

Spain

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Overview

1 Outline your jurisdiction's state aid policy and track record of compliance and enforcement.

By virtue of the 2016 state aid report of the National Markets and Competition Commission (NMCC, ie, the Spanish Competition Authority), which includes an economic analysis of state aid granted by Spain in 2014 (the last year with official data available published by the European Commission), the amount of state aid granted to the financial sector decreased, while the amount of aid granted to other sectors increased, representing 0.31 per cent of national GDP (compared to 0.28 per cent of GDP in 2013).

The granting of state aid, according to Law 38/2003 of 17 November 2003, on General Subsidies (General Subsidies Law), must be carried out in accordance with the principles of: (i) publicity, transparency, concurrence, objectivity, equality and non-discrimination; (ii) effectiveness in complying with the objectives set by the granting authority; and (iii) efficiency in public resources allocation (article 8 of the General Subsidies Law).

In January 2017, the European Commission lodged a complaint against Spain before the European Court of Justice for failing to recover the total amount of state aid granted by Spain, declared illegal by the Commission in 2013 and 2014, for the roll-out of digital terrestrial television (DTT) in Castilla-La Mancha and other areas. Spain has recovered only €5.5 million of €260 million regarding the aid granted to other areas of Spain, and nothing regarding the aid granted to Castilla-La Mancha (€42.8 million). Furthermore, the Commission complains that Spain has not suspended payments in these territories.

2 Which national authorities monitor compliance with state aid rules and have primary responsibility for dealing with the European Commission on state aid matters?

First, the Interministerial Commission for Economic Affairs related to the European Union (ICEAEU). Any public administration, proposing to establish, grant or modify any state aid that should be notified to the European Commission, shall send the relevant projects to this Interministerial Commission at least three months before its implementation. The ICEAU is in charge of examining state aid projects ex ante to assess their compatibility with EU state aid rules. This Interministerial Commission will decide the need to notify the analysed projects to the Commission.

Second, the Ministry of Foreign Affairs, and more specifically the Secretary of State for the EU, shall notify to the Commission, following the ICEAEU's assessment, the projects of state aid within a month of receiving the project.

The Ministry of Foreign Affairs should communicate to the NMCC all state aid projects notified to the Commission. Additionally, the NMCC could ask for information about any state aid given by any public administration, regardless of whether or not such aid is subject to prior notification. The NMCC can issue reports on state aid or aid systems (not only about the criteria for granting state aid) and make recommendations to other public administrations. Finally, the NMCC must publish an annual report on state aid every year. It can also issue reports ex officio or at the request of any public administration.

Moreover, the granting administrative authority can carry out an ex post control under article 106 of Law 39/2015, of 1 October 2015, on

the Common Administrative Procedure (Law 39/2015) of its own acts. Article 106 allows public authorities to review their own acts ex officio or at the request of an interested party. Furthermore, after the Council of State has issued a favourable opinion, public authorities may declare the invalidity of final administrative acts.

3 Which bodies are primarily in charge of granting aid and receiving aid applications?

Granting authorities include the central state, autonomous regions and local authorities (see article 3 of the General Subsidies Law). Other public authorities, with their own legal personality, governed by public law and linked to or dependent on any other public authority (from the national government or any autonomous region), may also grant state aid. Public foundations or public corporations cannot grant state aid, unless expressly authorised by the administration.

Ministers and secretaries of the national government administration and presidents or directors of agencies and public entities linked to or dependent on the national government administration are the bodies competent to grant subsidies in their respective areas. In order to grant subsidies of more than €12 million, an agreement of the Council of Ministers or the Government Delegate Commission for Economic Affairs will be necessary.

4 Describe the general procedural and substantive framework.

The general substantive legal framework is that of articles 107 and 108 of the Treaty on the Functioning of the European Union (TFEU) and implementing legislation and soft law. The general procedural framework that serves as a basis for granting state aid at national level is the General Subsidies Law and its implementing regulation. For the purposes of this law, a subsidy is any payment made by any public authority in favour of public or private persons and that meets three requirements:

- the aid is given for no consideration by the beneficiary;
- the delivery is subject to the fulfilment of a certain objective or the execution of a project or activity; and
- the project financed promotes an activity of public utility or social interest (see article 2 of the General Subsidies Law).

