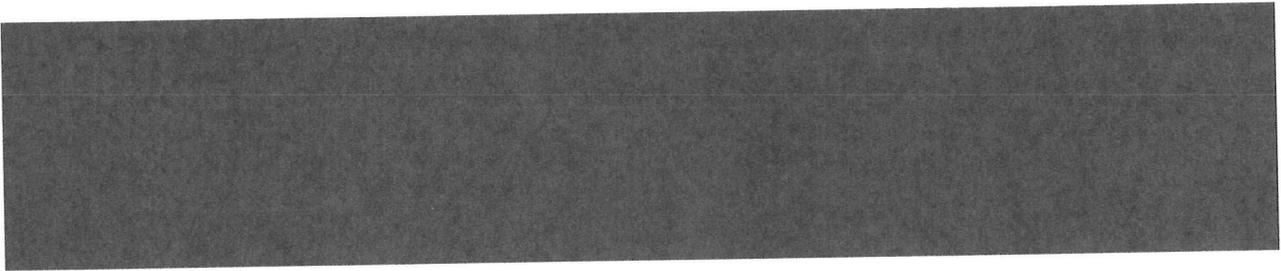




FRO is deemed to provide an assessment and follow up the information received on the SIRs provided by the Agency and Member States.

#### Serious Incidents Reporting (SIR)

During the reporting period, one SIR related to fundamental rights issues was received by the FRO.



The case is pending. Furthermore, FRO has devoted time to update pending SIRs and to conduct internal coordination in relation to this matter.

#### OPLANS & FRO Observations

Under Article 109(2)(e) of the EBCG Regulation, FRO shall provide opinions on the operational plans.

##### a) OPLANS received:

- OPLAN JO FPs 2020
- OPLAN JO Coordination Points 2020 Air
- OPLAN JO FOA LAND 2020
- OPLAN JO FOA WB-ALB 2020
- OPLAN JO THEMIS 2020
- OPLAN JO POSEIDON 2020
- Rolling OPLAN 2020 for return operations
- Frontex Operational Activity plan for Return (FOA-R) 2020
- OPLAN JO Coordination Points 2020 Land

##### b) Observations by FRO provided to OPLANS for 2020 operational activities:

- Frontex Operational Activity plan for Return (FOA-R) 2020 - FRO comments submitted on 29.11.2019
- OPLAN JO FPs 2020 - FRO comments submitted on 20.12.2019
- Rolling OPLAN 2020 for return operations - FRO comments submitted on 9.01.2020
- OPLAN JO Coordination Points 2020 Air - FRO comments submitted on 16.01.2020
- OPLAN JO FOA LAND 2020 - FRO comments submitted on 16.01.2020
- OPLAN JO FOA WB-ALB 2020 - FRO comments submitted on 17.01.2020
- OPLAN JO THEMIS 2020 - FRO observations submitted on 22.01.2020
- OPLAN JO POSEIDON 2020 - FRO observations submitted on 27.01.2020
- OPLAN JO Coordination Points 2020 Land - FRO comments submitted on 21.02.2020

Following Article 38(3), these should include:

- A description of tasks, including those requiring executive powers, and responsibilities including with regard to respect for FR.
- A reporting and evaluation scheme containing benchmarks for the evaluation report, including with regard to the protection of fundamental rights.
- General instructions on how to ensure the safeguarding of fundamental rights during the operational activity of the Agency.
- Procedures whereby persons in need of international protection, victims of trafficking in human beings, unaccompanied minors and persons in vulnerable situation are directed to the competent national authorities for appropriate assistance.
- Procedures setting out a mechanism to receive and transmit to the Agency a complaint against all persons participating in a joint operation or rapid border operation.

