



Civil society monitoring report
on the implementation of the national
strategic framework for Roma equality,
inclusion, and participation
in Belgium

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LIST OF ABBREVIATIONS

ASBL	Non-profit association
CIRE	Coordination and Initiatives for Refugees and Foreigners
CMGVR	Roma and Travellers Mediation Centre
COCOM	Joint Community Commission (Flemish-French speaking in Brussels)
CPAS	Public Centre for Social Action
EC	European Commission
FOYER	Regional Integration Centre
GGC	Community Commission
EURSF	EU Roma Strategic Framework
Minderhedenforum	Forum of Minorities
NGO	Non-Governmental Organisation
NRCP	National Roma Contact Point
NRIS	National Roma Integration Strategy 2012-2020
NRP	National Roma Platform
SPP SI /POD MI	Federal Public Service for Social Integration (NRCP)
UNIA	Equal Opportunity Body
NRSF	National Roma Strategic Framework
NRSF	National Roma Strategic Framework 2020-2030
RCM	Roma Civil Monitor
VGC	Flemish Community Commission
VZW	Non-profit association

EXECUTIVE SUMMARY

The updated National Roma Strategic Framework (NRSF) of Belgium until 2030 has several strengths: notably, its continuity with previous strategies, the secured financing for many ongoing initiatives, and alignment with the EU Roma Strategic Framework's sectoral objectives. Key achievements include improved coordination among federal, regional, and non-governmental actors and some successful awareness campaigns.

However, significant weaknesses persist. The document has not been updated since its adoption in 2022, and many Actions are mere continuations of previous ones rather than innovative interventions. There is a notable lack of political commitment and clear mechanisms for monitoring and evaluation, compounded by minimal direct involvement of Roma-led organisations in decision-making processes. This shortfall in participatory governance and the absence of robust data collection undermine the strategy's effectiveness and ability to address persistent structural challenges.

Implementation of the NRSF

Since its adoption in 2022, the NRSF has seen limited evolution, with many Actions simply continuing from previous strategies. While some initiatives—such as awareness campaigns led by UNIA and routine activities by regional associations—benefit from secured funding and sustained operation, other planned measures remain stuck at the planning stage due to weak political and local support. The establishment of a monitoring committee has yet to result in an active or transparent reporting framework, and issues such as unclear data collection practices persist.

Review of country situation by area

Efforts to counter anti-Roma discrimination are undermined by the lack of explicit recognition of antigypsyism and the reliance on broader anti-discrimination measures. Societal bias about Roma persists, fuelled by high-profile police actions, negative media portrayals, and low awareness of reporting mechanisms—despite isolated initiatives aimed at promoting positive narratives and observing key anti-racism and commemorative events.

Educational initiatives have yielded mixed results: while migrant Roma benefit from high school attendance rates, helped in part by school mediators, Traveller communities continue to experience very low attendance and high dropout rates. The lack of stable housing for Travellers (*Gens du Voyage* or *Woonwagenbewoners*, further referred to as “Travellers” in this report) disrupts their education, and the NRSF falls short in addressing data gaps and implementing targeted actions for this vulnerable group.

Employment measures, largely supported by ESF+ initiatives, have improved access to language training and professional skills for many Roma, particularly those from Eastern Europe. Nevertheless, challenges remain for low-qualified and recently arrived Roma, including refugees, and for Traveller communities, whose unstable housing conditions compound barriers to long-term labour market integration.

Belgium's healthcare system offers extensive services and benefits due to its long-established intercultural mediation practices. However, language barriers and a persistent lack of targeted awareness campaigns—especially in areas such as preventive care and sensitive topics like reproductive health—limit effective access for many Roma and Dom communities.

Critical housing shortages, particularly the dearth of adequate and permanent caravan sites, severely affect Roma and Traveller communities. Inadequate municipal planning, sporadic political commitment, and past police interventions continue to undermine access to stable housing, impacting education, health, and overall social inclusion.

While Belgium's social protection system ensures access to welfare and basic services for those with residence permits, members of Roma and Traveller communities without a stable registered address often remain excluded. Regular support provided by social service organisations is available, yet access-related barriers persist for the most marginalised.

Although Belgium has developed a structured network of social services—some specifically targeting Roma and Travellers—these initiatives are not always subject to systematic evaluation. The absence of tailored, Roma-specific measures within the broader social service framework limits their effectiveness in addressing the community's unique needs.

The NRSF largely neglects explicit child protection measures for Roma, particularly for those in unstable conditions or who are unhoused. This oversight results in inadequate support for vulnerable children and reinforces discriminatory practices concerning how child protection issues are addressed by authorities.

Cultural promotion remains a low priority within the NRSF. Aside from a few legacy projects, there is little effort to celebrate Roma art and history or remember the Roma Holocaust. This reflects a broader omission of the cultural dimensions critical for fostering a comprehensive understanding of Roma identity.

Focus on key issues affecting Roma

Certain Roma individuals (the most marginal groups that face poverty in their home country) arriving from other EU countries and local Traveller communities face severe challenges linked to their lack of a permanent address. This precarious situation hinders access to education, healthcare, social benefits, and employment. Although some housing projects based on the principle of 'Housing First' have proved promising, these are conditioned on having legal resident status, and Roma participation in planning remains minimal, further entrenching social exclusion.

The chronic shortage of legal and permanent caravan sites exemplifies the housing crisis facing Roma Travellers. Inadequate urban planning, restrictive municipal policies, and local resistance have resulted in limited, often temporary, accommodation solutions. Aggressive police interventions and political indifference exacerbate these conditions, reinforcing discrimination and impeding the stable living conditions necessary for accessing broader social rights.

INTRODUCTION

The Belgian National Roma Strategic Framework (NRSF), entitled “National Roma Integration Strategy 2020-2030”,¹ was adopted in June 2022, building on the foundation laid by the National Roma Integration Strategy 2012-2020 (NRIS).² The NRIS served as a reference framework for actions targeting Roma communities from 2012 to 2021. The updated NRSF retains and advances the successful practices from the previous strategy, which are detailed in its accompanying Action Plan.³ The renewed NRSF employs a dual approach combining mainstream measures, such as integration programmes for newcomers and targeted measures that address specific issues faced by Travellers and Roma communities.

The Federal Public Planning Service for Social Integration (SPP SI/POD MI)⁴ coordinates the preparation and implementation of the NRSF and serves as the National Roma Contact Point (NRCP). This federal institution is tasked with combating poverty and social exclusion, promoting social cohesion and sustainable urban development, and ensuring access to social assistance and minimum income.

The SPP SI/POD MI operates under the leadership of two ministers: the Minister for Pensions and Social Integration, responsible for disability and poverty-related matters, and the Minister for Development Cooperation and Urban Policies, responsible for asylum, migration, and social integration. The NRCP is specifically managed by the Minister for Pensions and Social Integration.

The primary responsibility for implementing the NRSF lies with the Belgian regions – Wallonia, Flanders, and Brussels Capital. Several major NGOs, including Foyer vzw⁵ and the Centre de Médiation des Gens du Voyage et des Roms,⁶ have been included permanently in policy conception, implementation, and monitoring.

The Roma communities in Belgium are very diverse. Generally, they are divided into three groups:

1. *Manouche* and *Gens du Voyage* (French-speaking) or *Woonwagenbewoners* (Dutch-speaking), referred to as “Travellers” in the text below.
2. Roma who have moved to Belgium in recent years because of war (in the former Yugoslavia) or economic crises and racism (Romania, Bulgaria, Slovakia),
3. Doms from Syria (war refugees); their specific needs and circumstances are not directly addressed in the current NRSF.

In addition to these individuals, last year, a number of Roma found refuge in Belgium, fleeing the conflict in Ukraine. So, some of the Actions are specifically linked to specific communities.

Approximately half of the NRSF document analyses the situation of the Roma population in Belgium, detailing implemented projects and regional actors' roles. The second half, the Action Plan, outlines 32 Actions aligned with the seven objectives of the EU Roma Strategic Framework for Equality, Inclusion, and Participation.⁷ Most Actions have secured funding and are distributed among the regions, with some coordinated federally. However, not all regions address every objective in the EU framework.

