual public report by each individual company. Not all information can be made public in order to protect the value of that information for the membership and prevent unauthorised use by non-members because sustainable financing of activities would not be possible by free distribution of all information and data.

The full range of information and updates can found at: <http://itsci.org> with example links shown on the inside back cover.



## iTSCI Step 4 & 5: Information available for companies to use in due diligence and reporting



# MOVING BEYOND CONFLICT

## Providing opportunities to make significant social and economic difference

The extensive network of staff which iTSCi has on the ground in order to monitor the supply chain provides a unique opportunity to make even more positive difference beyond conflict by looking at child labour, safety, or business skills development in 'phase 3'.

iTSCi remains the only traceability and due diligence programme successfully operating in a practical manner regionally across central Africa, covering extensive numbers of mining areas, assisting vast numbers of individuals, and continually expanding that coverage as resources, security and other circumstances allow. While resolving issues around the potential link between conflict and minerals is our primary focus, once the responsible supply chain has been established, we can also begin to address wider issues of importance to society, development and governance.

We co-ordinate and work with other partners and projects whenever possible to maximise the impacts of our activities and sometimes to also benefit from funding or other support from other organisations (iTSCi: working with others). In the past we have welcomed donation of funds from Qualcomm Inc to develop a basic health and safety training curriculum, and from Apple Inc to help support training on management of risks. Our partners Pact have carried out a GE Foundation supported study on child labour, and a subsequent practical pilot funded by Boeing and Microsoft. Pact also piloted a project to link national taxation reporting to the artisanal mineral production sector – a world first for the Extractive Industry Transparency Initiative (EITI).

While we have made a great start, much more can be done. Additional financial support of any value will help to make a difference.



**MFA (Ministry of Foreign Affairs of the Netherlands)** provides co-funding for iTSCi field activities in a 3 year project 'Scaling up mineral trade', which follows on the successful 'Conflict Free Tin Initiative'. Both projects support and build on the field infrastructure of iTSCi for conflict-free minerals and now extend to gender equality, business skills and other themes. The MFA focuses on stability and security, raw material security and improved human rights.

