



## Position on safe and legal pathways

### I INTRODUCTION

1. The UNHCR Regional Representation thanks the Chamber of Representatives of the Kingdom of Belgium for its invitation to submit its position in the context of the series of hearings on humanitarian visas undertaken by the Commission of the Interior, General Affairs and Civil Service on 29 January and 5 February 2019. UNHCR is cooperating on this request on a voluntary basis, without prejudice to its privileges and immunities, which are hereby reserved.

2. As the agency entrusted by the United Nations General Assembly with the mandate to provide international protection to refugees and, together with Governments, seek permanent solutions to the problems of refugees,<sup>1</sup> UNHCR has a direct interest in asylum laws and policies and in the search of durable solutions for refugees. Under its Statute, UNHCR fulfils its mandate by « promoting the conclusion and ratification of international conventions for the protection of refugees, supervising their application and proposing amendments thereto ».<sup>2</sup> This supervisory role of UNHCR is reaffirmed by Article 35 of the 1951 Convention and Article II of the 1967 Protocol relating to the Status of Refugees (hereinafter referred to together as the 1951 Convention).<sup>3</sup> It is also enshrined in European law, including by general reference to the 1951 Convention in Article 78(1) of the Treaty on the Functioning of the European Union (hereinafter: TFEU).<sup>4</sup> UNHCR also exercises its supervisory role by, inter alia, issuing guidelines for the interpretation of the provisions of the 1951 Convention<sup>5</sup> and commenting on legislative and policy proposals relating to the protection and durable solutions for persons of concern.

3. The purpose of this document is to emphasize the need for States to expand resettlement and complementary pathways, building on the commitments in the 2016 New York Declaration and the 2018 Global Compact on Refugees. After elaborating on some elements of the resettlement program, it will highlight the value of complementary pathways, which include humanitarian visa, and articulate some protection safeguards and considerations that need to be taken into account when countries are implementing such pathways. Some best practices in the European Union will be presented, as well as UNHCR's activities in Belgium in these areas. In this regard, UNHCR stands ready to collaborate and discuss with Belgium how existing legal pathways, such as those related to humanitarian visas, can be used to create expand complementary pathways for refugees.

<sup>1</sup> UN General Assembly, Statute of the Office of the United Nations High Commissioner for Refugees, 14 December 1950, A/RES/428(V), available at: <https://www.refworld.org/docid/3ae6b3628.html>

<sup>2</sup> *Ibid.*, para. 8(a).

<sup>3</sup> Under Article 35(1) of the 1951 Convention, UNHCR has an obligation to exercise « its duty of supervising the application of the provisions of [the] Convention. »

<sup>4</sup> European Union, *Treaty on the Functioning of the European Union (consolidated version)*, OJ L C 326/47 26 October 2012, available at: <http://www.refworld.org/docid/52303e8d4.html>. OJ L C 326/47 26 October 2012, available at: <http://www.refworld.org/docid/52303e8d4.html>

<sup>5</sup> UN High Commissioner for Refugees (UNHCR), *Handbook and Guidelines on Procedures and Criteria for Determining Refugee Status under the 1951 Convention and the 1967 Protocol Relating to the Status of Refugees*, December 2011, HCR/1P/4/ENG/REV. 3, available at: <https://www.refworld.org/docid/4f33c8d92.html>

## II GLOBAL CONTEXT

4. There are more than **68 million people forcibly displaced** in the world as a result of persecution, conflict, or generalized violence, yet again a record high. More than 25 million of these are refugees in need of protection. As opportunities for voluntary repatriation and local integration in countries of refuge remain limited, third country solutions, including resettlement and complementary pathways for admission of refugees, continue to be a critical protection tool. It is also a tangible way to show solidarity and share responsibility with countries hosting large numbers of refugees. UNHCR's Global Trends shows that in 2017, 85% of the world's refugees under UNHCR's mandate were hosted by developing countries. The least developed countries provided asylum to a growing proportion, amounting to one-third of the global total.<sup>6</sup>

