

Recasting the Single Permit Directive for third-country nationals

Impact assessment (SWD(2022) 656, SWD(2022) 655 (summary)) accompanying a Commission proposal for a directive of the European Parliament and of the Council on a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for third-country workers legally residing in a Member State (recast) – COM(2022) 655

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 27 April 2022 and referred to the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE). [Directive 2011/98/EU](#) (the 'Single Permit Directive') established a single application procedure for a combined work and residence permit, and a common set of rights for third-country (non-EU) workers. The proposal is part of a broader initiative, with which the Commission aims to overhaul the EU's acquis on legal migration (the 'skills and talent [package](#)'), as announced in its 2020 [new pact on migration and asylum](#). It builds on the Commission's 2019 [fitness check](#) on the EU's overall legislative framework on legal migration.

In 2021, the European Parliament adopted two resolutions: a [resolution](#) of 20 May 2021, in which it called for a comprehensive harmonised legal framework on legal migration and welcomed a review of the Single Permit Directive, suggesting an expansion of its scope; and a more recent [resolution](#) of 25 November 2021, in which it asked for the proper implementation of the Single Permit Directive, and for further harmonisation and simplification of its rules, including promoting its equal treatment provisions.¹ The revision of the Single Permit Directive is included in the 2021 [Commission work programme](#) under the regulatory fitness and performance programme (REFIT).² In parallel, the Commission has published a recast [proposal](#) for [Directive 2003/109/EC](#) (the 'Long-Term Residents Directive'); this proposal is complementary to the present initiative in that it aims to facilitate the acquisition of EU long-term resident status for third-country nationals (TCNs), including workers, who have settled down in the EU, and to improve their rights.

Problem definition

In defining the problem, the IA builds on the Commission's 2019 [report](#) on the implementation of the Single Permit Directive, fitness check, and consultations. The report identifies three problem areas relating to the Single Permit Directive (IA, p. 7):

- 1 Complex and inefficient application procedures and unclear rights resulting from a fragmented implementation decrease EU attractiveness for TCNs (non-EU nationals)

While the current directive established a single application procedure for work and residence permits, the fitness check found that in practice, procedures have often remained complicated. According to the IA, most Member States did not allow TCNs to lodge applications and receive permits on the territory of a third country. Moreover, some Member States required TCNs already residing legally to first leave their territory, to then apply for a single permit (IA, p. 9).



Where the application could only be lodged on the territory of a Member State (meaning that applicants first have to obtain an entry visa), the time required to apply for an entry visa sometimes extends considerably the overall procedure (deadlines for issuing visas vary between 15 and 90 days; some Member States do not have deadlines). Moreover, complaints have suggested that a TCN can be refused an entry visa despite meeting the conditions for obtaining a single permit, although no specific data is provided in this regard (IA, pp. 9-10).

Some Member States required applicants to submit the same documentation to obtain a single permit twice, once for the visa and the single permit, respectively. During the stakeholder consultation, migrants' representatives underscored the need to digitalise the application process. Furthermore, the IA finds that rules on labour market tests³ vary across Member States and prolong the procedure excessively. The IA also finds that applicants (and the general public) are insufficiently informed of their rights to equal treatment and of procedures (IA, pp. 10-12).

2 Lack of EU-level coverage of certain migrant categories; differing admission conditions for low- and medium-skilled TCNs

The Single Permit Directive is not clearly aligned with other EU instruments covering, for example, seasonal workers and intra-corporate transferees. Moreover, it is not clear if the exclusion of workers posted from third countries refers only to TCNs that have been posted from one Member State to another or also to those posted from a third country. This causes a lack of clarity for employers regarding the applicable legal regime and related rights (IA, p. 15).

Other categories, including self-employed TCNs and beneficiaries of protection according to national law, are currently excluded from the scope of the directive. Moreover, low- and medium-skilled TCNs are not covered by the EU legal migration framework, with the exception of seasonal workers under [Directive 2014/36/EU](#). The IA claims that, as a result, prospective migrants are deterred by diverging rules across Member States, reflecting the lack of a 'level playing field' in attracting such migrants. The IA, however, does not underpin the claim relating to this deterrent effect (IA, p. 16).

