Luxembourg

FRANET National Focal Point
Social Thematic Study
The situation of Roma
2012

Estudes et Formation S.A.

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Executive summary

According to the legal conditions on the collection of personal data (law of 02.08.2002 modified in 2007: law of 27.07.2007), it is impossible to identify Sinti and Roma in the framework of an administrative database.

The legal framework in Luxembourg prevented Roma from settling in the country. As a result, Roma had two alternatives, namely to settle and assimilate, adopting a sedentary lifestyle or to leave the country- transit and to limit their stay to several hours/day (itinerant lifestyle with residence in the French border region). However, estimates table around 500 settled Roma in Luxembourg. An important share of Roma among a significant number of voluntary returns has also been noted by scholars. Regarding the characteristics of the Roma in Luxembourg, two main groups can be distinguished, namely Roma who arrived since the second half of 2010 after visa obligations were abolished for the Western Balkan countries and asylum seekers having arrived from Kosovo in the 1990s.

With regard to the situation in **education**, authorities opened numerous welcoming classes in order to cope with the arrivals of AIP children or youngsters since the autumn of 2010 as they observed important deficits, mainly of children who had no previous school experience.

With regard to **employment**, it is believed that some of the few Roma who arrived in 1999 are well integrated, while others live on social assistance.

With regard to **housing**, a difference can be noted between applicants for international protection (AIPs) and asylum seekers/refugees. AIPs are housed in specific centres designed for this particular purpose. Given the high share of Roma arrivals among all AIP arrivals, approximately 90% of inhabitants of the only centre for newcomers are Roma. After this first compulsory stay in the centre for newcomers, authorities dispatch AIPs to different centres in the country; there is no wish by the authorities to concentrate Roma in certain centres and not in others. It is estimated that in other centres with an 'old-standing' group of AIPs, about 50% of the inhabitants are Roma, on average. The European Commission against Racism and Intolerance (ECRI) highlighted that Roma are discriminated against by administrators of camping places who deny them access to such sites.

Important **health** problems have been mentioned as a reason for the arrival of Roma in Luxembourg. As opposed to previous experiences and observation by authorities (Office luxembourgeois de l'accueil et de l'integration) with other IP-target groups, chronic illnesses, tumours, problems linked to hygiene (mainly dermatological problems), a higher ratio of paediatric illnesses (due to non-

vaccination) and disabilities are the predominant pathologies. Moreover, there are also higher ratios of pregnancies, mainly of medically uncontrolled pregnancies. No statistical data are available.

The main reason why Roma emigrate to Luxembourg is **poverty** – unemployment – in the country of origin. All AIPs receive the same social allowance. However, an important debate erupted at the end of 2011, when authorities presented the main changes as compared to the current grand-ducal decree of 1 September 2006. As opposed to the current grand-ducal decree, the social allowance will be reduced from \in 122 to \in 25 per month for a single adult with full boarding.

Regarding active citizenship and rights awareness, there is no political organisation amongst Roma AIPs.

1 Roma population

According to the legal conditions on the collection of personal data (law of 02.08.2002 modified in 2007: law of 27.07.2007), it is impossible to identify Sinti and Roma in the framework of an administrative database. Only data on Roma applicants for international protection is available.

Roma who live in Luxembourg became sedentary or had to become so. They are integrated in the society with a permanent housing situation, with children being in school just as any other child, in employment/having a wage or living on social assistance. Luxembourg's legal framework explains why Roma or travellers in general cannot enter and settle down temporarily within specifically designated areas such as in other countries - e.g. France.

Three laws provided a 'filtering' framework. The first and oldest such law is the legal framework prohibiting "*colportage*", door-to-door sales: act of 1 January 1850 with the last modification: act of 16 July 1987. There is no direct mentioning of Roma.

The second is the act of 28 March 1972 on the *entrance and stay of foreigners in Luxembourg* and additional grand-ducal decrees. This legislation provides that the entrance and stay can be refused to those foreigners who are found in a situation of vagabondage or begging or who do not have sufficient means for traveling and stay [in Luxembourg]; they can be banned from the territory by being returned to the border via a simple administrative procedure. In the immigration act of 29 August 2008, the references to vagabondage or begging were removed. Entrance and stay are submitted to the following conditions: a) possession of a passport or a visa (if they are required); b) not to be considered a danger for public order, interior security or public health; c) having sufficient personal means to pay for travelling and stay as well as for health insurance (article 34) as in the previous legal framework. Articles 99 and 100 stipulate that entrance and stay are refused to foreigners who do not fulfil the conditions mentioned in article 34.²

Thirdly, the *Code de la route* does not allow to stop for prolonged times on or close to public roads or to use a camping car for housing (art. 167 a) and b)). Luxembourgish camping owners can host Roma at three different price categories, but they are not keen to welcome them because of the effect it

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¹ This measure has been criticised by NGOs.

