

## **SECURITY – INTEROPERABILITY- COOPERATION-INFORMATION SHARING-ACTION ON MANAGING MIGRATION FLOW IN THE WESTERN BALKANS**

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**Abstract:** Western Balkans are entering into the seventh active year of mass-migration crisis with mixed results on the ability to direct, manage, house, register, assist and repatriate certain migrants or groups of migrants. This study collated available information from various process stakeholders and analysed strengths-weaknesses-opportunities-threats (SWOT) in the approaches to migrant crisis in North Macedonia, Albania, Kosovo\*, Serbia, Montenegro and Bosnia-Herzegovina. The main goal of the study was to investigate if the opportunities were seized / missed in improving cooperation, communication, interoperability among the stakeholders to make the flow of migration more humane, manageable, transparent (accountable) and effective in the field. Given security considerations and challenges of the migration flow as well as its subsidiary elements involving human smuggling / human trafficking and movement of problematic personnel, the analysis highlights some of the novel operative and technical solutions that can be fielded to improve identification, registration and additional screening or removal as required. Particularly important elements are the advances in digital data capture, biometrics, correlation, language recognition and information sharing among the varying levels of stakeholders. The analysis also identified significant opportunities in improving communication and data sharing among the principal countries of the migration route (North Macedonia – Serbia – Bosnia and Herzegovina), which could be beneficial in enhancing other security-related issues among the Western Balkan countries. The main challenge encountered is the lack of communications and reporting protocols as well as lack of documentation standards suitable for data entry, storage, indexing and searching. The analysis concludes that implementation of standardized, technical solutions may resolve some of the identified communications, mistrust or data sharing issues described in the SWOT analyses.

**Keywords:** Migrations, Western Balkans, Interoperability, Information-sharing, SWOT

### **Introduction**

The Western Balkan migratory route is firmly entrenched and continues to exert considerable pressure on the entire region, mostly on Bosnia and Herzegovina, Serbia and North Macedonia, which are along the main transit corridor. Given the unexpected and rapid

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increase of irregular migration cases since 2015, the Western Balkan countries are generally ill equipped, understaffed and institutionally unprepared to cope with the needs of the migrants and the broader effects of the migrations impact (particularly in the areas of safety and security). The border authorities in the high-impact countries still lack the motivation and required resources to cover the cost of accommodating irregulars and to sustain the level of protection, well-being, social, educational and health services provided to the migrant population.

## Problems

Notable structural and institutional deficiencies coupled with the lack of coordination and communication are the main themes that hamper (any) effective migration management. The sustainability and effectiveness of actions will first need to respond and address the most urgent risks identified within the migrant populations. This includes provision of basic services such as food, accommodation, medical assistance and access to education and social protection. Special attention needs to be given to women and vulnerable groups and their specific needs as well as to the abatement of criminal networks within the migrant communities.

The main challenges which have escalated along WB route are the admission (inclusive of registration, identification, housing, protection) and readmission agreements with the countries of origin. Part of the problem is that the countries are not rolling out the new strategies and action plans. Instead, they are improvising and relying on the expired procedures and plans that have not evolved with the situation. The WB countries are failing to look at the admission / readmission statistics and do not make adequate financial / budgetary projections, often coming out severely short-handed on the costs of implementing the measures, as well as on forecasting and pursuing possible external sources of funding. Lastly the countries are not acquiring or sharing important information (i.e., biometrical data) that would enable better tracking and identification of persons-in-transit.

## Background

Recent highlights from the combined reports<sup>11</sup> suggest that approximately 34,000 refugees and migrants arrive in Greece, Italy, Bulgaria, Serbia, Bosnia and Herzegovina and Montenegro each quarter. Compared to the previous quarters, the number of arrivals mark a dramatic increase in Italy (+58%), Bosnia and Herzegovina (+48%), and Montenegro (+40%)<sup>12</sup>. A particular challenge is the migrant quagmire that occurs in Bosnia and Herzegovina (notably the Federation administrative entity) and Serbia, where the migrants become effectively “stuck” given the dwindling availability of options to enter EU area, given the implementation of various measures and technical means to discourage entry<sup>13</sup>.

<sup>11</sup> UNICEF (2021) Humanitarian sitreps No.40, 41. <https://www.unicef.org/reports>

<sup>12</sup> Notes from the Sarajevo Migrations Dialogue, virtual conference 11/2021 – Conclusions and recommendations.