3 Insufficient protection of third-country workers from exploitation

The IA finds two main reasons limiting the protection of third-country workers from exploitation. First, linking the single permit to a specific employer creates dependencies and would pull TCNs into irregularity. It would also give rise to administrative burden when changing employer. Second, the sanctions applying to workforce exploitation differ considerably across Member States ([Directive 2009/52/EC](#), the 'Employers Sanctions Directive', is limited to irregular third-country workers⁴). According to the IA, quantifying the scale of the problem is challenging on account of underreporting, lack of a common definition of 'labour exploitation', and lack of data. The IA merely reports the number of victims of 'modern slavery' in the EU in 2016 (684 000) (IA, pp. 20-21). It appears the IA takes a narrow definition of what exploitation might be. Low wages could amount to labour exploitation (see also definition in Article 2(i) of Directive 2009/52/EC).

According to [Eurostat](#), only 2.7 million TCNs held an EU single permit in 2020. This is a small group compared with the 23.7 million TCNs living in the EU in 2021. Member States thus seem to have prioritised national migration schemes.⁵ However, this aspect has not been explicitly identified as a problem. The IA demonstrates convincingly that the fragmented implementation of the directive, which has led to complex procedures and unclear rights, is a regulatory failure that needs to be addressed. The Commission makes an effort to substantiate the problems with relevant data and evidence for the most part.

The IA clearly identifies the stakeholders affected, namely TCNs, countries of origin, EU employers, Member States' national, regional and local authorities, and indirectly also EU citizens because of skills shortages and demographic ageing (see Annex 3).

Subsidiarity / proportionality

The IA identifies as legal basis for EU action Article 79(2)(a) and (b) in connection with Article 79(1) of the Treaty on the Functioning of the EU (TFEU). The EU shares the competence over legal migration with the Member States. Article 79(5) TFEU lays down the Member States' prerogative to determine the number of non-EU nationals coming from third countries they admit for employment purposes. As regards the **necessity of EU action**, the IA links the need for a common EU framework on legal immigration to the abolition of border controls within the EU (IA, p. 23).

The framework's **EU added value** was affirmed in the fitness check, in which all stakeholders found the EU legal migration *acquis* to be overall beneficial. However, the IA also cites the fitness check as **requiring further EU action** to address the problems identified. The IA explains that the revision of the directive is not meant to encroach on Member State competence to define workers' rights, but rather to ensure workers' equal treatment. By enhancing protection from labour exploitation, the revision is also expected to level the playing field among Member States (IA, pp. 23-24). The IA considers the preferred option **proportional**, as its measures were limited to aspects that the Member States could not achieve satisfactorily on their own. The administrative burden on national authorities is deemed proportionate in view of the expected improvements (IA, p. 50). No reasoned opinions from national parliaments seem to have been submitted.

Objectives of the initiative

The initiative's **general objectives** are three-fold (IA, p. 25):

- to ensure efficient management of migration;
- to foster competitiveness and growth in the EU;
- to ensure fair treatment and protection of TCNs legally residing in the EU.

The IA defines five **specific policy objectives**, which correspond to the problem areas above:

- to simplify admission procedures;
- to ensure greater efficiency of application procedures;
- to address EU labour shortages;
- to enhance equal treatment of TCNs with EU citizens;
- to protect third-country national workers from labour exploitation.

The IA does not specify operational objectives defining concrete deliverables of policy actions, nor does it set a specific timeline for the achievement of these objectives. Thus, the objectives do not fully comply with the S.M.A.R.T. requirements set out in the [Better Regulation Toolbox](#).

Range of options considered

Under the **baseline scenario**, the Single Permit Directive would continue to apply, with monitoring and enforcement activities (IA, p. 25). While taking into account the proposed [revision](#) of the Long-Term Residents Directive, the baseline expects the effects of this revision to remain limited vis-à-vis (potential) single permit holders. The IA expects the problems identified to persist without further EU action. Citing two studies projecting future immigration to the EU, the IA assumes a linear increase, with the number of single permits issued over a 10-year period doubling under the baseline scenario (from 523 647 in 2020 to 1 217 424 in 2030, see IA, pp. 27 and 79). The IA considers **three policy options**:

1) Option 1: Non-legislative option

Option 1 envisages several **non-legislative measures** designed to enhance implementation:

- comparative analyses and targeted studies on specific implementation aspects;
- non-binding guidelines on the interpretation of the provisions of the directive;
- recommendations on aspects not currently covered by the Single Permit Directive or on provisions leaving wide discretion to Member States;

- promoting innovative approaches, e.g. the digitalisation and streamlining of processes;
- evaluating stakeholders' experiences with the enforcement of the directive;
- enforcement activities, including infringement proceedings (IA, p. 27).

