



Portugal - Arrival of resettled refugees to Lisbon

## UNHCR'S RECOMMENDATIONS FOR THE PORTUGUESE AND SLOVENIAN PRESIDENCIES OF THE COUNCIL OF THE EUROPEAN UNION (EU)

January - December 2021

## INTRODUCTION

Forced displacement and mixed movements are global phenomena. As of 2019, 79.5 million people were forced to flee.<sup>1</sup> Globally, 1 person out of every 100 is displaced internally or seeking asylum, and that proportion has risen significantly over the last five years. In a fragile global environment, an EU that saves lives, protects refugees and finds solutions to end forced displacement at home and abroad is needed more than ever before.

UNHCR has worked closely with the Croatian and German Presidencies of the Council of the EU on asylum and migration issues throughout their mandates covering 2020. During this crucial period around the release of the European Commission's Pact on Migration and Asylum (the Pact), UNHCR has continued to advocate for the rights of displaced people inside of the EU and globally, including via Recommendations to the new Pact.<sup>2</sup> UNHCR also advocated for adequate financing for forced displacement and asylum in the next Multiannual Financial Framework (MFF), and is pleased to see that the global EU Covid-19 response includes forcibly displaced people.

Recent events such as the fires in Moria, Greece, have highlighted the urgency for the EU to find a truly common, well-managed and predictable approach to address mixed movements of refugees and migrants effectively in accordance with international law. Four years on from the release of the European Commission's 2016 proposals to reform the EU's asylum rules, UNHCR welcomes the release of the Pact and the renewal of discussions that will be carried forward by the Portuguese and Slovenian Presidencies (the Presidencies). UNHCR broadly welcomes the direction of

the Pact, including efforts to quickly identify those in need of protection and those who are not, solidarity across the EU and in particular with regard to frontline Member States (MS), independent monitoring of compliance with legal obligations and respect of fundamental rights, a common approach to search and rescue and disembarkation, enhanced legal pathways and access to family reunification, stronger support for vulnerable groups and children, and measures to improve the efficiency of returns of persons found not to be in need of international protection. UNHCR also welcomes the clear commitment to global responsibility sharing in the Pact: forced displacement is mostly a challenge of the development world. EU financial and political support for hosting countries and regions is crucial so no-one is left behind.<sup>3</sup>

In 2021 the EU has two overarching opportunities to show leadership in better protecting refugees in Europe and abroad:

1. Negotiating sustainable asylum reform based on the Pact;
2. Providing more support for the countries and regions where most forcibly displaced people live and to address root causes for displacement and irregular migration.

UNHCR stands ready to support the Presidencies and provide expertise in the development of a fair and efficient asylum system within the EU, and the development of responses to tackle forced displacement globally.

1 UNHCR Global Trends: Forced Displacement in 2019. Available at: <https://www.unhcr.org/statistics/unhcrstats/5ee200e37/unhcr-global-trends-2019.html>

2 UNHCR. UNHCR's Recommendations for the European Commission's Proposed Pact on Migration and Asylum, January 2020, available at: <https://www.refworld.org/docid/5e3171364.html>

3 UN Sustainable Development Goals, available at: <https://www.un.org/sustainabledevelopment/>

# 1 NEGOTIATING SUSTAINABLE ASYLUM REFORM BASED ON THE PACT

The 2021 Council Presidencies will play a pivotal role facilitating discussions for a sustainable, rights-based reform of the Common European Asylum System (CEAS) that works for MS and refugees alike. The Presidencies are encouraged to adopt an evidence-based, coherent and pragmatic approach in carrying forward discussions on the Pact and are invited to place this at the centre of their Presidential work. In advance of UNHCR's detailed comments on the Pact currently in development, UNHCR would like to outline the following general vision, as laid out in Better Protecting Refugees<sup>4</sup>, Recommendations for the Pact,<sup>5</sup> Fair and Fast<sup>6</sup>, and most recently the Practical Considerations for Fair and Fast Border Procedures and Solidarity in the EU.<sup>7</sup>

- I. Ensure access to the territory and fair and fast procedures;
- II. Address fundamental rights violations at the borders;
- III. Enhance intra-EU solidarity and responsibility sharing;
- IV. Increase access to family reunification, resettlement, complementary pathways;
- V. Promote effective integration;
- VI. Ensure effective monitoring and contingency planning;
- VII. Develop an efficient, humane and sustainable system for return for those found not in need of international protection.

