Successes and Shortfalls of European Union Common Security and Defence Policy Missions in Africa:
Libya, South Sudan, the Democratic Republic of the Congo and the Central African Republic

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Introduction

This brief synthesises the IECEU project's most essential findings on the effectiveness of European Union (EU) missions in four Africa countries: Libya, South Sudan, the Democratic Republic of the Congo (DRC) and the Central African Republic (CAR).[1] It describes the main elements and impact of the EU missions in these countries, identifies key strategic and operational shortfalls and offers recommendations on how the EU can improve its effectiveness in future conflict prevention and crisis management missions. The EU missions investigated differ in scale, length, objective, budget, priority and context. However, the EU missions presented in this brief share the main characteristic that they have all been deployed under the union's Common Security and Defence Policy (CSDP)[2] with the explicit intent of improving the overall security situation and addressing conflicts in Africa. This brief will start by providing a short overview of each case, describing the conflict(s), security situation, mission objectives and obstacles. In this way, it compares the overall effectiveness of EU operational conflict prevention across the four African countries and discusses what lessons can be learned from them. The brief does not include all factors needed to answer this question, but highlights the IECEU project's most significant findings in these cases.

EU Border Assistance Mission (EUBAM) in Libya[3]

Libya has a history of 'institutionalized statelessness'.[4] Until 1963 the country consisted of three governing provinces with substantial autonomy, sharing little common history or interaction with one another.[5] When Colonel Qadhafi took power in Libya in 1969, he embraced and continued Libya's uninstitutionalised nature by creating a system in which power was centred at the top, but lacked cohesion at all other levels of governance. This allowed him to rule, but at the same time created an exceedingly unstable state and a weak security sector.[6] Therefore, when revolutionaries, aided by an international intervention based on UN Resolution 1973[7] removed Qadhafi from power in 2011, Libya lost its one stabilising component and denigrated

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1) IECEU project deliverables: http://www.ieceu-project.com/?page_id=197
2) The Common Security and Defence Policy (CSDP) enables the EU to take a leading role in peace-keeping operations, conflict prevention and the strengthening of international security. It is an integral part of the EU's comprehensive approach towards crisis management, drawing on civilian and military assets: https://eeas.europa.eu/topics/common-security-and-defence-policy-csdp_en
3) The text below is based on the IECEU studies of the Libya case: D3.4, D3.5 (2017) and D3.7 (2017): http://www.ieceu-project.com/?page_id=197
4) Rosan Smits, Floor Janssen, Ivan Briscoe and Terri Breswick, "Revolution and its discontents: state fractions and violence in the new Libya" (2013), The Cligendael Institute, p. 4: https://www.clingendael.org/sites/default/files/pdfs/Libya%20-%20Revolution%20and%20its%20discontents.pdf
5) IECEU, D3.4, The Libya Review (2017), pp. 12-13: http://www.ieceu-project.com/?page_id=3006-its-discontents-state-factions-and-violence-new-libya
6) IECEU, D3.7 Africa: Conclusion Report (2017).
7) United Nations, "Security Council Approves 'No-Fly Zone' over Libya, Authorizing 'All Necessary Measures' to Protect Civilians, by Vote of 10 in Favour with 5 Abstentions", press release, March 17, 2011.

into violent fragmentations, giving rise to radical Islamic movements.[8] These factors made Libya challenging to operate in for external international actors like the EU.

The aftermath of the 2011 Libya revolution was violent and chaotic, and international observers soon realised that the country was in need of ample assistance during its transition. However, the EU was paralysed, as it was unable to obtain an official invitation from Libyan officials, due to the fact that there was no single state structure in Libya at the time. So when the invitation finally came, the EU was in a hurry to launch a mission, and on May 22, 2013 the Council of the European Union gave the green light for an EU Border Assistance Mission in Libya, a civilian mission under the Common Security and Defence Policy.[9] Because of the long wait, the EU rushed the planning and did not follow the usual procedure for constructing an Operation Plan (OPLAN).[10] This turned out to be one of the mission's most significant shortfalls.[11] As the security situation in Libya deteriorated during the summer of 2014, the mission was withdrawn and all personnel evacuated. Consequently, the mission's contribution to improving the overall security situation in Libya was minimal. The mission did however provide some important insights that can prove useful in the planning and deployment of future CSDP missions and operations.[12]