¹ *National Roma Integration Strategy 2020-2030*, <https://www.mi-is.be/sites/default/files/documents/2020-2030 - de nationale strategie voor de integratie van roma - be.pdf>

² *National Roma Integration Strategy 2012-2020*, https://www.mi-is.be/sites/default/files/documents/nationale_strategie_voor_de_integratie_van_de_roma.pdf

³ Roma Civil Monitor. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Belgium*. Brussels, 2023, <https://romacivilmonitoring.eu/wp-content/uploads/2023/04/RCM2-2022-C3-Belgium-FINAL-PUBLISHED-CATALOGUE.pdf>

⁴ *Federal Public Planning Service for Social Integration*, accessed October 2022, <https://www.mi-is.be/en>

⁵ *Foyer vzw*, <https://www.foyer.be/?lang=en>

⁶ *Centre de Médiation pour les Gens du Voyage*, <https://cmgv.be/>

⁷ *European Commission, COMMISSION STAFF WORKING DOCUMENT Roma Inclusion Measures Reported under the EU Framework for NRIS Accompanying the Document Communication from the Commission to the European Parliament and the Council Report on the Implementation of National Roma Integration Strategies - 2019 - Belgium*, 2019, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019SC0320>

The NRSF reflects a continuation of initiatives undertaken over the past decade by government bodies and pro-Roma organisations. Many Actions in the 2021-2030 NRSF are extensions of previous or ongoing projects renewed biennially.

During the NRSF's preparation in 2021, consultations were conducted with regional authorities, Belgium's Equality Body (UNIA),⁸ and organisations working with Roma, such as Foyer vzw, Centre de Médiation des Gens du Voyage et Roms en Wallonie, CIRÉ asbl,⁹ and Diogenes asbl.¹⁰ While these sessions provided recommendations for the NRSF's content, they failed to involve direct participation from Roma-led organisations or representatives. Instead, input came primarily from non-Roma individuals associated with institutions and pro-Roma organisations.

Despite its comprehensive framework, the NRSF lacks clear mechanisms for monitoring and evaluation. It also does not specify how the participation of Roma representatives and organisations will be integrated into the process. This omission highlights the need for more inclusive and transparent governance to ensure that Roma voices are adequately represented in shaping and implementing policies.¹¹

The 2022 NRSF represents a continuation and refinement of Belgium's commitment to Roma inclusion, combining successful past practices with new objectives aligned with the EU Roma Strategy. However, addressing its gaps in monitoring, evaluation, and Roma participation is crucial for ensuring the strategy's effectiveness and legitimacy.

About this report

This report is part of a broader 'Roma Civil Monitor' initiative linked to the implementation of the NRSF. Its primary focus is to evaluate the adopted NRSF and its implementation over the last two years. The purpose of this report is to offer participatory and inclusive monitoring insights and reflections on the NRSF's implementation. It aims to support both national authorities and the European Commission in refining and implementing Roma-related policies effectively.

To prepare this report, the following methodologies were employed:

- Four meetings with representatives of civil society organisations, the technical secretariat of the NRCP, and regional authorities to discuss local policies, and municipal representatives and organisations working on Roma issues.
- Three interviews at the federal level with two national bodies. Additional interviews with representatives from local authorities, Roma, and non-Roma NGOs.
- Reviewed reports, articles, opinion papers, and recommendations prepared by social actors. These materials address the seven objectives of the EU Roma Strategic Framework for Equality, Inclusion, and Participation 2021-2030,¹² which include equality, inclusion, participation (horizontal), education, employment, housing, and health (sectoral).
- Review of publications between 2016 and 2025, focusing on the circumstances of Roma and Dom communities in Brussels.

⁸ <https://www.unia.be/en/>

⁹ <https://positions.cire.be/>

¹⁰ <https://www.diogenes.brussels/>

¹¹ Roma Civil Monitor. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Belgium*. Brussels, 2023, <https://romacivilmonitoring.eu/wp-content/uploads/2023/04/RCM2-2022-C3-Belgium-FINAL-PUBLISHED-CATALOGUE.pdf>

¹² EU Roma Strategy for Equality, Inclusion, and Participation 2021-2030, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019SC0320>

1. IMPLEMENTATION OF THE NRSF

1.1. Key developments and effectiveness of implementation

Since the adoption of the NRSF, no changes or updates have been made to the document. Despite the criticisms raised in the previous RCM report,¹³ the NRCP¹⁴ maintains the same set of Actions, with several of them merely being continuations of projects already implemented in the preceding period.

Most of the Actions that are implemented are part of the regular activities conducted by a few regional associations, such as Centre d'Intégration de Roms et Gens du voyage and Foyer vzw. These ongoing activities benefit from a secure financial background, ensuring their sustainability. Additionally, there has been progress in Actions implemented by UNIA, notably through campaigns aimed at raising awareness within public institutions about the commemoration of significant days related to discriminated communities.

Many planned Actions remain stuck at the planning stage, primarily because of a lack of political commitment, especially regarding initiatives for Travellers, and limited support from local authorities. There is no mechanism to enforce the strategy, making local authority involvement entirely voluntary. Moreover, issues concerning the Roma are absent from political party agendas, and local authorities tend to tap into existing funding opportunities only when there is a clear problem-solution framework. This overall lack of political and local backing has significantly stalled the progress of these measures. Strengthening Roma civil society to exert pressure on local and regional authorities or increasing the political participation of Roma representatives could potentially increase the visibility of Roma issues and encourage more targeted local action.

The monitoring cycle has not yet commenced. The NRCP is planning to distribute the first questionnaire to the stakeholders involved in the implementation process as a part of the reporting to the EC only in 2025. Back in 2022, during a meeting of the National Roma Contact Point, a committee was established to monitor progress, develop indicators, and set up the overall monitoring framework. However, this committee is not very active. Moreover, data collection remains underdeveloped, primarily because it is still unclear what kind of data should be collected, given that ethnic data collection is prohibited.

In its 2023 evaluation, the Commission called on all Member States to review and, if necessary, update their national Roma frameworks to set clear quantitative targets. During the previous reporting period, Belgium and 10 other Member States stated their intention to request technical assistance from the FRA to further develop targets and indicators. However, to date, Belgium's contact point has not participated in any FRA-led working groups nor requested technical assistance for the development of targets and indicators.¹⁵

1.2. NRSF's synergy with domestic and EU actions

Belgium signed the Durban Declaration¹⁶ in 2001, committing itself to developing a National Action Plan Against Racism. The NRSF is closely linked to this Action Plan. The state derives obligations from the Durban Declaration, which have been transposed into the NRSF and are reflected in several proposed actions incorporated within it.

The Belgian NRSF is fully aligned with the EU Roma Strategic Framework. It gives special emphasis to the framework's seven sectoral objectives. One particular feature that reflects the Belgian phenomenon of having

¹³ Roma Civil Monitor. *Civil Society Monitoring Report on the Quality of the National Strategic Framework for Roma Equality, Inclusion, and Participation in Belgium*. Brussels, 2023, <https://romacivilmonitoring.eu/wp-content/uploads/2023/04/RCM2-2022-C3-Belgium-FINAL-PUBLISHED-CATALOGUE.pdf>

¹⁴ Belgian National Roma Contact Point, accessed 23 October 2022, <https://www.mi-is.be/nl/het-belgisch-nationaal-roma-contactpunt?fbclid=IwAR1lWP2hEhGLYvtj0Eg4Q2SWU7M2Z5tdRuI8RrBfNvi9GF0SbFpV9osW4eM>

¹⁵ EC. *On the Implementation of the National Roma Strategic Frameworks in Light of the EU Roma Strategic Framework for Equality, Inclusion and Participation and the Council Recommendation on Roma Equality, Inclusion and Participation*—COM(2024) 422, 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2024:422:FIN>.

¹⁶ Belgium signed the Durban Declaration in 2001, <https://equal.belgium.be/en/introduction/action-plans/action-plan-against-racism#:~:text=Belgium%20signed%20the%20Durban%20Declaration,National%20Action%20Plan%20against%20Racism>.

an autochthonous Roma and Traveller population *and* an EU-mobile and migrant Roma population, most prominently from the Balkans, is that it also addresses the needs of Eastern European Roma and Syrian Dom communities. Furthermore, it has disaggregated the groups and thus pays particular attention to deliberation in the conception phase of the new EU framework on diversity within the Roma population¹⁷

1.3. Roma participation in implementation and monitoring

The implementation of the NRSF involved four meetings between 2022 and 2024, organised by the National Roma Contact Point Secretariat and coordinated by the Ministry for Pensions and Social Integration.¹⁸ These meetings included representatives from federal and regional authorities, local municipalities, the Belgian Equality Body UNIA, and several civil society organisations. However, Roma participation in these consultations was minimal—limited to about 15% of the participants—and involved only two Roma school mediators and two Roma activists, with no direct involvement of registered local or international Roma organisations or representatives of the Roma Travellers community. One of the reasons is the lack of capacity among the Roma NGOs to participate and address the issues. On the other hand, there is a lack of updated information within NCRP about the registered and active Roma organisations.

