

Open Olympics 2026

We want the Milano Cortina 2026 Winter Games transparent, lawful, accountable

First participatory monitoring report and position paper of the Open Olympics 2026 petition



**CIPRA
VIVERE
NELLE ALPI**



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FOREWORD

THE 'OPEN OLYMPICS 2026' CAMPAIGN IN 500 WORDS

Over **5 billion and 720 million** euro. These are the numbers of expenditure for the **XXV Olympic and Paralympic Winter Games Milano Cortina 2026**: 1 billion 600 million for the realisation of the Games and the further 4 billion 120 million for related public works.

Or at least: these are the figures that we have tracked in **our first action of civic monitoring**, as a network of local communities, national associations, and monitoring citizens.

Even if there is little time left and the management machine started up some time ago, **we still do not know what the total number of works actually is**. We have counted 79, but there is no single institutional list or dataset to inform us about this.

In the same way, it is **difficult to understand who is responsible for a work**, often also divided into several lots, and how the commissioning conditions the rules of the game.

We do not know why the works are being carried out, as we are not allowed to take part in the decision-making process, nor can we actually assess their impact.

It is often **extremely complex to locate the data**, as we are forced to bounce between different portals and websites.

Finally, of too many works **we do not know when they will be ready**, and what may happen to them in the future.

For all these reasons, we ask for a concrete commitment: **full transparency on the Olympic and Paralympic event and related works**. This request is translated into a **'Single Portal of Transparency of the Milano Cortina 2026 Winter Games'**, which will enable us to understand, work by work and in open data formats, the steps and decision-making process of the same, the expenses related to the organisation and promotion of the Games. Also, the portal should organise the data according to the types of works and the areas where they are to be implemented.

We launch a **loud call** to all those involved, from the International Olympic Committee to CONI, from SIMICO S.p.A to Anas S.p.A, from the Milano Cortina 2026 Foundation to the Italian Ministry for Sport and Youth, to ensure **full transparency, legality and accountability** of the Milano Cortina Winter Games.

Our request cannot remain unanswered. We have the **Right to Know** how the territories where the Games will take place are being transformed, in order to be certain of a responsible use of resources, and to properly assess their impact on our lives and on the environment.

At the same time, we have the **responsibility to monitor** the works, exercising those 'diffuse forms of control' from below that the law entrusts to us.

We want to ensure that none of these resources are dispersed in wrongdoing or inefficiency, discouraging any desire for criminal, mafia or corrupt infiltration, and ensuring that unnecessary expenditure is avoided.

We demand that **transparency, integrity and accountability**, the highest values of sport as enshrined in the 'Olympic Agenda 2020+5', are also preconditions for the realisation of works related to the Games.

We hope that our request will be granted, but regardless of it, we also **initiate a new collective civic monitoring action of the works**. Our ultimate goal is not to feed a generic accusation, but to ensure the **protection of the common good**.

CHAPTER 1

WHAT WE KNOW TO DATE ABOUT THE MILANO CORTINA 2026 WINTER GAMES: THE LACK OF TRANSPARENCY

1.1 How many public works there are, how much they cost and who pays, where they are and what they are for (as far as we can tell)

Background

Thanks to the efforts of a plurality of local communities and associations, ordinary citizens living in the areas of the Games, and above all to the fundamental collecting and processing action of Luigi Casanova, we managed to conduct a first recognition of the public works connected to the 2026 Milano-Cortina Winter Games, the main results of which we report in aggregate form, updated to **15 April 2024**.

We can call it 'proto-monitoring' because we conducted it in a rigorous but artisanal manner, driven by the care for the common good, which animates us, and with the intention (as we will say) of improving our ability to collect and analyse data.

In providing the following data, therefore, four premises are necessary.

The first is that the **data we present do not pretend to be a precise and complete account** of the public works connected to the Games. Otherwise, we would also lose the sense of our request for transparency and accountability that we address to the decision-makers through the Open Olympics petition, of which this is the positioning document.

The second premise is that it is **not up to us, civil society, to provide a list of the public works and their cost**. Publishing this report, we are thus acting in subsidiary forms.

We have chosen to take into account only what is documented in institutional acts, so we are aware that some projects may have already undergone changes, even substantial ones, or some we may have missed. In the same way, we are aware that, once tenders for the works have been awarded, they have undergone and will undergo changes during the course of the works, which will be incorporated into institutional documentation with a delay.

In addition, many works will be subcontracted, making the data retrieval even more difficult.

The third premise is that **providing this data serves to raise an alarm**: we are talking about an enormous amount of funds and projects, capable of changing the face of the areas involved.

The fourth premise is that this first monitoring action, the results of which we report here, has allowed us to **experience those immense difficulties and obstacles to access our Right to Know**, which we list in detail in the next paragraph. These data should therefore be considered as a starting point for our request for transparency, aimed at anyone who might decide or exert pressure around the Milan Cortina 2026 Olympic and Paralympic event.