Main Obstacles

Several factors significantly pushed the mission towards failure. Most of these problems began at the drawing board. The first main issue was the timing and lack of comprehensive planning as well as inability to grasp the complex nature of the accidental state of Libya; the second was the fact that EU ambitions in terms of mission goals were too ambitious from the beginning, and that the mission's focus should have been directed differently.[13] EU Border Assistance might have been more successful, if the mission had concentrated its assistance on establishing structures and fora addressing Libya's internal conflicts, instead of focussing on building systems against external threats, based on the idea that Libya was a solid state.[14] The fractional power struggles that arose from the power vacuum following Qadhafi's fall were arguably one of the main obstacles faced by EUBAM, since it prevented the establishment of a systemic relationship between the mission and Libyan representatives.[15] There was no single

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8)   IECEU, D3.7 (2017).
9)   EEAS, "About EU Border Assistance Mission in Libya (EUBAM)" (2016): https://eeas.europa.eu/csdp-missions-operations/eubam-libya/3859/about-eu-border-assistance-mission-libya-eubam_en
10)   Council of the European Union, "Revised draft EU Concept on CSDP Support to Integrated Border Management" (2013), doc. no. 16044/2/13, rev. 2, & IECEU, D3.4 (2017), p. 34.
11)   According to the Council of the European Union (2013), CDSP border-related missions generally require comprehensive assessment, e.g. evaluation of the country's present border capability and management needs as well as security, social and political risks and vulnerabilities. Such an assessment is usually a standard requirement before a mission is established and launched.
12)   IECEU, D3.7 (2017).
13)   IECEU, D3.4 (2017), p. 29.
14)   Ibid.
15)   Ibid.

responsible recipient or structure for the mission to partner up with, which hindered any kind of productive strategic planning.[16] Given these circumstances, 'in hindsight, simply looking analytically at the situation at the start of EUBAM Libya, the mission was doomed, at least in terms of achieving its ambitious, strategic level mandate'.[17]

Lessons Identified

Many different factors led to the failure of EUBAM Libya. However, it is possible to identify three major shortfalls, which significantly impacted the mission's effectiveness. These are: (1) a lack of proper conflict analysis and inability to comprehend and grasp Libya's complex nature and history; (2) too high ambitions from the beginning, which did not match reality on the ground; and (3) the timing was off, due to the long wait for an invitation from Libyan officials, which meant that the mission lost momentum and was rushed when it finally came into being.

EU Aviation Security Mission (EUAVSEC) in South Sudan[18]

Historically, the Sudan has seen severe tensions and conflicts, which in 2011 led to its division into two independent countries, Sudan and South Sudan. The Sudanese conflict on the surface seems to be religious and ethnic with an Arab-Muslim North and a predominantly African Christian and Animist South. However, the root cause fuelling the Sudanese wars has been conflict between economically and politically marginalised groups living in the outer areas of the region and the elites living in the city centres.[19] After more than two decades of civil war between the North and South, a division of the Sudan into two sovereign states was expected to lay the foundations for peaceful coexistence in the region.[20]

Following the 2011 independence of South Sudan, the EU alongside many other international actors declared that it would support the new state in achieving justice, liberty and prosperity.[21] The EU expressed hope that by assisting South Sudan during its transition phase it would be possible to prevent further conflicts with Sudan. However, despite foreseeing that tensions would continue to occur between Sudan and South Sudan, it turned out to be clashes within

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16)   IECEU, D3.4 (2017), p. 24.
17)   IECEU, D3.4 (2017), p. 23.
18)   The text below is based on IECEU studies of the South Sudan case to be found in D3.2, D3.4, D3.5 (2017) and D3.7 (2017).
19)   IECEU, D3.2 (2017), p. 12.
20)   Ibid.
21)   The Republic of South Sudan Motto Statements: Justice, Liberty, and Prosperity: http://www. southsudannewsagency.com/index.php/2012/12/13/the-republic-of-south-sudan-motto-statements-justice-liberty-and-prosperity/

the tribal structures of South Sudan that caused the destabilisation of the new country shortly after it had gained independence.[22]

After South Sudan had gained independence, the EU developed a comprehensive Single Country Strategy,[23] which 'set out, as a short-term option, the possible deployment of a civilian common security and defence policy (CSDP) mission to strengthen airport security and, as a medium-term option, the contribution to broader border management in South Sudan'.[24] EUAVSEC South Sudan,[25] a civilian mission with a non-executive mandate, was launched in July 2012 following the South Sudanese government's 'request for EU support to strengthening security at Juba International Airport, as part of the international community's overall assistance to the country'.[26] This was the first aviation security mission deployed by the EU.

