

**Opinion of the European Economic and Social Committee on the ‘Proposal for a regulation of the European Parliament and of the Council establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa’**

COM(2011) 750 final — 2011/0365 (COD),

**‘Proposal for a regulation of the European Parliament and of the Council establishing the Asylum and Migration Fund’**

COM(2011) 751 final — 2011/0366 (COD),

**‘Proposal for a regulation of the European Parliament and of the Council laying down general provisions on the Asylum and Migration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management’**

COM(2011) 752 final — 2011/0367 (COD)

**and the ‘Proposal for a regulation of the European Parliament and of the Council establishing, as part of the Internal Security Fund, the instrument for financial support for police cooperation, preventing and combating crime, and crisis management’**

COM(2011) 753 final — 2011/0368 (COD)

(2012/C 299/20)

Rapporteur: **Mr Pariza CASTAÑOS**

On 16 February 2012, the Council decided to consult the European Economic and Social Committee, under Article 304 of the Treaty on the Functioning of the European Union, on the

*Proposal for a regulation of the European Parliament and of the Council establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa*

COM(2011) 750 final — 2011/0365 (COD)

*Proposal for a regulation of the European Parliament and of the Council establishing the Asylum and Migration Fund*

COM(2011) 751 final — 2011/0366 (COD)

*Proposal for a regulation of the European Parliament and of the Council laying down general provisions on the Asylum and Migration Fund and on the instrument for financial support for police cooperation, preventing and combating crime, and crisis management*

COM(2011) 752 final — 2011/0367 (COD)

*Proposal for a regulation of the European Parliament and of the Council establishing, as part of the Internal Security Fund, the instrument for financial support for police cooperation, preventing and combating crime, and crisis management*

COM(2011) 753 final — 2011/0368 (COD)

The Section for Employment, Social Affairs and Citizenship, which was responsible for preparing the Committee’s work on the subject, adopted its opinion on 28 June 2012.

At its 482nd plenary session, held on 11 and 12 July 2012 (meeting of 11 July), the European Economic and Social Committee adopted the following opinion by 133 votes to none with two abstentions.

## 1. General comments

1.1 The European Commission’s proposals on the 2014–2020 budget for home affairs are crucial in terms of creating an area of freedom, security and justice, and a more open, secure and solidarity-based Europe. The EESC is in favour of increasing the importance of the Asylum and Migration and Internal Security Funds within the budget.

1.2 The Committee believes that the European Union provides these policies with great added value, since managing migratory flows, asylum and threats to security are areas that Member States cannot tackle alone.

1.3 The Committee supports the Commission’s proposal for shared management and a result-oriented approach, drawing up

multi-annual programmes in the context of high-level political dialogue, so that national programmes are consistent with the EU's political objectives and priorities.

1.4 It is essential that all actions funded are based on policies (the objectives of the area of freedom, security and justice), that they have European added value and that they contribute to the achievement of the EU's political objectives.

1.5 The EESC welcomes the Commission's efforts to simplify the financial instruments through the creation of two funds – the Asylum and Migration Fund<sup>(1)</sup> and the Internal Security Fund<sup>(2)</sup> – accompanied by a horizontal regulation laying down common rules on programming, information, financial management, control and evaluation<sup>(3)</sup>.

1.6 The EESC is in favour of the common horizontal framework which significantly simplifies the current system, making financial management and implementation more flexible and reinforcing the system of monitoring and evaluation.

1.7 The EESC supports the Commission's proposal to set a basic amount and another variable or flexible amount when distributing financial resources amongst the Member States.

1.8 Systems for evaluating results should be improved, making use of appropriate indicators, and the independent work of research centres and civil society organisations should therefore be funded.

1.9 The Committee agrees that national programmes should be based on the principle of partnership, but believes that better systems are needed for participation by all stakeholders: national, regional and local authorities, civil society organisations and social partners. The principle of partnership should be stipulated in the regulations so that it does not depend upon national provisions and practices.

1.10 The EESC, which works together with the other EU institutions on the development of immigration and asylum policies, has a particular commitment to the activities of the European Integration Forum. It would therefore stress the importance of the Asylum and Migration Fund for the integration of immigrants and refugees, and believes that integration policies should be complemented with European Social Fund resources.