Overview of works and costs of the Milano Cortina 2026 Olympic and Paralympic event, as monitored by us

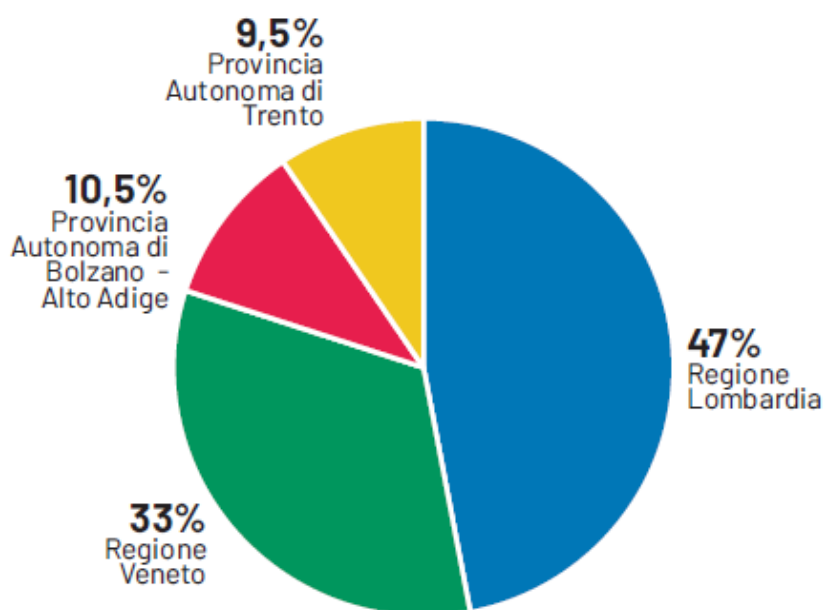
Here are the figures as of the date of our last observation, 15 April 2024.

We have distinguished the costs for public works connected to the Winter Games from those for the realisation of the Winter Games event itself.

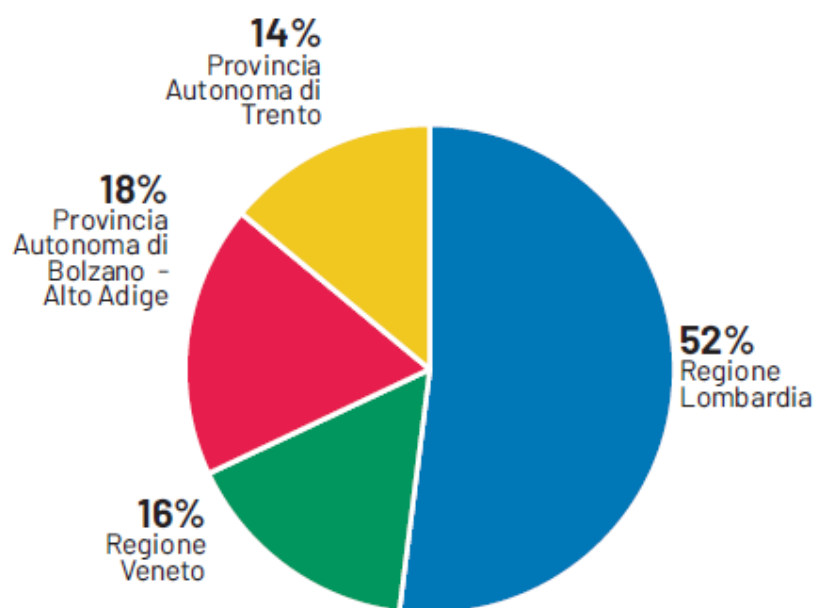
Table of expenditure for public works, divided by area

Region or Autonomous Province	Total planned expenditure	Number of works	% on total expenditure	% on total number of works
Lombardy Region	1.930.920.906,00	41	47%	52%
Veneto Region	1.369.640.684,00	13	33%	16%
Autonomous Province of Bolzano/South Tyrol	428.685.560,00	14	10,5%	18%
Autonomous Province of Trento	393.000.320,00	11	9,5%	14%
TOT	4.122.257.470,00	79	100%	100%

Graph 1: Percentage on total expenditure for public works, divided by area



Graph 2: Percentage on total number of public works, divided by area







The economic-territorial data show that:

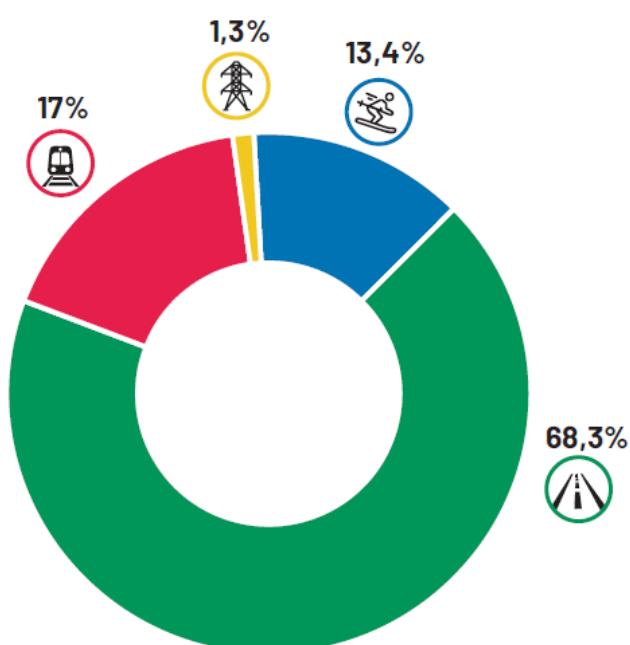
- Lombardy alone absorbs about half of the public works (52%) and related costs (47%);
- Veneto stands out for a smaller number of works (13, 16% of the total) with a higher related cost (33% of the total costs);
- The number of works to be held in the territory of the Autonomous Province of Bolzano/Bozen alone is numerically greater than that of the entire Veneto region (14 in Südtirol - Alto Adige, 13 in Veneto), opening up a

question on the environmental impact of these works, also considering that the surface area of Südtirol - Alto Adige (7,398 km²) is less than half that of Veneto (18,345 km²).