<sup>13</sup> Buzar, M (2021) Migration and refugee crisis as a security challenge in the Western Balkans, Ph.D. Thesis. University of Sarajevo, Faculty of Criminal Justice and Security Studies.

Given the increasing complexity of the matter, European Union, as the end-destination for migrations, has increased its efforts in expanding the migration management umbrella by co-opting the non-EU states to act as de-facto wave breakers<sup>14</sup>. The expansion of the Frontex system into the outside perimeter of EU make it possible for Frontex to undertake any operations deemed necessary on the other non-member territories. The agreement with the Western Balkan countries is signed in accordance with the EU/Frontex 2016 Regulation which allows the agency to carry out joint operations and rapid border interventions regardless of if the borders are coterminous with an EU member state or not. Frontex can also assist the signatory states with any deportation operations from EU member states to the buffer countries. With the approval of Frontex's 2019 mandate, the EU now has a legal authority to enforce migration-related agreements with states that do not border EU territory<sup>15</sup>. Given the uneven status of candidacy / ascension negotiation of Western Balkan states with the EU (discussed in the next section), there is a considerable interest in inter-operationalization and cooperation of the border security services and agencies in the Western Balkans.

The two main priorities of the current migration management are:

1. Repatriate all asylum (and temporary stay) ineligible individuals which would send a signal to all countries and people who would start their journey to not start it (migrants, not the refugees).
2. Establish a collective responsibility and cooperation in the exchange of information and personnel-tracking efforts with the WB transit countries<sup>16</sup>.

The compliance with the priorities among the WB countries has been haphazard, notably Serbia is particularly wary of the provisos granting Frontex operational freedom, access to information and immunity from Serbian law, which is at odds with the other participating nations<sup>17</sup>.

## Harmonization

Western Balkan countries were mandated to establish and harmonize their migration and asylum policies and procedures in line with the provisos set out in the EU ascension agreements; for Bosnia and Herzegovina it is also one of the key priorities identified before its application is even considered. Crucial strategies (policies), legal frameworks and institutions are identified in the table below. It must be emphasized that even though the policies, frameworks, reporting and systems have been de-jure synchronized, significant operational gaps remain.<sup>18</sup>

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<sup>14</sup> Bozic, K (2021) Fortified Gates of the Balkans. <https://kosovotwopointzero.com/en/the-fortified-gates-of-the-balkans/>

<sup>15</sup> Briefing: External Action – Frontex operations outside EU, March 11, 2021. <https://www.statewatch.org/analyses/2021/briefing-external-action-frontex-operations-outside-the-eu/>

<sup>16</sup> Notes from the Sarajevo Migration Dialogue (November 17 – 19, 2021); statement by minister Laogesse 02:17. Transcript available in the appendices.

<sup>17</sup> Nechev, Z. and Trauner, F. (2019). Status Agreements: Frontex's Novel Cooperation with the Western Balkans. Full text available: [https://idscs.org.mk/wp-content/uploads/2019/11/A5\\_FrontexENG.pdf](https://idscs.org.mk/wp-content/uploads/2019/11/A5_FrontexENG.pdf)

<sup>18</sup> Notes from Sarajevo Migration Dialogue (November 17 – 19, 2021), 05:17:04-5:19:11

Western Balkans (WB) are pieces of the same puzzle and encounter similar problems and issues managing migration flow and its secondary effects; the only type of cooperation and interoperability existing is when it is literally forced upon by an external (mainly EU) equity. Operational sharing and other types of cross-border assistance does not operate together under a common policy or management framework on migration. While bilateral cooperation among WB partners at borders has been developed (mainly through EU programs discussed in Section 5), true regional cooperation along the migratory routes covering other aspects of migration management, remains limited at best (as shown in the SWOT analyses). WB countries do not have at their disposal the full set of EU policy tools designed to underpin and sustain regional migration management, because they are not full members, applicants or even recognized by the EU (i.e., Kosovo\*). Lastly, limited domestic resources, overstretched and legacy-based systems coupled with a low level of migrant absorption capacity present continued challenges in each of the WB countries to a varying degree. The assessment shown below outlines some of the critical factors that define the current landscape along the WB route: limited interoperability, moderate (modest) cooperation, high number of management opportunities (issues that if remain unmanaged will grow into challenges and mounting challenges, failures and risk.