1.11 The Committee proposes that the financial resources for "Union actions" be increased, since they have great European added value. 20 % of the fund should be allocated to these actions, and the Commission should set up a dialogue with the EESC and with the European Integration Forum, bearing in mind that this financial instrument should be used

to strengthen the Forum's activities and support the European networks of civil society and of social partners.

1.12 The Committee has proposed that fora and platforms be created at national, regional and local levels to enable participation by immigrants' organisations and other civil society organisations. The functioning of these activities should be funded with Asylum and Migration Fund resources.

1.13 The EESC believes that integration policies geared towards reducing the social exclusion of European citizens, minorities and immigrants should be complemented with financial resources from the European Social Fund.

1.14 Europe should respond decisively to the rise in racism and xenophobia aimed at people of immigrant origin. The Union's institutions should be highly active in combating these ideologies and behaviour.

1.15 The protection of human rights and respect for the Charter of Fundamental Rights should be fully guaranteed in all actions funded by the Asylum and Migration and Internal Security Funds.

1.16 The Committee wishes to see a better balance between freedom and security. The European Union should continue to be a free and open society based on the rule of law, and the values of freedom and the protection of fundamental rights should never be sacrificed.

1.17 The EESC believes that the regulation should give organised civil society a more active role in assessing the impact, effectiveness and added value of the initiatives and actions of the European internal security strategy.

## **2. The Asylum and Migration Fund: civil society's approach**

2.1 In general terms, the Committee supports the initiatives and budget lines proposed by the Commission and is in favour of strengthening the partnership principle.

2.2 The EESC has a particular interest in the proposals on the Asylum and Migration Fund, and would call on the Member States, in the negotiations with the Council, to approve the sums proposed by the Commission, and not to reduce them, since the issues of asylum, migration, integration and the protection of people's fundamental rights should be provided with the necessary resources, particularly during the economic crisis.

2.3 In contrast to the current budgetary arrangements, the European Parliament will be able to play a decisive role, since it is a co-legislator and will be able to assess all initiatives democratically and ensure European added value.

<sup>(1)</sup> COM(2011) 751 final.

<sup>(2)</sup> COM(2011) 750 final; COM(2011) 753 final.

<sup>(3)</sup> COM(2011) 752 final.

2.4 The EESC believes that the EP should strengthen the European dimension of priority policies which are to receive funding, and at national level as well. Furthermore, during the political process of approving the regulations, it should facilitate participation by organised civil society by means of the partnership principle and the creation of fora and platforms, as well as the performance of independent assessments.

2.5 The EESC welcomes the new provisions in the regulations that help civil society to access subsidies, but recommends that the procedures be more flexible so that small organisations can also take part, with reduced administrative and financial burdens.

2.6 Civil society provides great added value in terms of identifying needs on the basis of independent reports and carrying out studies and evaluations of policies. Civil society organisations have great experience and knowledge of the local situation and are therefore well aware of how actions should be implemented.

2.7 The EESC believes that the principle of partnership is a cornerstone of the new financial framework, and it should ensure a more participatory approach for all stakeholders: national, regional and local authorities, civil society organisations and social partners.

2.8 The principle of partnership should be applied at all stages: from preparation and implementation to the monitoring and evaluation of the funding granted. This should include both Member State and EU actions <sup>(4)</sup>.

2.9 The EESC is in favour of the Member States, under the Financial Regulation, having to create partnerships with the authorities and bodies concerned to develop and implement national programmes. These authorities and bodies should include regional and local authorities, civil society (non-governmental organisations, immigrants' organisations and social partners) and international organisations (UNHCR, IOM etc.).

### 3. Priorities and political dialogue

3.1 The EESC would point out that a 'political dialogue' is crucial to establishing the priorities of national programmes, but believes that, in addition to the European Commission and the Member States, all European institutional stakeholders should take part (EP, EESC and CoR).

3.2 A specific role in the political dialogue should be guaranteed for the EESC and for the European Integration Forum, with a view to identifying the priorities and objectives for funding and to overcoming obstacles. The forum and the EESC can enhance the European added value of the Asylum and Migration Fund in each Member State's multi-annual programming.

3.3 The Forum and the EESC should also be consulted when establishing priorities in transnational actions or actions of special interest to the European Union, and in the mid-term review of specific actions. The European Commission should also establish a partnership with social partners and non-governmental organisations, in the context of "Union actions".

