2020 Deliverables Put to Work

EaP CSF commentary on the Work Plans of the
Eastern Partnership Platforms and Panels

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The Eastern Partnership Civil Society Forum (EaP CSF), being a permanent observer and the only civil society organisation (CSO) represented at EaP intergovernmental meetings, is providing its position in response to the request to comment on the work programmes of the four EaP multilateral platforms and panels for 2018-2019 by the European Union.

The EaP CSF has produced this document based on the expert feedback from more than 60 CSOs encompassing the entire range of civil society activity in the eastern neighbourhood. The EaP CSF has previously produced an in-depth analysis of the 2020 deliverables, and will continue to provide expert analysis and feedback as the reform process in the eastern neighbourhood continues and evolves.

The EaP CSF strongly believes that civil society will play a leading role in the shaping and achieving of the 2020 deliverables. In order to further continue and enhance the transformative process in the Eastern neighbourhood, and to ensure that EU and EaP citizens feel concrete benefits from this process, we reiterate the necessity of the involvement of the CSOs and EaP CSF's participation in all meetings of the EaP architecture as an equal partner.

EaP CSF members noted that the priorities and activities of the work programmes do, largely, reflect the realities of reform dynamics on the ground, but also identified and provided specific input on potential areas for improvement.

The work programmes should emphasise that the key to a successful reform effort is a firm commitment by the political leadership of the partner country, combined with a strong and consistent commitment by the European Commission and EU member states. The current approach of the work programmes is selective; consequently, success can only be achieved in countries with reform-committed governments, and countries that do not want to engage in reforms are provided with a convenient alibi allowing the peddling of the illusion of reform in place of actual reform. A mechanism for the implementation of the work plans in countries with difficult political conditions is sorely missing.

Our members suggested reforming the platform meetings to address the above point. Members identified that, by introducing a forward-thinking element to the meetings that seeks to identify, discuss and share experiences on barriers to progress, the Commission could transform the platform meetings into a tool capable of facilitating reform. We additionally recommend the creation of a uniform report template to encourage commentary on barriers to progress by the partner countries, and the strong involvement of the EaP CSF throughout the process, to ensure a civil society perspective. A common structure for the work plans is lacking; each panel has designed its plan and activities with differing logics and priorities. A template for developing the work plans of each panel can also be helpful in this regard.

The presentation of the cross-cutting deliverables in the work programmes is an area for concern. EaP CSF members noted an alarming lack of a gender perspective across all work plans, and emphasized that more must be done to mainstream gender approaches throughout. Members also noted weak or insufficient references to the role of civil society in almost every area, and urge a more explicit and specific role for CSOs. Commitments to media independence are largely missing, which is unacceptable given the realities on the ground. Furthermore, the strategic communication of the plan will be crucial to its success, and must be further prioritised.

Platform 1 – Strengthening Institutions and Good Governance

General recommendations
- We recommend to further strengthen inter-platform cross-fertilization, noting that several priorities of Platform 1 in particular (anti-corruption measures, judicial reform, PAR) as well as Platform 4 (Youth employability) are crosscutting for other platforms.
- The platform meetings, on top of being a place to report progress, should also discuss difficulties and barriers that might hamper further progress. A reporting mechanism can be introduced to encourage partner countries to comment on challenges and risks. The role of the EaP CSF is crucial here to provide a civil society perspective.
- The positive and negative experiences of multilateral cooperation (not only case studies from individual countries) within the EaP should be included.

Crosscutting deliverables

Gender
- The cross-cutting deliverable on gender equality is not well reflected, most targets of deliverables on gender equality are missing and gender priorities are not defined. There is no clarity on how the cross-cutting deliverable for gender will be achieved, as indicators for this deliverable such as the inclusion of a gender sensitive content for all work plan activities and a gender sensitive decision-making process are missing. All actions should foster gender equality and empowerment of girls and women, following GAP II, and this should be explicitly stated in all work plans. Specific attention should be paid to having gender mainstreamed in public policies; to anti-discrimination and gender-based violence legislation adopted; and to improved access to justice.

Civil society
- The role of civil society is inadequately reflected in the work programmes; involvement of civil society should be more explicit, especially in creating a connection between selected deliverables and cross-cutting themes.
- The role of the EaP CSF and its National Platforms in each thematic area should be further specified. The EaP CSF should be treated as an autonomous and equal partner.