2) Option 2: Basic legislative revision of the Single Permit Directive

Option 2 includes measures relating to the application procedure and the directive's personal scope, as well as soft-law measures to improve and harmonise implementation of equal treatment rights. For the **application procedure**, it envisages the following simplifications:

- Allowing applications from both outside and within each Member State's territory, 'depending on the circumstances', and clarifying that the initial entry visa should be issued if all conditions for the single permit are fulfilled;
- Specifying that only one substantive check of documents be made, either at the stage of applying for the entry visa or the residence permit, and that the visa procedure falls within the 4-month period for processing single permit applications;
- Modifying Article 1(2) to clarify that the labour market test is a component of the single application procedure and thus falls within the 4-month period;
- Mandating the provision of adequate information by Member States.

Regarding the **personal scope of the directive**, option 2 envisages the following measures:

- further clarifying the categories not covered by referring to the relevant *acquis*;
- including beneficiaries of protection according to national law in the scope (IA, p. 28).

3) Option 3: Basic legislative revision and regulating rights and protection

In addition to the measures of option 2, option 3 envisages enhanced equal treatment rights and better protection from labour exploitation. On **equal treatment rights**, option 3 would:

- ensure that the single permit is not linked to one specific employer, and that TCNs may continue to work during the re-application process if they change employer (Article 11(c));
- clarify Article 12(2)(d) to stipulate that access to private housing is not included in the derogation provided for by this article;
- clarify the equal right of TCNs to family benefits for family members residing outside the EU, in so far as EU nationals enjoy this right;⁶
- prevent Member States from excluding those working on a visa exceeding 6 months from family benefits (IA, pp. 28-29).

Regarding **labour exploitation**, option 3 would add rules on inspections, monitoring and sanctions against exploitative employers. **The Commission prefers option 3** (IA, p. 51).

The legislative measures taken up in options 2 and 3 are well-defined and sufficiently specific. However, the two options are largely cumulative, and it is questionable whether such options qualify as 'alternative options', as stipulated in the Commission's [Better Regulation Guidelines](#). Moreover, **option 3 is the only option that addresses the problems of regulating rights and protection from labour exploitation** (identified under the third problem area). This issue is covered neither by option 1 nor option 2. Moreover, it appears that none of the options specifically envisages measures to raise awareness of the EU single permit, even though lack of information on the single permit was identified as a sub-problem. Finally, given that the fitness check assessed the EU's fragmented approach to be a shortcoming in the EU framework, the Commission could have considered an option that envisages a codification of the EU legal migration *acquis* – or could at least have explained why this was not envisaged from the start. The [European Parliament](#) reiterated its call for respecting the Treaty obligation of developing a common immigration policy in 2021.

The IA **discarded two options at an earlier stage**: i) extending the scope of the directive to **self-employed TCNs**; and ii) defining **admission criteria for low- to medium-skilled TCNs** (IA, pp. 29-31). The first option was discarded because Member States expressed concern about finding

a workable definition of self-employed workers, and on account of the risk of exploitative mixed forms of self-employment. Some experts and representatives of civil society, business organisations and trade unions had supported the option of including self-employed TCNs, and both the [European Parliament](#) and the fitness check criticised the lack of EU rules in this field. The IA states that a 'more in-depth assessment' on this aspect was needed, but does not explain why such an assessment had not been carried out (IA, p. 30). The second option was discarded because of 'complexities' of a diverse regulatory landscape across Member States. However, the IA could have explained in greater detail why these complexities stand in the way of EU-level legislation and would not, on the contrary, demand harmonisation (as suggested by the fitness check, p. 99). Stakeholders cited by the IA appear to be of mixed opinions. Thus, the retained options proposed by the Commission only respond partially to the problems identified under problem area 2 regarding the lack of EU-level coverage of certain migrant categories.

