

Initial Appraisal of a European Commission Impact Assessment

Revising the Visa Information System

Impact assessment (SWD(2018) 195, SWD(2018) 196 (summary)) accompanying a Commission proposal for a regulation of the European Parliament and of the Council on amending Regulation (EC) No 767/2008, Regulation (EC) No 810/2009, Regulation (EU) 2017/2226, Regulation (EU) 2016/399 Regulation XX/2018 [Interoperability Regulation], and Decision 2004/512/EC and repealing Council Decision 2008/633/JHA

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the above-mentioned [proposal](#), submitted on 16 May 2018 and referred to the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE). The initiative is included in the [2018 Commission work programme](#) (REFIT).

According to the Commission, the EU's common visa policy needs to be adapted to facilitate legitimate travel, tackle irregular migration and safeguard public order and security. The Commission aims to upgrade the Visa Information System (VIS) to allow for more thorough background checks on visa applicants, while also closing security information gaps and ensuring full interoperability with other EU-wide databases. Several of the proposed changes stem from the 2016 [VIS evaluation](#).¹ The VIS was created in 2004 as a central IT database that enables Schengen states to exchange data on visas.² The initiative follows proposals on establishing interoperability between EU information systems for [borders and visas](#) and for [police and judicial cooperation, asylum and migration](#), as well as proposals on a [revised visa code](#) and on the [security of ID cards and residence documents](#).³

Problem definition

The IA identifies the following four problems:

1. Lack of travel documents as evidence in return proceedings

The storage and exchange of information on short-stay visas are not harmonised at EU level. Many Member States require applicants to submit hard copies of the bio data page⁴ of their travel document. However, national authorities have no information as to whether such copies are kept by other Member States. According to the IA, some third countries are slow and refuse to respond or to recognise their nationals, despite evidence collected in the VIS. In the absence of a valid travel document (or a copy thereof), return proceedings for third-country nationals (TCNs) irregularly present in EU territory are slow and often unsuccessful (IA, pp. 12-14; 23). The Commission considers this problematic, given that more return proceedings of irregular migrants are expected.⁵

In addition, the Commission claims that 'the failure to efficiently return [irregular] migrants to their home country is also an incentive for further irregular migration' (IA, p. 12). It appears that this statement is, however, not supported by evidence in the IA. The Commission asserts that delays in the return proceedings result in an administrative burden for the Member States, including increased costs estimated at €12.7 million (IA, p. 14).⁶ The IA concludes that the lack of travel document copies in the VIS undermines the functioning of the EU return policy.

2. A lack of fingerprinting data allowing to identify minors

EU legislation on the visa application procedure for short-stay visas exempts children under the age of 12 from providing fingerprints. The Commission claims that without fingerprints it is more

difficult to verify the identity of TCN children. The IA asserts that this phenomenon is exponentially amplified by the fact that a Schengen visa can be valid for up to five years (IA, p. 14). The Commission estimates that between 1 500 and 2 000 TCN children under the age of 12 could be victims of trafficking in the Schengen area annually. Extrapolations indicate that around 25 % of the trafficked children have gone through the visa process. The Commission 2016 [report on the fight against trafficking in human beings](#) states that these loopholes are being exploited (IA, pp. 14-16, 23-24; Annex 8). The IA does not clarify whether the problem is rooted in the lack of fingerprinting of such children or in their trafficking, facilitated by their mis- or non-identification. Defining the lack of fingerprinting of children as a stand-alone problem, as opposed to treating it in a more holistic way, naturally leads to the design of limited options on fingerprinting.

3. A lack of sufficient information on long-stay visas and residence documents

The issuance of long-stay visas and residence documents to TCNs is not fully harmonised at EU level. The IA highlights a two-fold problem in this regard. Firstly, it is difficult for authorities to verify the authenticity of documents issued by other Member States and to ascertain the identity of the person holding them. This is because data on long-stay visas and residence documents are kept at national level (IA, p. 24). Secondly, the IA considers that there is no effective system in place to access or exchange information on whether a person constitutes a security threat prior to such person reaching the external border or once they have reached it. The only EU-level exchange of information migration authorities have at their disposal is the Schengen Information System (SIS) for alerts on entry bans. In the Commission's view, this leads to inefficient and lengthy border-crossing procedures.