In order to ensure the operational plans contain the fundamental rights safeguards as required by the EBCG Regulation, FRO proposed draft instructions on how to ensure the safeguarding of fundamental rights during the operational activity including complaints mechanism. The FR guidelines cover EBCG obligations as regards the protection of fundamental rights, tasks and responsibilities of the deployed officers, specific FR safeguards on TC (Third Countries) observers, references to Fundamental Rights Monitors, access to asylum and vulnerable groups.

The cooperation with neighbouring TC should be undertaken in full alignment with fundamental rights. In the context of the Poseidon and Themis maritime operations, FRO expressed the need to enhance the quality and comprehensiveness of the assessments of the situation in third countries, content and methodology, to be followed by the Member States as well as by the Agency. FRO repeatedly calls for regular updates and use of a wide range of sources to ensure that the information collected to assess the situation serves the purpose of preventing violations of the principle of non-refoulement.

The national referral procedures shall be known and available for the deployed officers in the operational plan or annexed to the operational plan, as foreseen in Art 38.4, and not a mere separate document uploaded to FOSS. In January, FRO followed up on the Questionnaire on referrals previously shared with Member States (MS) in order to update relevant information for the 2020 operational cycle.

Recommendations and/or follow-up:

- To monitor implementation of the Operational Plans (OPLANs), including with regard to the instructions on how to ensure the safeguarding of fundamental rights during the operational activity including complaints mechanism.
- Update the referral related information and annex it to the OPLANs.
- To enhance general assessment of fundamental rights situation in the TC.

#### FERs & FRO Observations

Pursuant to Article 47 of the EBCG Regulation, the Executive Director shall transmit detailed evaluation reports within 60 days following the end of the Agency's operational activities to the Management Board, together with the observations of the FRO. During the reporting period, the FRO has received and provided opinions on the following:

- a) **FER JOs received:**
  - FER JO Alexis 2019
  - FER JO Minerva 2019
  - FER JO Coordination Points 2019 Land
  - FER JO Coordination Points 2019 Air
- b) **Observations by FRO provided to Evaluations of JOs**
  - FER JO Alexis 2019 - FRO observations submitted on 23.01.2020
  - FER JO Minerva 2019 - FRO observations submitted on 31.01.2020
  - FER JO Coordination Points 2019 Land - FRO observations submitted on 17.02.2020

Lack of information on referrals activated by the deployed officers related to victims of THB, children, persons in need of international protection and other persons in a vulnerable situation as well as sex/gender and age disaggregated data of migratory flows in the Agency's operational areas remain issues of concern. Inclusion of the relevant indicators in the Agency data collection for these matters, as expressed in the Regulation, would allow to assess impact on fundamental rights of the operation based on comprehensive data collection and could enable Frontex Operations to better deploy specialised officers to the area's where most of the vulnerable persons arrive. Discussions on how to include these aspects in the operational ICT tools between FRO and SAM/JORA are ongoing.

Although FR components within operations is part of the operational briefings, the FRO still perceives instances during field visits of lack of awareness among the deployed officers on FR related obligations, including identification and referral of vulnerable persons, difference between serious incident on possible FR violations and complaints mechanism, etc.

Recommendations and/or follow-up:

- To better operationalize FR related information in the operational briefings - new video on FR issues for the deployed officers to be developed by FRO and Communications;
- To enhance data collection and reporting with further gender, age disaggregated, vulnerabilities, in a comprehensive and systematic manner to allow FR impact analysis;
- To ensure briefing and raise awareness of the deployed officers on referral mechanism and vulnerable persons, THB, child protection, gender issues; FRO/FRMs to support.

#### Supervisory mechanism to monitor the use of force (Article 55(5)(a))

To date, FRO has not received information or documents for consultation in this regard.

#### Other support to Frontex operational activities

During the reporting period, FRO and the Team delivered presentations on fundamental rights as part of operational briefings for:

- JO Focal Points 2020 - LAND BCP, JO Coordination Points 2020 Land/Sea General Briefing, 15 January 2020;
- General Briefing for Air Border Joint Operations, 22 January 2020.