Table of expenditure for public works, divided by typology

	Typology of work	Total planned expenditure	Number of works	% on total expenditure	% on total number of works
	Sports works	542.053.740,00	24	13,4	30,5
	Road works and other	2.816.120.470,00	45	68,3	57
	Railway works	711.375.900,00	8	17	10
	Power lines	52.697.360,00	2	1,3	2,5
	TOT	4.122.247.470,00	79	100%	100%

Graph 3: Percentage on total expenditure for public works, divided by typology



Graph 4: Percentage on total number of public works, divided by typology

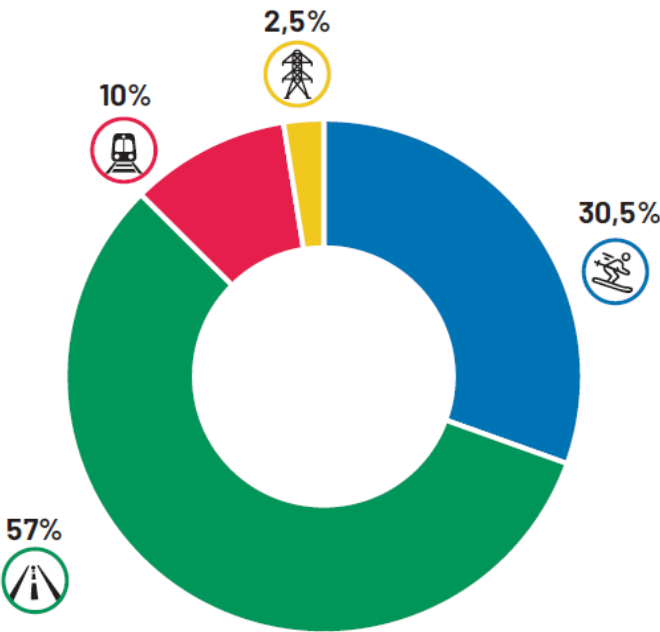


Table of costs for the realisation of the works and the Games

Typology	Total expenditure/financing	% on total expenditure
Realisation of all public works related to the Games	4.122.247.470	72%
Realisation of the Games (Milano Cortina 2026 Foundation resources)	1.600.000.000	28%
TOT	5.722.247.470,00	100%

Graph 5: Composition of expenditure for the realisation of the works and the Games



The economic and sectoral data show that:






- Considering both the resources for the realisation of all public works and the Games (destined to the Milano-Cortina 2026 Foundation), the total costs are over 5 billion and 720 million euros;
- For the public works alone, the total is over 4 billion 122 million euro;
- More than 68% of the resources are absorbed by the 45 road works we have mapped, costing more than 2.816 billion euro in total;
- The 24 works related to the Olympic and Paralympic event account for around 13.5% of the total expenditure;
- Our mapping, at the moment, has not detected any airport works.

LOMBARDY

In Lombardy, we have mapped 41 public works in various capacities related to the Milan Cortina 2026 Winter Games. These include: 14 sports works for infrastructure that will be used for the Olympic and Paralympic event; 25 roadworks; 2 railway works.

The estimated economic amount is just under 1.931 billion euro. The region has the largest number of works and, consequently, costs.

Lombardy - Table of public works and costs






	Typology of work	Number of works	Planned expenditure	% on total expenditure
	Sports works	14	187.849.140,00	10%
	Road works	25	1.292.399.666,00	67%
	Railway works	2	450.672.100,00	23%
	Airport works	0	0	0%
	Power lines	0	0	0%
	TOT	41	1.930.920.906,00	100%

VENETO

In Veneto, we have mapped 13 public works in various capacities related to the Milan Cortina 2026 Winter Games. These include: 5 sports works for infrastructure that will be used for the Olympic and Paralympic event; 5 roadworks; 3 railway works.

The estimated economic amount is just under 1.370 billion euro. The incidence, in the region, of the costs for road works is evident, counting for 80% of the costs alone.

Veneto - Table of public works and costs

	Typology of work	Number of works	Planned expenditure	% on total expenditure
	Sports works	5	216.158.300,00	16%
	Road works	5	1.096.620.984,00	80%
	Railway works	3	56.861.400,00	4%
	Airport works	0	0	0%
	Power lines	0	0	0%
	TOT	13	1.369.640.684,00	100%

SÜDTIROL/ALTO ADIGE

In Südtirol/Alto Adige, we have mapped 14 public works in various capacities related to the Milan Cortina 2026 Winter Games. These include: 1 sports work for infrastructure that will be used for the Olympic and Paralympic event; 11 roadworks; 1 railway work; 1 work for the implementation of energy transport.

The economic amount budgeted as the tender basis is more than 428.680 million euro. The incidence of the number of road works (11 out of a total of 14, 79%) on the total is significant.

Südtirol/Alto Adige - Table of public works and costs






Typology of work	Number of works	Planned expenditure	% on total expenditure
Sports works	1	47.825.800,00	11,5%
Road works	11	238.162.400,00	55,5%
Railway works	1	138.000.000,00	32%
Airport works	0	0	0%
Power lines	1	4.697.360,00	1%
TOT	14	428.685.560,00	100%