Border authorities bear an administrative burden, because information is not shared ('information gap'), as confirmed by Member States (IA, p. 19). 'Frontex observes that both the quantity and quality of fraudulent residence documents circulating in the EU have increased in recent years' (IA, pp. 16-18). According to the IA, criminals are taking advantage of this loophole. However, 'the exact size of the security risk posed by TCN holders of long stay visas or residence documents is difficult to measure' (IA, p. 19). The IA considers the identified problems as 'ultimately creating increased risks for internal security and irregular migration' (IA, p. 20). Reference is made to the Frontex [Risk Analysis for 2017](#). The IA states that organised criminal groupings use fraud for committing a number of related serious offences, such as terrorism and trafficking in human beings (IA, pp. 20-21; Annex 9).

4. A lack of sufficient checks on migration and security risks when processing visa applications

According to the Commission, the visa procedure does not take into account the possibilities offered by the available IT systems, nor does it make use of their interoperability with each other. The IA identifies the following problem drivers: the changed security and migratory context; the emergence of new IT systems, such as the European Travel Information and Authorisation System (ETIAS) for visa-exempt travellers; and interoperability. Currently, there are differences among the Member States in the checks they carry out. As a consequence, visa applicants may be subjected to more stringent or less stringent checks. The IA claims that the problem is exacerbated by the fact that in some countries, it is relatively cheap and easy to change personal data legally. However, the IA does not give any information or statistics on the actual number of documents obtained as a result of a change in personal data (IA, pp. 21-24), nor does it define or explain the term 'migration and security risks'. This seems, however, important in times where the use of biometrics in migration policy in identification and verification procedures is increasingly relied upon.⁷

Objectives of the initiative

The IA identifies **four general objectives**:

- 1) to contribute to the implementation of the common visa policy;
- 2) to facilitate checks at the EU's external borders and movement within the Schengen area;
- 3) to improve security within the EU and at its borders;
- 4) to improve the management of the Schengen external border.

The **specific objectives** are defined per problem:

1) *for records of travel documents*

- to improve the identification and the return of irregular third-country nationals;
- to make the VIS more efficient in terms of facilitating return proceedings.

2) *for the fingerprinting of minors*

- to facilitate border checks and the fight against fraud;
- to prevent and fight abuses of children's rights.

3) *for long-stay visas and residence documents*

- to facilitate checks at the external borders and within the territory of the Member States;
- to facilitate the exchange of information among Member States on TCNs;
- to prevent, detect and investigate serious crime, including terrorism;
- to gather statistics in support of evidence-based policy-making.

4) *for migration and security checks*

- to make full use of the interoperability of the EU border management IT systems.

According to the Commission's [Better Regulation Guidelines](#), objectives should be SMART (specific, measurable, achievable, realistic and time-bound).⁸ The above-listed objectives are neither very specific, nor time-bound.

Range of options considered

The IA proposes at least two policy options to address each of the four problems identified, in addition to the baseline. Several options, including the non-legislative options 3.1. A through C, were discarded at an early stage (IA, p. 38). Under the **baseline option**, the Member States' divergent approaches of collecting and storing visa applicants' documents would continue. According to the IA, this would lead to an increased backlog of TCNs undergoing return proceedings, and an increased administrative burden and costs for Member States.⁹ The IA claims that the risk of children's rights abuses would remain high or even increase further (IA, p. 25; 31). The information gap regarding long-term visas and residence documents might increase. This would hamper *bona fide* travellers and invite fraudsters to target less secure documents, the Commission concludes (IA, pp. 31-32).

The table below presents the **retained policy options. The Commission's preferred option combines options 1.1.A; 2.1; 3.4.B and 4.2, as highlighted in dark grey** (see Annex 11). The IA deals with the four identified problems separately.

1) Options regarding a copy of the travel document (IA, pp. 32-33)	
1.1	Include a digital copy of the travel document in the central VIS (centralised). Competent authorities would have access to the database.
1.2	Include a digital copy of the travel document in the national visa systems (decentralised). National authorities would request information from the Member State that owns the data.
Sub-option 1.A	Store the bio data page of the holder's travel document in the VIS.
Sub-option 1.B	Store all used pages of the applicant's travel document in the VIS.
2) Options regarding the fingerprinting of minors (IA, pp. 33-34)	
2.1	Lower the fingerprinting age to six years.
2.2	No age limit regarding fingerprinting.