FRO team took part in the ALL-One-Evaluation between 26 and 29 November 2019.

Recommendations and/or follow-up:

FRO to follow-up on the consultation regarding the rules and guidelines on the use of force, while these rules and guidelines will be the basis for training and operational plans and the foreseen update of the Frontex Code of Conduct.

### 3. RETURN OPERATIONS

#### Consultations on Return matters & pool of forced return monitors

In accordance with Article 48 of the EBCG Regulation, the Agency must perform return activities with respect for fundamental rights and general principles of Union law as well as for international law, including refugee protection and children's rights. These tasks include the coordination and organisation of return operations, including pre-return and post-arrival (Article 48(1)(a)(i) and (ii)) either in support of Member States or, with the agreement of the Member State concerned, on its own initiative and (Article 50).

In this context, FRO contributes on a monthly basis to the establishment and selection of forced-return monitors (Article 51(1)) for joint return operations. The selection procedure is organised by Pooled Resources Unit, following an open call addressed to relevant bodies in Member States. FRO Team contributed to the selection procedures on a monthly basis.

During the reporting period, and within the project FReM III, FRO engaged with the ICMPD in a coordination meeting on the Management of the Pool, on 3 December 2019, Warsaw where all incumbent internal units discussed with ICMPD on the steps ahead for ICMPD to devise, in close coordination with the Agency, a transitional plan for handover of the project by May 2021 -in line with the Roadmap for the implementation of the Regulation 1896. A preliminary agreement with all relevant units and endorsed by ED, has been internally reached, for FRO to coordinate the hand over and the pool in the future (Article 51). The implementation depends on funding and staff within FRO that is currently not allocated.

As a direct responsibility and output of that coordination, FRO held a Follow-Up Meeting on the Development of Reporting Software and the Database for Monitors of the Pool, on 22 January 2020, Vienna, Austria. The tool is intended to support the analysis of the increasing number of reports received from monitors in a systematic and comprehensive manner, allowing for easy follow up when required.

On 10-13 of November 2019, Associate FRO acted as a FR trainer and delivered several training sessions on fundamental rights at the FReM III 2nd training for forced-return monitors (Rome/Italy).

#### Consultations on IT return case management system (Article 48(1)(c))

In accordance with Article 48(1)(c) of the EBCG Regulation, FRO provided input to the development of the Return case management system (RECAMAS), especially related to the non-binding reference model for national IT systems for return case management, which will be used to link the national return management systems of the Member States with the platform, for exchange of data and information, including the automated transmission of statistical data. FRO requested to have a more prominent role in the process and to utilise the mandate to be consulted.

#### FERs & FRO Observations

In compliance with Article 50(7) of the EBCG Regulation, FRO observations are annexed to the Executive Director's evaluation report, transmitted to the Management Board every six months, covering all return operations conducted in the previous semester. During the reporting period, FRO received 60 monitoring reports which also serve to provide concrete recommendations as well as to adjust training needs of those organising the implementation of return operations. FRO is following up on issues of concern from the monitoring reports with respective MS as they arise.

Recommendations and/or follow-up:

Intensify discussions with ICMPD on the development and implementation of a transitional plan to hand over the ICMPD FREM III Project.

#### 4. FUNDAMENTAL RIGHTS MONITORS

Following Article 110 and 109(3), at least 40 Fundamental Rights Monitors (FRMs), shall be recruited by the Agency (as statutory staff) and appointed by the FRO to each operational activity of the Agency by 5 December 2020. Independent in the performance of their duties, the FRMs will be entrusted with the following tasks (among others):

- Constantly assess the fundamental rights compliance of operational activities;
- Report to FRO on any concerns related to possible violation of fundamental rights within the Agency's operational activities;
- Provide advice and assistance on fundamental rights in the preparation, conduct and evaluation of operational activities of the Agency;
- Inform the coordinating officer and report to the FRO on any concerns related to possible violations of fundamental rights within the Agency's operational activities;
- Contribute to training activities in their areas of activities;
- Act as forced-return monitors.