TRENTINO

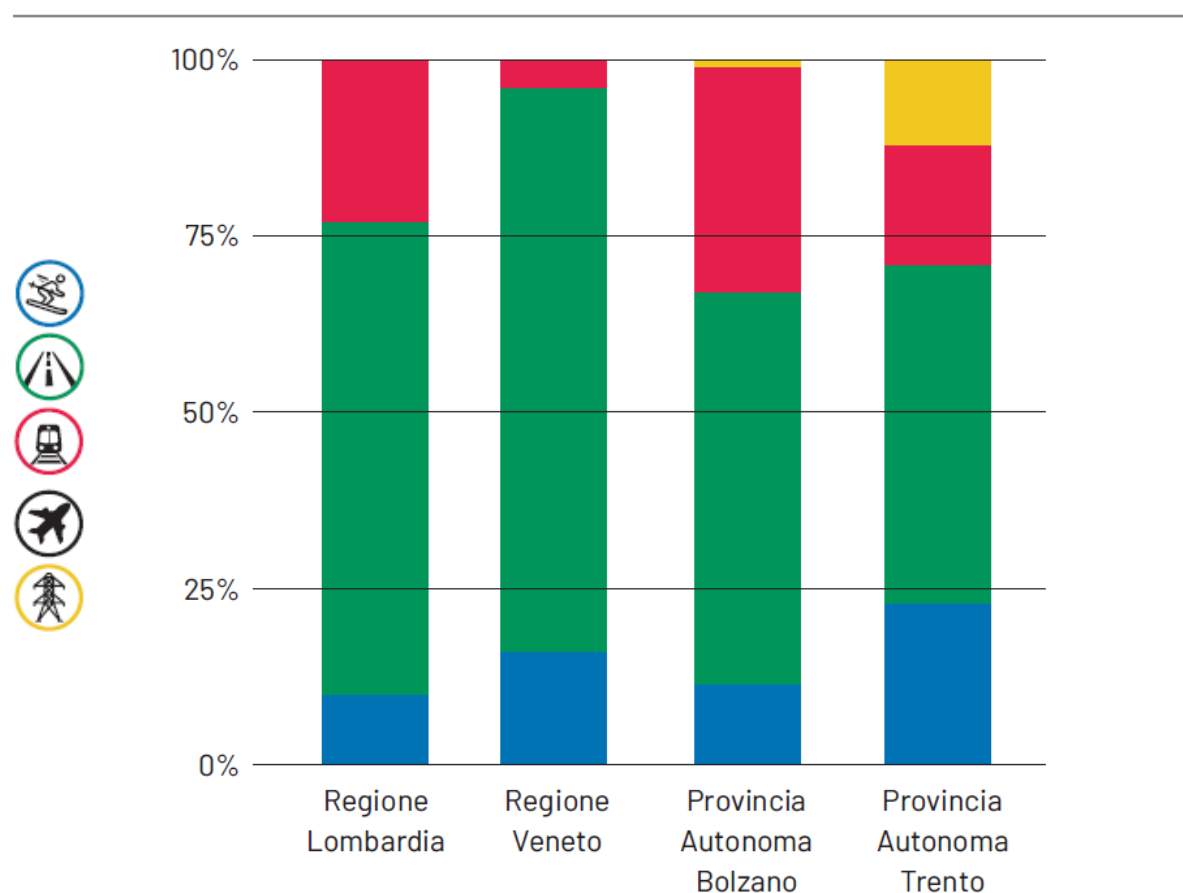
In Trentino, we have mapped 11 public works in various capacities related to the Milan Cortina 2026 Winter Games. These include: 4 sports works for infrastructure that will be used for the Olympic and Paralympic event; 4 roadworks; 2 railway works; 1 work for the implementation of energy transport.

The economic amount budgeted as the tender basis is more than 393 million euro. In Trentino, almost half of the costs (48%) are allocated for road works.

Trentino - Table of public works and costs

	Typology of work	Number of works	Planned expenditure	% on total expenditure
	Sports works	4	90.220.500,00	23%
	Road works	4	188.937.420,00	48%
	Railway works	2	65.842.400,00	17%
	Airport works	0	0	0%
	Power lines	1	48.000.000,00	12%
	TOT	11	393.000.320,00	100%

Graph 6: AREAS: Percentage of total expenditure - by typology of works



SOURCES

We identified the above-mentioned works through what is called 'scraping' of data, by searching in the various Prime Ministerial Decrees of 2022 and 2023; in dedicated ministerial decrees reporting financial resources to local authorities, in the 2022 and 2023 state budget forecast law, and in the subsequent budget.

By 'scraping', we mean that we had to read document by document in order to identify the works listed above. In the absence of a dedicated list or any open data, this operation was time-consuming and lends itself to a natural margin of error.

Below, a detailed list of all sources consulted.

DPCM 26/09/2022 (Draghi government)

This is the first organic law directly addressing the Milano Cortina 2026 Olympic and Paralympic event. It is an initial summary of the deliberated expenditure and the expected costs of various works. It summarises planned expenditures in several laws, especially the 2029, 2020, 2021, and 2022 financial acts, but not only. It is the decree that divides the works into 'essential-unavoidable' and 'essential'. The first are to be delivered by December 2025, the latter can be completed after 2026, undergo variations during construction, and be refinanced. The decree includes expenses still referable to the Turin 2006 Winter Games. It contains four annexes (Annex A, B, C, D).

DPCM 08/09/2023 (Meloni government)

This decree cancels the previous one. It updates the expenses referring to the various works, and includes some that were previously unfunded. It contains two annexes.

Law 160/2019 and implementing decrees

State budget for the financial year 2020 and multi-year budget for the three-year period 2020-2022.

Law 178/2020 and implementing decrees

State budget for the financial year 2021 and multi-year budget for the three-year period 2021-2023. References to the Games can be found in Article 1, paragraphs 772-774.

Law 234/2021 and implementing decrees

State budget for the financial year 2022 and multi-year budget for the three-year period 2022-2024. References to the Games can be found in Article 1, paragraphs 952.