Roma individuals are named employees in roles such as mediators and stewards, and they participate in consultative and monitoring bodies like the Roma Platform, which has been supported by the European Commission since 2016. Despite these provisions, the monitoring and evaluation processes are vague. The NRSF states that EU indicators will be used, but details about consultation processes and research to support these measures remain unclear, and there has been little follow-up on previous frameworks.

The empowerment of local Roma communities and capacity-building for Roma civil society are not mentioned in the NRSF and are not defined as objectives in it. While some Actions provide opportunities for grassroots Roma associations to receive funding and implement activities, Roma participation in monitoring remains non-existent, and there are no dedicated Actions aimed at building the capacity of Roma-led organisations. As a result, Roma civil society in Belgium continues to operate with limited resources and advocacy skills, in contrast to better-structured, non-Roma-led pro-Roma organisations that often influence local and regional policies more significantly.

1.4. Contribution of the National Roma Platform to the NRSF implementation

The National Roma Platform is currently not a well-structured space for dialogue. Prior to 2018, a group of NGOs even established a Roma Council (an informal structure uniting representatives of different Roma communities), but this structure quickly collapsed due to limited capacity and a lack of institutional support. In recent years, the Platform (the structure that brings together experts, representatives of regional and local institutions, and Roma) held only four meetings during 2022-2023, and no meetings were organised in 2024. Until now, the National Roma Platform has convened only in response to specific demands from civil society groups, such as the Roma civil society coalition formed within the current RCM project implementation, or from institutions.

The NRCP has applied with a project aimed at fostering dialogue within the Roma Platform; however, this project remains unexecuted due to Belgium's prolonged period without a fully functioning government. It is anticipated that this initiative will finally be implemented in 2025, marking a potential turning point regarding the structure and regularity of dialogue within the Platform.

¹⁷ Fresno, J.-M., Kolev, D., & Meyer, S. *Considering the Diversity of the Roma Population in a Post-2020 EU-Initiative for Roma Equality and Inclusion: Expert Reports Building on Forward Looking Aspects of the Evaluation of the EU Framework for National Roma Integration Strategies*, 2020, <https://data.europa.eu/doi/10.2838/430746>.

¹⁸ Federal Public Planning Service for Social Integration, <https://www.mi-is.be/en>

2. REVIEW BY THEMATIC AREA

2.1. Fighting antigypsyism and discrimination

The concept of antigypsyism is not recognised at the institutional level. While the NRSF 2030 mentions antigypsyism as a horizontal objective, it primarily relies on the broader concept of discrimination throughout its framework.

The Belgian media continues to perpetuate a negative image of Roma, contributing to societal bias. A 2020 survey¹⁹ by the European Fundamental Rights Agency (FRA) revealed that one in five Roma and Travellers had experienced discrimination in various aspects of life in the preceding year. Despite this, the reporting of such incidents remains low, with only 32% of Travellers and 19% of Roma aware of discrimination reporting mechanisms. Negative perceptions persist, as demonstrated by the May 2023 Eurobarometer: 16% of Belgians expressed discomfort with the idea of having a Roma colleague, 24% with a Roma as a political leader, and 28% opposed having a Roma family member through marriage.²⁰

On 7 May 2019, Belgian police conducted an operation to seize the caravans and property of Belgian Travellers across the country, leaving many without a home. This still affects the living conditions and acceptance of the Roma community in Belgium. The Belgian equality body UNIA acknowledged the legitimacy of the police action but criticised the excessive force used, highlighting that less severe measures, as prescribed by law, could have sufficed.²¹

An additional factor contributing to the rise of racist sentiments among the majority population was the controversial statements made in September 2023 by a leader of the Socialist political party.²² These remarks received widespread media coverage and prompted strong reactions from representatives of the Roma community. A court case was subsequently initiated, and the Belgian judiciary ultimately ruled that his statements were racist.

NRSF's Action 1 aims at raising the awareness of Roma and travellers about the existence of UNIA. This antidiscrimination body remains relatively unknown within the Roma and Traveler communities. However, the institution has taken steps to offer administrative support for reporting discrimination cases by visiting the victims and helping them formulate their complaints, particularly those related to access to halting sites for the Traveler community.

Action 2 from the NRSF is the 'Developing Positive Stories: Touring Exhibition: Reflections. Roma in Belgium' project. This project's most recent outreach occurred in 2022. No follow-up project was indicated as part of this initiative. However, in 2024, independent of the National Strategy and spurred by political controversy, as mentioned in more detail below, a prominent journalist published a new book offering insights into the Roma community.²³ This publication aimed to foster greater understanding and awareness of Roma culture and challenges, contributing positively to the ongoing dialogue about Roma integration in Belgium.

Action 4 is an action involving the German community. It is about raising the level of information about the situation of Roma to decrease the stigmatisation of the group. It should be a part of a broader awareness-raising campaign. Still, no information about it is available.

¹⁹ FRA. *Roma and Travellers in Six Countries – Roma and Travellers Survey*, <https://fra.europa.eu/en/publication/2020/roma-travellers-survey>

²⁰ EC. *Special Eurobarometer—Discrimination in the EU*, 2023, <https://europa.eu/eurobarometer/surveys/detail/2972>.

²¹ Unia. *Tweede Rapport Over De Situatie Van De Woonwagenbewoners In België Tengevolge Van De Zogenaamde Politieoperatie « Strike » Van 7 Mei 2019 [Second Report about the Situation of Travelers in Belgium as a Result of the so-called Police Operation Strike]*, https://www.unia.be/files/Tweede_Rapport_Unia_over_situatie_woonwagenbewoners_volgend_op_operatie_STRIKE.pdf

²² *Racist statement, Conner Rousseau, measures*, <https://www.unia.be/nl/actua/gerecht-moet-uitspraken-conner-rousseau-onderzoeken>

²³ Vanderstraeten, M. *Wij Roma*, 2024, <https://www.pelckmansuitgevers.be/wij-roma.html>.

As part of the implementation of the Brussels Plan to Combat Racism (Action 5), equal.brussels²⁴ prepared a communication plan to promote commemorative days dedicated to the fight against racism (including the International Roma Day). The initiative included visual communication materials shared by public administrations through their usual digital channels, encouraging the Brussels population to commemorate key dates in the fight against racism and discrimination.

2.2. Education

Since 2020, education in Belgium has been compulsory from the age of five to 18. However, access to and retention in education remain deeply unequal between Roma who migrated from Eastern Europe and the Traveller community. According to a 2020 FRA report, school attendance among migrant Roma stands at 95%, whereas it is only 39% among Travellers.²⁵

The high attendance rate among migrant Roma is largely attributed to school mediators, a practice introduced in 2010 in several Belgian localities. In contrast, school attendance among Travellers remains critically low, with many children dropping out after primary school. Dropout rates escalate in secondary education, and literacy levels within the community remain alarmingly low.

A key factor contributing to this disparity is the lack of stable housing for Travellers in urban areas. Many face frequent displacement due to pressure from local authorities and police, making it difficult for their children to attend school consistently. The 2020 FRA 'Roma and Travellers Survey'²⁶ highlights that the lack of permanent housing not only disrupts education but also undermines fundamental rights such as access to healthcare and adequate living conditions.

The NRSF includes actions to address school dropout (Action 8) and promote literacy among Roma Traveller children (Action 16). These initiatives are embedded in multi-year plans and financially supported by three leading organisations specialising in Roma mediation: Foyer vzw, Centre de Médiation des Roms et Gens du voyage, and CAW Antwerpen. The total number of mediators varies between 10 and 12; they are of both Roma and non-Roma origin, speaking Romani or one of the national languages of the migrant Roma. The number of schools varies as there are schools with a significant number of Roma where structural collaboration is present, as well as schools that demand these services in particular cases. Mediation has been widely recognised by stakeholders as a successful strategy for improving Roma children's educational outcomes.