According to Article 109, the FRO is mandated to select, manage and appoint the FRMs. The FRO shall also assign fundamental rights monitors to operations and activities as provided for in Article 110(3); nominate fundamental rights monitors as forced-return monitors for the pool; ensure that fundamental rights monitors are adequately trained and notify the Executive Director on possible violations of fundamental rights reported by the FRMs.

In order to prepare for the establishment and maintenance of the FRMs, the ED requested to launch a pilot project with the Fundamental Rights Agency (FRA) to test the means of deployment of the FRMs and to pilot the most effective monitoring of fundamental rights (FR) in Frontex operational areas. The project implementation started in November 2019 with a kick off workshop and foresees pilot monitoring visits, development of a dedicated monitoring methodology, support in the recruitment, design of the deployment and management model of the FRMs mechanism, both in the field and in HQ and development of training curricula for the FRMs. The FRO and FRA staff, served as "pilot monitor" during the visits to operational areas (land: Bulgaria, Hungary, Poland, Croatia, sea: Greece; Air: Rome Airport; TC: Albania). The visits served as the empirical milestones to develop and verify the guidelines for the FRMs and test the processes surrounding their recruitment and appointment. A mid-term review took place in Vienna on 23-24 January where preliminary findings and tools were discussed among pilot monitors, with the kind support of ORD in order to ensure applicability to the operational reality.

Pilot monitoring missions:

- 2-6.12.2019, Poland (BCPs Terespol and Dorohusk within JO FPs 2019 land)
- 16-20.12.2019, Hungary (BCPs Tompa and Roszke and land surveillance within JO FPs 2019 and FOA WB land)
- 1-2 December 2019, Italy, Rome airport
- 9-13 December 2019, Croatia (Zagreb-Vinkovci-Bajakovo-Tovarnik)

Recommendations and/or follow up:

FRO and FRA to design Phase II of the pilot project and send to IEC for further processing. Ensure access of all pilot monitors to all activities and documents of the Agency necessary to guarantee comprehensiveness of the project to establish the FRMs.

## 5. FUNDAMENTAL RIGHTS STRATEGY

According to Article 80 (1) of the EBCG Regulation, the Agency shall draw up, implement and further develop a fundamental rights strategy (FRS) and action plan (AP), including an effective mechanism for monitoring respect for fundamental rights in all the activities of the Agency. For this purpose, the FRO is mandated to contribute to the Agency's FRS. The FRS is also subject to the endorsement of the FRO.

During the reporting period, a consultancy on gender mainstreaming in the FRS and AP commenced, and the consultant conducted a set of interviews in all Units in-house (HQ level) on how gender aspects are integrated in their respective areas of work. FRO will integrate the recommendations stemming from the consultancy into the FRS.

The FRO has developed an initial version of the FRS for the consideration of the Agency. The draft outlines the Agency's understanding of its obligations towards guaranteeing fundamental rights in the performance of its tasks within the European Integrated Border Management.

Conducting of the inclusive FRS development process and a swift adoption of the document is crucial to the implementation of the Regulation 2019/1986 in line with FR standards and principles. Accordingly, the FRO is looking forward to supporting the consultative development of the FRS and its AP, including facilitating the provision of comments on the document by all business entities in-house, the Consultative Forum and the Management Board.

## 6. CAPACITY BUILDING ACTIVITIES

### Cooperation with Training Unit on the standing corps and use of force

Frontex shall ensure that all statutory staff to be deployed as member of teams receives training in relevant Union and international law, including on fundamental rights. This includes adequate theoretical and practical training on the use of force, weapons, ammunition and equipment and on applicable fundamental rights safeguards (Annex V).