State aid measures are governed by public law, under the general administrative procedure and budget laws. According to the General Subsidies Law, the granting authority must assess state aid measures on a case-by-case basis.

5 Identify and describe the main national legislation implementing European state aid rules.

The main national legislation implementing European state aid rules in Spain is the following (in chronological order):

- Royal Decree 1755/1987, of 23 December 1987, on the procedure for notifying the Commission of projects establishing, granting or modifying aid by public administrations or public entities. It establishes that public administrations proposing to grant or modify any aid that should be notified to the Commission shall send the relevant projects to the Interministerial Commission for Economic Affairs related to the European Union (article 1).
- Law on General Subsidies. This law regulates the general legal regime of subsidies granted by public authorities.

- Royal Decree 887/2006, of 21 July 2006, implementing the Law on General Subsidies.
- Law 15/2007, of 3 July 2007, on Competition Defence (Competition Act). It establishes that the NMCC can carry out an ex post control of state aid granted. The NMCC can also issue reports on individual aid or aid systems and make recommendations to other public administrations. In addition, the NMCC must publish an annual report on state aid. It can also issue reports ex officio or at the request of any public administration (see article 11).
- Royal Decree 261/2008, of 22 February 2008, implementing the Competition Act. It regulates the transmission of information on state aid between the NMCC and public administrations. It establishes the framework for cooperation between the NMCC and the autonomous competition authorities regarding the control of state aid.

Programmes

6 What are the most significant national schemes in place that have been approved by the Commission or that qualify for block exemptions?

Significant national schemes in place include those detailed in the table below.

7 Are there any specific rules in place on the implementation of the General Block Exemption Regulation (GBER)?

In Spain, no specific rules on the implementation of the General Block Exemption Regulation have been adopted.

Public ownership and SGEI

8 Do state aid implications concerning public undertakings, public holdings in company capital and public-private partnerships play a significant role in your country?

Former monopolies and state-owned companies are a source of concern in Spain; for instance, the postal sector, state-owned television, railways, ports, etc.

9 Are there any specific national rules on services of general economic interest?

In the 2016 Annual Report on State Aid published by the NMCC, services of general economic interest (SGEI) are referred to as economic activities of special importance for citizens (according to public authorities) that, in the absence of public intervention, would not be provided by the market or would be provided in different conditions. Typical examples of SGEI are transport networks, postal services and social services. Public service aid is reported in exceptional cases; for instance, if overcompensation exists.

Law 4/2007, of 3 April 2007, on the transparency of financial relations between public administrations and public undertakings, and financial transparency of certain undertakings, establishes as one of its objectives the transparency in the management of SGEIs.

Law 4/2007, cited, establishes the general obligations that undertakings operating SGEIs have to comply with. Undertakings must keep separate accounts when public authorities have granted them special or exclusive rights or have entrusted them with the management of an SGEI, and they receive compensation for managing that SGEI or develop those special or exclusive rights, if they carry out 'market' activities. These undertakings must provide detailed information of each activity carried out to the General Intervention of the National Government Administration.

Sector-specific regulations might also impose specific rules on SGEIs. As the responsibility for deciding the nature and scope of an SGEI lies not only on national, but also on regional and local, public authorities, regional and local provisions should also be taken into account.

Considerations for aid recipients

10 Is there a legal right for businesses to obtain state aid or is the granting of aid completely within the authorities' discretion?

No legal right to obtain state aid exists in principle. Spanish authorities are competent to grant aid at their discretion. However, any granting must be done in compliance with the pre-established criteria and with the general requirements established in the General Subsidies Law.