It too suffered several shortfalls – from the drawing board to deployment and eventual evacuation. Furthermore, the complex nature of shifting partnerships and allies in the context of tribal, religious and politically motivated dynamics on the ground did not make EU deployment any easier.[27] At the end of 2013 conflict linked to ethnic tensions and personal disagreement between the president and vice-president of South Sudan broke out, resulting in a civil war marked by brutal violence against civilians. 1.66 million people were internally displaced and hundreds of thousands fled to neighbouring countries.[28] Tensions continue to this day. The EUAVEC mission was severely affected by the worsening security situation during 2013, and all EU personnel were evacuated in January 2014. The mission officially came to a halt after its mandated deployment period.[29] Despite the fact that the mission had succeeded in training 350 personnel, EUAVSEC's ability to support the South Sudanese government and contribute to the overall security in South Sudan was limited.[30]

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22)   Arnold Kammel, "EUAVSEC South Sudan – a relatively unknown EU mission in a difficult environment" in Kirsi Hyttinen, Pasi Hario & Peter Österlund (eds.), "IMPROVING THE EFFECTIVENESS OF CAPABILITIES (IEC) IN EU CONFLICT PREVENTION" (2017). Laurea University of Applied Sciences, p. 30: file:///C:/Users/00461869/Desktop/Hyttinen%20et%20al%20(2017)%20Improving%20the%20 Effectiveness%20of%20the%20Capabilities%20in%20EU%20conflict%20prevention.pdf

23)   The EU Single Country Strategy 'covers all aspects of the EU's policy towards an independent South Sudan including political/diplomatic, security/rule of law, stabilization, development, human rights, humanitarian and trade. It also highlights the increasing role of EU development assistance in South Sudan and mandates the EU to take forward joint programming of development assistance in: justice/rule of law; education; health; water management and rural economic development in coordination with GRSS and in response to the SSDP': https://ec.europa.eu/europeaid/sites/devco/files/single-country-strategy-south-sudan-2011-2013_en.pdf

24)   IECEU, D3.7, Africa: Conclusion Report (2017).

25)   EEAS (2014): https://eeas.europa.eu/archives/csdp/missions-and-operations/euavsec-south-sudan/pdf/factsheet_euavsec_south-sudan_en.pdf

26)   IECEU, D3.4 (2017), p. 8.

27)   IECEU, D3.2 (2017), pp. 8-9.

28)   Ibid., p. 20.

29)   IECEU, D3.7 (2017).

30)   IECEU, D3.2 (2017), p. 8.

Main Obstacles

The successes and failures of EUAVSEC were first and foremost dependent on the EU's relationship with the South Sudanese government and its influence on the road to independence. The EU took a subordinate role in this matter, and the independence process was primarily driven by the United States and China which 'saw the potential of a new-born resource rich country that could prosper and lead to economic benefits'.[31] These internal and external limitations meant that the mission could work within a small section of the intended international approach only, which did not leave much leverage or room to actively contribute to improving the overall security situation in South Sudan.[32]

Another setback for the mission was its low level of ambition combined with a reluctance among EU institutions and member states to deploy a more ambitious and robust mission. If the EU had deployed a more robust criminal justice mission to South Sudan, it would likely have had a stronger impact than EUAVSEC.[33] Already before the mission was deployed the EU's limited focus on improving Juba's[34] airport security was criticised, as very few locals used this airport. Therefore, critics contested that the EU could have made a more visible and effective impact on improving the overall security situation in South Sudan by focussing its assistance elsewhere.[35] Furthermore, because this was the first aviation security mission deployed by the EU, it proved difficult to find and recruit skilled aviation security personnel.[36] Moreover, not only was this the first mission of its kind for the EU, but there were no similar previous establishments in South Sudan for EUAVSEC to build on or learn from.