Assessment of impacts

The Commission analysed the three retained options in view of their **economic, social, and fundamental rights impacts**. No significant environmental impacts are expected (IA, p. 31). The Commission analysed the selected impacts qualitatively, and, 'where possible', quantitatively. The assumptions underlying the quantitative analyses are detailed in Annexes 3 and 4. The IA considers the impacts on different affected groups (see also Annex 5 for a more detailed assessment).

The IA does not expect option 1 to entail significant **economic impacts**.⁷ For option 2, assuming a 2.5 % increase in permits issued, the IA assesses the potential economic impacts over 10 years. Providing an 'illustrative example', the IA estimates a **total economic benefit of around €9.1 billion for option 2** (IA, p. 39). For option 3, assuming a 5 % increase in permits issued, the IA assesses the potential economic impacts over 10 years. This results in a **total economic benefit of around €18.3 billion for option 3**. Measures aiming to prevent labour exploitation are expected to reduce downward pressure on wages, benefiting wider workforces. Only marginal economic benefits are expected from reinforcing equal treatment provisions (IA, p. 45). Remittances⁸ are expected to increase. According to the IA, other economic impacts, for instance on gross domestic product (GDP) growth and productivity, could not be quantified (IA, p. 40). Options 1 to 3 would all entail a positive **social impact** on TCNs (to a greater extent under options 2 and 3, and to a lesser extent under option 1), in particular by simplifying admission procedures, reducing legal uncertainty, and strengthening equal treatment. Options 2 and 3 would have a very favourable impact on TCNs and employers, since they aim to streamline the procedure and increase protection from labour exploitation.

According to the IA, options 1 to 3 would have a positive **impact on fundamental rights**, with option 3 having a much stronger impact compared with option 2. Relevant fundamental rights, as enshrined in the EU Charter of Fundamental Rights, include the prohibition of slavery and forced labour (Article 5), the right to property (Article 17), equality (Article 20), non-discrimination (Article 21), family and professional life (Article 33), and social security and social assistance (Article 34). It is unclear why Article 15(3) of the EU Charter on equivalent working conditions is not listed.

The IA expects **impacts on third countries**, such as the loss of human capital and labour ('brain drain'), to be limited, as 'simplification and harmonisation alone may not be a key driver' (IA, p. 38). It is not clear how this ties in with the Commission's claim that the same measures will boost the influx of human capital into the EU. It is regrettable that the IA does not expand on this. A more in-depth assessment of impacts on third countries, especially on developing countries, would have been warranted, given the inter-linkages between EU migration and development policies (as acknowledged in the fitness check, p. 59).

The options were also qualitatively assessed as to their **effectiveness and efficiency in reaching the objectives**, and in terms of their **coherence** with the overall EU legislative framework. **Option 1**

would entail some improvements, but its overall impact is expected to be limited (IA, pp. 33-34). **Option 2** is expected to be more effective in simplifying admission procedures (IA, pp. 36-37), notably by ensuring that TCNs can apply from both within and outside the EU, by clarifying that procedures relating to entry visas and labour market tests fall within the 4-month period, and by mandating Member States to provide adequate information. **Option 3** is considered to be highly effective in reaching the objectives (IA, pp. 41-43). The legislative measures seeking to enhance equal treatment and improve the protection of TCNs from labour exploitation are expected to bring more legal certainty and tangible results.

As regards efficiency, the IA expects that **administrative compliance costs** will be incurred if Member States implement the recommendations under **option 1**, and that costs will be incurred in implementing several activities (studies, meetings) at EU level, without quantifying them (IA, p. 35). The streamlining of procedures under **options 2 and 3** would result in cost savings for employers, TCNs and national authorities. The IA expects **option 2** to impose on national authorities administrative costs of about €2.2 million to €4.9 million (one-off), and an annual amount of €200 000 to €400 000. Annual administrative cost savings are estimated to range between €200 000 and €3.6 million for national authorities, between €129.4 and €545.7 million for TCNs, and between €31.7 and €101 million for employers (IA, p. 40). Some of the ranges provided are rather wide.