Case	Objective	Granting authority	Beneficiaries	Amount of aid	Duration
SA.36807 Strategic action on the economy and the digital society	Industrial research and experimental development (R&D)	Ministry of Industry, Energy and Tourism	SMEs and large companies	€463 million	2013–December 2016
SA.37233 State programme promoting talent and its employability	Fundamental research, industrial research, experimental development and aid for technical feasibility studies (R&D)	Ministry of Economy and Competitiveness	SMEs and large companies	€130 million	2013–December 2017
SA.40324 Centre for the Development of Industrial Technology R&D Aid Scheme	R&D	Ministry of Economy and Competitiveness	SMEs and large companies	€800 million (annual)	2015–2020
SA.46713 Aid for pilot projects for the development of new products in the forestry sector	Aid for cooperation in the forestry sector	Castilla-La Mancha Authority	Natural and legal persons who work in the forestry sector in Castilla-La Mancha	€300,000	Until December 2020
SA.45941 Aid scheme for investments in the establishment of irrigation systems in Aragon	Aid for investments in tangible assets or intangible assets in agricultural holdings linked to primary agricultural production	Government of Aragon	Communities of irrigators and users of Aragon that develop their activity in the field of primary agricultural production	€80 million	Until December 2020
SA.45494 Aid for investments in the processing, marketing or development of agricultural products into non-agricultural products and in the promotion of agri-food quality	Aid for investments concerning the processing of agricultural products into non-agricultural products, the production of cotton or investments in the creation and development of non-agricultural activities	Castilla-La Mancha Authority	Natural and legal persons holding an agri-food company established in Castilla-La Mancha	€50 million	Until December 2023
SA.35474 State aid to News Agency EFE	SGEI	N/A	News Agency EFE	€40 million	September 2017–2027

11 What are the main criteria the national authorities will consider before making an award?

The ordinary procedure for the granting of aid takes place in a regime of competitive public tendering. This is the proceeding by which the granting authority compares the applications submitted in order to establish a priority among them according to the evaluation criteria previously set.

Before awarding aid, the granting authorities basically assess criteria linked to any market failures. Job creation, supporting (or encouraging) R&D efforts, worker training and environmental protection are the criteria usually considered by the Spanish granting authorities.

12 What are the main strategic considerations and best practices for successful applications for aid?

First, applicants for subsidies have to assess if they meet the criteria and conditions established for the granting of the subsidy under article 13 of the General Subsidies Law.

Article 13 establishes the requirements to be fulfilled to gain beneficiary status. First, persons or entities that are in a situation that justifies the granting of the subsidy will be able to obtain beneficiary status. Notwithstanding the above, article 13 establishes a list of circumstances that, if met, prevent persons or entities from obtaining beneficiary status.

13 How may unsuccessful applicants challenge national authorities' refusal to grant aid?

If the administrative act as a result of which the subsidy is granted amounts to final administrative action, unsuccessful applicants may challenge the national authorities' refusal to grant aid before the contentious-administrative courts. Generally, prior to court litigation, an administrative appeal can be brought before the hierarchical superior administrative body of the granting authority.

14 To what extent is the aid recipient involved in the EU investigation and notification process?

There is no specific regulation on this regard concerning state aid. According to article 53.a) and e) of Law 39/2015, on Common Administrative Procedure, those with a legitimate interest in any administrative proceeding have the following rights:

- To know at any moment the status of proceedings in which they have the condition of interested parties, the competent body for the instruction and the resolution, and the administrative acts issued. They will also have the right to access the file and obtain a copy of the documents issued.
- To submit comments and to provide documents and evidence in proceedings.

Strategic considerations for competitors

15 To which national bodies should competitors address complaints about state aid?

The courts are entrusted with safeguarding individual rights under article 108.3 TFEU.

Competitors can also inform the NMCC, which is entitled to analyse the criteria and opportunity of aid and issue reports or address proposals to the relevant granting authority.

16 How can competitors find out about possible illegal or incompatible aid from official sources? What publicity is given to the granting of aid?

Competitors can access the following official sources:

- The official journal where available subsidies and subsidies granted by national and regional authorities and by the larger cities must be published. In case of municipalities with fewer than 50,000 inhabitants, this information can be published on the local noticeboard.
- The NMCC's Information Centre, which gathers information on state aid granted in Spain.

Finally, there is a national database storing information related to granting of subsidies. However, beneficiaries' competitors are not given access to this database because of the confidential nature of the information.

17 Give details of any legislation that gives competitors access to documents on state aid granted to beneficiaries.

The Spanish legal system does not contain a specific regulation giving competitors access to documents on state aid granted. However, under article 24.4 of the General Subsidies Law, interested parties appearing in the procedure who are not beneficiaries of the subsidy have the right to be notified of a reasoned provisional decision, and to make representations.

Notwithstanding the above regarding the Common Administrative Procedure, article 83 of Law 39/2015 establishes the possibility for all natural or legal persons to access any file during a public access period published by the granting authority if the latter considers it convenient.