#### Interoperability and information sharing assessment

The overall state of interoperability among the various stakeholders in the migrations management nexus of WB is limited. The main stumbling block is the inability to validate and cross-check the identity of individuals entering, exiting or transiting during a mass-migration event. This issue is affecting all WB countries and remains to be solved. Certain members of the nexus do not have access to the database (Kosovo\*), or the access is heavily curtailed (Bosnia and Herzegovina) whilst countries like Serbia or Albania do not want to share their data or share it only in certain circumstances, but only to EU or US authorities. The reporting protocols, statistics, legal definitions, legal frameworks and SOPs in all of the countries are different and remain to be synchronized to be up to par with EU mandated directives. Given current trends, achievement of an even moderate interoperability among WB countries is an arduous task, that will take years to accomplish. A particular item of high-importance and probably the best foundation to improve interoperability is to support the development and roll-out of an interoperable national biometric registration/data-sharing systems on asylum applicants and irregular migrants - systems which could be modelled on the Eurodac technical and data protection principles, thus enabling regular regional information exchange and ensuring their future interoperability and compatibility with EU systems<sup>19</sup>.

#### Cooperation assessment

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<sup>19</sup> Council of European Union (2020). Council conclusions on enhancing cooperation with Western Balkans partners in the field of migration and security, June 5, 2020.

As a result of external pressure, WB countries have adopted certain level of cooperation and coordination, mainly through EU / FRONTEX<sup>20</sup> and their current level of cooperation can be described as moderately successful. A substantial proportion of all EU activities are directed towards information exchange between the EU member states and specific partners in the region. However, during the joint SCIFA/HLWG meeting (2021)<sup>21</sup>, many delegates expressed concerns regarding the unsatisfactory level of unified information flow and the further needs for enhancement. The level of cooperation enhancement (driven by EU) is not equally and equitably distributed along WB route: the results from the recent 2021 survey indicate that the participating Member States (as many as 13 of them) have mostly directed their support to the Western Balkans partners bordering with the EU, namely North Macedonia and Serbia receiving the most support (almost 2/3) whilst Montenegro, Bosnia and Herzegovina, Albania with Kosovo\* received the least amount of support and attention in improving cooperation. The cooperation is largely fostered by the 17-point Plan of Action (2015)<sup>22</sup> and the subsequent supplements described in Section 2. The areas of increasing cooperation need to be specifically made on the free flow of information among the stakeholders (on an immigration / identity level) but also on the application of preventing illegal secondary movements and fighting migrant smuggling and other forms of serious crime, in the context of the call by the European Commission to finance and support common operational partnerships directed at the organized crime (transnational criminal networks engaged in migrant smuggling, illicit firearms proliferation, narcotics manufacturing and distribution, document/wire fraud and money laundering).

### Migrations management

The post-conflict and fragile environment of WB countries presents multiple management opportunities in several co-occurring crises (economic, migrant, pandemic, existential-security). The concept of migration management is still a subject to much debate<sup>23</sup> in the WB corridor and varying approaches are directly related to the legal-political legacies of the implementing state. In the countries with the high residual power of the centralized state (e.g., Serbia, Montenegro, Albania) the migration management practices are handled in a fairly rigid (and sometimes heavy-handed) fashion. In the hybrid-states such as Bosnia and Herzegovina, Kosovo\* and North Macedonia, the

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<sup>20</sup> Joint EASO, Europol and FRONTEX report 'Tackling migrant smuggling in the Western Balkans: Illegal immigration along the Western Balkan Route and neighbouring countries, July 2018 - June 2019

<sup>21</sup> [https://euaa.europa.eu/sites/default/files/SPD\\_2021-2023\\_amendment\\_2\\_adopted\\_And\\_ANNEX-ES.pdf](https://euaa.europa.eu/sites/default/files/SPD_2021-2023_amendment_2_adopted_And_ANNEX-ES.pdf)

<sup>22</sup> [https://ec.europa.eu/commission/presscorner/detail/ro/IP\\_15\\_5904](https://ec.europa.eu/commission/presscorner/detail/ro/IP_15_5904)