The EU and its member states wanted a stake in this new-born country, but had limited ambitions and political will to go for a CSDP mission, which would have made an impact on the overall situation of the country. Consequently, the EU missed its chance to have a decisive stake in South Sudan by not translating its comprehensive approach for South Sudan into more comprehensive CSDP action.[37]

Lessons Identified

EUAVSEC South Sudan did successfully train 350 personnel.[38] However, the mission encountered several difficulties and revealed significant shortfalls. Three main lessons can be identified: (1) There was a mismatch between the EU's comprehensive approach and the

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31)   IECEU, D3.7 (2017).
32)   Ibid.
33)   IECEU, D3.2 (2017), p. 41.
34)   Juba is the capital of South Sudan.
35)   Ibid.
36)   IECEU, D3.7 (2017).
37)   Kammel (2017), p. 32.
38)   Gurtong, "Immigration Officers Train for Better Service Delivery" (2013). Accessed October 28, 2017: http://www.gurtong.net/ECM/Editorial/tabid/124/ctl/ArticleView/mid/519/articleId/13162/categoryId/7/Immigration-Officers-Train-For-Better-Service-Delivery.aspx

implementation thereof on the ground, and because the mission's focus was misplaced, it was unable to contribute significantly to the improvement of the overall security situation; (2) there was a lack of support from member states for deploying a more robust mission, which was what South Sudan needed, and therefore the EU missed its chance to play a significant role in securing South Sudan by not translating its comprehensive approach for the country into more solid CSDP action; and (3) the EU was not prepared to launch its first-ever mission of this type in a hostile environment, where the necessary understanding of the security situation and contacts with local communities had not been gained prior to its deployment.

EU Police Mission (EUPOL) and EU Mission for Security Sector Reform (EUSEC) in the Democratic Republic of the Congo[39]

The Congolese wars (1996-1997 and 1998-2003) resulted in one of the most severe humanitarian disasters the world has witnessed since World War II, with around 5.4 million lives lost.[40] The long-standing conflicts in the Democratic Republic of the Congo (DRC) portray a very complex history that can be traced back to the country's independence from Belgium in 1960. During its independence struggle the country almost collapsed as different regions fought one another. Joseph Mobutu seized power in 1965 and as he plundered the country it gradually slipped out of his control. The 1994 genocide in neighbouring Rwanda accelerated his downfall and drew the DRC into the deadliest conflict in African history.[41] In 2011 Channel Research concluded that there were three main components fuelling the Congolese conflicts: (1) ethnic grievances and clashing identities; (2) the effects of state collapse, including inter-elite power struggles; and (3) conflicts over resources. Moreover, it identified regionalised conflict dynamics, specifically the impact of the Burundian civil war, the Rwandan genocide and the involvement of Uganda in the DRC.[42] Nonetheless, the security situation has improved over the last five years, despite the fact that there are still more than 20 non-state armed groups in one region of the DRC.[43]

The EU has a longstanding involvement in the DRC. This is based on the security development nexus, which assumes that security and development are related and thus that one cannot mature or grow without the other.[44] After signing the National Indicative Programme (NIP) in 2002, the EU increased its involvement in the DRC, and its first CSDP deployment, Operation

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39) The text below is based on IECEU studies of the DRC case to be found in D3.1, D3.4, D3.5, D3.6 and D3.7.

40) Amani Labda, "Joint evaluation of peacebuilding and prevention in the DRC", synthesis report (2011), Channel Research, p. 24: https://www.oecd.org/countries/congo/48859543.pdf

41) BBC News, "Q&A: DR Congo conflict" (2012). Retrieved October 28, 2017: http://www.bbc.com/news/world-africa-11108589

42) Channel Research, "Joint evaluation of peacebuilding and prevention in the DRC" (2011), appendix – vol. 2, p. 396: https://diplomatie.belgium.be/sites/default/files/downloads/2011_06_Vol2_Synthesis_Report_Annexes.pdf

43) D3.1, The DR Congo Review (2017), p. 12.

44) L. Buur, F. Stepputat & S. Jensen, "The security-development nexus: expressions of sovereignty and securitization in Southern Africa" (2007), Uppsala, The Nordic Africa Institute.