18 What other publicly available sources can help competitors obtain information about possible illegal or incompatible aid?

The NMCC issues and publishes an annual report on aid granted in Spain, in which it details the most significant state aid measures. Regional competition authorities can issue similar reports on aid granted in their regions.

19 Apart from complaints to the national authorities and petitions to national and EU courts, how else may complainants counter illegal or incompatible aid?

We are not aware of any other common alternative strategies aimed at countering illegal or incompatible aid in Spain (other than complaints to the European Commission).

Private enforcement in national courts

20 Which courts will hear private complaints against the award of state aid? Who has standing to bring an action?

In the framework of procedures for the awarding of aid, article 76 of Law 39/2015, on administrative procedure, establishes that interested parties may submit comments and provide documents or evidence (see also articles 53.e) and 82). These comments will be taken into account by the competent body when drafting the award decision. In addition, interested parties may claim procedural errors at any time.

Regarding the concept of interested party, article 4 of Law 39/2015 establishes that the following will be considered interested parties in the administrative proceeding:

- those who promote it (the recipient undertaking),
- those who did not initiate the proceeding but have rights that can be affected by the decision (such as, competitors), and
- those whose legitimate interests, individual or collective, may be affected by the decision.

Any natural or legal persons having the status of an interested party may bring an administrative action before the hierarchical superior administrative body to the granting authority. Furthermore, under article 19.1.a) of Law 29/1998, of 13 July 1998, on the contentious-administrative courts (Law 29/1998), natural or legal persons who have a legitimate interest or right can appeal the resulting decision before the contentious-administrative courts if the administrative action is dismissed.

As stated above, competitors may bring actions for damages against the granting authority. However, in certain circumstances, competitors may choose to claim action for damages directly against the beneficiary. In the ECJ judgment of 11 July 1996, *Syndicat Français de l'Express international (SFEI)*, the Court of Justice concluded that, since article 108.3 TFEU does not impose any direct obligation on the beneficiary, there is no sufficient basis in EU law for such actions. However, this does not prevent a competitor from lodging a claim for damages against the beneficiary of the aid based on Law 3/1991, of 10 January 1991, the Unfair Competition Act (UCA), for receiving state aid without prior notification to the Commission in breach of article 108.3 TFEU.

The purpose of the UCA is to protect competition in the interests of all those involved in the market, and to this end establishes the prohibition of unfair acts. The UCA is applicable to the case of illegal state aid because it fits in its objective and subjective scope. The legal basis for action against the aid beneficiary is found in article 15, which regulates unfair conduct in cases of breach of laws on regulations, such as illegal state aid gained through breach of article 108.3 TFEU.

Update and trends

The priorities of the Spanish authorities focus on the control, surveillance and assessment of state aid to avoid unjustified distortions and to safeguard the effective functioning of the markets. As such, the NMCC must submit an annual report on the state aid granted in Spain to improve the transparency of the state aid system. The annual report on state aid should be submitted to the Spanish parliament and senate to increase its awareness (see article 11, Competition Act).

To our knowledge, there are no proposals to amend the national legislation on state aid.

Regarding recent case law and state aid practice at the end of 2016 and in 2017, the European Commission has adopted several decisions concerning state aid granted by Spain. Some of them were negative with recovery: (i) state aid to Real Madrid Football Club (sectoral development); (ii) state aid to Valencia Football Clubs (Valencia FC, Hércules FC and Elche FC) (support for economic activity); (iii) state aid to certain Spanish football clubs (Athletic Club Bilbao, Club Atlético Osasuna, Barcelona FC and Real Madrid FC) (sectoral development); (iv) to ADIF, the state railway company (R&D); and (v) state aid to public and private DTT broadcasters (sectoral development). The state aid to the Basque country, whose objective is the promotion of the Basque language in digital news media, was not considered state aid under article 107.1 TFEU.