Strategic communication and media
- The Platform 1 and Platform 4 work plans only address media in terms of strategic communication – support for media independence and freedom is missing. At each Platform 1 meeting, Rule of Law panel meeting, and Good Governance panel meeting, reports of transgressions against journalists' rights and safety should be noted. Ensuring that relevant data is systematically included in Platform and Panel meetings (such as the CoE alert system, or upholding of ECHR rulings) is recommended.
- Strategic communication must be further prioritised, it is not clear to which extent civil society and the EaP CSF will be involved in strategic communication.
- Neither Platform 1 nor Platform 4 address how diversity and intercultural dialogue will achieve implementation, and neither are mentioned in the work plans.

Governance & Public Administration Reform Panel
- Activities related to a gendered analysis of PA reform are missing; there is no reference to the priority to make gender specific statistics and data analysis available.
- Implementation of Civil Service Reforms should be monitored from day one.
- Meetings should be held on administrative and territorial reform implementation, fiscal decentralisation, and civic participation in planning and budgeting.
- The EU's twinning programme with EaP countries should be mentioned in association with capacity-building and training of civil servants in the work plans.

Rule of Law Panel
- The panel on Rule of Law reflects none of the ambitious targets of deliverable 10 in the area of the implementation of key judicial reforms and the reform of prosecution services (a pressing issue in at least two EaP countries); the focus on narrow issues should be combined with a continuous assessment of dynamics at a general institutional level and an emphasis on the independence of judiciary and access to justice.
- The fight against organised crime should be prioritised and moved to the 2018 discussions; corruption and organised crime are, on a daily basis, threatening the very structure of the EaP countries and undermining the citizens' trust in the provision of the public good, which has a negative effect on citizens' support for necessary reforms.
- Reference to deliverables related to gender-based violence and anti-discrimination legislation, and references to the ratification of the Istanbul convention, are missing from the work plan.
- The panel should promote best practices in the anticorruption area and include explicit reference to the anti-corruption courts; the effectiveness of anti-corruption bodies should also be discussed.

Security, CSDP & Civil Protection Panel
- The realities on the ground in several EaP countries call for a people-centred, conflict sensitive approach to crisis management and prevention.
- Workshops on 'Strategic Communication', 'Gender issues', 'Conflict Analysis', 'Participation in CSDP missions and operations' and 'Cyber Security, Hybrid Threats and Strategic Communication' should be exchanged from one year to another; EaP governments are facing cyber-attacks, disinformation and propaganda on a daily basis, undermining the state structures and public trust in the political system.
- It is important to ensure adequate representation of women in trainings and capacity building, and to promote agency though outreach, participation and influence.
- We recommend including gender as a component of conflict analysis.
- The Security, CSDP & Civil Protection Panel should include additional reference to security cooperation with NATO.
- Several activities in this panel, such as the discussion on SSR and capacity building, provision of courses and conferences on the CSDP, and enhancement of training initiatives, amongst others, would benefit from the inclusion of a specific research component. It is difficult to see how these activities could be efficient in their current form.

Platform 2 – Economic Development and Market Opportunities

General
- Deliverable 6 should be added to 'Main Goals and Actions'. The Platform will monitor the development of projects supporting agricultural development in EaP countries. This concerns the governments' work towards implementation of agricultural development strategies, drawn in line with the sustainable development goals; introducing and improving the programs and projects supporting the creation of agricultural cooperatives and their efforts to consolidate land; contributing to rural development; and implementing regional development strategies and socio-economic development strategies.
- To ensure smart and sustainable growth of the economy, as well as the development of enterprises, some attention should be paid to innovation in enterprises and the financial and regulatory frameworks designed to support the innovative activity of enterprises.
- Strengthening the role of private sector organizations (business associations and business support organizations), in conjunction with national SME development policies, within the framework of an open dialogue with governments should be stressed.
- A component on a 'Continuing Education System' should be added. This will help EaP governments overcome high levels of unemployment, and gives opportunities for the populace to re-qualify themselves according to labour market demands.
- The core objective 'support the creation of new job opportunities at the local and regional level' should also reflect the cross-cutting deliverable on gender equality.