Artemis,[45] was launched in 2003 to stop an unfolding ethnic conflict in the Ituri region. Two years later the EU launched both an EUPOL and an EUSEC mission, 'which were supposed to help train the Congolese police and military institutions as part of the SSR[46] and state-building project initiated after the signing of the two peace agreements'.[47] The EU has had a significant presence in the DRC ever since 2003, where it has been operating alongside and sometimes in cooperation with other actors such as the UN.[48]

The EUPOL mission ended in 2014, and the EUSEC deployment in 2016. Both contributed significantly to the DRC's 2006 and 2011 national elections, but fell short of achieving their medium- to long-term objectives.[49] The termination of both missions also demonstrates how the EU has reduced its engagement in the DRC over the past three years and instead prioritises other parts of Africa. This shift 'puts the EU in line with its member states, where an increased focus has been placed on the security risks stemming from migration, conflict and radicalization in areas closer to the EU border'.[50]

Main Obstacles

The CSDP engagements in the DRC were successful in some areas and fell short in others. As such, the DRC deployments acted as benchmarks for the EU's comprehensive approach, both because this was the first hostile environment in which the union launched a military mission, and because it was followed up with different types of civilian missions.[51] Generally speaking, there has been a discrepancy between events in Brussels and events on the ground in the DRC.[52] Specifically, there has been inconsistency between mission planning and overall strategic ambitions, on the one hand, and available budgets and operational realities, on the other. As a result, both EUPOL and EUSEC suffered from unrealistic operational objectives, which they consequently failed to achieve.

In the field CSDP efforts were driven by European personnel with limited in-depth understanding of the Congolese context combined with minimal to no experience of working with local networks in the DRC.[53] Additionally, prolonged response times on part of both the EU and its reluctant Congolese partners led to delayed and suspended projects, hampering implementation on the ground.[54]

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45)   Operation Artemis: http://eeas.europa.eu/archives/csdp/missions-and-operations/artemis-drc/index_en.htm
46)   Security Sector Reform (SSR).
47)   IECEU, D3.1 (2017), p. 6.
48)   IECEU, D3.7 (2017).
49)   Ibid.
50)   IECEU, D3.1 (2017), p. 7.
51)   IECEU, D3.7 (2017).
52)   Ibid.
53)   Ibid.
54)   Ibid.

Lessons Identified

Both EUPOL and EUSEC failed to reach strategic and operational aims, although they successfully managed to implement a number of initiatives on the ground. The coordination and cooperation with other actors, especially at the local level, proved problematic in both instances. The CSDP project in the DRC can be described as over-ambitious, unrealistic and driven by changing internationally seconded personnel, who arrived with their own personal ambitions.[55] There is no one specific fault or reason why the EUPOL and EUSEC missions fell short in reaching all their goals, but three shortfalls significantly influenced these missions' effectiveness: (1) poor communication between decision-makers in Brussels and EU personnel implementing missions on the ground, which meant that there was a mismatch between the mandated objectives and what was actually possible, given the context into which mission staff were deployed; (2) timing played an important role, as responses often took too long due to the bureaucratic nature of the EU system; and (3) the EU was not good enough at engaging with local knowledge and expertise, and instead the missions were designed without thorough and in-depth understanding of the Congolese context. As a result, both DRC missions were sought and perceived as imposed by an external European actor on local African counterparts.[56]

EU Military Operation in the Central African Republic (EUFOR RCA)[57]

Ever since its independence from France in 1960 the Central African Republic (CAR) has been embedded in conflict. It remains one of the poorest and least developed countries in the world despite its vast riches in natural resources.[58] The country has never had an effective central government and has instead struggled with recurring insurgencies and military coups.[59] Its instability mirrors factors affecting the region, which is characterised by post-colonial ethnic tensions, poverty, coups, crime, misgovernment and a weak security sector.[60] Following an escalation of conflicts in CAR in 2013 international donors such as the EU began focussing their efforts on stabilising and rehabilitating the country.[61] 50 years after its independence CAR and France remain closely connected, and 'France has played a central role in intervening in conflicts that have erupted throughout the country's violent history'.[62]

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55)   Ibid.
56)   Ibid.
57)   The text below is based on IECEU studies of the CAR case to be found in D3.3, D3.4, D3.5 (2017) and D3.7 (2017).
58)   IECEU, D3.3, "The Central African Republic (CAR) Review" (2017), p. 1: http://www.ieceu-project. com/wp-content/uploads/2017/05/IECEU_D3.3_Central_African_Republic_Review.pdf
59)   IECEU, D3.7 (2017).
60)   IECEU, D3.3 (2017), p. 1.
61)   IECEU, D3.7 (2017).
62)   Ibid.