3) Options regarding long-stay visas and residence documents (IA, pp. 34-36)	
3.2	Further harmonise and secure long-stay visas and residence documents by strengthening the format and security features of the residence cards currently issued, to which the harmonised format is not applied.
3.3.	Set up an integrated database system by connecting existing national databases. This would allow all Member States to query each other's relevant databases when assessing a long-stay visa or residence document.
3.4 A	Integrate data on long-stay visas, residence permits and residence cards from the national systems into the VIS, without storing data on rejected applications.
3.4 B	Integrate data on long-stay visas, residence permits and residence cards from the national systems into the VIS, including data on rejected applications.
4) Options regarding migration and security checks (IA, pp. 36-37)	
4.1	Introduce systematic and automated checks against the available databases, following the same logic as ETIAS. The risk assessment based on checks on databases would be performed in an automated manner using the interoperability component (European Search Portal).
4.2	Same as option 4.1, but also introducing a screening tool: an algorithm that would enable the comparison of data in the applications for a short-stay visa with specific risk indicators (not defined in the IA).

The IA states that the collection and storage of long-stay travellers' biometric data by Member States is not harmonised (problem 3). Contrary to the suggestion in the IA that 'the inclusion of biometrics could be considered after a period of assessment' (IA, Annex 10, p. 120),¹⁰ the Commission did not consider this as an option and instead included biometric identifiers in option 3.4, without laying out its reasons in the text describing the option (IA, pp. 51-52). One would indeed have expected a more thorough analysis, in particular with regard to effectiveness, necessity and proportionality. The IA states that the current VIS already includes a robust set of data-protection safeguards, which would also be part of the revised VIS 'for any of the proposed options' (IA, p. 30).

Scope of the impact assessment

The IA analyses the economic costs and benefits, the policy impacts and the impacts on fundamental rights for each of the options in the four problem areas.

Options envisaging a copy of the travel document – the IA gives two estimates for all of the costs related to the options. Eu-LISA estimates the one-off cost for the central system (option 1.1) as being in the range of €3.3-4 million, while the supporting ECORYS study places it above €5 million. The study suggests the decentralised system (option 1.2) would entail costs as high as €200 million. As regards operational costs, eu-LISA places them at around €375 000-560 000 per year. According to the IA, the potential benefits of both options would be sufficiently substantial to offset the costs incurred (IA, pp. 39-40). In the Commission's view, both options would meet the specific objectives. According to the IA, the storage of a digital copy of the visa applicants' travel document in the central VIS (option 1.1) or national VIS (option 1.2), can have a positive impact on the right to asylum (Article 18 of the EU Charter of Fundamental Rights (CFR)) and the protection of the principle of *non-refoulement* (Article 19 of the CFR). Sub-options A and B would interfere with the right to privacy and family life (Article 7 of the CFR) and the right to the protection of personal data (Article 8 of the CFR). However, the IA claims that existing safeguards should limit any potential negative impacts the two sub-options could have (IA, pp. 40-42).

Options envisaging biometric data of minors – according to the Commission, the one-off costs would be higher for option 2.2 (taking fingerprints of all children) than for option 2.1 (lowering the

fingerprinting age to six) (IA, p. 42). The IA emphasises that taking fingerprints of children under 12 would support authorities in detecting identity fraud. Both options would satisfy the VIS objectives. However, a 2013 [JRC study](#) on fingerprints concluded that the reliability of fingerprints is lower for children under six and satisfactory for children aged six-12 (IA, p. 42 and p. 34).

The IA regards options 2.1 and 2.2 as having a positive impact on the protection of fundamental rights overall. Fingerprints would assist in protecting children against trafficking and in identifying children that have gone missing, have been abducted or have become victims of human traffickers. Both options would also have an impact on the right to human dignity and privacy, and to personal data protection. In the Commission's view, fingerprints are the only means to unambiguously identify a child and to better prevent child-related abuses using visas. The IA states that the processing of children's fingerprint data would be subjected to strict safeguards (IA, p. 44).¹¹

It would have been welcome if the Commission had given a more detailed account of these safeguards in the IA, given that, as highlighted by the [EU Agency for Fundamental Rights](#) (FRA), children's best interests must be a primary consideration for all actions concerning them. In his [opinion 07/2016](#), the European Data Protection Supervisor (EDPS) recommended making a detailed assessment of the situation of minors and striking a balance between the risks and harms involved in fingerprinting minors, and the advantages this procedure would bring.