Cross-Cutting Deliverables

Gender

- The cross-cutting deliverable on gender is largely absent from the work programme – it is desirable to include sectoral ministerial meetings and dialogues for the development of women's entrepreneurship, and to contribute to a broader understanding among key stakeholders on methods of developing female entrepreneurship and ensuring a favourable climate for existing women-led businesses by facilitating exchange of best practices, enterprise skills, education and training, and access to finance and working capital.

Structural Reforms, Financial Sector, Architecture, Agriculture and SME's Panel

- The prioritized deliverables are important and should be seen as central to the development of national SME policies and development strategies, as this is crucial for successfully managing the structural and social changes in the process of reforms.
- Concrete objectives, aimed at strengthening the SME sector in development of competitive and dynamic knowledge-based economy; the creation of more and better jobs; and greater social cohesion, would help governments understand what they can and cannot do effectively in supporting SME development.
- 'Pensions' as a topic are not reflected in any way, despite pensioners comprising 30% of the population and the undergoing of pension reform efforts by three EaP countries.
- We recommend adding to the work plan a comprehensive policy assessment tool to assess SME policy frameworks and provide recommendations on how to align with the principles of the Small Business Act.
- The panel should address how SMEs will be helped to access the EU market – not only in terms of imports and exports, but also in terms of activities that help develop meaningful business relationships with

foreign partners such as foreign direct investment, international subcontracting and international technical co-operation.

- The work plan should include provisions for facilitating the exchange of best practices and experiences regarding the role of SMEs and corporate actors in the transition to a green economy.
- An enterprising skills and innovation policy for SMEs, including the launching of effect support tools to provide support for start-ups and SMEs, could be helpful.
- On Deliverable 4;
  - Targets on involving women in entrepreneurship and rural development are missing;
  - We suggest adding specific topics to be discussed on structural reform – such as taxation, privatization, the rule of law, labour market reforms and state aid;
  - Attention should be paid to the implementation of innovation in enterprise, and the financial and regulatory framework supporting innovation;
  - Emphasis is needed on strengthening the role of NGOs, especially Business Associations, in supporting SMEs, considering statistical data to identify tendencies and potential weak points to develop key areas for improvement. The development of SMEs is not possible without comprehensive dialogue between the private sector, the government and NGOs, so we should work out the development strategy and structure of the Public-Private Dialogue Network in the EaP countries, as well as to use the best practices of the EU MS on how to improve it. This approach would be important for each EaP country, and especially so for non-DCFTA countries;
  - Specific targets relating to international competitiveness may also improve the focus of small business development initiatives in EaP countries.
- On Deliverable 5;
  - We suggest adding a point on SME support programs, financed by EU funds, as well as their monitoring and government accountability for ensuring transparency and impartiality;
  - We suggest to explore possibilities for an increased engagement of European Financial Institutions, such as European Investment Bank (EIB), European Bank for Reconstruction and Development and European Investment Fund (EIF) in supporting, for example, nation and region-wide projects of industrial and agricultural development, SME support, human development, and infrastructure.
- On Deliverable 6;
  - Considering the concentration of SMEs in urban areas, there could be more results formulated regarding local economic development and activities that can impact people in the regions;
  - We suggest adding a point on the challenges of stakeholder cooperation at a local community level, and the problems of public-private partnerships;
  - We suggest adding a point emphasising the potential of learning from EaP country experiences in supporting measures for agricultural producers, and a discussion on monitoring and evaluation instruments.

Trade Panel

- With a view towards further improving economic integration between the EU and the AA/DCFTA countries, the Panel should discuss the possibility of initiating multilateral free trade areas, moving towards the creation of a European Neighbourhood Community.
- Regarding technical regulations and standardisation, we believe that adding references to conformity assessment procedures, the improvement of Authorized Economic Operator status, and references to the Appellation of Origin to Geographical Indications, would be beneficial.
- Regarding the training of commercial attachés on trade promotion, the Customs and Trade Facilitation Workshop for managers of customs departments is not necessary, as they were trained before the WTO

TFA came into force; instead, we believe we should prioritise informing the private sector about the business implications of the TF WTO agreement (including adding Business Associations as a target group).

● Promotion of trade should go hand-in-hand with sustainable development objectives, ensuring that an opening of markets does not bring about negative social, labour, environmental or other implications. While there are specific mechanisms in place for monitoring the impact of AAs / DCFTAs on sustainable development, they only apply to the three countries – the AA signatories. These questions are directly tied to long-term economic growth and the legitimacy of economic reforms.