The most recent state aid granted by Spain that have been approved by the Commission were granted to: (i) Banco CEISS and Unicaja Banco (a new restructuring plan for Banco CEISS on the basis of a takeover of that bank by Unicaja Banco); (ii) all natural and legal persons who work in the forestry sector in Castilla-La Mancha (aid for cooperation in forestry sector); (iii) communities of irrigators and users of Aragon that develop their activity in the field of primary agricultural production (aid for investments in

tangible assets or intangible assets in agricultural holdings linked to primary agricultural production); (iv) all natural and legal persons holding an agri-food company established in Castilla-La Mancha; (v) News Agency EFE, SGEI (proposal for appropriate measures); (vi) coal-mining companies (for environmental protection); and (vii) cultural magazines in the Spanish (Castilian), Basque, Catalan, Galician or Valencian languages that enrich the Spanish bibliographic heritage (aid for culture and heritage).

Furthermore, in January 2016 the European Commission issued a decision to initiate a formal investigation procedure regarding a complaint of unlawful state aid in favour of the company Iberpotash. In March 2016, the European Commission also initiated a formal investigation procedure against state aid granted to the Spanish state postal and telegraph company (Sociedad Estatal Correos y Telégrafos, SA).

On the other hand, regarding the non-compliance with EU law by Spain with regard to state aid, in January 2017, the European Commission denounced Spain before the European Court of Justice for failing to recover the total amount of the aid granted by Spain for the expansion of digital terrestrial television (DTT) in Castilla-La Mancha and other areas, and declared illegal by the Commission in 2013 and 2014 (this decision was confirmed by the General Court in November 2015). Spain has recovered only €5.5 million of €260 million regarding the aid granted to other areas of Spain, and nothing regarding the aid granted to Castilla-La Mancha (€43.8 million). Furthermore, the Commission complains that Spain has not suspended payments in these territories. Spain has already been the subject of several judgments for not recovering illegal aid immediately and effectively: ECJ judgment of 2 July 2002 (C-499/99); of 26 June 2003 (C-404-00); of 20 September 2007 (C-177/06); of 24 January 2013 (C-529/09); and of 13 May 2014 (C-184/11).

21 What are the available grounds for bringing a private enforcement action?

Unfair competition and article 108.3 TFUE.

22 Who defends an action challenging the legality of state aid? How may defendants defeat a challenge?

The granting authority. However, the beneficiary may submit allegations as an interested party.

23 Have the national courts been petitioned to enforce compliance with EU state aid rules or the standstill obligation under article 108(3) TFEU? What is the national courts' track record for enforcement?

National courts have, indeed, been petitioned to enforce compliance with EU state aid rules and the standstill obligation under article 108.3 TFEU. The Supreme Court has dismissed appeals by beneficiaries' competitors by considering the national measure could not be qualified as state aid (see judgment of the Supreme Court, appeal number 7349/1992, 22 February 1999).

As for compliance with the standstill obligation under article 108.3 TFEU, courts have a good track record of enforcing Commission decisions (for example, the judgments of 16 July 2012, appeal number 6539/2011; 18 October 2012, appeal number 6163/2011; and 6 May 2013, appeal number 1484/2012).

24 Is there a mechanism under your jurisdiction's rules of procedure that allows national courts to refer a question on state aid to the Commission and to stay proceedings?

Regulation 734/2013, amending Regulation 659/1999 laying down detailed rules for the application of article 93 of the EC Treaty, stipulates that the courts of the member states may ask the Commission to give them its opinion on questions concerning the application of state aid rules (see article 23.bis.1).

As a matter of practice, Spanish courts sometimes ask the Commission on matters such as the existence of aid and the fact of its notification, and the Commission's response is used in proceedings.

25 Which party bears the burden of proof? How easy is it to discharge?

The acts of the public administration are presumed to be accurate. Article 217 of the Civil Procedure Law establishes that the burden of proof corresponds to the claimant (ie, the party asking the Spanish court to consider the illegality of the state aid).

26 What is the role of economic evidence in the decision-making process?

The following means of proof are acceptable before courts: questioning the parties; public documents; private documents; expert's opinions; taking of evidence by the court; and questioning witnesses.

Economic evidence, such as economic reports from experts or private documents with real accounts and charts of benefits, are essential before the courts in state aid proceedings.

27 What is the usual time frame for court proceedings at first instance and on appeal?

First instance proceedings usually take one to three years; appeals usually take a minimum of two years.