In conjunction with discussions on the Pact, the Council Presidencies should address the need for the consistent implementation of the current CEAS framework across the EU. The knowledge of stakeholders such as NGOs, refugee-led organisations, and academia should also be taken into consideration when discussing asylum reform.

## I. ENSURE ACCESS TO THE TERRITORY AND FAIR AND FAST PROCEDURES

The Portuguese and Slovenian Presidencies should continue to ensure access to territory for persons wishing to seek asylum, including those arriving irregularly in the EU in compliance with the right to asylum and the principle of non-refoulement. UNHCR has consistently advocated for a streamlined process on arrival,<sup>8</sup> including vulnerability screening and the identification of specific needs, and in this regard welcomes the Commission's proposal to establish a screening procedure at the border that must be carried out in line with legal safeguards and with full respect for the right to seek asylum. In particular, legal obligations of states remain despite the proposed artificial fiction of non-entry and MS are required under international law to provide admission to examine the claim. Furthermore, procedural safeguards need to apply equally to all asylum seekers, irrespective of the type of asylum procedure they subsequently undergo and its location.<sup>9</sup>

4 UNHCR, Better Protecting Refugees in the EU and Globally: UNHCR's proposals to rebuild trust through better management, partnership and solidarity, December 2016, available at: <https://www.refworld.org/docid/58385d4e4.html>

5 UNHCR, UNHCR's Recommendations for the European Commission's Proposed Pact on Migration and Asylum, January 2020, available at: <https://www.refworld.org/docid/5e3171364.html>

6 UNHCR, UNHCR Discussion Paper Fair and Fast - Accelerated and Simplified Procedures in the European Union, 25 July 2018, available at: <https://www.refworld.org/docid/5b589eef4.html>

7 UNHCR, Practical considerations for fair and fast border procedures and solidarity in the European Union, 15 October 2020, available at: <https://www.refworld.org/docid/5f8838974.html>

8 UN High Commissioner for Refugees (UNHCR), UNHCR's Recommendations for the European Commission's Proposed Pact on Migration and Asylum, January 2020, available at: <https://www.refworld.org/docid/5e3171364.html>

9 UNHCR, Practical considerations for fair and fast border procedures and solidarity in the European Union, 15 October 2020, available at: <https://www.refworld.org/docid/5f8838974.html>

Fair and fast procedures within the EU continue to be the cornerstone of sustainable asylum reform. The Presidencies should ensure that full procedural safeguards are in place in asylum procedures including for accelerated in-merits assessments in asylum border procedures for manifestly unfounded claims. This is preferable to the use of admissibility procedures to quickly determine whether the applicant has the right to stay in the EU or is required to return.<sup>10</sup> UNHCR considers the use of admissibility procedures based on the safe third country concept undermines efforts to share responsibility, rather shifting it to countries outside the EU with less capacities that risks overloading nascent asylum systems in these countries. The Presidencies could explore the fast adoption of the EUAA Regulation, that would allow for the new Agency to provide operational support to MS with these new procedures in a harmonised manner to better achieve consistent implementation of European standards. Further efforts are also needed in the Western Balkans to make further progress on accession benchmarks relating to asylum as well as statelessness.

The Presidencies should underline the importance of sufficient reception capacity and safe and dignified reception conditions throughout the procedure. Border procedures may imply the use of movement restrictions and detention. In UNHCR's view, minimal periods of detention in border procedures are permissible at the outset to carry out initial identity and security checks in cases where identity is undetermined or disputed, or there are indications of security risks. It is also permissible for a limited initial period for the purpose of recording, within the context of a preliminary interview, the elements of their claim to international protection to facilitate effective triaging as a basis for channelling cases into the different processing streams. For cases triaged as manifestly unfounded, detention beyond this period may be legitimate for a short limited period with the applicable safeguards

as established by the CJEU and ECtHR. Where detention is applied for a legitimate purpose, it needs to be provided for by law, based on an individual decision, be strictly necessary and proportional, timebound and regularly reviewed. However, alternatives to detention, e.g. temporary movement restrictions, are generally preferable and possible in border procedures as per current practice in several States.