However, despite these measures, the NRSF still lacks targeted actions to address the persistently low school attendance and high dropout rates among Traveller children. While there has been progress in ensuring education for migrant Roma, no similar advancements have been made for Travellers. The framework does not include specific commitments for tackling the educational challenges faced by this community, leaving a significant policy gap.

One of the key obstacles to addressing educational disparities among Travellers is the absence of reliable data on school retention and graduation rates. This lack of data complicates the development of effective policies and targeted interventions.

Furthermore, institutional restructuring in the Flemish region has led to a withdrawal of school mediation programmes, which were among the most effective measures for supporting Roma students. While organisations like CAW Antwerp²⁷ continue this work on a limited scale, this reduction is concerning, particularly as one-third of the Roma in Belgium reside in cities such as Antwerp and Gent.

The ongoing shortage of legal residential sites for Travellers remains a critical barrier. Without stable living conditions, many children struggle to attend school regularly, reinforcing cycles of social exclusion and marginalisation.

²⁴ Equal Brussels, <https://equal.brussels/fr/>

²⁵ FRA. *Roma and Travellers in Six Countries – Roma and Travellers Survey, 2020*, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-travellers-six-countries_en.pdf

²⁶ FRA. *Roma and Travellers Survey 2019, Policy and Practical Aspects, 2019*, https://fra.europa.eu/sites/default/files/fra_uploads/belgium_legislation_and_policies_rts_report.pdf

²⁷ CAW Antwerpen. *Roma team*, <https://www.caw.be/locaties/roma-coaches/>

Despite some progress in Roma education through mediation programmes, Traveller children continue to face significant challenges in accessing and completing education. The lack of targeted measures in the NRSF, combined with unreliable data and structural barriers such as housing instability, prevents meaningful improvements in their educational outcomes.

The continued exclusion of Travellers from education has long-term consequences, not only for their social integration but also for their access to the labour market. Without stronger policy commitments, enhanced data collection, and sustained mediation efforts, the education gap between Roma and Travellers will persist. Addressing these shortcomings requires urgent action, including targeted research, reinforced mediation programmes, and policies that ensure stable housing to support uninterrupted schooling.

2.3. Employment

Roma employment in Belgium is influenced by the overall labour market conditions, with employment patterns ranging from self-employment to contractual positions in sectors such as construction, hospitality, and logistics. Since 2014, job opportunities have expanded for Eastern European Roma—particularly for citizens of Romania and Bulgaria—yet challenges persist due to the language barriers and low level of qualifications. Additionally, the employment experiences among diverse Roma groups vary considerably. For example, seasonal work is typical among Eastern European Roma, while Traveller communities face significant hurdles due to housing instability. Refugees from Syria, Ukraine, and Moldova, who are also part of the Roma population, encounter distinct challenges in accessing stable employment.

The NRSF 2022–2030 outlines five employment-related Actions aimed at boosting Roma inclusion in the labour market. These policies build on previous efforts, incorporating initiatives supported by the European Social Fund+ (ESF+) that focus on language training, professional skills, and clear employment pathways tailored to the needs of the Roma community.

Use of the calls under ESF+ for activation and awareness (18), Promoting socio-economic integration of Roma and Travellers (19), Accompanying the Roma on the employment market (20), Employment of Roma stewards to facilitate the outreach to Roma (21), and the ‘Roma at Work’ initiative (22), have secured financial resources for their execution. Most of these activities are led by the NGO Foyer vzw in collaboration with various professional organisations, demonstrating a coordinated effort to enhance employment opportunities for the Roma and Dom communities. These initiatives provide crucial support in accessing language and professional training, offer administrative assistance, and facilitate job placement. According to Foyer’s information, 60 clients receive support every year. In 2020–2023, 122 persons participated, 38% finding regular employment (a 38% success rate).²⁸

While the NRSF’s employment policies have fostered positive results, especially in improving integration and expanding opportunities,²⁹ the broader landscape of Roma employment remains complex. The labour market offers diverse opportunities amid existing shortages, yet persistent issues such as language barriers, low-level qualifications, and challenges with making social security contributions (as payments depend on the self-insured person and the employer) for low-qualified freelancers continue to impede their long-term employment integration. Furthermore, while second-generation Roma face fewer employment obstacles, newly arrived Roma refugees and Traveller communities remain significantly disadvantaged, underscoring the need for sustained, targeted interventions to ensure equitable access to emerging digital and other professional sectors.

2.4. Healthcare

Belgium’s healthcare system is well-developed, guaranteeing urgent medical care even to those without insurance or documentation. Language barriers are a common issue in healthcare, addressed for over 15 years through intercultural mediators who bridge communication gaps. Organisations like Medimigrant vzw provide legal aid to those struggling to access healthcare, with Roma making up a significant number of their beneficiaries. The Federal Service for Public Health employs over 50 intercultural mediators who conduct more than 110,000 interventions annually in 20+ languages, including Romani. Foyer vzw also contributes to this network by employing mediators with diverse linguistic abilities, including a Roma mediator, to improve healthcare access for Roma and Dom communities.

²⁸ Project Roma & Work, 2025, <https://www.foyer.be/project-romawork/>.

²⁹ Foyer. Roma at Work, 2024, <https://www.vqc.be/subsidies-en-dienstverlening/stedelijk-beleid/roma-werking>.

NRSF's Action 23, Support for community health workers,³⁰ is a well-established and ongoing initiative, continuing from previous periods with support from local and structural funds. Intercultural mediators, who play a key role in this Action, operate as part of an informal network backed by the Ministry of Health. The Ministry provides regular meetings and training sessions for these mediators, ensuring their effectiveness in addressing communication gaps and promoting inclusivity.

While Belgium's healthcare sector provides extensive services, significant gaps remain in raising awareness within the Roma community about preventive care, early marriages, sexual and reproductive health, mental health, and family planning. Topics such as LGBT+ issues remain taboo, limiting access to healthcare for some groups. Although medical services are comprehensive once accessed, Roma communities often avoid preventive care. To address these challenges, targeted awareness campaigns are essential to ensure equitable healthcare access for all.

2.5. Housing, essential services, and environmental justice

The housing issue is critical in Belgium, especially for homeless Roma families, with inadequate policies in place for the past decade. Newly arrived Roma families experiencing economic hardship are also at risk of long-term housing exclusion, often living in makeshift camps or on the street, although the latter represent less than 1% of the overall Roma population.

To tackle this issue, the NRSF states that there have been investments into housing first projects (Action 27) in Wallonia, supported by a Decree from 2019³¹. Information on the outcomes of these Actions is not available. However, the most significant concentration of people in need remains in the Brussels Region. Actions (initiatives) related to housing first projects are expected to be taken at the local level using the resources provided by the municipalities.

Many Traveller Roma live in caravans, which are recognised as housing, but the latter face challenges due to municipalities not providing adequate caravan sites. Often, Travellers can only stay temporarily, and despite financial resources being available for permanent sites, municipalities hesitate to invest due to local resistance. Past police actions have intensified negative perceptions of Travellers.

NRSF lacks a clear strategy to address the housing needs of the Travellers community. The Actions in the NRSF are lacking comprehensive and coordinated implementation. So far, only the listing of temporary halting sites (Action 31) is backed, and is under implementation.

2.6. Social protection

Belgium has a comprehensive social protection system that provides residents with access to essential welfare measures, including guaranteed minimum income, labor market assistance, and basic healthcare services. Individuals who have worked for a certain period can also benefit from unemployment support.

While Roma and Dom communities formally have equal access to these rights, many still face difficulties in navigating the system and securing the assistance they are entitled to. Barriers such as bureaucratic complexity, a lack of awareness, and social exclusion often hinder effective access. Organisations like Foyer vzw, CAW, and Inburgering en Integratie are crucial in helping these communities integrate and access social services. However, there remains a need to enlarge the scope of support to ensure full inclusion and accessibility.

The NRSF outlines several Actions for improving access to social protection and facilitating Roma integration. Key commitments include:

- Action 7: Improving the integration of Roma into Belgian society.
- Action 12: Supporting structures responsible for implementing Roma integration measures.
- Action 13: Extending financial support for Foyer vzw, a key organisation assisting Roma communities.

³⁰ *Vers Une Belgique En Bonne Santé*, 2024, <https://www.belgiqueenbonnesante.be/fr/donnees-phares-dans-les-soins-de-sante/soins-en-sante-mentale/qualite-et-innovation/mediation-interculturelle>.