3.4 The EESC also proposes that the new financial framework guarantee that all Member States set up a national-level structured and multi-stakeholder dialogue with social partners and non-governmental organisations so that they can play a significant role in identifying national priorities before the dialogue with the European Commission.

### 4. Programming and management

4.1 The EESC believes that the financial capacity of EU actions should be increased, i.e. the funds intended for activities of a priority political nature (supporting legislation and political coordination), as well as projects in which organised civil society and social partners play a role. To this end, the EESC is in favour of the European Commission having 20 % of the total budget of the Asylum and Migration Fund. In its management, the Commission should establish a more active dialogue with the EESC, the Forum and civil society organisations.

4.2 The EESC supports the Commission's proposal that the financial contribution in the context of national programmes should cover 75 % of the total eligible costs of the project, which may also be co-financed from public or private sources.

4.3 It is also in favour of the possibility of increasing the contribution to 90 % under the strategic priorities defined in each of the specific regulations, or "in duly justified circumstances, in particular if projects could otherwise not have been implemented and the objectives of the national programme would not have been achieved". Actions and projects carried out by small non-governmental organisations should be prioritised.

4.4 The EESC agrees with the objective of simplifying and reducing the administrative burden, and that the monitoring and evaluation of national- and European-level programmes and projects should be a priority. It is essential to ensure an independent assessment of the highest quality, in cooperation with organised civil society, and to provide them with the financial resources required.

<sup>(4)</sup> Comments of the Commission's Proposals for a New EU Funding of Asylum and Migration Actions under the Multiannual Financial Framework, Caritas Europa, CCME, COMECE, Eurodiaconia, ICMC, JRS-Europe, QCEA, available at [http://www.caritas-europa.org/module/FileLib/MFF-Christiangroupstatement\\_April2012.pdf](http://www.caritas-europa.org/module/FileLib/MFF-Christiangroupstatement_April2012.pdf). Civil Society Statement and Recommendations on the Future EU Funding in the Area of Migration and Asylum 2014-2020, ECRE and 40 other CSOs, March 2012, available at [http://www.ecre.org/index.php?option=com\\_downloads&id=444](http://www.ecre.org/index.php?option=com_downloads&id=444).

4.5 On the basis of the assessment reports provided by the Member States (a provisional report in 2017 and an ex post report in 2023), the Commission will present a report to the European Parliament, the Council, the EESC and the CoR on the application and impact of the regulations. The EESC believes that civil society should be given a role in the assessment, and to this end will propose to the Commission that a structured system of consultation be set up and a conference called.

4.6 The EESC supports the Commission's proposal to establish a basic amount and another variable or flexible amount when distributing financial resources amongst the Member States. With regard to the flexible amount, the EESC considers it crucial for each Member State to draw up their annual programme in line with the EU's priorities and including cooperation with other Member States.

4.7 With regard to the Asylum and Migration Fund, the EESC believes that the establishment of national, regional and local immigration and integration fora and/or platforms, in which civil society organisations participate, should be expressly included as a priority action, to be funded by means of a variable amount.

4.8 There should also be more transparency in the allocation of percentages of the fund dedicated to each specific objective, with a view to ensuring a balance at national level.

4.9 The financial resources for "Union actions" should not just be allocated to emergency assistance, the European Migration Network, technical assistance and the implementation of specific operational tasks by Union agencies, but also to support for the European Integration Forum and for European civil-society and social-partner networks.

4.10 The EESC does not agree with the Commission's proposal only to fund research projects considered 'innovative' from the point of view of their application by security forces and services. Support for research projects in which civil society, social partners and non-governmental organisations participate should be maintained, and security and immigration policies and their impact on fundamental rights should be assessed.

## 5. Beneficiaries of the Asylum and Migration Fund

5.1 The EESC welcomes the flexibility in the Commission's proposal in terms of the beneficiaries covered and stresses the need to ensure that actions funded can be applied to a broad range of people, and not just third-country nationals residing legally in the EU. There has been much discussion of this issue in the European Integration Forum and in the EESC's opinions.

5.2 The EESC would like the Asylum and Migration Fund to allow for actions aimed at everybody, regardless of their status,

including immigrants without papers, and it therefore welcomes the Commission's proposal to broaden the scope of the beneficiaries of actions, since this is the only way to fund the integration work of social partners and non-governmental organisations working on the integration of people without documents.