Law 197/2022 and implementing decrees

State budget for the financial year 2023 and multi-year budget for the three-year period 2023-2025. References to the Games can be found in Article 1, paragraphs 498-502.

DM MIMS 07/12/2020

Implementing decree of l. 160/2019. Identification of infrastructural works to be implemented in order to guarantee the sustainability of the Milano Cortina 2026 Winter Olympics.

CIPESS Resolution no. 44/2021 (Aggiornamento 2020 del Contratto di Programma MIT-Anas 2016-2020)

Resolution of the Interministerial Committee for Economic Planning and Sustainable Development (CIPESS) updating the Programme Contract between the Ministry of Infrastructure and Sustainable Mobility and Anas. The latter is the instrument through which the use of the resources allocated to Anas for the implementation of infrastructure works and for the management of services related to the network under concession is regulated.

Contratto di Programma MIT-RFI 2022-2026

The instrument entrusted with regulating the economic and financial aspects of the concession relationship between RFI and the State.

Trento Province Resolution no. 1497/2021**Veneto Region Law no. 44/2019**

1.2 Why it is difficult to exercise our Right to Know: the 5 problems we encountered in monitoring the public works

As already mentioned, the data described above are the outcome of an initial civic monitoring work by local communities and associations. During this action, we encountered enormous problems in accessing the data and the information, which grounds our petition. We have grouped them into 5 macro-items.

a. We really don't know HOW many works there are in total, nor their total cost

While it is true that we have reported data and costs for 79 works, we are by no means certain that we have been able to map all of them.

This is because the DPCM of 8 September 2023 lists works and costs related to the Winter Games, but there are others that do not appear in the Decree even though they are related to the event. In fact, each Region or Province has included other proposals with reference to the Winter Games, contained in a plurality of resolutions and determinations.

Therefore, although we have tried to identify a number with our monitoring, today no one can say with certainty how many works actually revolve around the Winter Games, because there is no single public list or dataset from which to draw this information.

The current system of reporting, although consistent with the relevant legal framework, is not sufficient for the exercise of our Right to Know: we are a long way from an effective system of transparency that is also combined with the principle of usability, worthy of an event such as the Milano Cortina 2026 Games.

b. It is difficult to understand WHO is in charge of a work, often even divided into several lots, and HOW commissioning conditions the rules of the game

For some works, even very expensive ones, it is not possible to clearly identify a certain party responsible, to whom we can direct our monitoring.

This is because the public subjects involved in the event, more or less directly, are in fact diverse. The institutions involved are the Municipalities, the Valley Communities, the Provinces and Regions, the State at the central level, and the state-owned company SIMICO.

There are also the private players: consultancy companies for the design and planning phase, contracting authorities, construction companies, other publicly owned companies such as ANAS, Rete Ferrovie Italia, power line and utility operators.

Finally, there are the commissioners of ongoing works (as in the case where ANAS took over from Simico).

Knowing who pays is also complex, because the sources of financing for the works are multiple: they range from the Municipalities to the State; private entities are involved in various finance projects; resources have also been sought in the National Recovery and Resilience Plan and from various regional, provincial and State laws.

If we then consider that the subdivision into several lots prevents an overview of the size of the projects, their unit cost and the companies working on them, the end result is an overlapping of contracting stations, procedures, financing bodies and commissioning bodies. All to the detriment of transparency.

c. We do not know WHY the works are being carried out, as we are not allowed to take part in the decision-making process, nor can we actually assess their impact

From the bidding phase onwards, public debate around the Winter Games has been sporadic and on specific projects. Where there has been some room for debate, citizens have been able to respond with improved and, in some cases, alternative proposals.

Those who decide, however, have not wanted to sit down at a table for dialogue with those who live in the areas, which would address the totality of the Games with an holistic approach, and the evaluation if all works were actually linked to the objectives of the Games.

This is all the more serious in view of the fact that the current transparency model does not provide detailed data, work by work, on the criteria of environmental impact assessment, sustainability, flexibility, reversibility and reuse, containment of land consumption, and management and economic efficiency. This by virtue of an administrative 'simplification' that is all to the detriment of environmental protection and, probably, of the quality and efficiency of the work itself and of the Games as a whole.

In conclusion: we cannot monitor how the lands are changing, nor take part in the decisions about them.

d. It is extremely complex to understand WHERE the data are, having to bounce between different portals and websites

We verified how the data around the works are not always available, are often incomplete and/or in any case are not in open format, thus preventing their use and reuse for monitoring purposes.

On the platform of Milano Cortina 2026 Foundation, it is possible to find its financial statements. On the 'Amministrazione trasparente' (Transparent Administration) page of SIMICO S.p.A. we find an extensive amount of documents relating to calls for tenders (not in open format and difficult to use), with a subsequent cross-reference to the portal of the Ministry of Infrastructure and Transport (MIT) for everything else relating to the contract awarding (which, however useful, remains difficult to access).

Again: on the 'Società trasparente' (Transparent Company) page of Anas S.p.A., if you search in the 'Contracts' area and enter 'Olympics' in the subject line, you currently have access to only three results, accompanied by a large number of documents, which are not immediately readable and require a great deal of time and expertise to render useful information.

Further data on contracts can be found in the portals of Anac or of the General State Accountancy Office (Open Bdap), without, however, being able to trace a useful red thread to help understand where the flow of data begins and ends.

This bouncing between portals, within portals and between documents (resolutions, calls for tenders, DPCMs, DMs ...) does not help usability and the data published are in any case meagre or difficult to read.