² "Peuvent être conduits immédiatement à la frontière par la force publique, sans autre forme de procédure que la simple constatation du fait par le procès-verbal à adresser au ministre de la justice les étrangers non autorisés à résidence : 1) qui sont trouvés en état de vagabondage ou de mendicité ou en contravention à la loi sur les professions ambulantes ; 2) qui ne disposent pas de moyens suffisants pour supporter les frais de voyage et de séjour. » (art. 12 of same act).

would have on their usual clients and the police who often appears shortly after travellers arrive to deal with conflictive situations and to register incidents of discrimination.³

Thus, Luxembourg's legal framework had an excluding effect on travellers staying in the country for a certain time period.

Due to this legal framework, Roma had two alternatives, namely to settle and assimilate, adopting a sedentary lifestyle or to leave the country- transit and to limit their stay to several hours/day (itinerant lifestyle with residence in the French border region).⁴ However, estimates table around 500 settled Roma in Luxembourg.⁵ An important share of Roma among a significant number of voluntary returns has also been noted by scholars.⁶

Regarding the characteristics of the Roma in Luxembourg, two main groups can be distinguished. A first group consists of numerous Roma who arrived since the second half of 2010 after visa obligations were abolished for the Western Balkan countries. They apply immediately for international protection (IP) as Roma coming from Serbia, Northern FYR of Macedonia, Kosovo and, recently, from Montenegero and Albania. Western Balkan Roma immigrants usually have large families, with many children, and the housing situation in the country of origin goes from ordinary to very poor. Language, living conditions and the political context vary also depending on the country of origin. According to representatives of NGOs, a difference is visible between those who have "Western"-style attitudes and those with Roma stereotypical attitudes. The main reason for emigrating is unemployment and a feeling of discrimination; both factors, linked to the country of origin, provide little probability for a successful IP procedure in Luxembourg. The high number of Roma arriving from certain cities of the former Republic of Yugoslavia (see Table 1 in Annex 2) might be taken as an indicator of high connectedness. Authorities and NGOs observed an important trend of voluntary returns, even before finalising the IP procedure. NGOs explain this by the fact that expectancies might not have been met or, according to both NGOs and authorities, by the fact that the current social allowance will be decreased may also have an impact on the number of voluntary returns. At the same time, there seems to be pressure on Serbia and other EU candidates to hinder IP applications lodged by their citizens using the visa liberalisation

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³ Bulletin 5, RAXEN 7.

⁴ Reyniers, A., 1990, « Les Tsiganes au Grand-Duché de Luxembourg » in *Etudes Tsiganes* 3, pp. 52 – 55 and Waringo, K., 2002 « Luxembourg, Deine Zigeuner » in *D'Letzebuerger Land*: 1907.2002.

⁵ Reyniers, A., 1990, « Les Tsiganes au Grand-Duché de Luxembourg » in *Etudes Tsiganes* 3, pp. 52 – 55

⁶ Reyniers, A., 1990, « Les Tsiganes au Grand-Duché de Luxembourg » in *Etudes Tsiganes* 3, pp. 52 – 55

⁷ Information provided by authorities and NGOs (Caritas).

agreement, in vigour since January 2010.⁸ The fact that Roma applicants do not insist to stay in Luxembourg, as opposed to other AIPs from the former Republic of Yugoslavia, was also mentioned.

A second group of Roma consists of a small group of individuals coming from Kosovo during and after the war in 1999/2000 and who submitted an application for asylum. Once their asylum application is definitively rejected, they present themselves as Roma. Most of them (Caritas estimates less than 50 persons) were recognized as refugees and integrated into the society.