In 2014 the EU deployed a military mission (EUFOR RCA), which aimed 'to contribute to a secure environment in the Central African Republic'.[63] However, even though the EU member states unanimously voted to intervene in CAR, they were reluctant to provide troops for the mission. As a result, EUFOR RCA received a limited mandate in terms of tasks, time period and area of operation. When the mission was terminated on March 15, 2015,[64] EUFOR RCA had fulfilled its mandate and reached its overall objectives. 'EU troops improved the security conditions considerably and prevented violence from diffusing, escalating, or intensifying even if they could not stop every crime'.[65] However, EUFOR RCA was not to continue until a specific situation or peace agreement had been reached. Hence, it was a short-term mission with no political mandate. 'Internal goal attainment was relatively easy to achieve because of its narrow mandate', but 'the operation's limited objectives prevented the European troops from making a significant contribution to external goal attainment in terms of further conflict prevention and conflict transformation at the national level'.[66]

Main Obstacles

EUFOR RCA met its objectives without any casualties, which is significant as the force was deployed into a hostile area of operations. However, despite fulfilling its own operational objectives, EUFOR RCA had a limited effect on the security situation in CAR, and therefore the operation must be deemed only a partial success. One challenge was the lack of a functioning host government able to support the planning process or to partner up with EUFOR, and that made mission planning and implementation more difficult.[67] The mission did not face its main obstacle on the ground in CAR, however, but rather in inconsistencies between EU member states' ambitions, on the one hand, and their unwillingness to support and contribute troops to the mission, on the other. In effect, the operation's limited objectives prevented EUFOR from making a significant contribution to conflict prevention and transformation.

Lessons Identified

Despite the fact that EUFOR RCA achieved what it set out to do, three main challenges can be identified in terms of its efforts to improve the overall security situation in CAR: (1) a general lack of political will and commitment from EU member states towards the CSDP; by refusing to use its battle group the EU missed the mark in terms of what the situation would have benefitted most from; (2) timing played an important role, and because of the EU member states' unwillingness to contribute troops to the mission, EUFOR RCA's deployment was delayed by six months, which allowed time for the conflict to escalate further; and (3) a limited mandate in terms of

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63)   EEAS, "EUFOR RCA" (2014): https://eeas.europa.eu/archives/csdp/missions-and-operations/eufor-rca/index_en.htm

64)   Ibid.

65)   IECEU, D3.7 (2017).

66)   Ibid.

67)   IECEU, D3.5 (2017), pp. 184-186.

timespan, scope of operations and resources prevented the mission from making a significant contribution to conflict prevention and transformation in the country.[68]

Conclusion

This brief has synthesised the IECEU project's most essential findings on the overall effectiveness of EU missions and operations in four Africa countries: Libya, South Sudan, the Democratic Republic of the Congo and the Central African Republic. The four African cases differ, just as the CSDP engagements deployed in response. Nevertheless, this brief provides an overview of the main successes and shortfalls faced by the EU both prior to and during deployment, which is then used to identify shared lessons with a view to improving the effectiveness of future EU missions in Africa and beyond.

Common to these deployments is the fact that none of the mission designs had a realistic balance between the level of ambition and resources available. Neither did they build on in-depth understanding of the situational context in which they engaged.[69] The missions were all over-ambitious, planned and executed from the top down, without establishing and sustaining local partnerships and contextual insights necessary to ensure a realistic and successful outcome. Instead, the missions were designed following standard project design frameworks and not tailor-made for the specific situation, country, region or local community that they were meant to benefit. Furthermore, all the cases show disconnect between Brussels and the missions. Another repeated factor shared by the four missions was the issue of timing, which suffered due to bureaucracy on part of the EU. The union was generally too slow in responding to needs on the ground, and there were prolonged delays between initial concepts being presented to actual missions becoming operational.

The EU may not be able to prevent, end or transform conflicts on its own, but it does choose where, when and how to engage. By making these decisions wisely based on careful considerations of the above, the EU would be better able to make meaningful contributions to preventing further violent conflict, which in turn would benefit both Brussels and people on the ground. Therefore, if the EU is to improve its overall effectiveness in operational conflict prevention, it must learn from the lessons identified in the IECEU project and summarised in this brief.

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68)   Ibid.
69)   IECEU, D3.7 (2017).