It takes an enormous amount of perseverance to navigate through links, numbers (and their absence), administrative documents (often badly scanned) and sometimes we end up getting lost and interrupting the monitoring process.

In fact, the transparency model does not follow a 'citizen-friendly' logic that an event like the Olympic and Paralympic Games would require.

e. Of too many works we do not know WHEN they will be ready, and what may happen to them in the future

Having an effective and comprehensive schedule of the public works is still a chimaera at the moment.

The rush to award the works, due to delays, will then increase the risk of future disputes with the awarded and/or excluded companies. Who will pay when everything is finished, but will such disputes remain?

In addition: some works risk not being ready by the time of the Games. Who will cover the financial exposure of the local authorities in that case? Also considering that they have already had to take on costs for preparatory projects for the Games that were not foreseen by the DPCMs.

Last but not least, what will happen to these works after the event? There are some legacy plans at local level that intend to discuss such future utility, but no concrete trace of them can be found online apart from initial statements.

CHAPTER 2

THE 'OPEN OLYMPICS 2026' PETITION AND THE 5 KEY POINTS OF OUR REQUEST

2.1 The petition

Open Olympics 2026

We want the Milano Cortina 2026 Winter Games transparent, lawful, accountable

RECIPIENTS

to the Executive Board of the International Olympic Committee
to the Board of Directors of the Milano Cortina 2026 Foundation
to the Board of Directors of the Company Infrastrutture Milano Cortina 2020 - 2026 S.p.A. (SIMICO S.p.A.)
to the Board of Directors of ANAS S.p.A.
to the Italian Ministry for Sport and Youth

CONTEXT

The XXV Olympic and Paralympic Winter Games in 2026 are just a short time away and the Italian administration machine has been running for some time. If the Milano Cortina 2026 Foundation, as we read in the digital channels, will carry out 'all organisational, promotional and communication activities for the sporting and cultural events linked to the realisation of the Games', the Società Infrastrutture Milano Cortina 2020 - 2026 S.p.A. (SIMICO) already has contracts and works in the pipeline because it is called upon to carry out 'all the implementation activities, as central purchasing and contracting station, also stipulating conventions with other contracting administrations'. In any case, there are many entities that have responsibility for huge investments: Anas, Terna, Autostrade Brennero, Ferrovie dello Stato, Regions and Autonomous Provinces, individual municipalities, A22 Spa, etc.

As monitored by us, the works connected to the Games, and the Games themselves, will cost, counting only the funds allocated by institutional bodies, around **5.7 billion euro**, and it is already clear that this figure will be exceeded by a considerable amount.

We want to make sure that **none of these resources, whether dedicated to infrastructure or to the realisation of the Games, are dispersed in wrongdoing or inefficiency**, discouraging any attempt at criminal infiltration, whether of a

mafia or corrupt kind, while at the same time ensuring that wasteful expenditure is avoided.

Moreover, as people and communities living on the sites of the works, as historical guardians and carers of the territory, we want to know how these will change, in order to properly assess **the impact on our lives and the environment**. This can only be guaranteed by having constant information and transparency regarding the expenditure made directly and indirectly in connection with landscape-related interventions.

From a careful reading of the Prime Minister's Decree of 8 September 2023, we are surprised how, in contrast to what is stated, the local level plans and programmes and the overall plan of works for the event are not subject to Strategic Environmental Assessment (in Italian: VAS).

OLYMPIC AGENDA 2020+5

The 'Olympic Agenda 2020+5' published by the International Olympic Committee itself mentions 'further strengthening integrity, transparency, and good governance across the entire Olympic Movement' as a goal to be met to ensure the credibility of its institutions and competitions. Recommendation 14 on *good governance* then calls for 'increas[ing] the effectiveness of anti-corruption measures' and that 'the Olympic Movement's stakeholders will have to embrace all the facets of governance. This includes full transparency with regard to the use of their resources'.

Moreover, recommendation 2 includes a long list of actions and goals on making the Olympic Games sustainable, in which it is expressly noted to 'improve monitoring and measurement of the impact and legacy of the Olympic Games including their contribution to the UN Sustainable Development Goals'. We intend to contribute to this monitoring.

On the portals of the Milano Cortina Foundation, which has already adopted its own Organisation, Management and Control Model (in line with decree 231/2001), it informs 'all its interlocutors that all unlawful conduct is absolutely condemned and opposed'.

As for SIMICO, the aforementioned Prime Minister's Decree, in Article 2 concerning the implementation of the Comprehensive Plan of Works, states that the company is called upon to act 'in accordance with the principles of transparency, impartiality and correctness of action for the public purpose for which it was established'.

These desirable intentions **must be matched by effective actions and appropriate measures**, both organisational and reporting, that go beyond the dimension of regulatory compliance.

OUR DEMAND: FULL TRANSPARENCY THROUGH A SINGLE REPORTING PORTAL

Full compliance with the 'Right to Know' would allow us to make this essential extra step possible. The Right to Know is the primary tool we have as civil society to do our part, as well as it is a fundamental human right enshrined in the Charter of Rights of the European Union and in national laws.

Knowing, in order to exercise civic monitoring, is a due act that we intend to fulfil. To enable us to know, by means of complete, up-to-date and open data and tools to help understand the scope of that data, is equally so.

On the platform of Milano Cortina 2026 Foundation, it is possible to find its financial statements. On the 'Amministrazione trasparente' (Transparent Administration) page of SIMICO S.p.A. we find an extensive amount of documents relating to calls for tenders (not in open format and difficult to use), with a subsequent cross-reference to the portal of the Ministry of Infrastructure and Transport (MIT) for everything else relating to the contract awarding (which, however useful, remains difficult to access).