Options envisaging long-stay visas and residence documents – the IA refers to a 2017 Commission [feasibility study](#), which concluded that a central repository as part of the VIS would be the most adequate solution. A 2016/2017 eu-LISA study on the technical and budgetary impacts of the VIS developments estimated a one-off cost of €10-12 million for the repository (IA, p. 45). The IA states that all retained options would meet the general objectives, yet only options 3.3 and 3.4.A/3.4.B would meet the specific objectives (IA, pp. 45-46).

The IA analyses the impacts on data protection (Article 8 of the CFR). According to the IA, options 3.4.A/3.4.B would entail more risks for data protection than option 3.3, as they would rely on a central database (VIS) for storage, although a breach would be less likely if this were the case. There would be no derogation from the general data protection regime of Member States or of the VIS Regulation (IA, pp. 46-48). In the Commission's view, all retained options may have a positive impact on the right to life (Article 3 of the CFR) 'by increasing security' (IA, p. 49), while also admitting that 'the extent of the link between long-stay and residence documents fraud and the right to life of EU residents is difficult to assess'. The IA considers that the options would affect the right to privacy (Article 7 of the CFR), with option 3.4.B having the most significant negative impact. The IA states that all options would have a positive impact on the right of freedom of movement and residence (Article 45(2) of the CFR), if residence cards would be included in their scope. The IA only briefly discusses the inclusion of biometrics in option 3.4, under impacts (IA, pp. 49-52).

Options envisaging migration checks and security checks – according to the IA, a high estimate would place the investment for the central system for implementing option 4.1 (automated checks against multiple databases) at €10 million. It states that the interface and process applied to the ETIAS could be reused, thus limiting the costs and complexity for Member State integration. Options 4.1 and 4.2 (automated cross-checks and screening rules) would entail similar costs. The IA finds that the public interest of ensuring a high level of security would be positively affected by an automated data-base check (IA, pp. 52-53).

Options 4.1 and 4.2 would affect the following fundamental rights: to liberty and security (Article 6 of the CFR); to protection of personal data (Article 8 of the CFR); to non-discrimination (Article 21 of the CFR); and to an effective remedy (Article 47 of the CFR). The proposed checks against several databases would not entail collecting new data, but new processing, in particular of biometrics.¹² The Commission claims that screening rules would not entail processing of personal data, but a check against several risk indicators.¹³ This would be based on a model used in migratory- and risk assessments (IA, pp. 53-54). While the IA speaks of safeguards for non-discrimination, a more thorough analysis would have been useful in this regard.

Finally, the IA compares the options with regard to their effectiveness, efficiency, social impact and impact on fundamental rights, necessity, proportionality and coherence, in line with the [Better Regulation Guidelines](#) (IA, pp. 55-64), based on which it makes a choice of the preferred option.

Subsidiarity / proportionality

The current legal basis of the VIS are Articles 77 (2)(a) and (b), 87(2)(a) and 88(2)(a) of the Treaty on the Functioning of the European Union (TFEU). The IA states that Articles 16(2), 74, and 77(2)(c) and (d) TFEU as well as Articles 78(2) and 79(2)(c) and (d) TFEU could also be added (IA, p. 26).

According to the IA, the objectives of the revised VIS Regulation of setting-up a common system and common procedures for the exchange of visa data between Member States cannot be sufficiently achieved at Member State level. Therefore, it argues that because of the scale and impact of the action, these objectives can be better achieved at EU level. The IA points to the added value of EU action, highlighting that the problems identified are unlikely to disappear in the near future and that they are directly related to the existing VIS provisions (IA, pp. 26-27). It seems that the discussion on the necessity and proportionality of the options in section 7 of the IA could have been more extensive. The Commission considers its policy choices proportionate.¹⁴ No reasoned opinions were submitted by national parliaments by the deadline of 24 September 2018.

Budgetary or public finance implications

The Commission estimates the costs linked to the implementation of the proposal at €182 million, referring to a 2016 eu-LISA study.¹⁵ These are allocated as follows:

- €105 million to eu-LISA (indirect management);
- €45 million to the Member States, earmarked in their national programmes (shared management);
- €2 million to the European Border and Coast Guard Agency (indirect management);
- €30 million to Europol (indirect management).