In light of proposals by the Commission to increase the flexibility of the CEAS in situations of crisis and force majeure, the Presidencies are reminded that access to asylum procedures and the 1951 Refugee Convention cannot be suspended even under such situations. Drawing on recent experiences in the COVID-19 situation, as well as other large-scale emergencies, flexibility and adaptation needs in times of crisis still allow to maintain basic registration to ensure access to essential services and assistance. In addition, essential procedural safeguards, such as those meant to protect the right to an effective remedy or the principle of non-refoulement, should also be maintained in situations of modified asylum procedures during 'crisis' situations.<sup>11</sup>

#### Key Recommendations:

- Ensure access to territory and the asylum procedure through the screening process at the border.
- Ensure that essential procedural safeguards, such as the right to an effective remedy, are upheld during fair and fast in-merits asylum procedures, including in asylum border procedures for manifestly unfounded claims.
- Ensure only minimal periods of detention at the outset of the border procedures coupled with alternatives to detention that are capable of ensuring high rates of compliance while reducing the potential for judicial challenge.

<sup>10</sup> UNHCR, UNHCR Discussion Paper Fair and Fast - Accelerated and Simplified Procedures in the European Union, 25 July 2018, available at: <https://www.refworld.org/docid/5b589eef4.html>; UNHCR Practical considerations for fair and fast border procedures and solidarity in the European Union, 15 October 2020, available at: <https://www.refworld.org/docid/5f8838974.html>

<sup>11</sup> Practical Recommendations and Good Practice to Address Protection Concerns in the Context of the COVID-19 Pandemic, 9 April 2020, available at: <https://www.unhcr.org/cy/wp-content/uploads/sites/41/2020/04/Practical-Recommendations-and-Good-Practice-to-Address-Protection-Concerns-in-the-COVID-19-Context-April-2020.pdf>

## II. ADDRESS FUNDAMENTAL RIGHTS VIOLATIONS AT THE BORDERS

The Pact highlights the need to provide for independent monitoring and investigations on fundamental rights violations at borders. The proposal comes in light of recent approaches to access to territory that have increasingly been defined by deterrence policies, including push-backs that seriously undermine the right to asylum and the principle of non-refoulement. UNHCR remains deeply concerned about credible and repeated allegations of push-backs and encourages the Presidencies to support investigations and end such practices. Further efforts are also needed in the Western Balkans to develop protection sensitive border management in the context of the capacity-building support provided by EU agencies.

### Key Recommendations:

- Ensure that independent monitoring mechanisms are established and reinforced while incentivising the undertaking of effective investigations.
- Support and enable the extension of existing mechanisms such as the Schengen evaluation mechanism and Frontex vulnerability assessments and the Frontex fundamental rights mechanisms.

## III. ENHANCE INTRA-EU SOLIDARITY AND RESPONSIBILITY SHARING

The Presidencies should continue to develop predictable intra-EU solidarity measures, and a fair, transparent and proportional system for responsibility sharing. In particular, UNHCR considers predictable relocation for manifestly well-founded and complex cases would contribute to a well-functioning CEAS. The guiding considerations for the Presidencies when discussing relocation should be family unity, regardless of the nature of the claim, effective links with a MS, and the best interest of the child for unaccompanied children.

UNHCR welcomes proposals for predictable rescue at sea and disembarkation arrangements that move away from crisis-response and ad hoc approaches, and encourages the Presidencies to shepherd their swift adoption. MS should be encouraged to increase their search and rescue (SAR) capacity and activities, including with Frontex support. In addition, the EU should set up an EU funded and run SAR operation (including naval assets). SAR activities should be in line with UNHCR's non-return position to Libya.<sup>12</sup> Furthermore, NGOs engaging in SAR should not be criminalised for saving lives at sea.

### Key Recommendations:

- Prioritise family unity within the intra-EU solidarity mechanism and the Dublin Regulation, or its proposed replacement, to help reduce dangerous journeys and onward movement.
- Establish a predictable solidarity mechanism, including in the context of SAR operations, by facilitating the swift advancement on the Asylum and Migration Management Regulation.
- Facilitate the cooperation and the exchange of good practices in the interdisciplinary Contact Group on MS cooperation in the context of SAR activities, established by the Commission.<sup>13</sup> UNHCR stands ready to support the Contact Group with relevant information, expertise and analysis.
- Encourage MS to include an explicit provision in national law prohibiting the criminalisation of actors who carry out SAR operations at sea, or who are providing humanitarian assistance when it is mandated by law, reflecting the Commission's Guidance<sup>14</sup>. In addition, encourage MS to include an exception from criminalisation of assistance, that is provided on purely humanitarian grounds in line with international and regional refugee and human rights law, conducted on land or carried out by organisations not mandated by law.