³¹ *Arrêté Du Gouvernement Wallon Insérant Des Dispositions Relatives à l'aide Aux Gens Du Voyage Dans Le Code Réglementaire Wallon de l'Action Sociale et de La Santé*, 2019, <https://wallex.wallonie.be/eli/arrete/2019/07/18/2019204642>.

- Action 15: Contributing to the operational functioning of Foyer vzw.

These Actions are designed to strengthen the work of existing support structures and ensure that Roma and Dom communities can fully access their rights within Belgium's welfare system.

The social protection system in Belgium guarantees access to welfare measures for all citizens and residents, including Roma and Dom communities. The actions outlined in the NRSF are primarily linked to the regular activities of organisations that have long provided support in this area. However, while financial support for Foyer vzw and other institutions continues, there is little evidence of new or expanded initiatives beyond those that were already in place.

While the NRSF acknowledges the importance of facilitating access to rights for Roma communities, its impact remains limited. The framework primarily reinforces existing structures rather than introducing new, innovative solutions to address persistent barriers.

To enhance the effectiveness of these measures, there is a need for proactive outreach, simplified administrative procedures, and greater investment in tailored support programmes that directly address the unique challenges faced by Roma and Dom communities.

2.7. Social services

In Belgium, all citizens, including Roma with residence permits, have guaranteed access to social services. Those without legal status can access certain basic rights, such as education and urgent healthcare, but continue to face significant challenges in securing stable housing. Despite the availability of social protection measures, Roma and Travellers often struggle with bureaucratic obstacles, a lack of awareness about their rights, and difficulties navigating the system. This highlights the ongoing need for targeted support to ensure equal access to social services for these communities.

The NRSF includes specific Actions aimed at facilitating Roma access to social services. Actions 7, 12, 13, and 15 (mentioned earlier in Section 2.6) focus on improving Roma integration, supporting key structures that provide social assistance, and prolonging financial support for organisations such as CAW, Foyer vzw, and the Centre de Médiation des Gens du Voyage et Roms. These organisations play a crucial role in helping Roma communities access social services, primarily through mediation efforts.

In addition to mainstream social services, specialised initiatives for Roma have been introduced in Brussels and Anderlecht. They are coordinated by the Federal Public Service for Social Integration (SPP SI/POD MI) through the Public Centre for Social Action (CPAS), which provides support for families with a low or no income. In Anderlecht, they focus on homeless persons and problems faced by Travellers, while in Brussels, their main target group is the Roma.

The work of Roma mediators through organisations such as Foyer vzw, CAW, and the Centre de Médiation des Gens du Voyage et Roms has been instrumental in improving access to social services. The specialised Roma services in Brussels and Anderlecht, despite not being part of the NRSF, provide targeted assistance and could serve as models for expansion in other regions.

While Belgium has a strong social protection system and key organisations facilitating Roma inclusion, the implementation of NRSF commitments remains incomplete. The lack of evaluation and integration of specialised Roma services into national strategies represents a gap in policy effectiveness. Strengthening data collection, ensuring the sustainability of successful initiatives, and addressing housing challenges remain critical areas for improvement.

2.8. Child protection

Child protection remains a critical and overlooked issue within the Belgian policy framework for Roma inclusion. While organisations such as Foyer vzw, CAW Antwerp, and the Centre for Mediation for Travellers and Roma work to support the well-being of Roma children—primarily through mediation between schools and parents—there is no explicit recognition of child protection concerns in the NRSF.

A particularly vulnerable group is homeless Roma families, especially those with children living in makeshift shelters or on the streets. The lack of targeted child protection measures for Roma minors raises concerns about their safety, well-being, and access to essential services. Moreover, the failure to address institutional

discrimination exacerbates the marginalisation of Roma children, leaving them without the same level of protection afforded to non-Roma children.

The role of child protection services in safeguarding Roma children is not defined in the NRSF, leaving a critical gap in the strategy. This omission means that issues such as intervention in cases of neglect, abuse, or homelessness are not addressed within the national strategy.

However, reports and testimonies from Roma activists indicate institutional discrimination in child protection services. Authorities often fail to intervene in cases when Roma children are homeless, begging, or living in unsafe conditions, whereas similar situations involving non-Roma children typically prompt swift action from child welfare services.

The previous RCM2 report criticised Belgium's insufficient application of child protection policies and highlighted how the neglect of Roma children's rights constitutes a form of institutional racism. The report emphasised that child protection services do not respond to Roma children's needs with the same urgency as they do for non-Roma children,³² an issue that remains unaddressed in the NRSF and its action plans.

The exclusion of child protection from the NRSF represents a serious oversight in Belgium's strategy for Roma inclusion. Despite the existence of mediation programmes, there is no structured approach to ensuring the safety and well-being of Roma children, particularly those who are homeless or living in precarious conditions. Addressing this gap requires urgent policy changes, including the: Explicit recognition of child protection as a priority in Roma inclusion strategies; Equal enforcement of child protection standards for Roma and non-Roma children; Systematic intervention by child welfare services in cases of Roma child neglect, homelessness, and forced begging; and Greater accountability in ensuring Belgium upholds international child protection commitments for all children, including Roma minors.

2.9. Promoting (awareness of) Roma arts, culture, and history

Recognition of Roma art, culture, and history is essential for fostering social inclusion, combating discrimination, and preserving Roma heritage. However, in Belgium, there is no structured policy framework for acknowledging the Roma Holocaust or ensuring the adequate representation of Roma history³³ in educational materials. The historical persecution of Roma, particularly during the Nazi regime, remains largely unrecognised, contributing to the marginalisation and historical erasure of the community.

Education plays a crucial role in shaping public understanding, yet Roma history is absent from history books, and no major initiatives exist to promote awareness of Roma contributions to Belgian and European society. Addressing this gap requires institutional commitment to historical recognition, cultural promotion, and educational reform.

The NRSF does not adequately reflect the importance of Roma history, culture, or heritage. While Action 2 mentions a project aimed at promoting positive Roma role models, this initiative is not new—it was already implemented during the previous strategic period. There are no additional commitments to build upon or expand this effort.

In practice, no systematic efforts have been made in Belgium to incorporate Roma history into education or public commemorations. Unlike other marginalised groups whose histories are acknowledged through memorials and official remembrance days, the Roma Holocaust remains largely unrecognised in national discourse.

Roma history is not included in school curricula. There is no official commemoration of the Roma Holocaust. Public awareness campaigns on Roma culture and contributions are minimal or non-existent. Although some independent organisations and Roma activists have advocated for recognition, these efforts have not translated into formal government action or structured programmes.

³² *The Last Accepted Form of Racism is against the Roma*, 5 February 2022, https://www.standaard.be/cnt/dmf20220204_95677938.

³³ Spielhaus, A. *The Representation of Roma in European Curricula and Textbooks. Analytical Report*, <https://repository.gqi.de/items/dfeab91b-0ba4-42e8-880c-3133aaf19484>.

3. FOCUS ON KEY PROBLEMS AFFECTING ROMA

3.1. Access of the EU-mobile Roma and non-sedentary population to public services

When discussing the EU-mobile Roma and non-sedentary population, it is essential to distinguish between two specific groups:³⁴

- Roma from Eastern European: Estimated at 30,000 in Flanders and Brussels since 2014,³⁵ these Roma, originally from Romania, Bulgaria, and Slovakia, have moved to Belgium due to racism, discrimination, and economic hardship in their home countries. Among them, around 400 live in precarious conditions,³⁶ often squatting in abandoned buildings or forming small shantytowns. These marginalised groups face severe social exclusion, lack professional skills, and struggle with accessing housing and essential services. Their visibility in urban areas—particularly due to their begging—has contributed to negative public perceptions of Roma.
- Belgian Roma Travellers: Estimated at between 7,000,³⁷ and 10,000,³⁸ this group consists of local Belgian Travellers who reside in both regions of Belgium. Due to a severe shortage of permanent caravan sites, they are forced to move frequently,³⁹ often due to police action, which in turn leads to the loss of access to social benefits, healthcare, and education when they leave a municipality.