In Annex 3, the IA summarises the costs and benefits of the preferred option. Savings of €3.2-€12.7 million in administrative costs could be made, as authorities would no longer be required to contact the consulates for obtaining copies of travel documents. However, at times the range of figures does appear rather broad.

SME test / competitiveness

The IA considers that the initiative would not have any direct implications for businesses (IA, pp. 78- 79). However, additional costs are expected for external service providers involved in the visa procedure (IA, p.81). It is unclear why service providers are first listed in Annex 3 under 'administrations' and subsequently under 'businesses'.

Relations with third countries

The IA admits that the initiative would have an impact on the EU's relations with third countries, especially on visa and readmission policy (IA, Annex 5, p. 88), but gives no further explanations.

Simplification and other regulatory implications

The 2016 [REFIT evaluation](#) concluded that the VIS meets its objectives and functions well (IA, p. 66). The evaluation recommended to further develop and improve the VIS, in particular the monitoring of data quality and statistics (IA, p. 10). It would have been useful if more specific information had been provided on how this initiative would ensure simplification.

Quality of data, research and analysis

The IA is built on the [VIS evaluation](#) and several external studies. These include: 1) a [study](#) on the implications of lowering the fingerprinting age of children and of storing a digital copy of the travel

document in the VIS, conducted by ECORYS, Fraunhofer IGD and Vrije Universiteit Amsterdam (Annex 7); 2) a [legal analysis](#) on extending the scope of the VIS to include data on long-stay visas and residence documents, produced by PwC (Annex 9); and 3) a [feasibility study](#) on integrated border management for persons not recorded in the Entry-Exit System (EES), conducted by PwC (Annex 8). The IA admits that several limitations were encountered in the data collection process. It states that the calculation of costs to be incurred by the different stakeholders was mostly based on a simplified estimation model related to assumptions about the amount of time it would reasonably take to perform the additional activities required to comply with the proposed changes (IA, p. 69). According to the IA, the extrapolations and assumptions used were referred to in the supporting studies; it makes such a reference in its own text (IA, p. 85). Some costs and benefits have been quantified (Annexes 3 and 5).

Stakeholder consultation

The Commission made efforts to consult widely for this IA. Two open online public consultations were conducted, one on [lowering the fingerprinting age for minors in the visa procedure](#) (17 August 2017 to 9 November 2017) and another one on [extending the scope of the VIS to include data on long-stay visas and residence documents](#) (17 November 2017 to 9 February 2018). However, both consultations attracted little response. The Commission carried out interviews with the FRA; the EDPS; eu-LISA and the VIS Advisory Working Groups; Europol; Frontex; Missing Children; and eight Schengen states. It also conducted field trips to four non-EU countries (IA, Annex 2). In his [response](#) to the Commission public consultation on lowering the fingerprinting age, the EDPS raised several concerns. He recommended that taking children's fingerprints should not be seen as serving to incriminate them, since below a certain age children could not represent any meaningful threat. The Commission did not explain how the FRA was consulted for this initiative; nor does the IA consistently indicate which stakeholder group supports which specific option.

Monitoring and evaluation

Four years after the entry into force of the revised VIS Regulation and every four years thereafter, the Commission plans to submit an evaluation on it. In Annex 6 of the IA, the specific objectives are linked to key performance indicators, though not all seem to have been taken over in the proposal. Unlike what is stated in the IA, no operational objectives were identified (IA, p. 67).

Commission Regulatory Scrutiny Board

The Commission's Regulatory Scrutiny Board (RSB) first issued a [negative opinion](#) on 4 April 2017, stating that 1) problems 1 to 3 did not fully substantiate the choice of options; 2) the baseline did not incorporate the existing framework for fundamental rights' protection, nor were additional safeguards developed; 3) the scoring of the options was not fully coherent. Subsequently, the RSB delivered a [positive opinion](#), in which it stated that 1) the evidence provided in the IA still does not sufficiently support limiting the fingerprinting of children to the age of six and above; 2) the IA should clarify how the numerous additions of information and data-sharing in this VIS proposal are compatible with the objective of simplifying the visa code proposal; and that 3) the IA should clarify the practical feasibility of the available solutions. Some of the RSB's comments still appear valid, yet the IA does not explain how they were addressed, despite this being required by the Guidelines.