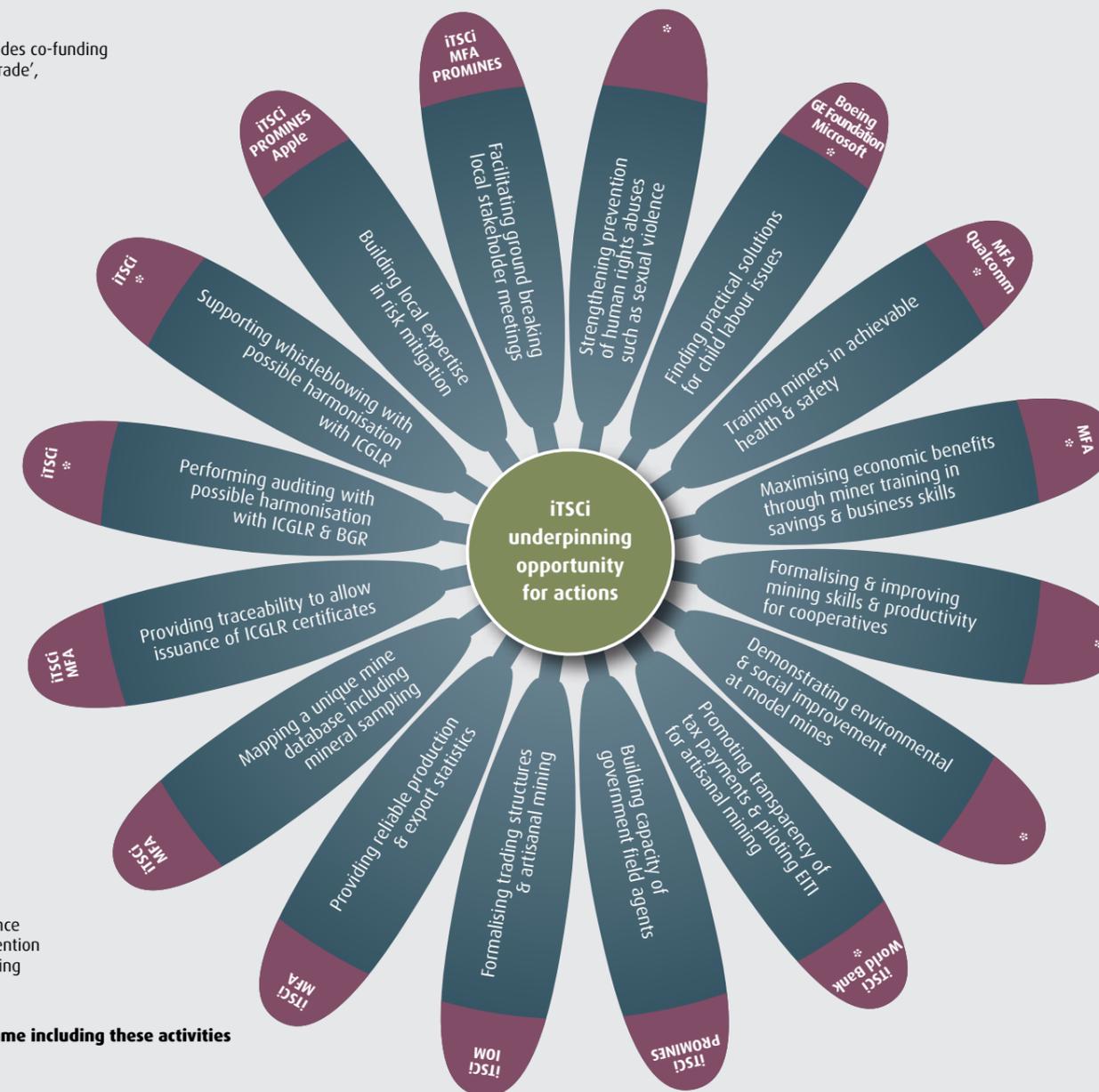
**PROMINES** (Growth with Governance in the Mineral Sector Project for DRC) is a project of the World Bank which, through the government of the DRC, aims to strengthen the capacity of institutions to better manage the minerals sector, improve conditions for investment in mining and increase revenues and the socio-economic benefits from artisanal and industrial mining. PROMINES has supported training as well as provision of much needed equipment to iTSCi.

Private sector donors from **downstream industry** have funded activities relating to child labour, health and safety and comprehensive training on risk management.

iTSCi is complemented by the **BGR** (Federal Institute for Geosciences and Natural Resources) Certified Trading Chains (CTC) project, and the **IOM** (International Organisation of Migration) work on mine validation and construction of centres de négoce.

iTSCi aims to harmonise with the **ICGLR** (International Conference on the Great Lakes Region) and their work related to the prevention of the illegal exploitation of natural resources and has an existing MOU with the organisation.

\* **Further funding is sought for all aspects of the programme including these activities** see the Scaling Up Mineral Trade section of the iTSCi website



# HOW iTSCI IS FUNDED AND OUR EXPENSES

## A sustainable industry programme for long term regional stability

Our greatest challenge is the huge unpredictability in planning implementation of iTSCI. The mining sector is subject to mineral price, demand and production changes, and artisanal mining suffers from poor mine planning, cash availability, unreliable equipment and impacts of changes in weather. Many areas have poor infrastructure and communications and can be insecure, remote and expensive locations to work.

In early 2011, the Dodd Frank Act had been published, the Government of the DRC had implemented a mining suspension in the Kivus and Maniema, and the April 2011 Conflict Free Smelter Program deadline for traceable mineral was looming. While iTSCI highlighting the need for coordinated action and upfront funding to avoid de-facto embargo funds remained limited and we committed to implement an appropriate system in as many areas as possible within the budget available. This remains the situation today.

Our sources of funding include membership fees, payments from levies on mineral trading, fixed payment arrangements and donations. Membership fees are maintained at a low level in order to allow any upstream company to participate, while the majority of funds to cover the cost of implementation comes from upstream levies. Levies are collected at a point in the supply chain most appropriate to prevailing business structures and after a final determination of metal content many weeks or months following the time of mining.