For both groups, access to essential rights is intricately linked to residency status. Social welfare benefits, healthcare, and education all require a registered permanent address, which many Roma lack due to their housing instability. For example, social welfare benefits often depend on municipal registration, and those without a permanent address are excluded from services, except for urgent medical care; Roma children struggle to enrol in schools, as they lack proof of residence, while families without a registered address are also often denied preventive healthcare services. This restrictive administrative framework disproportionately affects Roma and Travellers, perpetuating cycles of poverty and exclusion. When the Travellers cannot reside for more than two weeks in different spots in the outskirts of the city, they should move to a new place after the police ask them to leave.⁴⁰

To address these challenges, the NRSF Action Plan⁴¹ outlines eight measures. However, only three Actions have been actively implemented: Access to essential services (Action 24); Financing of mediators working in access to housing (Action 30); and Facilitating access to a reference address (Action 32).

These Actions are primarily carried out by civil society organisations (CSOs) such as Centre de Mediation des Gens du Voyage et des Roms, Foyer vzw, and the DIOGENES association, whose regular work aligns with these measures.

The remaining four Actions, which focus on the creation of caravan sites and housing solutions, depend heavily on local authorities for implementation. These measures involve: Providing temporary accommodation for Travellers; Investing in 'Housing First' initiatives; and supporting municipalities in hosting and integrating Roma Travellers

³⁴ ECRI. *Report on Belgium*, 2020, <https://rm.coe.int/ecri-sixth-report-on-belgium-/16809ce9f0>

³⁵ Geurts, K. *Roma in beweging*. Brussels: Foyer vzw, 2014.

³⁶ Soare, T. *Housing Quality and Homelessness among People who Beg*, 2024, <https://www.tandfonline.com/doi/full/10.1080/02673037.2024.2347310>.

³⁷ Ibidem

³⁸ Reedsma, M. *Rondtrekkende woonwagenbewoners*, 2020, https://hiva.kuleuven.be/nl/nieuws/docs/Rondtrekkende_woonwagenbewoners_Rapport_ZL730757.pdf.

³⁹ Geurts, K. *Les Gens Du Voyage à Bruxelles et La Pénurie d'emplacements*. Bruxelles: Foyer vzw, 2015

⁴⁰ Ibidem.

⁴¹ *National Roma Integration Strategy 2020-2030*, https://www.mi-is.be/sites/default/files/documents/2020-2030_-_de_nationale_strategie_voor_de_integratie_van_roma_-_be.pdf

However, these Actions have largely been carried over from the previous NRSF Action Plan,⁴² where they had only been partially implemented. Their success now depends on political will at the regional and municipal levels, which has been inconsistent.

The participation of Roma in policy implementation remains limited. Roma are only formally included in three measures: Roma stewards (Action 21), ESF Roma at work (Action 22), and Mediators for housing access (Action 30). Usually, at the different regional and municipal levels, consultation processes are defined by representatives of professional or representative structures for drafting and implementing anti-discrimination plans. Due to the lack of well-organised Roma civil society in Belgium, many of these consultation processes do not include Roma.

In these roles, Roma are employed as mediators within civil society organisations, helping their communities navigate services and administrative barriers. However, their participation remains restricted to service provision rather than policy-making or strategic planning.

Consultation processes with Roma communities are largely limited to information-sharing, rather than offering them a genuine role in designing, planning, and shaping policies that directly impact their needs. In contrast, Jewish representative structures and African diaspora organisations are actively invited to participate in discussions on issues affecting their communities, as well as in the development of targeted projects. This disparity means that Roma perspectives and lived experiences remain largely excluded from the formulation and implementation of the NRSF's initiatives, undermining their effectiveness and relevance.

Several barriers continue to undermine progress in implementing housing and social inclusion measures for Roma and Travellers.

- Political challenges: The political climate in Flanders, dominated by the nationalist party, has led to a restrictive stance regarding Roma housing rights. Funding streams for services supporting Roma and Travellers have been halted, weakening the capacity of organisations working in this field. The 2021 amendment to the integration decree removed "caravan residents" as a specific target group, effectively erasing policy attention and professional support for the sector.⁴³
- Limited policy advancement: Many housing-related measures were only partially implemented under the previous NRSF Action Plan and remain stalled. The ongoing formation of new regional and federal governments creates further uncertainty about the future of housing and social inclusion measures for Roma.
- Persistence of housing issues: While some 'Housing First'⁴⁴ projects have successfully helped families integrate into society, the influx of new (not numerous) Roma migrants in precarious conditions continues, meaning housing instability remains an issue. Civil society organisations continue to provide essential mediation services, helping Roma and Travellers navigate administrative barriers and access basic services.

The effectiveness of the NRSF's housing and social inclusion policies is at risk due to a lack of sustained political will, funding, and institutional commitment. Without the active involvement of regional and local authorities, a formalised role for Roma in decision-making, and the reinstatement of funding for housing initiatives, the structural barriers faced by Roma and Travellers will persist, further deepening their marginalisation and social exclusion. Meaningful progress in Roma and Traveller inclusion in Belgium will remain stagnant until clear policy commitments and institutional accountability are firmly established.

3.2. Lack of suitable halting sites

The housing challenges faced by Roma Travellers in the Brussels Region and Flanders reflect a longstanding gap in policy and practice. Despite a recognised right to live in caravans, the current policy framework for

⁴² National Roma Integration Strategy 2012-2020, https://www.mis.be/sites/default/files/documents/nationale_strategie_voor_de_integratie_van_de_roma.pdf

⁴³ Jansens, K. *Woonwagengewoners Vinden Moeilijk Aansluiting Bij Samenleving*, 2019, <https://www.mo.be/interview/woonwagengewoners-geschrapt-uit-Vlaams-integratiebeleid>

⁴⁴ Geurts, K. *Accroches pour Travailler avec les Roms*, 2024, <https://www.foyer.be/wp-content/uploads/2024/09/Accroches-pour-Travailler-avec-les-Roms.pdf>.

residential halting sites does not meet their specific needs. Under Article 8 of the European Convention on Human Rights,⁴⁵ caravan dwellers have a unique right to housing, encompassing two key elements: living in a caravan and preserving family cohesion. This right imposes a positive obligation on states to facilitate their lifestyle, a principle reaffirmed by various human rights frameworks.⁴⁶

The Brussels and Flemish housing systems lack provisions for residential caravan sites, failing to meet the demand for legal sites. A shortage of caravan sites undermines Roma Travellers' social rights, including access to education, healthcare, and employment. Vulnerable groups, such as children, are disproportionately affected. Belgium has faced criticism from the European Social Charter and the UN for its failure to provide sufficient residential sites.

Belgium faces a significant challenge in accommodating the Roma Traveller population, particularly in terms of the availability and adequacy of caravan sites. Current estimates reveal a scarcity of such sites, which are unevenly distributed across the country. The Flemish region has only four caravan sites, while Brussels has eight—mostly privately owned. Wallonia hosts another eight sites. They are both private and municipal facilities and are only for temporary use.

The number of Roma Travellers in Belgium is estimated to be 10,000.⁴⁷ NGO reports⁴⁸ indicate that in the Brussels Region alone, around 200 families reside in caravans, yet only 60 have access to a designated caravan site. The situation in Flanders is similarly dire, with nearly half of the Roma Traveller⁴⁹ population unable to secure a stable place for their caravans. Many are forced to live on the outskirts of towns, moving from location to location due to the lack of permanent or transit sites. This precarious existence underscores the urgent need for the construction of new caravan facilities, both transit and residential, to meet the community's growing needs.

In 2010, the International Federation for Human Rights filed a complaint with the European Committee for Social Rights (CoE), citing Belgium's failure to comply with the European Social Charter. The complaint highlighted the country's lack of adequate caravan sites, urban planning legislation unsuitable for caravans, and the unlawful expulsion practices targeting Roma Travellers. As a result, Belgium was found in violation of human rights standards.⁵⁰ Since then, Belgium has undertaken several changes and ensured financial resources for the creation of caravan halting sites. Unfortunately, the progress in improving the housing rights of Travellers has been limited to providing a reference address for Roma travellers. The lack of halting sites remains a central issue. Even the existing subsidies⁵¹ for the creation of halting sites are unused—very few municipalities have made use of the funding opportunity. The last examples date to 2015.

Despite some efforts to address this issue, progress has been inconsistent. For instance, a renovated caravan site was opened in 2011 but closed a year later due to damage allegedly caused by Roma families. Similarly, while regional authorities have allocated funds for new caravan sites, no municipalities have taken up this initiative. One notable exception was the opening of a site in Haren by the Brussels Municipality, but this facility operated for less than three years (2012–2015), and no new halting site has been created since. Political indifference is a major factor; the Roma Traveller community lacks significant electoral influence, leading

⁴⁵ *European Convention on Human Rights*, Article 8, <https://fra.europa.eu/en/Law-Reference/European-Convention-Human-Rights-Article-8-0>

⁴⁶ If someone lives in a caravan, the state must respect and protect their right to a home while also ensuring that any regulatory measures affecting their living situation are fair and justified. Article 8 of the ECHR.