Most applications for international protection (AIP) are processed as normal ones. In 2011 and 2012, 15 and respectively 34% of all decisions⁹ were taken according to art. 20 (quick procedures). With the exception of Kosovo, Balkan countries including Albania are considered safe countries. In 2011, applicants for international protection (AIPs) increased from 786 to 2164 (by 175%). In 2011 and 2012, 82.5 and respectively 79% of AIPs came from the former Republic of Yugoslavia, and Albania (only since the beginning of 2012) According to data from the Ministry of Foreign Affairs, in 2010, 2011 and up to March 31st 2012, 1514 Roma arrived in Luxembourg as AIP.¹⁰

Most of the AIPs arrive from a limited number of Balkan cities. For instance, in 2010 and 2011, AIPs from Serbia mainly arrived from Nis, Vranje and Novi Pazar and in 2012 from Novi Pazar, Belgrade and Tutin.

2 Education

Authorities opened numerous welcoming classes in order to cope with the arrivals of AIP children or youngsters since the autumn of 2010. The ministry does not provide data on the ethnic origin of the AIP children. Authorities observed important deficits, mainly of children who had no previous school experience. Specific welcoming classes for Roma students in primary school have been organized in order to cope with specific problems and due to their presumably short-term stay in Luxembourg.

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⁸ Chachipe, *Visa liberalisation vs. asylum*, available at http://romarights.wordpress.com/visa-liberalisation-vs-asylum/

asylum/

⁹ Which concern Roma and other AIP. Observation by NGOs: in times of the Former Republic of Yugoslavia, Roma were not discriminated; they were citizens as anybody else and were integrated into the labour market.

¹⁰ Admnistrative data for AIP arrivals: Ministère des Affaires Etrangères, Direction de l'Immigration for the years 2010, 2011 and 2012

NGOs observed a high interest in schooling from a certain share of parents as well as a lower one by others.

3 Employment

The main reason for emigrating is unemployment, which seems to be mostly due to discrimination at the level of recruitment.

Despite the lack of data, it is believed that some of the few Roma who arrived in 1999 are well integrated, while others live on social assistance.¹¹

4 Housing/Neighbourhood

Current AIPs are housed by the authorities in specific centres designed for this particular purpose. Given the high share of Roma arrivals among all AIP arrivals, approximately 90% of inhabitants of the only centre for newcomers (every AIP has to pass a certain time at the beginning of his stay in this centre) are Roma. After this first compulsory stay in the centre for newcomers, authorities dispatch AIPs to different centres in the country; there is no wish by the authorities to concentrate Roma in certain centres and not in others. It is estimated that in other centres with an 'old-standing' group of AIPs, about 50% of the inhabitants are Roma, on average. Authorities and NGOs confirm an important trend of voluntary returns of Roma, which also explains the significantly lower share of Roma in these second-stage housing centres. ¹² Future housing depends on the result of the IP procedure. ¹³

Roma having arrived from Kosovo at the end of the war in the 1990s were not numerous and those who are still in Luxembourg received either the status of refugee or a humanitarian status. Caritas estimates this number to be less than 50 persons.

The European Commission against Racism and Intolerance (ECRI) highlighted, in a report published as part of the fourth monitoring cycle, that Roma are discriminated against by administrators of camping places who deny them access to such sites.¹⁴

¹¹ Based on a testimony of a Roma family living in Luxembourg in Caritas News n. 90: September 2011.

¹² Estimates by Office Luxembourgeois de l'Accueil et de l'Intégration: OLAI); public body responsible for the welcoming and housing of AIPs.

¹³ Parliamentary question n. 1795 of 22 August 2002 (http://www.deigreng.lu/sites/greng/files/x20020822-1795GensDuVoyageAccesLuxembourg.pdf

¹⁴ ECRI (2012), Rapport de l'ECRI sur le Luxembourg (Quatrième Cycle De Monitoring), available at http://www.coe.int/t/dghl/monitoring/ecri/country-by-country-luxembourg/LUX-CbC-IV-2012-004-FRE.pdf.

A non-governmental report from argues that the housing problem exist only for Roma who are invisible as Roma in administrative data sets and who did not want to speak up in the study. 15

5 Health

Important health problems have also been mentioned as a reason for the arrival of Roma in Luxembourg. As opposed to previous experiences and observation by authorities (Office luxembourgeois de l'accueil et de l'integration) with other IP-target groups, chronic illnesses, tumours, problems linked to hygiene (mainly dermatological problems), a higher ratio of paediatric illnesses (due to non-vaccination) and disabilities are the predominant pathologies. Moreover, there are also higher ratios of pregnancies, mainly of medically uncontrolled pregnancies. No statistical data are available.