Coherence between the Commission's legislative proposal and IA

Overall, the Commission's legislative proposal appears to match the IA's preferred option.

Conclusions

This initiative follows other proposals aiming to enhance security and tackle irregular migration. Several stakeholders were consulted and a number of external studies were used. The IA seems to be transparent about the limitations experienced with regard to the availability of data. However, the problem descriptions are not always clear (problem 4 on migration and security risks) or

convincing (problem 2 on the lack of fingerprinting of minors). Also, considering the partly highly sensitive issues at hand, such as the fingerprinting of minors, the safeguards for fundamental rights protection in cases of errors (e.g. false positives) or abuse could have been explained more thoroughly. Finally, the inclusion of biometrics of long-stay travellers in option 3.4B (preferred option) would have deserved more explanation and a thorough analysis.

ENDNOTES

¹ See also the Commission's [inception impact assessment](#) of March 2017.

² See A. Scherrer, [Revision of the Visa Code and Visa Information System](#), EPRS, March 2018.

³ C. Dumbrava, [Interoperability of European information systems for border management and security](#), EPRS, June 2017; for analyses on the accompanying IAs, see K. Eisele, [Interoperability between EU information systems for security, border and migration management](#), EPRS, February 2018; K. Eisele, [Revision of the visa code](#), EPRS, April 2018.

⁴ According to International Civil Aviation Organization (ICAO) standards, the bio data page is where the issuing state or organisation enters personal data relating to the holder of the document as well as data concerning the issuance and validity of the machine-readable travel document.

⁵ The IA states that the number of irregular migrants in the EU expected to return to their home country has grown considerably. In the six-year period covering 2011-2016, 2 891 260 persons were ordered to leave, of whom 1 118 385 were returned to third countries. This means that 1 772 875 persons were not returned, of whom 600 925 in 2015-2016 alone. According to the Commission, the majority of these persons remain on EU territory (IA, p. 12).

⁶ Return proceedings may be delayed by two days during the low season, and up to two weeks during busier periods; stakeholders consulted in the supporting Ecorys study say this brings further annual costs of up to €12.7 million (IA, p. 14).

⁷ See I. van der Ploeg and I. Sprenkels, *Migration and the Machine-Readable Body: Identification and Biometrics*, in: *Migration and the New Technological Borders of Europe* (eds. Dijstelbloem and Meijer), Palgrave Macmillan, 2011, p. 68).

⁸ See [Tool #16](#) of the Better Regulation Toolbox on 'How to set objectives', pp. 100-101.

⁹ The IA states that 'in the absence of further action at EU level, the proportion of visa overstayers in 2019 will increase to more than 350 000, between 30 000 to 60 000 of which will find themselves in return proceedings without valid travel documents' (IA, p. 25, referring to the 2017 [ECORYS study](#)).

¹⁰ See [Statewatch analysis](#) of 20 August 2018; the suggestion comes originally from the commissioned [legal analysis](#), p. 90.

¹¹ According to the Commission, these strict safeguards already exist for the processing of biometric data of TCN visa applicants above the age of 12 (IA, p. 44).

¹² See also European Data Protection Supervisor, [Reflection paper on the interoperability of information systems in the area of Freedom, Security and Justice](#), 17 November 2017, p. 9.

¹³ The Fundamental Rights Guidance Board established by the ETIAS Regulation would define these indicators (IA, p. 54).

¹⁴ See also the explanatory memorandum to the proposal, p. 13.

¹⁵ See also the explanatory memorandum to the proposal, pp. 14-15.

This briefing, prepared for the Committee on Civil Liberties, Justice and Home Affairs (LIBE), analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

DISCLAIMER AND COPYRIGHT

This document is prepared for, and addressed to, the Members and staff of the European Parliament as background material to assist them in their parliamentary work. The content of the document is the sole responsibility of its author(s) and any opinions expressed herein should not be taken to represent an official position of the Parliament.

Reproduction and translation for non-commercial purposes are authorised, provided the source is acknowledged and the European Parliament is given prior notice and sent a copy.

© European Union, 2018.

eprs@ep.europa.eu (contact)

www.eprs.ep.parl.union.eu (intranet)

www.europarl.europa.eu/thinktank (internet)

<http://epthinktank.eu> (blog)