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This bouncing between portals, within portals and between documents (resolutions, calls for tenders, DPCMs, DMs ...) does not help usability and the data published are in any case meagre or difficult to read.

In fact, the transparency model does not follow a 'citizen-friendly' logic that an event like the Olympic and Paralympic Games would require.

Therefore, the current system of reporting, although consistent with the relevant legal framework, is not sufficient for the exercise of our Right to Know: **we are a long way from an effective system of transparency that is also combined with the principle of usability**, worthy of an event such as the Olympic and Paralympic Games.

Concretely, we ask for the creation of a **'Single Portal of Transparency of the Milano Cortina 2026 Winter Games', available on the Foundation's and/or SIMICO's website**, which will enable us to understand, work by work and in open data formats, the steps and decision-making process of the same, the expenses related to the organisation and promotion of the Games.

This portal shall:

- be fed by **disaggregated data**, made available in an open, complete and continuously updated format, from all the contracting stations involved, thus being multi-source;
- **organise the data** (and provide corresponding infographics) not according to bureaucratic reading logics, but **around five guidelines**:
 - 'Why' (motivation of the choice to build the work or to realise the activity/service/good)
 - 'When' (timeline of the implementation of the work/service/good in its various phases)
 - 'How' (type of contract and account of its different phases)
 - 'Where' (places and spaces where the work/service/good is/will be realised, with related environmental impact data)
 - 'Who' (data on the contracting station and private actors involved, including a detail on subcontracting).

Such a portal would elevate Italy to the forefront of right-to-know and open government and would fully realise those values of fairness, transparency and legality that sport represents.

APPEAL TO THE RECIPIENTS: TRANSPARENCY AS A VALUE AND OBJECTIVE

We ask the International Olympic Committee to be the first ambassador of this request to the Milano Cortina 2026 Foundation, SIMICO S.p.A. and the various contracting stations, putting in place all the necessary and indispensable actions to make this request a reality.

We hope that the Milano Cortina 2026 Foundation, which was established on 9 December 2019 to coincide with the International Anti-Corruption Day, will match this coincidence by supporting our request and actively committing itself to the realisation of the transparency portal.

We trust that SIMICO S.p.A. and all contracting stations will be willing, given the strategic importance and worldwide visibility represented by the event, to take a qualitative step forward in the reporting of related works, which cannot be considered as something separate from the Winter Games.

Finally, we wish that each institutional actor, especially the Italian Ministry for Sport and Youth, would make this request its own, encouraging it in every competent forum.

It would only take **0.01% of the entire budget** allocated to the works to set up such a portal.

Practices such as 'integrity pacts', which bind both contracting parties and contractors to more transparency, could ensure the economic sustainability of the initiative.

CONCLUSIONS

Only **full transparency**, which enables effective enforcement of the Right to Know, will guarantee that the Milano Cortina 2026 Winter Games will be a true celebration of sport and its values, which we feel are ours and wish to see realised.

2.2 The five reasons for our request

1. We have the Right to Know how the territories where we live are being transformed, in order to be certain of a responsible use of resources.

The Right to Know is a fundamental human right enshrined in international charters and major human rights bodies and tribunals, as well as an essential component of a democratic society. It is also an implicit constitutional right enshrined in our Constitutional Charter.

As people living in the areas of the works for the Games, local communities and national associations, by virtue of this right we thus demand to know the impact on the environment, society and economic return that a work such as the Winter Games entails.

As guardians and carers of the territory, we want to be considered an active part of the issue.

We cannot and will not remain silent spectators.

2. We have the responsibility to monitor the works, exercising those 'diffuse forms of control' from below that the law entrusts to us.

It is the corruption prevention law 190/2012 that, as it recognises our Right to Know, entrusts us with the task of monitoring how collective resources are used. This civic oversight is exercised as safeguard of public interest, legality and the common good.

It allows us to do our part to minimise the risks of wrongdoing, inefficiency, infiltration by mafias, the realisation of useless or overly impactful works, and undeclared or unsafe employment.

We are determined to comply with the task entrusted to us by law and we intend to conduct this battle of 'civil obedience'.

3. We call for the respect of the highest sporting values of fairness, integrity and transparency, consistent with the 'Olympic Agenda 2020+5'.

Transparency, integrity and fairness are the core pillars to ensure a fair, ethical environment that respects the rules and principles of sport.

We call for the same criteria to be the preconditions for the realisation of works related to the Games.

The Olympic Agenda 2020+5 itself', produced by the International Olympic Committee, in fact prioritises 'further strengthening integrity, transparency, and good governance across the entire Olympic Movement'.

Recommendation 14 on *good governance* then calls for 'increas[ing] the effectiveness of anti-corruption measures' and that 'the Olympic Movement's stakeholders will have to embrace all the facets of governance. This includes full transparency with regard to the use of their resources'.

Moreover, recommendation 2 includes a long list of actions and goals on making the Olympic Games sustainable, in which it is expressly noted to 'improve monitoring and measurement of the impact and legacy of the Olympic Games including their contribution to the UN Sustainable Development Goals'. We intend to contribute to this monitoring.

We therefore want the path set out by the IOC to be pursued with determination and concreteness.

4. We call for a determined effort towards full transparency, considering the global reach of an event like the Olympics and Paralympics.

During the Games, the eyes of the whole world will be on Italy. An extra effort, putting transparency at the centre, is a due act.

It is an extraordinary opportunity: we want our country's name to be associated with those who do everything to reduce waste of public money, mafia infiltration, and episodes of corruption.