6 Poverty/ Economic situation

The main reason why Roma emigrate to Luxembourg is poverty – unemployment – in the country of origin. If unemployment and discrimination are mentioned as push factors, according to NGOs, a strong link between both factors can be identified meaning that, in the country of origin, unemployment may be due to a discriminatory attitude by employers.

All AIPs receive the same social allowance. However, an important debate erupted at the end of 2011, when authorities presented the main changes as compared to the current grand-ducal decree of 1 September 2006. 16 As opposed to the current grand-ducal decree, the social allowance will be reduced from € 122 to € 25 per month for a single adult with full boarding provided by authorities.

Authorities highlighted the fact that current rates provided an incentive as compared to the neighbouring countries; Belgium was quoted.

NGOs criticised the decision arguing that basic needs will not be covered with € 25 due to significantly higher living costs in Luxembourg than in Belgium. Moreover, in Belgium (€ 29) the amount is slightly higher than in Luxembourg. In response, authorities offered extra provisions, which will be provided on a case-by-case basis although this attempt was also met

http://www.legilux.public.lu/leg/a/archives/2006/0078/a078.pdf#page=2
 http://www.legilux.public.lu/leg/a/archives/2006/0078/a078.pdf#page=2

with scepticism by NGOs arguing that fundamental rights are not guaranteed and that the acceptance of individual demands implies much more administrative efforts.

The high share of voluntary returns of AIPs among those who return in general, when compared to previous years, may be due to the fact that the upcoming grand-ducal decree has decreased the attraction of Luxembourg as a destination country.

7 Active citizenship/Rights awareness

Concerning Roma who arrived during the Kosovo war, there might be some who have asked for naturalization in the meantime although no precise information is available.

There is no political organisation amongst Roma AIPs.

Chachipe, an NGO, argues that Roma have been obliged to assimilate and to renounce their own identity and that the national plan for the integration of Roma – asked for by the European Commission - reflects this instead of addressing the needs of this "hidden" population and offer specific measures.¹⁷

Reports from RAXEN and FRANET as well as comments of the Chachipe NGO and an ECRI report from 2010 highlighted a campaign against begging launched by the police which involved discriminatory leaflets and which assumed risks to focus on Roma.

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¹⁷ Report by Chachipe: cf. table 2.

Annexes

1. Bibliography

Administrative data from the Ministry of Foreign Affairs and Immigration

Chachipe (2012), Luxembourg: Stratégie nationale de non-intégration des Roms: Les commentaires de Chachipe, available at http://romarights.wordpress.com/2012/02/01/luxembourg-strategie-nationale-de-non-integration-des-roms-les-commentaires-de-chachipe/

Chachipe (2012), Concerne: Stratégie luxembourgeoise pour l'intégration des Roms—Les commentaires de Chachipe, available at http://romarights.files.wordpress.com/2012/01/chachipe-commentaires-stratc3a9gie-rom-3001121.pdf

Chachipe, *Visa liberalisation vs. asylum*, available at http://romarights.wordpress.com/visa-liberalisation-vs-asylum/

CEPS/INSTEAD (2010), Hate crime study on Luxembourg, RAXEN: special study.

Council of Europe, ECRI Rapport (2012), http://www.coe.int/t/dghl/monitoring/ecri/country-by-country/luxembourg/LUX-CbC-IV-2012-004-FRE.pdf

ENAR, (2012), Rapport Alternatif. Le racisme et les discriminations au Grand-Duche de Luxembourg, available at http://cms.horus.be/files/99935/MediaArchive/publications/shadow%20report%202010-11/17.%20Luxembourg.pdf

Parliamentary question n. 1795 of 22 August 2002 (<u>http://www.deigreng.lu/sites/greng/files/x20020822-1795GensDuVoyageAccesLuxembourg.pdf</u>

Reyniers, A., 1990, « Les Tsiganes au Grand-Duché de Luxembourg » in *Etudes Tsiganes* 3, pp. 52 – 55 and Waringo, K., 2002 « Luxembourg, Deine Zigeuner » in *D'Letzebuerger Land:* 1907.2002.