⁴⁷ Reidsma, M. *Rondtrekkende*, 2020, https://hiva.kuleuven.be/nl/nieuws/docs/Rondtrekkende_woonwagenbewoners_Rapport_ZL730757.pdf

⁴⁸ Geurt, K. *Les gens du voyage à Bruxelles et la pénurie d'emplacements*. (2015 ed.). Foyer vzw.

⁴⁹ Ibidem.

⁵⁰ N° 62/2010 *Fédération Internationale des Droits de l'Homme (FIDH) c. Belgique*, Comité européen des Droits sociaux, 2010.

⁵¹ Decree of the Flemish Government Concerning the Subsidisation of the Acquisition, Development, Renovation and Expansion of Sites for Caravan Dwellers. 2015, <https://woonwagenbewoners.be/wp-content/uploads/2022/02/Besluit-van-de-Vlaamse-Regering-houdende-de-subsidiering-van-de-verwerving-de-inrichting-de-renovatatie-en-de-uitbreiding-van-terreinen-voor-woonwag.pdf>

authorities to prioritise the preferences of the non-Roma majority who do not want to live close to Roma.⁵² In many cases, this has resulted in the eviction of Roma families (based on family-related problems in the community) without legal justification, and allowing other groups to occupy their spaces.⁵³

In 2012, an amendment to the Brussels Housing Code marked a significant step forward by recognising mobile housing as a legitimate form of accommodation. This amendment expanded the definition of decent housing to include caravans and introduced quality standards tailored to the specific needs of Travellers. However, these legal advancements have yet to translate into substantial increases in available caravan sites.

Until recently (2024),⁵⁴ municipalities could apply to the Flemish government for subsidies to realise or maintain residential areas, transit areas, or rest areas. Residential areas are intended for permanent residence with a caravan. Individuals may stay in a transit area for a maximum of three weeks for a fee. Rest areas are areas whose zoning plans do not mention housing, but which function as emergency solutions. Because local governments do not use the subsidy scheme, it has been stopped.

A key obstacle to the development of caravan sites (including amenities such as water, electricity, solid waste, and sewage systems) is the lack of specific urban planning guidelines tailored to the needs of Travellers. Existing land use and construction regulations are designed for conventional housing models, creating structural barriers to caravan-based living. While the Regional Land Use Plan (PRAS) in Brussels designates certain areas, such as residential, mixed-use, or public service zones, as potentially suitable for caravan sites, these areas are not explicitly reserved or guaranteed for such purposes. Furthermore, the Regional Development Plan (PRD) does not include provisions for Traveller-specific accommodations.

Municipalities wield significant discretion in applying urban planning rules and issuing building permits. Many impose additional restrictions, often citing vague principles like 'good local construction' to deny permits for caravan sites. As a result, most Roma families in Brussels live on tolerated sites without formal permits, leaving them vulnerable to eviction.

Resistance from local residents is another significant barrier. The 'Not In My Backyard'⁵⁵ (NIMBY) syndrome frequently arises, with locals organising protests or petitions against the establishment of caravan sites. In one notable case, a mayor accompanied a protest with music to discourage Roma families from settling.⁵⁶ Negative media coverage further exacerbates public opposition by perpetuating stereotypes about the Traveller community.

An additional event that strengthened the negative perception of the majority of Roma Travellers was the large-scale targeted police operation, with 1,200 officers raiding 19 sites where Travellers resided. Ostensibly⁵⁷ aimed at tackling vehicle trafficking, the operation led to the arrest of at least 76 individuals, though the community reports a higher number. Over 90 caravans, 91 cars, and one million EUR were confiscated, leaving many families homeless and reliant on relatives for shelter. Allegations of discriminatory treatment have been raised, as innocent community members faced property seizures and had their bank accounts frozen, some without proper legal justification or prior investigation. The Roma traveller community has highlighted severe rights violations, including the right to housing, as recognised under Belgian law, as well as broader human rights concerns. Vulnerable groups, such as children, pregnant women, and disabled individuals, were left

⁵² FRA. *Roma and Travellers in Six Countries – Roma and Travellers Survey*, 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024DC0422>.

⁵³ *La Ville de Bruxelles Donne Un Terrain Aux Forains, 'et Nous ?', Rétorquent Les Gens Du Voyage*, <https://www.dhnet.be/regions/bruxelles/2021/06/30/haren-la-ville-de-bruxelles-donne-un-terrain-aux-forains-et-nous-retorquent-les-gens-du-voyage-VSJEJ4UFDNBGLCAXTMZLKH4HXA/>.

⁵⁴ Corvers, S. *Dignified Existence of Caravan Dwellers*. Dewereld Morgen, 2024. <https://www.dewereldmorgen.be/artikel/2024/04/12/menswaardig-voortbestaan-van-woonwagenbewoners-in-het-gedrang-na-afschaffen-van-groepsbescherming/>.

⁵⁵ Jansens, K. *Woonwagenbewoners Opnieuw Aan de Zijlijn*, 2019, <https://sociaal.net/opinie/woonwagenbewoners-opnieuw-aan-de-zijlijn/>.

⁵⁶ De Standaard. *Debroux: Die Muziek Was Een Ludiek Middel*, https://www.standaard.be/cnt/dmf20140716_01180914.

⁵⁷ Belgium's Police Raids on Romani Travellers Deemed Discriminatory by European Committee, 2023, <https://www.errc.org/press-releases/belgiums-police-raids-on-romani-travellers-deemed-discriminatory-by-european-committee>.

without proper shelter, exacerbating their precarious situation. The operation underscores systemic challenges, such as insufficient caravan sites and a lack of support for Roma Travellers' education and welfare.⁵⁸

In the NRSF, there are few Actions aimed at improving access to halting sites for Roma Travellers. The Action Plan foresees the following measures: Support for the Municipalities that receive Roma travellers (Action 25), Creation of temporary caravan sites (Action 26), and Financial support for creating a database of available free temporary caravan sites (Action 31, which is also part of the Brussels Action Plan Against Racism).⁵⁹ This latter initiative is being implemented by Perspective Brussels and Citydev and is still in progress. For the rest of the Actions, there is no information about progress so far.

The UNIA team is working on a policy paper aimed at creating a comprehensive halting sites policy⁶⁰ for mobile home residents in Flanders for the period 2025-2029, recognising their specific right to live in mobile homes and in family units. It highlights the current failure of Flemish housing policies to provide adequate legal residential sites, underlining the severe shortage that forces many to live in unstable conditions. To address this, the policy suggests creating additional public housing options similar to social rental schemes and removing legal and administrative barriers that hinder private initiatives for setting up housing sites. It further grounds its recommendations in national and international human rights frameworks—citing European and social rights conventions—and draws on lessons from the Dutch policy shift to prevent forced evictions and ensure the equal treatment of mobile home residents.

The lack of adequate caravan sites and insufficient political will have hindered progress, posing the risk of failure of these Actions. Implementing these measures requires coordinated efforts and commitment from all governmental levels, which, unfortunately, has not yet been realised. A crucial component of this process is the inclusion of Roma Traveller activists and community members to ensure their voices are heard and their needs addressed.

The housing challenges of Roma Travellers in the Brussels Region and Flanders underscore a persistent failure of policy and practice to honour their unique right to live in caravans while maintaining family cohesion, as mandated by international human rights frameworks. Despite legal recognition and some policy amendments, the chronic shortage of designated caravan sites—exacerbated by rigid urban planning, political indifference, and local resistance—continues to marginalise a vulnerable community. This lack of appropriate, secure housing not only jeopardises their access to essential services like education and healthcare but also perpetuates social exclusion and discrimination, calling for urgent, coordinated reform that fully integrates the voices and needs of Roma Travellers into future housing strategies.