● It would be relevant to highlight more potential reform proposals in the first and second panels; for example, sanitary and phytosanitary measures in trade can increase intra-regional trade and trade with the EU. In this regard, more focus can be placed on eliminating non-trade tariffs, as has been the case with the EaP countries who signed the DCFTA, where the main obstacle to an increase in trade has been non-trade tariffs. More focus can be placed on eliminating non-trade tariffs.

Harmonisation of Digital Markets Panel

● The Panel should provide a perspective looking towards a withdrawal of EaP countries from the influence of Russian hosting and domains, since many enterprises and individuals use services of Russian operators. Especially in the context of increasingly stringent sanctions against Russia, there is a risk that in the future there may be restrictions on Russia's access to global digital technologies, including its complete disconnection from global internet. This would negatively influence the development of EaP digital markets.

● Goals on roaming tariffs should have a concrete objective of reducing costs by at least 10%.

● The cross-cutting deliverable on 'Structured Engagement with Civil Society' could be reflected in 'ICT Innovation and Start-up Ecosystems', by adding the involvement of stakeholders from the civil society sector.

● References to consumers are missing – consumers, as important actors on the market, should have their concerns paid attention to, including data security, electronic payments, equal access to online services and goods, and cross-border services, for example.

● We suggest adding a digital skills goal; 'To set up an e-Competence Framework in EaP partner countries'. This would provide a reference for 40 competences applied in the IT sector, using a common language for competences, skills, knowledge and proficiency levels that can be understood across Europe. An e-Competence Framework will help to develop the system of standards under the European e-Competence Framework umbrella. This would enable the identification of skills and competences that may be required to successfully perform duties and fulfil responsibilities related to the IT workplace.

● We believe that the Platform should provide guidance on the creation of digital infrastructure building blocks in the Eastern Partnership countries, to ensure the three main instruments in addressing the elimination of existing obstacles and barriers of pan-European online services; cross-border e-Signatures, electronic trade and Digital Transport Corridor services.

Platform 3 – Connectivity, Energy Efficiency, Environment and Climate Change

General Comments and Cross-Cutting Deliverables
- Cross-cutting deliverables should be more visible in the work programme. For example, the role of civil society and access to environmental information could have a clear reference to the Aarhus Convention and relevant EU directives and Regulation. Joint activities can be organised, in partnership with the Aarhus Convention Secretariat and the EC, as well as targeted workshops and seminars for environmental journalists. Civil society can be more involved in monitoring at the local level, particularly regarding regulator activities (such as independence and performance assessment, amongst others).

Energy Panel:
- Increasing the role of the consumer and civil society in the energy transition and protecting against energy poverty is crucial. It is also important to ensure the involvement of civil society organisations in the tariff design. Currently the work programme only mentions that 'special attention will be paid to the role of the regulators and transmission operators in the tariff design'.
- A uniform system of energy service management can be considered as a priority for the panel.
- In actions for 2018, there are no mentions of the EU member states crucial for interconnection projects (for example, relating to gas and electricity in Moldova). We suggest clearly specifying the technical, financial and operational support envisaged for the implementation of energy efficiency actions in 2018. In actions for 2019, focus should fall on ensuring proper implementation and measurable progress of interconnectivity. We suggest making the target to be achieved more specific.
- We recommend to have at least one meeting (either towards the end of 2018 or the beginning of 2019) devoted to broader aspects of energy security, beyond concrete interconnectivity projects; other important measures and safeguards could be discussed, such as transparency, good governance and regulation; energy planning and energy security risk; energy relations with breakaway regions; public participation and dialogue; and emergency plans; amongst others.
- It is important to monitor governance and institutional issues in the sector regarding the implementation of deliverables 14 and 15, and to create a link to the conditionality available. Additionally, in some cases, there is limited coordination between IFIs on reaching similar objectives. Deliverables 14 and 15 should be coordinated with IFI conditionality.
- In the focus for 2018, bullet 4, we suggest adding 'including legal and institutional changes and the enacting of National Energy Efficiency and Renewable Energy plans' (as an example, the establishment of Sustainable Energy Agency and its proper functionality could pose a challenge, as well as the adoption and oversight of EE and RE action plans) after 'Support countries to implement energy efficiency legislation'. In the activities, it is suggested to add 'energy security and renewable energy' after 'with the IFIs (Deliverable 14) and energy efficiency'.
- In the focus for 2019, bullet 1, the report on new electricity interconnection between Georgia and Turkey could be problematic, due to Turkish internal policy.
- Regarding bullet 5 in priorities for 2019, it is also suggested to remove the specific focus on energy efficiency in 'identifying measures for sustainable financing options' and to add 'renewable energy' to 'stimulating the private market in the area of energy efficiency'.
- In 2019, it is suggested to devote a meeting or a session to energy security.