The premise is that transparency should not be perceived as a 'waste of time': 'commissioning' and 'speeding up' must not mean bypassing the rules and putting accountability as the last priority.

5. We call for a national and international commitment so that transparency is put at the forefront of the Olympic event.

Our call for transparency extends to anyone who, in various capacities, may intervene in the decision in order to guarantee, encourage, support, and implement full transparency of the data, acts, documents, and choices that revolve around the Olympic machine and related works.

Therefore, we appeal to the International Olympic Committee and CONI, as well as SIMICO S.p.A., Anas S.p.A. and any Italian contracting station.

We trust that each one will deploy the means at their disposal, be it a decision or an action of moral pressure, to put, at the centre of these Games, the protection and safety of the territory, transparency, the prevention of corruption, the fight against useless works and mafia infiltration.

2.3 Our request: a single transparency portal for all the public works and the Games

We ask for a **'Single Portal of Transparency of the Milano Cortina 2026 Winter Games'**, available on the platform of the Foundation and/or SIMICO S.p.A. and Anas S.p.A., which would enable us to understand, work by work, the steps and the process of the same, as well as the expenses related to the organisation, promotion and realisation of the Games.

This portal shall:

- be fed by **disaggregated data**, made available in an open, complete and continuously updated format, from all the contracting stations involved, thus being multi-source;
- **organise the data** (and provide corresponding infographics) not according to bureaucratic reading logics, but **around five guidelines**:

'Why' (motivation of the choice to build the work or to realise the activity/service/good)

'When' (timeline of the implementation of the work/service/good in its various phases)

'How' (type of contract and account of its different phases)

'Where' (places and spaces where the work/service/good is/will be realised, with related environmental impact data)

'Who' (data on the contracting station and private actors involved, including a detail on subcontracting).

We are not asking for the moon: there are already transparency portals that can serve as shining examples. One example out of all is [OpenCoesione](#), a platform that reports, acting as a single data aggregator and encouraging civic monitoring, the detail, work by work, of how the resources allocated to cohesion policies are spent.

CHAPTER 3

LET'S MONITOR THEM ALL! TOWARDS A COMMUNITY-BASED STRATEGY TO MONITOR THE WORKS OF THE GAMES

Despite the lack of a simple and usable transparency system, which puts a very heavy burden on our ability to monitor, through the launch of this petition we also take on the commitment to **renew a strong civic control of what is happening and will happen around the Milan Cortina 2026 Olympics and Paralympics.**

This monitoring action is not new: we have reported the results of an initial pilot experiment at the opening of this position paper, thanks above all to the careful and punctual action of Luigi Casanova, but also of many citizens and associations who care about their territories, and whom we thank.

Libera, through the Common - monitoring communities initiative (run together with the Fondazione Gruppo Abele ONLUS), will act as facilitator and travel companion. National environmentalist associations, together with local committees spread throughout the valleys and cities where the Olympics will take place, will then mobilise for a **systematic data collection work** on the planning procedures, on the procurement modalities, and on the progress of the various works that will host the next Winter Olympics and Paralympics.

Our ultimate goal, as we have already said several times, is **not an accusation**: we care about safeguarding the common good, be it environmental or economic resources. **The added value of monitoring is that of information.** It can benefit associations, citizens, economic operators, the media, the State institutions themselves in their ramifications. We will offer everyone open civic data that can be used and reused for different purposes.

The monitoring strategy that we will disseminate will follow three steps:

- **illuminating**
- **monitoring**
- **participating**



ILLUMINATING

Even in the absence of the single data portal that we demand through the petition, **we will search for information and data on the works for the Olympics and Paralympics wherever they are.** We will search the different platforms of the contracting stations in order to reconstruct as complete a chain of information as possible.

We will reconstruct the history of each individual project, from its inception to its current realisation, checking the coherence between it and the event.

Through Freedom of Information requests, we will ask for the data if they are not available.



MONITORING

We will not just collect numbers: **we will 'let the data speak'** by offering an interpretation of them in the light of the protection of the common good and the environment. Our monitoring action will verify not only the correct use of public money, but also compliance with European directives aimed at safeguarding protected areas (parks and the Natura 2000 network), water and forests. **Our guides will be the contents of the Protocols of the Alpine Convention and subsequent directives.**



PARTICIPATING

We will be **enablers and activators of monitoring communities and civic participation**. We will continue to ask institutions to listen to our voice to access public decision-making on the Games, where possible through participatory forms such as 'public debate'. **We are inspired, above all, by the Aarhus Convention.**

Would you like to join our monitoring?

Write to: common@libera.it

FINAL NOTES

ABOUT US AND THANK-NOTES

This report/position paper is edited by Libera - Associazioni, nomi e numeri contro le mafie APS.

In detail, it was conceived and written by the Common - monitoring communities (a joint initiative with Fondazione Gruppo Abele ONLUS), in the persons of Leonardo Ferrante, Carlotta Bartolucci and Elisa Orlando.

The monitoring and data presented in chapter 1, paragraph 1.1 were collected and analysed by Luigi Casanova, assisted by a plurality of local communities and associations, as well as ordinary citizens. We would like to thank everyone who, in different capacities, conducted the research.

The final date for data collection was 15 April 2024. Any subsequent updates have not been taken into account in the document.

Editing was completed on 22 April 2024.

We would like to thank the regional coordination of Libera Veneto, which coordinated the network of local and national actors in order to produce the petition and this paper.

Below is the list of national and territorial organisations that have promoted the petition so far. Endorsement is still open to anyone by writing to common@libera.it.

Graphic design: Francesco Iandolo