5.3 However, the EESC is against the Commission's proposal including actions to integrate citizens of a Member State with a migration background, "having at least one parent (i.e. mother or father) who is a third-country national", because it could lead to discrimination, since nationals of Member States should not be subject to integration tests or programmes as a condition for residence and free movement, since that would violate the principle of equal treatment guaranteed by virtue of being a Union citizen.

5.4 The EESC believes the Asylum and Migration Fund to be aimed at funding integration and reception policies for people who have recently arrived in Europe. The EU has more appropriate financial instruments for preventing the social exclusion and lack of opportunities suffered by certain European citizens of immigrant descent, or by EU citizens living in a Member State other than their State of nationality, such as the European Social Fund.

5.5 Programmes intended to protect particularly vulnerable people should be priorities for funding, particularly those aimed at unaccompanied minors, pregnant women and victims of trafficking and sexual exploitation.

## 6. Information, transparency and publicity

6.1 The EESC believes that the new financial framework should guarantee greater information, publicity and transparency. Member States and competent authorities should guarantee access to information on national programmes (through the creation of a web portal).

6.2 However, simplifying procedures should not mean less transparency. The new framework should increase the degree of transparency in the implementation of programmes and of actions at national, regional and local levels.

## 7. Fundamental Rights

7.1 The EESC believes that the financial framework should enhance the protection of human rights in all actions, since the Charter of Fundamental Rights has a positive impact on internal security, asylum and migration policies. The Committee has previously drawn up an own-initiative opinion<sup>(5)</sup> calling for human rights to be protected in immigration, asylum, return and border policies.

<sup>(5)</sup> EESC opinion, OJ C 128, 18.5.2010, p. 29.

7.2 The EESC recommends that the regulations on the Asylum and Migration Fund and the Internal Security Fund guarantee that all actions and projects funded by the EU rigorously respect people's fundamental rights and ensure that the rights enshrined in the Charter are properly protected.

7.3 The Fundamental Rights Agency (FRA) in Vienna should play an active and concrete role in assessing whether the policies and actions funded by the EU are compatible with fundamental rights. Non-governmental organisations can play a key role in assessing the impact of national, regional and local actions on the application of the Charter of Fundamental Rights.

7.4 The European Integration Forum can also evaluate the compatibility of integration policies with the protection of fundamental rights and non-discrimination.

## 8. Emergencies and technical assistance

8.1 The new regulation pays particular attention to emergency and crisis situations. The EESC agrees with the Commission's proposal to ensure that the EU has the capacity to act flexibly, with sufficient financial resources to tackle emergencies.

8.2 The EESC supports the Commission's initiative to provide resources which can be mobilised quickly in the event of "migration-related crises", or to address "urgent and specific needs in the event of an emergency situation", and that within the limits of the available resources, the assistance may amount to 100 % of the eligible expenditure.

8.3 However, the Committee proposes that these funds principally be directed towards tackling humanitarian crisis situations, because solidarity should firstly be applied to the protection and security of the people affected.

8.4 Furthermore, the common guarantees, standards and rights laid down in EU law should be respected by Member States and EU authorities, including in emergency situations.

8.5 The EESC also supports the establishment of an emergency mechanism to enable the EU to fund prompt intervention, in cooperation with Member States, in the event of disasters, terrorist attacks or large-scale cyber-attacks.

## 9. External dimension

9.1 The EESC believes that, since the external dimension of these policies is now a priority, the funding of actions should be consistent with the EU's internal and external priorities in these areas.

9.2 Cooperation between DG HOME and the European External Action Service in the establishment and agreement of political priorities should be improved. This will help to ensure that policies and projects funded under the new budgetary framework complement rather than contradict the EU's development policies and external relations. Cooperation should be improved through agreements between the EU and third countries, but development aid should not be conditional upon readmission and border control agreements.

9.3 The objective of the external dimension of these policies should be to improve both internal security and third countries' development. External policy and development aid are the most coherent framework for the external dimension of asylum, migration and internal security policies <sup>(6)</sup>.

9.4 The EESC proposes that the Asylum and Migration Fund and the Internal Security Fund also be used to improve development in relation to human rights and the rule of law, particularly in terms of third countries strengthening their asylum systems and compliance with international standards.