Transport Panel:

- The Common Aviation Area Agreement is part of Deliverable 13, and should be mentioned in the work plan.
- It is difficult to see how cross-cutting issues will be incorporated into the work of the transport panel.
- Deliverable 13 mentions financial mechanisms; the transparency in the implementation of the new financial mechanisms and oversight by civil society is crucial.

Environment and Climate Change Panel:

- In the 2018 priorities, water sector policies and river basin management could be expanded to take into account transboundary aspects of the river basin; the adoption and usage of Strategic Environmental Assessment and Environmental Impact assessment could be changed to reflect different realities and diverse implementation legislation and practice in each country; forest and ecosystems protection could be changed to reflect EU priorities in the EU Biodiversity Strategy 2020.
- In the text for the priority 'Promote implementation of water sector policies and uptake of the river basin management planning in line with the EU Water Framework Directive', we suggest adding 'applying the ecosystem approach'.
- In the text for the activity 'Support the next Eastern Partnership Ministerial meeting on Environment and Climate Change with sustainable waste management', we suggest adding 'in accordance with the 4 'R's' principle (Reduce, Reuse, Recycle and Recovery)'.
- We suggest presenting and discussing the challenges of implementing the Paris agreement, incorporating civil society actors and specialists.
- In the 2019 priorities, promotion of the role of civil society and environmental information could have a clear reference to the Aarhus Convention, and the EU directives and Regulation implementing it.
- Environmental governance is an area in which the work plan is missing. Notably, a stark lack of capacity at both the local level and at a ministerial level, as well as ongoing decentralization processes - which often result in environmental priorities becoming neglected, need to be addressed. Whilst the work plan does contribute to the overall goal of achieving better environmental governance, it does not address it as a whole – only in a few sectors.
- The significance of the Luxembourg Declaration on Cooperation on Environment and Climate Change in the Eastern Partnership is not made apparent.

Platform 4 – Mobility and People-to-People Contacts

General
- Clarification is needed on mechanisms and ways to implement deliverables in the countries with difficult political conditions, such as Azerbaijan.
- It is important to ensure cross-sectoral synergy with Platform 2 when it comes to the issue of economic development, especially with regard to the development of SMEs and access to finance for ex-migrants.
- Young people should be encouraged to engage in reforming the state in the following cross-cutting areas; good governance; stronger justice system; fight against corruption; and strengthening democracy. Indicator based sectoral plans where young people are key stakeholders should be developed with biennial evaluations of results.
- The existing EU and Council of Europe frameworks and support tools should be translated into the Platform Work Programme, to avoid duplicating the effort.
- The Platform 4 Work Programme would benefit from the creation of a concrete activity involving a meeting of CSO experts in the fields of e-learning and online education, as well as expanding the e-libraries network and facilitating access to it.
- The work programmes of either Platform 1 or Platform 4 should address how diversity and intercultural dialogue will be streamlined.
- Cross-border initiatives should be promoted to establish cooperation between border regions of the EaP countries; for example, cross-border journalism.
- The securitisation of the Eastern border is impossible without supporting the development of civil peace services in the EaP, and in particular without the strengthening of the role of women and youth in peacebuilding and conflict transformation efforts.
- Cybersecurity activities should be complemented by online peace promotion and bridging the connectivity divide in the EaP countries.