In line with annex V (4) of the EBCG Regulation, the Fundamental Rights Officer shall verify and provide feedback on the content of the inception and refreshment training with special regards to their fundamental rights aspects and their application in the situation where the use of force is necessary, and ensure relevant preventive techniques are included. The Frontex rules and guidelines on the use of force will be considered the underlying basis for this training.

FRO provided brief input on the curricula for the EBCG Standing Corps (SCs). The standing corps curricula was designed based on the CCC which had been consulted with FRO and the CF, and is intended to integrate fundamental rights horizontally in this standing corps training. FRO was invited to the development sessions of the basic training programme for the European BCG standing corps CAT1. Since FRO team is not entirely available to attend those lengthy sessions nor to take part fully in the upcoming training delivery for SCs, FRO has suggested Senior Management that external expertise on fundamental rights is advisable in order to support both the development and the delivery and to ensure that fundamental rights is consistently mainstreamed in the curricula and training.

Once developed and shared for consultation with FRO, the Frontex rules and guidelines on the use of force will be closely monitored to comply with fundamental rights standards as provided in the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the United Nations Code of Conduct for Law Enforcement Officials, among other crucial international and regional human rights standards in this delicate matter.

### Other capacity building activities

On 29 January FRO team provided a presentation for the Border Surveillance Officer - Maritime Operations training I/2020 (MBSO) training. Discussions after the presentation, shared with the UNHCR LO, are always encouraged and interesting to clarify fundamental rights practical matters encountered during patrolling at sea.

During the reporting period, FRO took part in the FReM III 2nd training for forced-return monitors, 11-15 November 2019, Rome, Italy, as an active trainer, which was also attended by some CF delegates.

FRO Office are continuously engaged in the **Induction trainings for new-comers**. Sessions were held during the reporting period on a monthly basis. The engagement in this activity is deemed even more important, since the Regulation 2019/1896 has clearly stepped up the fundamental rights obligations of the European Border and Coast Guard. FRO team

has revised and reflected on the most efficient way to convey FR basic information and enhance the awareness of the Agency's staff on the matter, as the first step towards effective implementation of these obligations, and is presenting a revised version of the key messages on FR in accordance to the new Regulation.

Recommendations and/or follow-up:

- Additional expertise is needed in order to ensure that fundamental rights is consistently mainstreamed in the Standing corps curricula.
- Close follow up on the development and delivery of the SC training is essential to ensure fundamental right mainstreaming in line with obligations

## 7. INTERNATIONAL AND EUROPEAN COOPERATION ACTIVITIES

In international and European cooperation (IEC), the FRO is tasked by the EBCG Regulation, Art.109(2) to provide opinions on pilot projects, technical assistance projects and working arrangements on third countries.

During the reporting period, FRO has provided opinions on the lexicon of migration-related terms developed under the EU for Border Security Project. The Lexicon now contains a set of fundamental rights-relevant terms and has been vetted for alignment with international law. Further consultation took place for the implementation of the cooperation with Canada.

The FRO also developed a draft Fundamental Rights Due Diligence Procedure to adequately manage and mitigate the risks of FR violations that can arise prior to launching activities, or that can occur during Frontex operations or in cooperation with non-EU countries. The proposed procedure allows assessing the potential fundamental rights risks, devising an appropriate response, in line with Article 46 of the EBCG 2019/1986, by the Agency as well as instituting relevant risk mitigation measures.

Regular cooperation and exchanges with IEC various Units have been established, as well as a mechanism to receive relevant information from LOs on FR matters. Further discussions on how FRO could advice the LOs should follow.

Recommendations and/or follow-up:

Discussions on the due diligence procedure drafted need to be stepped up internally.

## 8. COOPERATION WITH THE CONSULTATIVE FORUM (CF)

According to Article 108(3), the consultative forum shall be consulted on the further development and implementation of the fundamental rights strategy, on the functioning of the complaints mechanism, on codes of conduct and on the common core curricula.