In conclusion, addressing the chronic housing challenges of Roma Travellers requires a coordinated effort from all stakeholders: National and regional governments must reform urban planning regulations and reinstate dedicated, adequately funded subsidy schemes to create both permanent and transitional caravan sites, ensuring compliance with international human rights standards. Municipalities are called upon to proactively implement these reforms, overcome local resistance by engaging in transparent dialogue with communities, and utilise available resources to expand legal residential sites. NGOs and local advocacy groups should intensify efforts to amplify Roma Traveller voices in decision-making processes, while local residents must be encouraged to embrace inclusive practices that respect the rights and needs of the Traveller community.

⁵⁸ Ibidem.

⁵⁹ *Action Plan Against Racism of Brussels Region*, https://equal.brussels/wp-content/uploads/2022/12/FR_Plan_Racisme_anysurfer.pdf

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CONCLUSIONS AND RECOMMENDATIONS

The Belgian NRSF 2030 combines both mainstream initiatives and targeted Actions, offering a clear, actionable roadmap developed through inter-institutional dialogue at the federal and regional levels.

From an implementation standpoint, the framework largely advances established Actions contained in the previous plan. However, a significant portion of the NRSF's Action Plan is based on the ongoing activities of major pro-Roma organisations. This continuity supports sustainable efforts at Roma integration, but also highlights a potential shortfall: the reliance on a limited pool of service providers

The consultation process, crucial for effective implementation, has been primarily limited to input from a few pro-Roma organisations. For example, the process mainly involved inviting selected Roma mediators to contribute to discussions during National Roma Platform meetings. This narrow approach has resulted in minimal direct involvement of the broader Roma community, suggesting a gap in the framework's implementation strategy.

To strengthen implementation, the NRSF would benefit from introducing mechanisms that ensure the broader and more diversified participation of Roma civil society organisations. Such measures would not only enrich the Action Plan with diverse perspectives but also facilitate the more effective execution of its initiatives by tapping into the wider network of grassroots organisations.

Recommendations to national authorities

1. The Belgian National Roma Contact Point (NRCP) should set up a formal, regular consultation process with Roma civil society representatives.
2. The NRCP should dedicate and utilise specific funds to strengthen Roma-led organisations through policy design and collaborative projects.
3. National authorities should implement measures to guarantee that children's rights in Roma communities are fully respected and uniformly applied.
4. National authorities, in partnership with Roma sector representatives, should move forward with officially recognising the Roma Holocaust in Belgium by establishing a joint task force that includes Roma community leaders, historians, and policymakers.
5. National authorities should design and implement policies that specifically address the right to housing for the Roma Traveller community.
6. National authorities must include Roma community representatives in drafting policies that include clear targets, timelines, and resource allocation.
7. National authorities must help regional authorities launch pilot projects in key regions to test and refine housing solutions before a nationwide rollout.
8. Create dedicated financial instruments. National institutions should allocate specific financial resources to support the formation and sustained operation of the national Belgian Roma coalition.

Recommendations to European institutions

9. Following the current RCM project, European institutions should support the establishment of a national Roma coalition to prepare shadow reports on the implementation of the Belgian NRSF.

Recommendations to civil society

10. Roma civil society organisations should actively utilise existing local opportunities and forge national alliances to influence policy design, implementation, and monitoring. Organise regular local meetings to discuss and address community issues. Form a national network that consolidates local experiences and presents unified recommendations to policymakers. Invest in training and resource-sharing platforms to empower grassroots organisations.

Recommendations to other stakeholders

11. Other civil society actors working on intersectional issues should proactively seek partnerships with Roma inclusion advocates to combine efforts and resources. Identify overlapping interests and develop joint projects or advocacy campaigns.

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ANNEXE: LIST OF PROBLEMS AND CONDITIONS

Fighting antigypsyism and discrimination

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Antigypsyism is not recognised as a specific problem in national policy frameworks	significant problem	understood with limitations	present but insufficient	adequate but with room for improvement	Campaign targeting public institutions commemorating important dates (including 8 April). This was widespread among regional institutions and reached regional public services Roma experts were engaged in the development of campaign materials
Weak effectiveness of protection from discrimination	significant problem	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	Ongoing process of collecting complaints and the use of antidiscrimination legal instruments. Research has been conducted in the field of 'Improving data collection' by UNIA. Roma participated actively in the content development.
Forced evictions and demolitions lead to homelessness, inadequate housing, and social exclusion	critical problem	mentioned but not analysed sufficiently	absent	absent	No measure adopted.

Education

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
High drop-out rate before completion of primary education	significant problem	identified and analysed sufficiently	appropriate	The relevant targets are well defined	Ongoing projects for school mediators in the three regions are being implemented by the Regional Pro-Roma organisations. Positive results include a decrease in the percentage of dropouts. Roma are employed as school mediators.

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in Belgium

Early leaving from secondary education	significant problem	mentioned but not analysed sufficiently	absent	absent	No measure adopted
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Employment

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Youth not in employment, education, or training (NEET)	significant problem	identified and analysed sufficiently	appropriate	relevant targets are well defined	The ongoing ESF project is continued from the previous period. There is a date for young people's realisation in the employment market. Roma were employed as coaches and stewards.
Poor access to (re-) training, lifelong learning, and skills development	significant problem	identified and analysed sufficiently	appropriate	relevant targets are well defined	The ongoing ESF project is continued from the previous period. There is a date for young people's realisation in the employment market. Roma were employed as coaches and stewards.

Healthcare

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Limited access to health-related information	significant problem	identified and analysed sufficiently	appropriate	relevant targets are well defined	Ongoing activity of the Ministry of Health, with the network of mediators. Limited scope, as only one Roma person is employed, and the targeted group cannot be reached easily.
Poor access to preventive care (vaccination, check-ups, screenings, awareness-raising about healthy lifestyles)	significant problem	identified and analysed sufficiently	appropriate	relevant targets are well defined	Ongoing activity of the Ministry of Health, with the network of mediators. Limited scope, as only one Roma person is employed, and the targeted group cannot be reached easily.
Poor access to sexual/reproduct	significant	identified and analysed	appropriate	relevant targets are well defined	No measure adopted

ive healthcare and family planning services	problem	sufficiently			
Specific barriers to better healthcare for vulnerable groups such as elderly Roma people, Roma with disabilities, LGBTI, and others	significant problem	identified and analysed sufficiently	appropriate	relevant targets are well defined	No measure adopted

Housing, essential services, and environmental justice

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Lack of housing sites for Travellers	critical problem	mentioned but not analysed sufficiently	present but insufficient	some targets but not relevant	There is ongoing research for available possible caravan sites. Brussels and Citydev. Effectiveness cannot be evaluated yet. No participation of Roma.

Social protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
	significant problems	identified and analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	Ongoing activities of the Integration centres and Syndicates. Effectiveness is translated into improved awareness of the Roma concerning their social protection rights. No data available. Roma are part of the general public.

Social services

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
	significant problems	mentioned but not analysed sufficiently	adequate but with room for improvement	adequate but with room for improvement	Ongoing activities of the Social Welfare and Integration institutions. Effectiveness is translated into improved awareness of the Roma concerning their access to social services. Specific Roma services created in two Municipalities.

Child protection

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Child protection is not considered in the NRSF	critical problem	irrelevant	absent	absent	No measure adopted
The specific vulnerability of Romani children as victims of violence is not considered	critical problem	irrelevant	absent	absent	No measure adopted
Segregated or	critical problem	irrelevant	absent	absent	No measure adopted

discriminatory child protection services provided to Roma					
Activities aimed at strengthening parental responsibility and skills not available or not reaching out to Roma parents	critical problem	irrelevant	absent	absent	No measure adopted
Illegal practices of child labour	critical problem	irrelevant	absent	absent	No measure adopted

Promoting (awareness of) Roma arts, culture, and history

Problems and conditions:	Significance:	Identified by strategy:	Measures to address:	Targets defined:	Details of NRSF implementation relevant to the problem:
Poor or lacking awareness of the general population of the contribution of Roma art and culture to national and European heritage	significant problem	understood with limitations	adequate but with room for improvement	adequate but with room for improvement	There is funding available for organising cultural events at local level. Few Roma organisations have access to these funds, and implement activities.
Exclusion of Roma communities from national cultural narratives	significant problem	irrelevant	absent	absent	No measure adopted
Romani history and culture are	significant	irrelevant	absent	absent	No measure adopted

not included in school curricula and textbooks for both Roma and non-Roma students	problem				
Lack of memorialisation of Roma history through establishing monuments, commemorative activities, and institutionalising dates relevant to Roma history	significant problem	irrelevant	absent	absent	No measure adopted

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