5. Refugees are identified as in need of **resettlement** when they are at risk in their country of refuge or have particular needs or vulnerabilities as detailed under various categories.<sup>7</sup> In its 2019 Projected Global Resettlement Needs, UNHCR estimates that close to 1.4 million refugees are needing access to this key durable solution in the coming year. The total is 17 per cent higher than that of 2018 and reflects needs from more than sixty countries of asylum, from both protracted and more recent refugee situations. Syrian refugees represent, for the third year in a row, the population with the highest global resettlement needs, with 42 per cent of the total. Refugees from the Democratic Republic of Congo (DRC) and South-Sudan have the second and third highest needs. Africa remains the region with the highest projected resettlement needs with an estimated 629,744 refugees in need of resettlement from 31 different countries of asylum. This marks a 23 per cent increase from the previous year.<sup>8</sup>

6. UNHCR is a global organization that has representations and offices in 138 countries around the world. Its more than 16,765 personnel works both in major capitals as well as remote locations where its field staff are directly helping the most vulnerable victims of displacement. In Syria, following the escalation of the crisis, UNHCR expanded in 2012 the scope of its operations to respond to the humanitarian needs of an increasing number of internally displaced persons and other affected populations. By 2015, UNHCR had 398 staff based in six offices in Damascus, Aleppo, Qamishli, Tartous, Homs and Swaida. Currently, UNHCR has over 400 staff in the six mentioned locations.

7. Globally, UNHCR identifies refugees in need of resettlement as part of its mandate, but it is States that offer permanent places of residence in their countries. The global resettlement

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<sup>6</sup> UN High Commissioner for Refugees (UNHCR), Global Trends: Forced Displacement in 2017, 25 June 2018, available at: <https://www.refworld.org/docid/5b2d1a867.html>

<sup>7</sup> Resettlement submission categories are (1) Legal and/or Physical Protection Needs of the refugee in the country of refuge (this includes a threat of refoulement); (2) Survivors of Torture and/or Violence, where repatriation or the conditions of asylum could result in further traumatization and/or heightened risk; or where appropriate treatment is not available; (3) Medical Needs, in particular life-saving treatment that is unavailable in the country of refuge; (4) Women and Girls at Risk, who have protection problems particular to their gender; (5) Family Reunification, when resettlement is the only means to reunite refugee family members who, owing to refugee flight or displacement, are separated by borders or entire continents; (6) Children and Adolescents at Risk, where a best interests determination supports resettlement; (7) Lack of Foreseeable Alternative Durable Solutions, which generally is relevant only when other solutions are not feasible in the foreseeable future, when resettlement can be used strategically, and/or when it can open possibilities for comprehensive solutions. For more information, see UNHCR Resettlement Handbook 2011, July 2011, available at: <https://www.refworld.org/docid/4ecb973c2.html>

<sup>8</sup> UNHCR Projected Global Resettlement Needs 2019, available at: <https://www.unhcr.org/protection/resettlement/5b28a7df4/projected-global-resettlement-needs-2019.html>

landscape has recently been characterized by fluctuations in State quotas. The growth in resettlement quotas over the period 2012-2016 saw a steep reversal with declining resettlement opportunities in 2017. The 20 year high record of 163,200 submissions in 2016 was more than halved in 2017, in which only 75,200 refugees were submitted for resettlement.<sup>9</sup> This 54% decline in resettlement submissions is a trend that continued in 2018. Based on 2017 quotas, it would take more than 18 years for today's needs to be addressed.

8. The need to expand resettlement and complementary pathways was acknowledged by all UN Member States in the September 2016 **New York Declaration for Refugees and Migrants**. States, including the Member States of the European Union, expressed their 'aim to provide resettlement places and other legal pathways for admission on a scale that would enable the annual resettlement needs identified by UNHCR to be met'.<sup>10</sup> Building on this commitment, the **Global Compact on Refugees**, affirmed by the UN General Assembly in December 2018, highlights the possibility of using humanitarian visas and other humanitarian admission programmes; educational opportunities for refugees through grant of scholarship and student visas; and labour mobility opportunities for refugees to expand third country solutions for refugees.<sup>11</sup>

9. With the adoption of the Global Compact on Refugees, UNHCR and partners are working on a global **three-year strategy**<sup>12</sup> to increase opportunities for resettlement and complementary pathways of admission, including to countries which do not currently have such programmes. The GCR emphasizes the key role of resettlement and complementary pathways as tangible solidarity mechanisms, which can reduce the impact of large refugee situations on host countries. This UNHCR-led multi-stakeholder strategy will aim to support an expansion of resettlement and complementary pathways for refugees that is effective and strategic, with a view to meeting the increasing needs identified by UNHCR.