During the reporting period CF members took part in development meeting for basic training programme for CAT 1 of European BCG Standing Corps (27-31 January 2020).

The FRO has sought CF's advice in reference to consultancy on gender mainstreaming commissioned by FRO in reference to of the revision of the fundamental rights strategy and its action plan.

Additionally, in 2019 the Forum continued to support further development of the VEGA initiative with a focus on its extension to land and sea borders. Forum experts were deployed at the Polish/Ukrainian within the framework of Joint Operation Focal Points 2019 from 6 to 21 November. Moreover, CF members took part in 2nd Training for forced return monitors of the project "Forced Re-turn Monitoring III" (FReM III) in Rome from 11 to 15 November.

On 20 November, CF's Activity Report for 2019 was presented at the 77nd Management Board meeting, Warsaw. Finally, in the end of 2019, the Forum had requested the Executive Director to support the organisation of a visit to Frontex operational activities in Albania, which eventually took place from 16 to 19 December. The purpose of the visit was for the CF to better understand the enhanced role of the Agency in third countries, and its Joint Operations, with a view to being in a position to address well-founded recommendations to Frontex on the possible impact to fundamental rights of that engagement.

Following the MB Decision 26/2019 of 14 October 2019, a call was launched for the civil society organisations with the view of establishing a new composition of the Forum for a period of three years (January 2020 until December 2022). A selection procedure took place with the civil society organisations of which seven out of eight were selected. In addition, the UN Human Rights Regional Office for Europe, of the category of international organizations, was invited following its expression of interest to become a CF member. The new Composition of the CF is established and the initial meeting was held on 18 and 19 February 2020 with following entities invited as members: EASO, FRA, UNHCR; CoE, IOM, OSCE-ODIHR, OHCHR, Amnesty International European Institutions Office (EIO), Churches' Commission for Migrants in Europe (CCME), International Commission of Jurists (ICJ), Jesuit Refugee Service Europe (JRS), Platform for International Cooperation on Undocumented Migrants (PICUM), Red Cross EU Office (RCEU) and Save the Children (SC).

Recommendations and/or follow-up

The CF meeting on 18-19 February also served to clarify the necessary timelines for consultation on mandatory documents from Agency to CF (FRS, CCC, Frontex Complaints Rules, etc.) in the near future.

## 9. INDIVIDUAL COMPLAINTS MECHANISM (CM)

Following Article 111(1), the Agency shall, in cooperation with the fundamental rights officer, develop an independent and effective complaints mechanism to monitor and ensure respect for fundamental rights in all the activities of the Agency. In addition, Article 111(4) mandates the fundamental rights officer for handling complaints received by the Agency in accordance with the right to good administration.

During the reporting period, the FRO has received twelve (12) complaints, out of which six (6) complaints have been declared admissible and have been forwarded to the relevant MS authorities and the Executive Director. Further, another three (3) complaints are currently under admissibility assessment. In relation to the three (3) complaints declared inadmissible, the FRO responded individually, providing information on other remedies when available.

The complaints team received two (2) requests regarding Access to Documents (PAD) under Regulation (EC) No 1049/2001 on access to public documents.

Article 111(10) foresees that the fundamental rights officer shall also draw up any further detailed rules as necessary and submits them to the executive director and to the management board. In the light of the entering into force of the Regulation (EU) 2019/1896 and with the aim to further develop the independent and effective complaints mechanism of the Agency, the new Complaints Mechanism Rules are to be adopted by the FRO in the first half of 2020. Currently, the FRO is finalising the text of the new Rules as leading actor in charge of the exercise, which will be shared within the Agency, to be later consulted with the Consultative Forum as a further development of the mechanism, and finally submitted to the ED and MB.