<sup>23</sup> Vukomanovic, D (2021). Development of migration management portfolio in Western Balkans region. <https://hrcak.srce.hr/file/394582>

managerial approaches to mass movements, transiting and protection of vulnerable categories is ad-hoc, diffuse and consequential. Mass-migratory movements have therefore opened a management opportunity for the WB countries to develop a flexible migration-management system that could potentially combine humanitarian with security approach, but that did not happen, because they bungled the humanitarian aspect. Instead, the countries opted to harmonize their migration management framework with the EU standards, chiefly in the accepted obligations to harmonize their national legislation and standards with the provisos of the EU ascension *chapter 24* (justice, freedom and security). The operationalized management model is in-line with the EU migration management model, with a strong emphasis on pervasive control, securitization of migrants, migration process and fortress-mentality.

### Planning assessment

The reliance on expired plans, procedures and bureaucratic obstacles in implementing new plans and are bound to create additional friction points in an already fragmented and tense WB landscape<sup>24</sup>. The WB stakeholders are failing to look at the admission / readmission statistics and do not make adequate financial / budgetary projection often coming out short-handed on the costs of implementing the measures, as well as on forecasting and pursuing possible external sources of funding. The lack of available resources directly impacts the admission / readmission challenges and the cycle becomes a cyclic redundancy loop. There is no political advantage in accepting failure, but there is a practical advantage in accepting that the certain migration-management measures are not working and that they need to be overhauled. The measures needing overhaul in the short term are: (1) common policy or management framework on mixed-migration in WB; (2) personal information and case management sharing within the WB nexus; (3) coherent asylum policy, inclusive of the transient and temporary asylum (protection) status. Several recent reports from 2021/2022<sup>25</sup> and EU IPA audits<sup>26</sup> suggest that while bilateral cooperation and ad-hoc cooperation between WB border/migration-management stakeholders has been achieved in places true cooperation along the migratory routes

<sup>24</sup> Common Western Balkan Migration Policy: Borders and Returns Regional Policy Paper, Ed. Jelena Unijat, October 2019, Sarajevo, Bosnia and Herzegovina. [https://www.grupa484.org.rs/h-content/uploads/2020/04/FV-Borders\\_and\\_Returns\\_BRMC-grupa-484.pdf](https://www.grupa484.org.rs/h-content/uploads/2020/04/FV-Borders_and_Returns_BRMC-grupa-484.pdf)

<sup>25</sup> ICMPCD Non-Paper: [https://www.icmpd.org/file/download/56971/file/Non\\_Paper\\_NATC\\_SEE\\_December\\_2021.pdf](https://www.icmpd.org/file/download/56971/file/Non_Paper_NATC_SEE_December_2021.pdf)

IOM World Migrations Report 2022: <https://publications.iom.int/system/files/pdf/WMR-2022-EN.pdf>

<sup>26</sup> <https://ec.europa.eu/neighbourhood-enlargement/system/files/2021-12/AD%2003%20W1-MC%20Regional%20migration%20management%20systems%20WBs%202021.pdf>

covering other aspects of migration management, remains limited without notable positive trends.

### Corruption assessment

The corruption remains entrenched in all aspects of public / political arena in WB and it is also present in the areas of migration-management. In the 2021 report<sup>27</sup>, the EC warns that the number of high-level corruption cases remains limited throughout WB while the various national agendas are either stalled in the ratification process or rejected by the assemblies as it was the case in Kosovo\*. It is strongly recommended the data collection methodology for both corruption and organized crime cases be further improved (particularly regarding the key priorities in human trafficking and smuggling) while increasing successful prosecutions and convictions in the high-level corruption cases, especially cases involving civil servants (Albania, Kosovo\*, Bosnia and Herzegovina). There were several notable cases of corruption within border-security agencies in Bosnia and Herzegovina,<sup>28</sup> Serbia,<sup>29</sup> and Montenegro<sup>30</sup> showing a full spectrum of corruptive actions possible along the WB route, some of it also having considerable trans-national elements.