Expenses spent on implementation include the field activities of the on-the-ground teams, incident reporting and training as well as relevant items such as tags, but also relate to auditing and evaluation costs, management of the traceability data systems, administration of the membership procedures, translations and legal issues.

All iTSCI activities and expenses are driven by the expectations laid out in the OECD guidance which essentially defines the need for extensive information. Financial records are kept separately within ITRI accounting systems and discretely ring-fenced from both other ITRI managed projects and general ITRI operations.

Detailed information is available in the iTSCI Annual Review such as here: [https://www.itri.co.uk/index.php?option=com\\_mtree&task=viewlink&link\\_id=55336&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=viewlink&link_id=55336&Itemid=11)



# THE FIRST FIVE YEARS OF iTSCI

## Rapid progress and success with limited sources of finance

In the five year period 2010-2014 upstream industry funded 81% of the implementation cost, with donors providing 16%, and downstream industry less than 2%. During the same five year period, 77% of funds were spent on field activities, 12% on data collection and reporting, 6% on auditing, and the remaining 5% on membership and other activities.

Funding of the iTSCI Programme since 2010

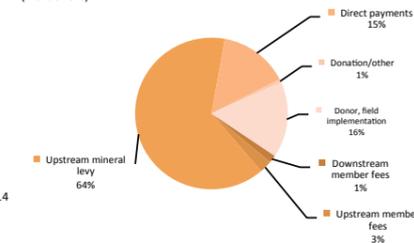
FUNDING TYPE	US\$ 000's	%	2010	2011	2012	2013	2014
Downstream member fees	411	1.6	317	13	15	20	45
Upstream member fees	677	2.7	0	0	117	185	375
Upstream mineral levy	16,311	64.1	452	1,433	4,169	5,310	4,948
⇒ Levy cassiterite	7,288	28.6	327	1,134	1,799	2,125	1,904
⇒ Levy coltan	7,609	29.9	125	215	1,956	2,683	2,629
⇒ Levy wolfram	1,414	5.6	0	83	414	502	414
Direct payments	3,760	14.8	29	2,013	0	70	1,648
Donation/other	173	0.7	5	38	0	0	131
Donor, field implementation†	4,120	16.2	0	150	1,703	2,075	192
<b>TOTAL</b>	<b>25,497</b>	<b>100.0</b>	<b>804</b>	<b>3,646</b>	<b>6,004</b>	<b>7,660</b>	<b>7,384</b>
Sub-total via ITRI†	21,332	83.7	804	3,496	4,301	5,585	7,146

† Donor contributions are managed directly by Pact and not via ITRI. Such contributions indicated in brown are included in the total funding figures, but excluded from the sub-total shown for funding via ITRI.

FUNDING TYPES OVER THE PERIOD 2010-2014 (inc. donors)



FUNDING TYPES TOTAL 2010-2014 (inc. donors)



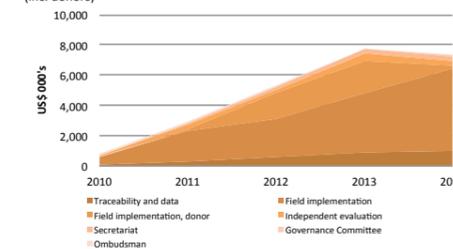
Expenses of the iTSCI Programme since 2010

EXPENSE TYPE+	US\$ 000's	%	2010	2011	2012	2013	2014
Traceability and data	2,931	12.2	52	306	640	913	1,019
Field implementation	14,394	60.0	583	2,001	2,436	3,928	5,445
Field implementation, donor*	4,120	17.2	0	150	1,703	2,075	192
Independent evaluation	1,365	5.7	45	244	262	511	303
Secretariat	904	3.8	53	142	155	285	268
Governance Committee	269	1.1	15	15	81	78	79
Ombudsman	20	0.1	1	2	5	6	7
<b>TOTAL</b>	<b>24,002</b>	<b>100.0</b>	<b>749</b>	<b>2,862</b>	<b>5,283</b>	<b>7,795</b>	<b>7,313</b>
Sub-total via ITRI	19,882	82.8	749	2,711	3,580	5,720	7,122

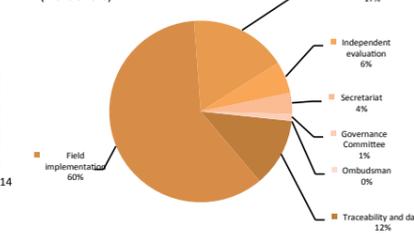
+ Expenses in 2010 to 2013 in this table have been restated according to account codes applicable in 2014 in order to allow comparison however this should be considered a guide only.