<sup>12</sup> UNHCR, UNHCR Position on Returns to Libya - Update II, September 2018, available at: <https://www.refworld.org/docid/5b8d02314.html>

<sup>13</sup> Commission Recommendation on cooperation among Member States concerning operations carried out by vessels owned or operated by private entities for the purpose of search and rescue activities, 23.09.2020, recital (16).

<sup>14</sup> Commission Guidance on the implementation of EU rules on definition and prevention of the facilitation of unauthorised entry, transit and residence, 23.09.2020

#### IV. INCREASE ACCESS TO FAMILY REUNIFICATION, RESETTLEMENT, COMPLEMENTARY PATHWAYS

It is estimated that the number of refugees in need of resettlement will increase to over 1.45 million by 2021. COVID-19 has brought significant challenges with an unprecedented health crisis impacting all without discrimination. It has also caused an economic crisis and impacted on access to essential services, both increasing and exacerbating the vulnerabilities of those most in need, including refugees.

Solidarity as envisaged in the Global Compact on Refugees is more relevant and needed than ever. The situation requires the international community to operationalize solidarity and do more to address refugee needs. UNHCR welcomes the Pact as a call to the EU for more solidarity, and as a foundation for growing resettlement and complementary pathways in 2021 and beyond in reflection of the goals of the Three-Year Strategy on Resettlement and Complementary Pathways.<sup>15</sup>

While the right to family unity is enshrined in international and regional instruments, many legal and administrative obstacles to family reunification remain. The Global Compact on Refugees calls on States to put in place effective procedures and referral pathways to facilitate the family reunification of refugees. The new Pact on Migration and Asylum presents an opportunity to tackle some of these obstacles by streamlining family reunification criteria and procedures, facilitating access to information, legal advice and support; and ensuring that beneficiaries of subsidiary protection also have access to family reunification.

##### Key Recommendations:

- Advance discussions on legal pathways and confirm the EU's global leadership on resettlement by scaling up much needed resettlement programmes.
- Recall that resettlement must remain a protection-centred tool and should not be conditional on other policy objectives

such as implementation of readmission agreement or to reduced number of asylum applications.

- Encourage the swift adoption of the Union Resettlement Framework which will help consolidate predictable and sustainable resettlement programmes.
- Ensure sufficient and adequate funding to support resettlement and complementary pathways programmes.
- Expand complementary pathways while ensuring resettlement is not substituted and remains the primary tool to provide protection to refugees at risk. Ensure that intra-EU relocation does not take place at the expense of resettlement places.
- Preserve the right to family unity and expand and ease refugees' access to established procedures that allow refugees to reunite with immediate and dependent family members.

#### V. PROMOTE EFFECTIVE INTEGRATION

While significant progress has been made in recent years, the integration of refugees and migrants remains a challenge across the EU. Giving refugees the opportunity to build their futures wherever they are in the EU and to improve their condition will enhance economic growth and social cohesion within the bloc and will reduce risks of onward movement. The narrative need to be adjusted and reflect the reality and the many successful integration stories to help to counter negative mindset and politicization of debates on asylum.

The Presidencies are encouraged to support the renewed focus on the need to amend the Long-Term Residents Directive in an effort to incentivise those recognised refugees to not move onward within the EU from first asylum countries (e.g. after only three years of continuous residence refugees could get long-term residence status). UNHCR welcomes the Commission's proposed release of the Action Plan on Integration, embracing a multi-stakeholders and whole society approach with extensive consultations, including refugees and asylum seekers.

<sup>15</sup> UNHCR, Three Year Strategy on Resettlement and Complimentary Pathways, available at: <https://www.unhcr.org/protection/resettlement/5d115db254/three-year-strategy-resettlement-complementary-pathways.html>

**Key Recommendations:**

- Encourage Member States to ensure a minimum allocation of 30% of the overall budget is earmarked to support integration measures.
- Promote an evidence-based approach to integration through the systematic collection and analysis of disaggregated data by legal status. Provide timely and adequate support and reduce practical barriers for socio-economic inclusion of refugees, including through improved access to skills assessments training, counselling, mentoring schemes and information sharing.
- Ensure refugee participation in the design and implementation of integration programmes and ensure that effective consultation mechanisms are in place.
- Continue to promote practical measures and support for municipal officials and local actors in host communities, including through simplified procedures and more direct access to AMIF funding.
- Promote a positive narrative about refugees and their contribution to host communities, combat hate speech, xenophobia, fake news and misinformation about refugees and EU asylum policies.