### III SOME HIGHLIGHTED ASPECTS OF RESETTLEMENT

10. Properly **identifying** refugees in need of resettlement consideration is one of the most crucial, yet challenging, aspects of resettlement. It requires detailed knowledge of the refugee population, their protection risks and specific needs and vulnerabilities. Some groups have been identified as having specific protection needs and potential vulnerabilities, such as women and girls, children, older refugees, refugees with disabilities, LGBTI refugees, and refugees from minorities and indigenous groups. Such minorities and indigenous groups are usually in a non-dominant position in the society in which they live. This unfavourable position can lead to a lack of power to affect the decisions that concern them, and place them at risk of marginalization, discrimination and abuse. Particularly in situations of active conflict, this discrimination may take extreme and violent forms that ultimately lead to their flight. Resettlement may be the most

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<sup>9</sup> UNHCR Projected Global Resettlement Needs 2019, available at:

<https://www.unhcr.org/protection/resettlement/5b28a7df4/projected-global-resettlement-needs-2019.html>

<sup>10</sup> UN General Assembly, New York Declaration for Refugees and Migrants : resolution / adopted by the General Assembly, 3 October 2016, A/RES/71/1, available at: <https://www.refworld.org/docid/57ceb74a4.html>, para. 78.

[http://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A\\_RES\\_71\\_1.pdf](http://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_RES_71_1.pdf)

<sup>11</sup> UN General Assembly, Report of the United Nations High Commissioner for Refugees. Part II. Global compact on refugees, (GCR) available at: [https://www.unhcr.org/gcr/GCR\\_English.pdf](https://www.unhcr.org/gcr/GCR_English.pdf), para. 95.

<sup>12</sup> GCR para. 91.

appropriate protection tool to address serious human rights violations suffered by a minority or indigenous group.<sup>13</sup>

11. Generally, **refugee status is a precondition** for resettlement consideration. Resettlement under the auspices of UNHCR is available to mandate refugees who have a continued need for international protection and who fall under UNHCR's mandate. The few exceptions to the precondition of refugee recognition are non-refugee stateless persons, and certain dependent non-refugee family members of refugees.<sup>14</sup> This implies that the criteria set out in the definition of article 1A(2) of the 1951 Refugee Convention should be met, including the requirement to be outside the country of nationality or habitual residence. Hence, evacuation of vulnerable groups from their country of origin will in principle not be possible under UNHCR's resettlement program.

12. UNHCR has, however, been engaged in a number of activities involving the identification and processing of **individuals in their countries of origin**, including but not limited to Internally Displaced Persons (IDPs), with a view to facilitating their relocation to another country, where they are granted international protection and have the opportunity to access a durable solution. Of note has been UNHCR's recent involvement in the Protection Transfer Arrangement (PTA), which involves the transfer of individuals at heightened risk from El Salvador, Honduras and Guatemala, directly or via Costa Rica as a transit country, to resettlement countries, as well as in the direct processing of extremely vulnerable IDPs from Kurdistan Region of Iraq (KR-I) for relocation to resettlement countries.

13. Engagement in such activity, which UNHCR defines as protective relocation, however, entails a number of significant policy and operational implications that make it different from both resettlement of refugees or from other protection interventions in the context of UNHCR's engagement with IDPs, including humanitarian evacuation. Such engagement needs to be motivated by the protection needs of the individuals concerned. UNHCR stands ready to discuss with Belgium the possibility of using its humanitarian visa pathways to support individuals at risk in their countries of origin.

14. UNHCR's decision to submit a refugee's case to a **resettlement country** is made in a transparent way, and according to objective criteria. Major considerations to identify a suitable resettlement country include family links, resettlement submission priority, vulnerability, and capacity for urgent processing, selection criteria of the resettlement country and quota, health requirements and availability of treatment, language abilities, cultural aspects, nationality, family configuration and if possible the refugee's expressed preference. In general, all efforts must be made to preserve or restore family unity in the course of resettlement operations. Where possible and where resettlement opportunities are available, UNHCR promotes the admission of refugees to a country where they have relatives or other personal ties.<sup>15</sup> Family links are indeed considered as a factor of integration.