The IA expects preferred **option 3** to cost national authorities an estimated €1.9 to €7 million (one-off), and an annual amount of €100 000 to €12.4 million. Annual administrative cost savings are expected to range from €200 000 to €3.6 million for national authorities, from €89.0 to €545.7 million for TCNs, and from €22.2 to €101 million for employers (IA, p. 46). According to the IA, this is because certain cost items (such as transposition or monitoring costs) were duplicated across policy measures and could therefore not simply be aggregated (IA, p. 83). A split-up of costs by measure is presented (see table on costs and benefits, IA, pp. 74-76).

SMEs/ Competitiveness

The IA states repeatedly that 'any simplifications in the application process are expected to benefit SMEs given the reduction of their disproportional administrative burden' (IA, p. 54). It is unclear why the Commission did not provide a more detailed analysis regarding the impacts on SMEs. The initiative aims to foster EU competitiveness; the IA has taken this aspect into account in more general terms by emphasising the need to attract international skills and talent.

Simplification and other regulatory implications

The initiative aims to streamline and simplify the single application procedure. It forms part of the REFIT programme (see table on REFIT cost savings, IA, pp. 53-54). The IA includes a dedicated section on the 'one in, one out' approach (IA, Section 8.2., pp. 54-55). The IA indicates the expected impacts of the preferred option on EU businesses and citizens.

Monitoring and evaluation

For the implementation stage, the IA envisages: i) meetings with the EU-25⁹ to clarify transposition issues; ii) a conformity assessment of the transposition in the EU-25; and iii) a report evaluating the directive two or three years after its transposition into national law (IA, p. 56). The IA plans for the directive to be monitored against the specific objectives using several indicators. For the most part, the proposed indicators appear to be sufficiently specific and measurable so as to assess progress in attaining the directive's objectives. The IA could also have listed the number of applications as an indicator.

Stakeholder consultation

Stakeholder views and opinions are generally well integrated and represented in a balanced manner throughout the IA, in particular in the problem definition and, to a lesser extent, in the assessment of impacts. Where appropriate, they are broken down by type of stakeholder. Annex 2 provides a

synopsis report of the stakeholder consultations. The Commission's consultation strategy comprised two broader, open public consultations on legal migration conducted in [2019](#) and [2020](#); eight targeted consultation meetings on this specific initiative in 2021; and ad-hoc queries to the [European migration network](#). In so far as stakeholders' opinions on the policy options are represented in the synopsis report, they predominantly support the measures reflected in the preferred option (IA, pp. 65-69). However, as pointed out above, views varied regarding the two discarded options (IA, p. 67).

Supporting data and analytical methods used

The IA was supported by an external study by [ICE](#)¹⁰ however, the study was not publicly available at the time of writing this document, which goes against the transparency requirements set out in the Better Regulation Guidelines. The IA is also based on the results of the [fitness check](#) on legal migration, the Single Permit Directive [implementation report](#) mentioned previously, and stakeholder consultations. According to the Commission, being of a more general nature, the data collected through the consultations were supplemented with representative data on costs provided by certain Member States and stakeholders (IA, p. 60). The IA nevertheless reports data limitations. Furthermore, while the IA uses a wide range of studies, reports and articles, it fails to refer to a 2021 EPRS European added value [assessment](#), which could have provided further input for assessing impacts.¹¹

Annex 4 details the analytical methods and assumptions used for the quantification of costs and impacts. A standard cost model was used to itemise and, where possible, quantify relevant costs for each measure. Economic impacts are presented by means of 'illustrative examples', based on the assumption that the number of single permit holders will increase at the level of 2.5 % for option 2 (5 % for option 3) (IA, pp. 77 and 84). The IA further assumes that the integration of TCNs is successful, and that they would almost exclusively take up roles that could not be filled with EU nationals (IA, pp. 39 and 84).

According to the IA, the link between increased migration and economic benefits was derived from, among other literature, a 2021 International Monetary Fund [report](#) (IA, p. 84). The IA admits difficulties in quantifying the options' economic impacts, 'given the magnitude of uncertainty and complexity of factors intervening at different levels' (IA, p. 84).