**VI. ENSURE EFFECTIVE MONITORING AND CONTINGENCY PLANNING**

Regular monitoring and contingency planning are needed to ensure an EU that is prepared. Early warning and well-coordinated needs assessments are required to establish mechanisms that can be activated in case an influx increases and ensure access to registration, reception, and asylum procedures. The Presidencies should prioritise the swift adoption and operationalization of the EU Agency for Asylum, which would address issues such as the harmonisation of the implementation of the CEAS and also allow for greater emphasis on contingency planning.

**Key Recommendations:**

- Ensure the establishment of an effective and regular monitoring mechanism under a new EUAA Regulation to ensure harmonisation in MS implementation of the CEAS.
- Encourage regular contingency planning and well-coordinated needs assessments to ensure that MS are better prepared.

**VII. DEVELOP A HUMANE AND SUSTAINABLE SYSTEM FOR RETURN FOR THOSE FOUND NOT IN NEED OF INTERNATIONAL PROTECTION**

The fact that only one-third of finally rejected asylum seekers actually return to countries of origin has contributed to widespread perceptions of mismanagement and efficiency of the current asylum system. UNHCR therefore welcomes the Pact's focus on increased returns through migration partnerships with and support to countries of origin and transit, an expansion of readmission agreements and enhanced implementation of the existing ones, coupled with an increase of legal pathways. Throughout the procedure, asylum seekers should have the opportunity to avail themselves of voluntary return assistance. If this is not taken up, returns can take place following a final negative asylum decision reached in a fair procedure, with due consideration of humanitarian and statelessness-related aspects. The recently enhanced mandate for Frontex on returns provides additional supports and resources of which MS should avail themselves.

**Key Recommendations:**

- When progressing the recast Return Directive, the Presidencies should promote the development of assisted voluntary return and reintegration (AVRR) programmes in all MS to support sustainable and dignified returns.
- Ensure that the new role of Frontex on returns, particularly on voluntary returns and post return assistance, builds on the extensive expertise of international and civil society organisations.

## 2 PROVIDING MORE SUPPORT TO COUNTRIES AND REGIONS WHERE MOST FORCIBLY DISPLACED PEOPLE LIVE

Of the 79.5 million people forced to flee their homes around 85% live in developing countries, often in the most fragile parts, including conflict-affected border areas. At the same time, access to durable solutions, such as voluntary return, resettlement or local integration has diminished. Refugee flows require comprehensive responses of humanitarian, development and peace actors to work in complementary ways.

Through increased funding for large displacement settings and political leverage to enhance peaceful coexistence between forcibly displaced and their hosts with more investment in self-reliance activities, the EU has been a steady partner in comprehensive responses since 2016. The EU's commitments at the 2019 Global Refugee Forum (GRF) and in the Pact to increase its multifaceted engagement are encouraging. The financial and political support the EU has provided to regional initiatives, such as the Support Platforms, is exemplary. The December 2021 High-Level Officials Meeting, which will take stock of progress made and look ahead to the next GRF, will be an important milestone to demonstrate how the EU is further advancing towards implementing its commitment in the Pact to global solidarity.

### I. TAKE COMPREHENSIVE ACTION FOR FORCED DISPLACEMENT SITUATIONS

The new MFF will allow for continued and reinforced implementation of the Lives in Dignity Policy<sup>16</sup> and will strengthen the coordination across EU Services. The 10% for migration and forced displacement in the Neighbourhood,

Development and International Cooperation Instrument (NDICI) enables the EU to provide for the much needed additionality to large hosting countries and regions, so EU support to displacement settings comes on top of standard bilateral aid. This would also allow the EU to work with hosting countries so refugees can access national services, such as health, education or the labour market. In addition, the EU's political leadership in the Support Platform for the Solutions Strategy for Afghan Refugees (SSAR) and in the IGAD Support Platform is essential, so the EU can bring its rich diplomatic toolbox to mobilize others and to help find solutions to regional displacement. UNHCR counts on the EU's continued leadership for other platforms and the nascent Sudan and South Sudan Solutions Initiative. The future of the EU Generalized Scheme of Preferences (GSP) Regulation post-2023 is another opportunity to advance on the global displacement agenda: EU Trade agreements could include forced displacement and asylum components to improve protection of and solutions for forcibly displaced people.