In the reporting period the FRO complaints team has been also working on the concept of how to deal with complaints regarding Frontex activities in the Republic of Albania. The FRO team met with competent national authorities in Albania in October 2019. Both parties agreed on the draft of a Memorandum of Understanding (MoU) to coordinate between both complaints mechanisms. The MoU draft proposal has been shared with LPU and IEC in January 2020.

FRO complaints team is permanently working on the dissemination campaign to raise awareness about the existence of the mechanism. The FRO has finalized a new booklet on the complaints mechanism, the new edition is available and ready for distribution from December 2019.

FRO complaints team has finished, in cooperation with the ICT unit, the development of an online system for submission of complaints directly from mobile devices. From January 2020 the new system is under internal pilot test.

Recommendations and/or follow-up:

- Engage in the consultation on the new Rules on the Agency complaints mechanism.
- Follow-up on the Memorandum of understanding with the Republic of Albania and further coordination structures with national authorities.

## 10. RELATIONS WITH EXTERNAL ACTORS

In support to the EU CSDP Mission EUAM Iraq, from 9-11 December Frontex received a study visit from a high-level delegation from a number of national agencies involved in border management in Iraq. The visit was requested with the objective of raising awareness to EIBM practices and standards, including on fundamental rights. FRO team delivered a presentation on the fundamental rights in border management, including combating trafficking in human beings.

On 21-20 November 2019, Associate FRO delivered a speech and provided with training session at the conference and following seminar on the monitoring system organised by the Greek Ombudsman (Athens/Greece).

On 24 February 2020, the Adviser on Fundamental Rights discussed the implementation of enhanced fundamental rights dimension in EBCG regulation during the visit of LIBE Members of the European Parliament to Frontex headquarters.

Recommendations and/or follow-up:

- FRO continues to prioritize internal engagements to externals due to staffing.
- Further external engagement from FRO has proven to be beneficial to clarify the Agency's compliance especially with fundamental rights actors in the EU and beyond.

## 11. STAFFING

As a result of an impact assessment carried out by FRO, in which a comprehensive analysis on FR in the new Regulation was conducted collectively with the team, and that was shared with senior management in January 2020, the recruitment of additional staff will be crucial to ensure that the monitoring of FX compliance with FR obligations effectively takes place.

The above-mentioned positions are:

- The Deputy FRO,
- At least 40 FRMs,
- A support office for the FRMs in HQ, to be proposed during FRA pilot project,
- A senior staff for the complaints mechanism, and additional specialists on return (priority); TC cooperation; ETIAS and technology; and FR training support,
- Support staff for the coordination of the pool of monitors, to be proposed during ICMPD project,
- One additional staff for the CF Secretariat, following ICF consultancy recommendations.

Recommendations and/or follow-up:

Prompt allocation of staff other than the FRMs would guarantee the comprehensive FR advice required in this crucial period of early implementation of the new Regulation.

## 12. MISCELLANEOUS

### Complaints Mechanism Report

In line with the Agency Regulation, the FRO provided information on the Complaints Mechanism as part of the Agency's Annual Activity Report 2019. FRO will report to Frontex Executive Director and Management Board on the complaints held in 2019.

### FRO independence:

After a preliminary discussion with LPU as per the division of tasks in the roadmap on the implementation of the EBCG Regulation 2019/1896 last October, FRO drafted special rules in order to guarantee the independence of the FRO in the performance of his or her duties, following research on external models within United Nations, Council of Europe and Ombudspersons offices. Internal consultations are being held.

### Implementation of ETIAS

FRO is following the developments on ETIAS but, at this stage, the lack of resources and internal expertise does not allow for a follow-up and thorough analysis of the impact of ETIAS on fundamental rights. Additional staff is crucial to be able to ensure that ETIAS is being implemented in line with fundamental rights standards.

Recommendations and/or follow-up:

- Guidance on the next steps regarding the adoption and implementation of the special rules on FRO independence
- Additional staff dedicated to ETIAS needed to follow-up on fundamental rights aspects of ETIAS

Fundamental Rights Officer