## **Threats and Opportunities**

Mixed-migration flow management in Bosnia and Herzegovina opened up two unresolved issues, one dealing with the internal political blockades and the other on the complex relationship BH has with the EU. Several authors suggest that EU decided that *BH stabilization goal needs to be put aside mainly to benefit from the fragility of the political system to carry out undisturbed the externalization of migration control*, at the expense of continued deterioration of BH viability<sup>31</sup>. Furthermore, the individuals caught up in the mass-migrations have also been intentionally weaponized and used to further certain hybrid-warfare goals, aimed primarily at the destabilization of EU (and WB in particular)<sup>32</sup>. In BH, the migration crisis revealed the full fragility of the decentralized system where the majority of incoming persons were directed to the Federation entity and two cantons in particular: Sarajevo canton and Unsko-sanski canton. Majority of the reception / housing centres were located within those counties and the available area for the permanent or transient camps was allocated by the municipalities, not the State or entity government, requiring considerable negotiation

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<sup>27</sup> [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_21\\_5275](https://ec.europa.eu/commission/presscorner/detail/en/IP_21_5275)

<sup>28</sup> [http://www.tuzilastvobih.gov.ba/komponente/print\\_vijesti.php?id=5032&jezik=e](http://www.tuzilastvobih.gov.ba/komponente/print_vijesti.php?id=5032&jezik=e)

<sup>29</sup> [https://bezbednost.org/wp-content/uploads/2020/07/corruption\\_at\\_the\\_serbian\\_border\\_police.pdf](https://bezbednost.org/wp-content/uploads/2020/07/corruption_at_the_serbian_border_police.pdf)

<sup>30</sup> <https://balkaninsight.com/2021/10/14/montenegro-urged-to-investigate-former-police-heads-gang-ties/>

<sup>31</sup> Deidda, E. 2020. Bosnia and Herzegovina: A Migrant Hotspot at the Gates of Fortress Europe; Linköping university - Department of Culture and Society (IKOS) Master's Thesis.

Majstorovic and Seper (2022). Race, Gender, and Migration at an EU periphery: A View from Bosnia and Herzegovina <https://lefteast.org/race-gender-migration-bih/>

<sup>32</sup> <https://www.foreignaffairs.com/articles/2021-12-02/how-migrants-got-weaponized>

and tact among the stakeholders<sup>33</sup>. It is therefore imperative that an acceptable compromise is reached among the constituencies of BH that would ameliorate the political blockade and move forward in the migration-management arena. It is, at present, unlikely that a consensus is likely in a short term, while the escalation of political crisis, instability and secession is increasing in likelihood.

A bold regional-integration vision introduced by the leadership of Albania, North Macedonia, and Serbia, the Open Balkan Initiative (OBI), seeks to improve interstate commerce, allow for the free movement of people, goods and services and improve the cooperation in the areas of border security and migration management. Even though the initiative was presented to the remaining WB countries, the leaders of Kosovo, Montenegro, and Bosnia Herzegovina (not including the Republic of Srpska) are reluctant to join due to fears it could hinder their EU path or reinforce Serbia's political agenda<sup>34</sup>. Besides being a sound idea, the actual execution of it would run into considerable difficulties from the get-go. Given the challenges in interoperability and information sharing the Open Balkan initiative could exacerbate human/drug/weapons trafficking across WB border and encourage various other trans-national criminal activities in the absence of borders and the rule of law. The European Commission has already, in this regard, highlighted the WB route as the main entry point for various types of contraband into the EU. As an additional complicating factor, in a border-free region, it would be nearly impossible to keep track of any TCN entries/exits, transiting persons or irregular migrations, placing the heterogeneous visa regimes of OBI countries under severe stress. Absent some creative IT solution, cooperative data sharing agreements and networked operations, the OBI remains a vision.

A common theme reported in the post-mortem analyses of the two mixed-migration waves in WB is that the NGO sector bore the brunt of support services that should have been the responsibility of the respective governments<sup>35</sup>. However, instead of recognition for the grass-roots work in managing the immediate effects of the migrant crisis or encouraging networking and cooperation, many of the NGOs have been curtailed by the respective governments and caught in the cross-fire of criminalizing migrations<sup>36</sup>. In a strictly *de-jure* interpretation when a migrant's entry into a given territory is considered "illegal", any work or activity of NGOs to provide required humanitarian or other support (i.e., legal) may be intentionally or unintentionally construed as a form of *aiding or abetting* an offender or direct (or implicit) complicity in the *de-jure* illegal nature of the migrant situation<sup>37</sup>. In particular,

<sup>33</sup> [https://eeas.europa.eu/headquarters/headquarters-homepage/91182/bosnia-and-herzegovina-migration-crisis-far-over\\_en](https://eeas.europa.eu/headquarters/headquarters-homepage/91182/bosnia-and-herzegovina-migration-crisis-far-over_en)