28 What are the conditions and procedures for grant of interim relief against unlawfully granted aid?

Article 129 of Law 29/1998 allows any claimant to request either the suspension of the administrative act granting the aid or any other measures deemed necessary to ensure the effectiveness of the final judgment. The court may decide to grant the interim measure when the execution of the contested act or the application of the contested provision could eliminate the legitimate purpose of the appeal, after assessing (i) the possibility that the effectiveness of the final judgment will be put at risk if interim relief is not granted (*periculum in mora*); (ii) the balance between public and private interests at stake; and (iii) the probability of the existence of the right that deserves judicial protection (*fumus boni iuris*). In any case, interim measures must not lead to the seizure of goods or assets belonging to the public administration.

This assessment is carried out in a separate proceeding. A hearing with the opposing party will take place within 10 days from the date on which the interim measure is requested, and the decision will be made within the following five days (article 131). Once granted the interim measures will be in force until a final judgment is issued (see

also article 132), but can be modified or revoked during the course of the procedure.

In recent years, the Spanish Supreme Court has granted interim relief under article 108.3 TFEU in several cases after the European Commission initiated an in-depth investigation of the relevant aid (see the rulings of 16 July 2012, appeal number 6539/2011; 18 October 2012, appeal number 6163/2011; and 6 May 2013, appeal number 1484/2012). However, the justification for interim relief must be analysed on a case-by-case basis, and there is also a recent precedent (10 July 2015, appeal number 660/2014) in which the Supreme Court denied the suspension requested by the Spanish government on the basis that the existence of an ongoing investigation by the European Commission is not, by itself, reason to suspend the national proceedings.

29 What are the conditions for competitors to obtain damages for award of unlawful state aid or a breach of the standstill obligation in article 108(3) TFEU? How do national courts calculate damages?

For competitors to claim damages against the granting authority, the following conditions must be met: the damage should be effective and economically appreciable; and the injury should be a consequence of the normal functioning of public authorities (except in cases of force majeure). Damages are awarded to a plaintiff for (i) actual loss and (ii) loss of profit.

State actions to recover incompatible aid

30 What is the relevant legislation for the recovery of incompatible aid and who enforces it?

Law 39/2015 provides a general regime applicable by default, under which the administration that granted the incompatible aid is in charge of its recovery. It recognises the administration's right to recover the amount paid to the beneficiaries of an incompatible aid, which is time-barred after four years. This proceeding of reimbursement may not exceed 12 months.

Moreover, the General Subsidies Law and the General Taxation Law establish specific provisions related to the recovery proceedings for cases where the Commission adopts a decision resulting in the need for repayment of a subsidy or a tax, respectively.

31 What is the legal basis for recovery? Are there any grounds for recovery that are purely based on national law?

Law 39/2015 establishes causes of invalidity of administrative acts in general, such as the omission of the legally established procedure.

Second, the General Subsidies Law also establishes other causes of invalidity of administrative acts issued in specific state aid proceedings, such as non-compliance of the aid objective.

Finally, the specific provisions of the General Taxation Law are applicable in any case in which, in compliance with EU law, the recovery of state aid in the form of taxes must be required.

32 How is recovery effected?

It is possible to recover the aid based on a unilateral administrative act approved by the public administration that granted the incompatible aid.

The granting authority will normally start the proceeding on its own initiative but, if it refuses to do so, a third party distinct from the granting authority and the beneficiary may go to court to obtain a judicial declaration of recovery or the mandatory execution of the recovery.

33 How may beneficiaries of aid challenge recovery actions by the state?

When the authority issues a final decision, which ends the specific administrative recovery procedure, beneficiaries may appeal the decision before a contentious-administrative court.

34 Is there a possibility to obtain interim relief against a recovery order? How may aid recipients receive damages for recovery of incompatible aid?

By virtue of articles 129 and following of Law 29/1998, it is possible to obtain interim relief against a recovery order (see question 28).

According to the case law of the EU courts, when granting interim relief, national courts must respect the *Atlanta/Zuckerfabrik* criteria:

- the national court must have serious doubts as to the validity of the Commission's decision (*fumus boni iuris*, if the validity of the recovery order is not already being tested before the EU courts, the national court must refer this question to the ECJ);
- the granting of aid must be necessary to avoid serious and irreparable damage to the claimant (*periculum in mora*);
- the national court must take EU interests into account; and
- the national court must fully respect previous decisions by the EU courts.

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