9.5 It should also be borne in mind that countries neighbouring the EU should not have to bear the full cost of asylum procedures for people transiting through their territory. The EU should cooperate by means of these funds.

## 10. Integration

10.1 The EESC supports the Commission's proposal that integration policies should be implemented at local and regional level through language courses, civic orientation, participation in social and civil life, promoting intercultural dialogue and facilitating equal access to goods and services. It is crucial that actions are managed by non-governmental organisations and local and regional authorities.

10.2 The Committee has drawn up an own-initiative opinion <sup>(7)</sup> containing the same proposal, and held a conference in Valencia involving local and regional authorities and many civil society organisations. This approach was also supported by the European Integration Forum.

10.3 Particular attention should be paid to supporting actions and projects which treat integration as a dynamic two-way social process of mutual adaptation.

<sup>(6)</sup> UNHCR's observations on future arrangements for EU Funding in the area of Home Affairs after 2013, June 2011, <http://www.unhcr.org/4df752779.pdf>.

<sup>(7)</sup> EESC opinion, OJ C 318, 29.10.2011, p. 69–75.

10.4 The EESC supports the Commission's proposal that European funds should be dedicated to specific objectives and not be used to fund national programmes which are not linked to European programmes <sup>(8)</sup>.

10.5 The Committee believes that Asylum and Migration Fund resources should not be used to fund national programmes which violate human rights or contradict the common basic principles for integration. The EESC is against the use by certain Member States of "integration tests" for the renewal of residence permits, family reunification or access to public goods and services.

10.6 The Committee has stated in other opinions <sup>(9)</sup> that there should be more complementarity between the Integration Fund and the European Social Fund in the funding of certain programmes.

## 11. Asylum

11.1 The EESC agrees with the priorities of the common European asylum system (CEAS), in particular the support measures to improve reception and integration conditions and asylum procedures and to enhance Member States' capacities.

11.2 The Committee proposes that a proportion of the funds be allocated to projects and activities aimed at ensuring that Member States meet their international protection obligations and implement European legislation.

11.3 The EESC considers the funding of the evaluation of Member States' asylum policies to be a priority, particularly aimed at improving procedures and the quality of protection for refugees and asylum seekers.

11.4 The EESC supports the development of a resettlement programme for the transfer of refugees from outside of the EU and their settlement within it.

11.5 The Committee also supports the programme for relocation within the EU, providing financial incentives for Member States adhering to it.

11.6 The European Asylum Support Office (EASO) in Malta should have a clear mandate for assessing national asylum

systems and their conformity with European and international law and fundamental rights. This evaluation should be carried out in cooperation with civil society and the UNHCR.

## 12. Admission

12.1 The EESC welcomes the possibility for the Asylum and Migration Fund to finance "capacity-building" measures, such as drawing up strategies to promote legal migration through flexible and transparent admission procedures and improving Member States' capacity to develop and evaluate their immigration policies.

## 13. Mobility partnerships

13.1 The EESC has drawn up a specific opinion <sup>(10)</sup> expressing the view that mobility and migration agreements should include four pillars: organising and facilitating legal migration and mobility; preventing and reducing irregular migration and trafficking in human beings; promoting international protection and enhancing the external dimension of asylum policy; and maximising the development impact of migration and mobility.

## 14. Return

14.1 The EESC believes that the use of voluntary return should be prioritised, accompanied by support systems, and it therefore supports the Commission's proposal that national actions should include assisted voluntary return programmes.

14.2 Resources from the fund should be used to provide support systems for voluntary return, with a view to ensuring that return is positive for the people in question and for their countries of origin.

14.3 In the exceptional event that enforced return procedures are launched, people's human rights should be fully respected, taking account of the Council of Europe's recommendations <sup>(11)</sup>.

14.4 However, the Committee is not in favour of using European funds to finance enforced returns, some of which are considered by civil society to violate the Charter of Fundamental Rights.

## 15. Internal security and borders

15.1 Supporting police cooperation in preventing cross-border crime and in combating organised crime is a priority. The EESC supports measures aimed at improving cooperation amongst security services and the work of Europol.