15. UNHCR believes that ensuring the **integrity** of the resettlement process is critical to sustaining the global resettlement programme, and it acknowledges that resettlement activities are particularly vulnerable to fraud because of the benefits they offer. For that reason, UNHCR

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<sup>13</sup> UNHCR Resettlement Handbook 2011, p. 200-201.

<sup>14</sup> UNHCR Resettlement Handbook 2011, p. 75 and beyond.

<sup>15</sup> UNHCR Resettlement Handbook 2011, p. 353-355.

has developed several preventive anti-fraud measures and safeguards. It also maintains a zero-tolerance policy towards fraud and corruption.<sup>16</sup>

#### IV KEY CONSIDERATIONS ON COMPLEMENTARY PATHWAYS

16. Complementary to resettlement, UNHCR has also worked with States, civil society, private sector, academia, governmental organizations and refugees as part of UNHCR's comprehensive approach to solutions to identify, establish and expand complementary pathways for admission of refugees to third countries, in line with the High Commissioner's Strategic Directions for 2017-2021. Complementary pathways for admission are safe and regulated avenues for refugees that complement resettlement by providing lawful stay in a third country where their international protection needs are met. They do not replace resettlement or substitute the protection afforded to refugees under the international protection regime. These pathways help refugees access protection and solutions when durable solutions are not achievable for all members of a refugee population, particularly in large scale and protracted situations.<sup>17</sup> The objectives of complementary pathways for admission are three-fold: to ease pressure on host countries, to expand third country solutions for refugees, and to enhance refugee self-reliance and build capacities to attain a durable solution.

17. A general distinction can be made between **refugee and non-refugee specific pathways**. The first are intended for persons in need of international protection, and may include, but are not limited to, humanitarian admission, private or community sponsored programmes and humanitarian visas. Refugee specific pathways are a tool for protection and can provide flexibility and complement resettlement by offering additional opportunities for vulnerable refugees who have resettlement needs. Non-refugee specific pathways for admission, such as family reunification, education and labour opportunities, are entry or migration avenues that can and should increasingly be made available to persons in need of international protection. In addition to enhancing responsibility-sharing for refugees, these often have the objective of strengthening the capabilities and skills of refugees.

18. UNHCR believes complementary pathways must be carefully designed and implemented in such a way that the rights of refugees and continuing international protection needs are safeguarded. First of all, protection against *refoulement* should be guaranteed at all time. Complementary pathways should be non-discriminatory and not make distinctions on the basis of nationality, race, gender, religious belief, class or political opinion, and should be based on objective criteria taking into consideration the protection needs of the refugees concerned as well as the over-all protection context in the first country of asylum. In the case of refugee specific pathways, vulnerable refugees with resettlement needs should be prioritized. Flexible legal and administrative procedures might be needed to guarantee access to complementary pathways. In the host country, beneficiaries should have access to a legal status and documentation, to justice and support services, as well as to family unity wherever possible.<sup>18</sup> UNHCR will continue to provide technical expertise and guidance to States in the development and expansion of pathways for admission, and in addressing practical obstacles to their implementation.

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<sup>16</sup> For more detail, see UNHCR Resettlement Handbook p. 127-141, and UNHCR Policy and Guidelines on Addressing Fraud Committed by Persons of Concern, 1 September 2017.

<sup>17</sup> United Nations High Commissioner for Refugees (UNHCR), Note on International Protection, 16 June 2017 available at: <https://www.unhcr.org/excom/standcom/594a56cf7/note-on-international-protection.html>

<sup>18</sup> A UNHCR document containing more detail on these key considerations is under development and will be shared with the Belgian Chamber Committee as soon as possible.



## V GOOD PRACTICES IN THE EUROPEAN UNION

19. In Europe, since 2015 an unprecedented number of countries pledged to resettle refugees, but EU's contribution to meet UNHCR's global resettlement needs remains modest. Positive developments to build upon include the commitment of 20 EU Member States to resettle over 50,000 refugees by October 2019, the proposal for a Union Resettlement Framework Regulation, and the European Commission's and EASO's interest in community-based sponsorship.

20. Complementary pathways for admission of refugees have been established by a number of European countries, notably in response to the Syrian refugee crisis. It is key to further develop these pathways. The next step would be to develop sustainable, accessible and scalable programmes that respond to the needs of a diverse global refugee population. This would give further credibility to calls for more regularized movements of refugees and for solidarity with third countries.