With the new budget in place, the EU can also consider its contribution to the grand bargain<sup>17</sup> goals seven (multi-year funding) and eight (reduce earmarking). Donor financing that is less earmarked can follow refugees during their displacement and return, meeting refugees' needs in a timely and sustainable manner. Flexible funding also allows host governments to respond in an agile way to the dynamic nature of refugee situations.

<sup>16</sup> European Commission Communication, Lives in Dignity: from Aid-dependence to Self-reliance, 14 December 2016, available at : <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/lives-dignity-aid-dependence-self-reliance>

<sup>17</sup> The Grand Bargain – A Shared Commitment to Better Serve People in Need , 23 May 2016, available at: <http://agendaforhumanity.org/initiatives/3861>



**Key Recommendations:**

- Ensure financing for forced displacement goes hand in hand with EU political advocacy to large host countries and regions to improve protection for refugees.
- Ensure the EU's continued and increased engagement as a donor and political advocate in regional comprehensive initiatives, such as the Support Platforms.
- Ensure commitment to refugee protection in trade preferences or agreements with refugee hosting countries in the development world.
- Encourage agreement to make progress on more flexible and less earmarked funding to respond to large refugee movements.
- Advocate for the inclusion of refugees and displaced persons in national development plans and SDG-related initiatives, to ensure no one is left behind.

**II. ADDRESS CLIMATE CHANGE INDUCED DISPLACEMENT**

Climate change is recognized as a global challenge requiring a global response and the EU through its Green Deal is raising global ambition to tackle it. The Green Deal has the capacity to set the standards not just for MS but for the rest of the world.

Climate change is recognized as a driver of human mobility – be it in the form of forced displacement, migration as an adaptation strategy, or of planned relocation. Climate change also acts as a ‘threat multiplier’ which may exacerbate conflict over limited natural resources. The negative impacts of climate change are disproportionately experienced by communities that are already disadvantaged including refugees, internally displaced, stateless and host populations. Through the Green Deals new ambitious Strategy for Climate Change Adaptation, the EU has an opportunity to put resilience at the heart of the EU agenda. It can also demonstrate through concrete actions the willingness to prevent and reduce risks linked to climate change, with particular

attention to the most vulnerable people, including forcibly displaced populations. Enhancing their resilience contributes to the implementation of the Paris Agreement and the Sendai Framework for Disaster Risk Reduction and achievement of the Sustainable Development Goals.

Adaptation efforts are even more important against the background of the severe socio-economic consequences of the Covid-19 pandemic, to ensure that policies aim from the start at the mutually reinforcing objectives of social and environmental sustainability.

**Key Recommendations:**

- Ensure that the EU remains a committed and ambitious driving force behind collective efforts that amplify the scale, impact and timeliness of climate action and the reduction of disaster risk for vulnerable and displaced populations worldwide.
- Ensure that EU Strategy for Climate Change Adaptation remains inclusive and aims to benefit all residing in Europe including refugees, displaced persons, asylum seekers and stateless people.
- Ensure that the Strategy is coherent with policies relating to migration and displacement in the context of climate change and disaster risk reduction. This includes EU support to the Global Compact on Refugees and its call to strengthen the international protection framework, and human mobility issues in relation to adaptation and loss and damage under UNFCCC-related commitments.
- Encourage the EU to maintain a strong collaboration with relevant stakeholders, including UNHCR, to develop guidance on measures to assist those forcibly displaced by the effects of climate change and disasters.

### III. ADDRESS STATELESSNESS

Pursuant to UNHCR's #IBelong Campaign to End Statelessness by 2024 with its mid-point High-Level Segment (HLS) on Statelessness held in October 2019, and also recalling the 2015 Council Conclusions, the Council Presidencies should:

#### Key recommendations:

- Develop a comprehensive EU strategy and an action plan within the EU.
- In the context of EU enlargement, this strategy could further include increased EU support to civil registration and documentation systems in third countries.
- Show leadership in bringing the issue of statelessness to the attention of COHOM, CODEV and COHAFA to support efforts to end statelessness globally.

UNHCR, December 2020