<sup>(8)</sup> Report on the Stakeholder Conference "The Future of EU Funding for Home Affairs: A Fresh Look", European Commission, DG Home Affairs, Brussels, 8 April 2011, [http://ec.europa.eu/dgs/home-affairs/event/docs/mff\\_conference\\_report\\_11-5-2011\\_final\\_participants.doc.pdf](http://ec.europa.eu/dgs/home-affairs/event/docs/mff_conference_report_11-5-2011_final_participants.doc.pdf) which states as one of the conclusions that "EU funding should not be seen as substituting national funding, i.e. Member States remain responsible for ensuring that sufficient national funding is available to support Home Affairs policies. In order to add value, EU spending should reflect EU level priorities and policy commitments and should support the implementation of EU Home Affairs acquis".

<sup>(9)</sup> EESC opinion, OJ C 347, 18.12.2010, p. 19.

<sup>(10)</sup> EESC opinion on the *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: the Global Approach to Migration and Mobility*, Rapporteur: Luis Miguel Pariza Castaños, Co-rapporteur: Brenda King (OJ C 191, 29.6.2012, p. 134).

<sup>(11)</sup> Twenty guidelines on forced return COM(2005) 40 final.

15.2 The EESC agrees with the Commission's proposal to improve police cooperation on the prevention and combating of cross-border crime in the EU, particularly measures aimed at improving cooperation amongst security services in combating organised crime. It is crucial that all priorities focus on enhancing mutual trust amongst security forces, including aspects relating to the rule of law.

15.3 The funds should be used to improve and develop the quality and transparency of the common methodologies employed at European level to identify threats and risks to Europe's security, such as the work of Europol and its reports on organised crime (OCTA).

15.4 The European Union should strengthen the combating of criminal networks involved in illegal human trafficking, bearing in mind that borders in the Mediterranean and Eastern Europe are particularly vulnerable.

15.5 The EESC is in favour of the Internal Security Fund supporting Member States in relation to border controls, with a view to making them more efficient, bearing in mind that border control is a public service, but believes that this cooperation, including actions coordinated by Frontex, should be transparent and in line with the Schengen Borders Code and the Charter of Fundamental Rights.

15.6 The EESC agrees that Member States should be given support with a view to better applying the Schengen *acquis*, including the visa system and the implementation of an integrated border management system. It is crucial to guarantee that the common rules on border control are applied consistently by all Member States and that fundamental rights and the free movement of persons are respected.

15.7 The EESC believes that the budget allocated to European internal security agencies, in particular Europol, Eurojust, Frontex etc, should be linked to greater democratic scrutiny by the European Parliament of their activities, particularly where there may be the greatest problems in terms of the Charter of Fundamental Rights, such as their operational powers at national level, the exchange and use of personal data, the quality of information exchanged with national and third-country authorities and the objectiveness of their risk analyses.

15.8 A public debate should be launched with representatives of civil society on added value, budgetary impact and the protection of fundamental rights in relation to EUROSUR (the European border surveillance system). It is crucial that, in the case of such an important political initiative, there is complete transparency and legal security both in its objectives and in its scope.

15.9 The EESC calls on the European Parliament to pay particular attention to the proportionality of EUROSUR and its contribution to protecting human rights in border controls and surveillance in the Mediterranean, bearing in mind that border guards' first obligation is to rescue people in danger.

15.10 The Committee recommends that all political proposals be subject to a democratic and transparent debate, in accordance with the principle of proportionality and with fundamental rights, particularly when they have such a great impact on the budget.

#### 16. Large-scale IT systems (VIS, SIS, Eurodac)

16.1 The EESC believes that the European Parliament should carry out an evaluation of the necessity, proportionality and effectiveness of the existing large-scale IT systems (Schengen Information System (SIS), Visa Information System (VIS) and Eurodac), and of the systems which are being implemented (SIS II).

16.2 This evaluation should be carried out prior to any decision to fund new systems such as those presented by the European Commission in the communication on 'smart borders', in particular the entry/exit system (EES) and the registered traveller programme (RTP), which the Commission intends to present during 2012.

16.3 The Committee would stress the responsibility of the new agency for the operational management of IT systems, based in Tallinn, which is very important to the area of freedom, security and justice, since it will coordinate all existing systems and any systems created in the future. The agency should be subject to more democratic scrutiny by the European Parliament, particularly in terms of the compatibility of its actions with data protection, privacy and the purpose limitation principle in the use of information, and regarding the possibility of extending its current competences to the development and coordination of future IT systems.

Brussels, 11 July 2012.

*The President*  
*of the European Economic and Social Committee*  
Staffan NILSSON

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