21. Humanitarian admission has been used as an effective protection and burden-sharing tool, including as part of the Humanitarian evacuation/ admission Programme for Kosovar refugees in 1999.<sup>19</sup> More recently, a number of countries, including Germany, Austria and France have implemented humanitarian admission programmes for Syrian refugees in close collaboration with UNHCR. France, Italy and Switzerland have used humanitarian visas to allow persons in need of international protection to seek asylum on their territory. Germany has used existing family reunification pathways to facilitate the reunification of Syrian refugees located in Turkey, Lebanon and Northern Iraq with their nuclear family members in Germany by providing counselling and assistance with the visa application in collaboration with IOM. In addition, Germany and Ireland have implemented refugee specific family reunification programmes to facilitate the admission of extended family members of Syrian refugees. Examples of education schemes that offer complementary pathways to refugees include the *Région Occitane-Pyrénées-Méditerranée* Scholarship programme for Syrian refugees in France.

22. UNHCR has been working with a wide range of partners in Europe to promote the establishment of community sponsorship programmes for refugees. Community sponsorship programmes can play a critical role in expanding resettlement opportunities for refugees, enhance the integration outcomes of resettled refugees as well as contribute to building social cohesion. UNHCR has been pursuing its work on community sponsorship through the Global Refugee Sponsorship Initiative (GRSI), a multi-sectoral partnership, has promoted community sponsorship for refugees, by sharing Canada's experience of private sponsorship and supporting new programmes to grow.

23. Since 2011, the European Resettlement Network (ERN)<sup>20</sup> has worked to develop and strengthen resettlement programmes in Europe by connecting a variety of actors involved in refugee resettlement. Recognising the need for new approaches, since 2016 the ERN has broadened its scope of activities to include research on complementary pathways of refugee admission to Europe. The project was undertaken by UNHCR, IOM and ICMC. The outputs include seven joint publications: three scoping papers on private sponsorship, higher education

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<sup>19</sup> United Nations High Commissioner for Refugees (UNHCR), "*The Kosovo refugee crisis: An independent evaluation of UNHCR's emergency preparedness and response*", available at: <https://www.unhcr.org/afr/3ba0bbeb4.pdf>

<sup>20</sup> [www.resettlement.eu](http://www.resettlement.eu)

student scholarships for refugees, and humanitarian admission programmes, three feasibility and policy research studies in these same areas, and a strategic assessment with recommendations<sup>21</sup>. A final conference to conclude the project was organised in Brussels in April 2018, with the participation of over 100 stakeholders from governments, the European institutions, civil society and refugee diaspora and advocacy organisations across Europe.

## V FAMILY REUNIFICATION

24. Besides increased resettlement places and complementary pathways, barriers to family reunification in EU Member States need to be addressed to avoid prolonged separation, reduced integration prospects and irregular onward movement. The desire to join close family members is a key reason why refugees may wish to go to Europe. Family reunification enables many women and children to access protection in Europe, and reduces their exposure to exploitation by smugglers or human traffickers in countries of transit or first asylum. At its core, family unity is a fundamental right.<sup>22</sup> There is a direct link between family reunification, mental health and successful integration. However, legal and practical obstacles to family reunification often lead to prolonged separation and significant procedural costs, and have limited possibilities for success. As a result, the need to reunite with family members is a key driver of irregular, onward movements. This speaks to the need for effective family reunification arrangements.

## VI UNHCR INVOLVEMENT IN BELGIAN CONTEXT

25. UNHCR's engagement on complementary pathways to Belgium is built mainly on two axes: resettlement and family reunification. UNHCR has not played any role in the creation or implementation of the humanitarian admission programs that have been developed since 2015. However, it is ready to collaborate and offer its assistance in the development of further complementary pathways.