\* Expenses associated with donor contributions are managed directly by Pact and not via ITRI. Such expenses indicated in brown are included in the total figures but excluded from the sub-total shown for expenses managed via ITRI.

EXPENSE TYPES OVER THE PERIOD 2010-2014 (inc. donors)



EXPENSE TYPE TOTAL 2010-2014 (inc. donors)



## PLANS FOR THE FUTURE

### Breaking links to, and moving beyond conflict mineral issues

iTSCI aims to consolidate existing success, further scale up to provide opportunity for participation to more mining communities, and continue to improve processes and systems as resources allow. We hope to help further address important social issues beyond conflict and welcome contributions from those able to make that happen.

Our first priority remains to consolidate the success of iTSCI in existing areas, breaking links between minerals and conflict, driving improvements in due diligence practices of members companies, reviewing and updating procedures to maintain requirements, and to continue the roll out of more rapid digital data collection in appropriate locations. This will allow us to continue to enhance the provision of information to members and participating governments alike.

Our second objective is to find ways to finance further scaling up of iTSCI to mining areas which are not currently benefiting from inclusion. In an environment of low metal prices both these objectives are already challenging.

We plan to focus further attention on using existing iTSCI infrastructure as an opportunity for addressing social and economic issues beyond the resolution of conflict, and involving all in the supply chain, and would also like to progress discussions relating to the harmonisation of activity with the ICGLR in order to support the regional certification mechanism, avoid repetition, reduce costs and ensure effective auditing.

Finally, since a new EU regulation on minerals from high risk areas is expected, we will aim to adapt any necessary aspects of iTSCI to ensure conformance with the final text, and will request recognition of the iTSCI programme by the EU to ensure avoidance of overlap and inefficiency.

The extent and speed with which all of these plans can be achieved will directly depend on available funding, whether from industry and/or other sources.



## iTSCI CREATES INFORMATION TO ENABLE DUE DILIGENCE

### A unique source of information on upstream 3T industry and artisanal mining

iTSCI generates a huge amount of information and data. Some is available immediately, while some is available to different stakeholders after a short delay to verify information, to manage sensitive issues, or to prevent use by free-riders who have not contributed to the cost of the activities.

**Summary charts describing the type of data and reports released to various stakeholders upon what conditions are available on-line;**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=viewlink&link\\_id=53532&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=viewlink&link_id=53532&Itemid=11)

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=viewlink&link\\_id=53533&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=viewlink&link_id=53533&Itemid=11)

**General information and updates such as press releases**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=190&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=190&Itemid=11)

**Upstream member company summary and suggested due diligence actions**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=viewlink&link\\_id=52326&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=viewlink&link_id=52326&Itemid=11)

**Upstream member company independent site audits**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=193&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=193&Itemid=11)

**Upstream member company Step 5 annual due diligence reports**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=196&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=196&Itemid=11)

**Implementing area situational governance assessments relating to OECD Annex II themes**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=186&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=186&Itemid=11)

**Incident reports relating to management of risks in the supply chain**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=198&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=198&Itemid=11)

**Mineral production and export figures**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=listcats&cat\\_id=184&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=listcats&cat_id=184&Itemid=11)

**Downstream member companies supporting iTSCI and receiving information**

[https://www.itri.co.uk/index.php?option=com\\_mtree&task=viewlink&link\\_id=52275&Itemid=11](https://www.itri.co.uk/index.php?option=com_mtree&task=viewlink&link_id=52275&Itemid=11)





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Web: [www.itri.co.uk](http://www.itri.co.uk)  
[www.itsci.org](http://www.itsci.org)

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