<sup>34</sup> [https://europeanwesternbalkans.com/2021/07/29/mini-schengen-renamed-open-balkan-vucic-rama-and-zaev-sign-three-documents/?fbclid=IwAR2Ry5y76b0Nlz\\_XnsGKOYGYjAuhPdDy-Sem1u838iBHRISQbPSi70\\_vlbyc](https://europeanwesternbalkans.com/2021/07/29/mini-schengen-renamed-open-balkan-vucic-rama-and-zaev-sign-three-documents/?fbclid=IwAR2Ry5y76b0Nlz_XnsGKOYGYjAuhPdDy-Sem1u838iBHRISQbPSi70_vlbyc)

<sup>35</sup> Sapoch, J.M. (2018). Europe's Outsourced Refugees: Contextualizing NGO work in the "Calais of the Balkans" Thesis. <https://scarab.bates.edu/cgi/viewcontent.cgi?article=1302&context=honorstheses>

<sup>36</sup> <https://rm.coe.int/expert-council-conf-exp-2019-1-criminal-law-ngo-restrictions-migration/1680996969>

<sup>37</sup> Lina Vosyliūtė and Anne-Linde Joki, 'Integration: The Social Inclusion of Undocumented Migrants', ReSOMA Discussion Brief, November 2018 <https://ec.europa.eu/research/participants/documents/downloadPublic/a1ISVEhuTk9VZIJLbixQ1V1SzVrOWVtVWlpNVlImOGdvU3o5a2hpRm5n-MVZKRE1oV0ZOMjR3PT0=/attachment/VFEyQTQ4M3ptUWZlSU4zL2hZODdrbEJWRGs5K1VRamY=>



Greek authorities have been increasingly criminalizing civil-society equities supporting migrants and refugees, including NGOs involved in the Search and Rescue (SAR) operations at sea, with Italy, Croatia and WB countries following the trend citing security concerns<sup>38</sup>.

Another complicating element for the NGOs, particularly in the arena of “social license to operate” are the rising accountability issues when the organizations are operating in isolation (self-styled effort), and risk becoming exclusive and unaccountable to local communities or to the people-in-transit they are trying to help. The evolving tunnel vision of the NGOs/CSOs concerned in just executing the *doing part* rather than trying to understand the wider context and developing the necessary coalition to achieve an across-the-board effort. In the vacuum of such situation many grassroots groups supporting refugees and irregular migrants, often disregard the needs and perception of the local community that may be instrumental in a sustainable solution and end up in “us versus them” scenario within the locals (and in turn, the local constabulary that can result in further challenges), particularly in Bosnia and Herzegovina<sup>39</sup>.

### **Concluding recommendations**

There are four immediate recommendations that could be implemented to improve the migration management along WB route:

- Not losing an opportunity to maintain the dialogue and enable the exchange of data and information. The countries are already exchanging information in legal border crossings, they can readily implement the same procedure in irregular migrations.
- Implementing active training curriculum and dedicated resources that can be used to tackle critical inadequacies of the migration management system (working with vulnerable groups, technical literacy, translation) and develop better biometric data sharing protocols among the users and sponsors (e.g., have sponsors mandate sharing of the data collected).
- Encouraging cooperation and pooling of available resources to decrease the “appeal” of the WB migratory route. Priority cooperation is on the biometric data exchange and repatriation of certain persons by adopting and pushing the repatriation / readmission agreements.
- Creating a monolithic approach towards EU and requesting accountability and participation in the risk management process. WB stakeholders need to form a unified front in migration management both towards EU as well as towards the source/ transit countries.

Ultimately the stakeholders must agree in principle that they truly want to manage the situation jointly and not use it as a convenient excuse to create a problem and a way to exact a petty revenge on the neighbouring countries along the WB route.

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<sup>38</sup> <https://www.amnesty.org/en/latest/news/2020/03/europe-people-helping-refugees-and-migrants-risk-jail-as-authorities-misuse-anti-smuggling-laws/>

<sup>39</sup> OSCE Report 2019– Situation report with regards to migrants and refugees in Bosnia and Herzegovina. <https://www.osce.org/files/f/documents/3/b/397322.pdf>

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