Cross-Cutting Issues
Gender
- All specific deliverables could have at least one gender sensitive indicator. Since Deliverables 17 (Mobility and Migration Management), 18 (Youth leadership and entrepreneurship), 19 (the establishment of an EaP European school), and 20 (Research and Innovation) are all gender sensitive issues, gender should be explicitly mentioned as an integral element. In the framework of the Panel on Education, Youth and Culture it is necessary to include a perspective on women's leadership and encouragement in STEM (science, technology, engineering, and mathematics) fields. All the youth conferences to be conducted in 2019 are also gender sensitive events, and should include panels on gender equality and gender experts. In the framework of the Panel on 'Migration, Mobility and IBM', a gender perspective on 2018-2019 activities in the gender sensitive field of human trafficking is mentioned, but should be incorporated in a more meaningful manner. Establishment of multidisciplinary projects incorporating a gender perspective should be considered.

Strategic Communication
- The EaP CSF's role in Strategic Communication should be spelled out in practical terms, and Platform 4 activities should include far-reaching communications campaigns in the Association countries. The work programmes of Platform 1 and 4 only address media in terms of strategic communication; however, it is crucial that media independence and freedom are specifically discussed.

Panel on Education, Culture and Youth
- The Platform 4 and Panel meetings would benefit from the presence of Council of Europe representatives.
- The discussion on the failure to implement the provisions of the Bologna Roadmap for Belarus should be added to the agenda.
- Since the EU educational programmes have proven to be one of the facilitators of Azerbaijan's gradual Europeanisation, the work programmes should promote; the wide publicity of such programmes; independence of the candidates' selection; and education fields that are prioritised; all independent from the government.
- Educational programmes promoting critical engagement with public policy and governance should be supported. Young people should be engaged in evidence based policymaking and implementation, while consultative and participatory structures involving them in all levels of governance should be set up. Youth initiatives at local, national and regional levels should be supported, as well as the connection with youth NGOs and structures, representing them in all relevant EaP policy processes.
- Initiatives for education workers should focus on their retraining and engaging them as key agents for change.
- Since youth engagement roadmaps and action plans already exist in the EaP countries, we recommended to build on the existing ones, instead of duplicating work. Instead of a peer-to-peer exchange of best practices solely between policymakers in research and innovation, the scope should be broadened to involve young people, freelancers, academics and CSOs.
- In 2018-2019 priorities. the following text should be added to 'Developing youth engagement roadmaps and youth action plans': 'including establishment of inclusive and evidence-based youth policy development and decision-making structures, co-managed by governments and youth organizations, based on principles of transparency and accountability'. Other priorities should include 'Developing e-learning and online education in EaP countries' and 'Encouraging broader recognition of non-formal education by EaP countries governments, particularly on the issues of civic education, inclusion, democracy, environmental issues.'
- Challenges for civil society in the field of social and youth entrepreneurship, due to the lack of legislation in Ukraine, should be addressed.
- In order to achieve the set objectives, the number of expert meetings (currently 2) on creative hubs and cultural heritage should be increased.
- A greater involvement and active participation of civil society in European school partnerships and in new partner networks for youth entrepreneurship programmes for EaP countries is needed. It would be advisable to consider the creation of a EaP Peace University instead of or in addition to the EaP European School, based on the model of the EPU (European Peace University) or UNPU (UN Peace University).

Panel on Research and Innovation:
- We suggest potentially expanding the priorities to include the availability of a highly skilled workforce as a crucial factor, to enhance competitiveness of a high-growth industry within the context of transition to a knowledge-based economy.
- Innovation policy instruments can also give a boost to creating an enabling environment for attracting private investors to high-tech sectors, improving access of innovative enterprises to venture capital, building an effective mechanism of cluster-based spatial development.

Panel on Migration, Mobility and IBM:
- Protection of labour and social rights of labour migrants should be meaningfully covered, and the active participation of trade unions, economic think tanks and academia in addressing those rights should be encouraged.
- Maximizing the development impact of migration and mobility, as well as the defence of migrants rights and maximizing development impact of remittances should be reflected in the Panel activities for 2018-2019, as some of the main focuses.
- Unlawful extradition of asylum-seekers (politically persecuted journalists and activists) from the EaP countries should be addressed under Deliverable 17.
- We suggest adding a specific reference to remittances, and enhancing the wording by adding the important descriptor 'dignified and sustainable' to the point on return and readmission.
- A focus on implementation of specific areas related to visa liberalization benchmarks for AA countries should be added, together with the creation of roadmap recommendations.
- There is potential for broadening the issues to be addressed, for example; innovative IT solutions to migration; discussion on the Members States tools to address the refugee crisis; a further focus on irregular migration, amongst others.