26. Belgium has had a structural **resettlement** program since 2013, under which the quota has gradually increased from 100 in 2014 to 1,150 in 2018. The size of the quota is decided by the Government. The Office of the Commissioner General for Refugees and Stateless Persons (CGRS) and the Federal Agency for the Reception of Asylum Seekers (FEDASIL) make a proposal on the allocation of the quota based on the UNHCR projected global resettlement needs, the EU priorities in the Joint European Resettlement Scheme and other EU-programmes and national considerations. The final decision on each and every case belongs to the Government. To optimize the national strategic use of resettlement, coherence with the Belgian Foreign Affairs and Development cooperation policy is sought. The timing of the decision process follows publication of UNHCR Projected Global Resettlement Needs document, European thematic and geographic priorities and Asylum and Migration Fund (AMF) pledging exercises, and Belgian budget cycles. The focus is on protracted refugee situations, although other political considerations are also taken into account (e.g. the start of the one-to-one scheme of the EU-Turkey statement of 18 March 2016). Absorption capacities (including integration facilities, housing for large families, specific services e.g. for unaccompanied children, etc.) are taken into account when setting the allocation of the quota.<sup>23</sup>

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<sup>21</sup> [www.resettlement.eu/page/ern-publications](http://www.resettlement.eu/page/ern-publications)

<sup>22</sup> United Nations, Convention on the Rights of the Child, entry into force 2 September 1990, available at <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

<sup>23</sup> UNHCR Resettlement Handbook. Country Chapter Belgium 2018, available at: <https://www.unhcr.org/protection/resettlement/5278adfb9/unhcr-resettlement-handbook-country-chapter-belgium.html>

27. Belgium only accepts UNHCR submissions for resettlement. No places are foreseen for non-UNHCR submissions. The selection process is managed by CGRS. In 2017, all the 1.309 resettled refugees were selected during 9 selection missions. Travel and medical arrangements, pre-departure cultural orientation, initial reception and transition to mainstream and specific integration services are managed by FEDASIL. Transportation in the country of asylum, medical arrangements, and organization of the transfer to Belgium are delegated to the International Organization for Migration (IOM).<sup>24</sup>

28. UNHCR praises the efforts deployed by Belgium to reach and significantly increase its resettlement pledges over the last years. The collaboration with the Government and the asylum authorities to implement the program is excellent. CGRS and FEDASIL are a strong tandem who, in close collaboration with the Ministry of Foreign Affairs, Aliens Office and IOM, are very committed to fulfil Belgium's pledges and beyond. UNHCR is also grateful that Belgium in 2018 resettled 47 persons from Niger in addition to the foreseen quota for Syrians and Congolese.

29. While acknowledging the operational challenges that Belgium was facing in the second half of 2018 to provide adequate reception conditions to persons applying for asylum, caused by the earlier reduction of its reception capacity, it is with concern that UNHCR noted the announcement that Belgium was suspending its resettlement activities until further notice. UNHCR appealed to Belgium to pursue its efforts to protect and assist the most vulnerable and to continue the implementation of Belgium's resettlement program.

30. Since 2017, Myria has been an operational partner of UNHCR Belgium regarding the issue of **family reunification** of persons enjoying international protection in Belgium. In that context, Myria provides specialized legal and practical advice via its helpdesk. Myria follows up on individual cases of visa applications for family reunification and humanitarian visas for relatives of recognized refugees and beneficiaries of subsidiary protection, regularly including interventions with UNHCR or the relevant authorities. In addition, Myria serves as a platform giving a voice to these partners and as a mediator between the various actors involved. At least once a year, a meeting is organized with the relevant stakeholders (UNHCR, Aliens Office and Ministry of Foreign Affairs), as well as a meeting with the various partners. Finally, Myria seeks to defend the family life of this target group by making policy recommendations vis-à-vis the relevant authorities.<sup>25</sup> Together, Myria and UNHCR issued a note with observations and recommendations on family reunification for beneficiaries of international protection in Belgium in 2018, which includes a recommendation on the use of humanitarian visa for those who are not legally entitled to be reunited with their family members in Belgium but should be admitted as extended family members, with a broader notion of dependence and within a reasonable timeframe.<sup>26</sup>

UNHCR Regional Representation for EU Affairs  
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<sup>24</sup> Idem

<sup>25</sup> For more information, see <https://www.myria.be/en/international/unhcr>

<sup>26</sup> Myria – UNHCR, Le regroupement familial des bénéficiaires d'une protection internationale en Belgique. Constats et recommandations, juin 2018, [https://www.myria.be/files/Myria\\_Nota-FR\\_v2.pdf](https://www.myria.be/files/Myria_Nota-FR_v2.pdf)