Follow-up to the opinion of the Commission Regulatory Scrutiny Board

On 25 October 2021, the Commission's Regulatory Scrutiny Board (RSB) issued a positive [opinion](#) with reservations on the draft IA report, indicating 'significant shortcomings'. The RSB raised three main concerns: i) the report was not sufficiently clear on the initiative's narrow scope, considering the results of the fitness check; ii) the options were not appropriately structured or linked to the problems identified, so that no real alternative solutions were presented; and iii) the impacts on domestic labour markets and administrative systems were not analysed in sufficient detail.

The RSB recommended discarding 'the issues and measures related to self-employed and to mid- and low-skilled workers' from the outset, so that the options 'could be structured around the key thematic areas of the Directive, rather than around policy-delivery instruments'. However, it is not clear what the RSB means by that. Without having access to the draft IA report and background, it is unclear why the RSB made these specific recommendations. It appears that the RSB's comments have mostly been addressed, barring that on presenting 'real alternative options' (see Annex 1 on how the RSB comments were addressed, IA, pp. 58-60).

Coherence between the Commission's legislative proposal and IA

The proposal seems to correspond largely to the IA's preferred option. It appears that the monitoring indicators have only been taken over partly in the proposal.

The IA demonstrates convincingly that the directive's fragmented implementation, which has led to complex procedures and unclear rights, is a regulatory failure that needs addressing. However, the problem definition fails to state explicitly that Member States seem to have prioritised national migration schemes over the EU single permit. Moreover, there is no 'real' range of options: the preferred option 3 (out of three options in addition to the baseline) is the only one that addresses the problems of regulating rights and of protection from labour exploitation. The IA could have done more to justify why two options were discarded from the outset (one of them relating to low-to medium-skilled TCNs, an issue on which the European Parliament has been calling for EU-level action, and on which stakeholders had mixed views). The IA assessed the economic, social, and fundamental rights impacts, as well as impacts on third countries. However, a more in-depth assessment of impacts on third countries (which the IA considered limited), in particular on developing countries, would have been warranted, given the inter-linkages between EU migration and development policies. Stakeholder views are integrated in a balanced manner in the IA. The Commission could have provided a more detailed analysis regarding the impacts on SMEs.

ENDNOTES

- ¹ In particular, paragraphs 10 and 11 and recommendations 5 and 6. See also C. Navarra and M. Fernandes, [Legal Migration Policy and Law](#), European added value assessment, EPRS, European Parliament, September 2021.
- ² H. Ahamad Madatali, [Single permit for third-country nationals to reside and work in the EU – Directive 2011/98/EU](#), implementation appraisal, EPRS, European Parliament, April 2022.
- ³ Labour market tests aims to ensure that migrant workers are only admitted after employers have unsuccessfully searched for national workers, EU citizens or legally residing TCNs with access to the labour market.
- ⁴ See recommendation 8 of Parliament's [resolution](#) of 25 November 2021.
- ⁵ See T. de Lange, [Recasting the Single Permit Directive: furthering the protection of migrants at work in the EU?](#), EU Immigration and Asylum Law and Policy blog, 13 July 2022.
- ⁶ See, in this regard, Court of Justice of the EU judgment in Case C-328/20 of 16 June 2022 ([press release](#)).
- ⁷ The IA considered as economic impacts: tax revenue, consumption, additional earnings, remittances, job vacancies and productivity (IA, p. 39).
- ⁸ A financial transfer from a migrant to a beneficiary or beneficiaries in the migrant's country of origin (see EMN asylum and migration [glossary](#)).
- ⁹ Denmark and Ireland opted out from adopting the directive.
- ¹⁰ The study was published on the EU Publications Office [website](#) at the beginning of October 2022.
- ¹¹ The EPRS assessment estimates the promotion of equal treatment for all migrants. The results could have been used, or at least cited (see policy option 4b – productivity, human capital and GDP increase (0.14 %) or €19.5 billion per year).

This briefing, prepared for the European Parliament's Civil Liberties, Justice and Home Affairs (LIBE) committee, 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, 2022.

eprs@ep.europa.eu (contact)

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

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

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