Report by Chachipe: cf. table 2. Cf also parliamentary question of 8 April 2012: http://www.asti.lu/wp-content/uploads/2012/04/QPromsQ.pdf

Online sources:

STATEC (www.statec.lu)

http://www.legilux.public.lu/leg/a/archives/2006/0078/a078.pdf#page=2

http://www.legilux.public.lu/rgl/2011/A/2180/A.pdf

2. Statistical tables

Table 1. Share of Roma AIPs coming from the following non-EU countries: in %

	2010	2011	2012*	Total
FYRM Macedonia	21.43	99.12	97.18	96.83
Serbia	75.89	79.18	54.10	75.16
Kosovo	n.a.	20.4	6.6	
Montenegro	6.48	0.00	4.12	4.12

Source: Ministry of Foreign Affairs and Immigration; *1January to 31 March 2012

Table 2. Student newcomers, share of AIP students, welcoming classes, special welcoming classes

		2009/10	2010/11	2011/12
Primary school	Number of students Number of AIP students	812	757 66	980 269
	Number of welcoming classes for AIP, including Roma		14	21
Secondary school	Number of students Number of AIP students, including Roma	489 37	608 107	451 133
	Number of welcoming classes	21	22	30

Data: Ministry of Education

3. Table of complaints

No data available.

4. Table of sources (reports and studies on Roma)

	Title, author, source	Housing of Roma in Europe by EUMC: Luxembourg did not participate in this study due to results of the aforementioned study
		CEPS/INSTEAD
	Source and type	EU report by EUMC.
		CEPS delivered a short text
	Education	
	Housing	✓
Thematic area	Employment	
ıatic	Health	
hem	Poverty	
L	Migration	
	Active citizenship	
	Sample	-
	Location	General comment on Luxembourg
	Target population	-
	Key findings	The CEPS paper explained the legal framework which hinders travellers to 'settle' for a certain time in the Grand-Duchy. Housing problem exist only for Roma who are invisible as Roma in administrative data sets and who did not want to speak up in the aforementioned study.
	Methodology	Quotation and explication of three laws
	Representativeness, transferability of findings	

	Title, author, source	Hate crime study on Luxembourg, RAXEN : special study, 2010
		CEPS/INSTEAD
	Source and type	Non-governmental report
		By CEPS/INSTEAD (research institute)
	Education	
	Housing	✓
area	Employment	
Thematic area	Health	
hem	Poverty	✓
L	Migration	
	Active citizenship	
	Sample	-
	Location	Luxembourg
	Target population	-
	Key findings	Paragraph 21:
		Quotation and explication of three laws
		Paragraph 28:
		Police action against organized begging, focussing indirectly on Roma.
	Methodology	Administrative data, documents of all type and expert interviews
	Representativeness, transferability of findings	-

Title, author, source	ECRI Rapport 2012
	Council of Europe
	http://www.coe.int/t/dghl/monitoring/ecri/country-by-

		country/luxembourg/LUX-CbC-IV-2012-004-FRE.pdf
	Source and type	Council of Europe
	Education	
	Housing	✓
area	Employment	
atic	Health	
Thematic area	Poverty	✓
L	Migration	
	Active citizenship	
	Sample	n.a
	Location	Luxembourg
	Target population	-
	Key findings	p. 29s:
		1) discrimination of Roma on camping places
		2) campaign against organised begging by the Police
	Methodology	Administrative data, documents of all type and expert interviews
	Representativeness,	-
	transferability of findings	

	Title, author, source	ENAR rapports
		Anita Petersheim
		http://cms.horus.be/files/99935/MediaArchive/publications/shado w%20report%202010-11/17.%20Luxembourg.pdf
	Source and type	-
tic	Education	
Thematic area	Housing	
Th	Employment	

Health	
Poverty	
Migration	
Active citizenship	
Sample	n.a.
Location	Luxembourg
Target population	-
Key findings	Recent arrival of Roma from the Balkans as asylum applicants
Methodology	Administrative data, documents of all type and expert interviews
Representativeness, transferability of findings	-
inidings	

	Title, author, source	RAXEN et FRANET reports
		CEPS/INSTEAD and Etudes & Formation
	Source and type	CEPS/INSTEAD
	Education	
	Housing	
area	Employment	
atic	Health	
Thematic area	Poverty	✓
T	Migration	
	Active citizenship	
	Sample	n.a.
	Location	Luxembourg
	Target population	
	Key findings	campaign against organised begging by the Police and its discriminating leaflets

Methodology	Administrative data, documents of all type and expert interviews
Representativeness, transferability of findings	

	Title, author, source	Concerne : Stratégie luxembourgeoise pour l'intégration des
		Roms –
		Les commentaires de Chachipe
		http://romarights.wordpress.com/2012/02/01/luxembourg-
		strategie-nationale-de-non-integration-des-roms-les-
		commentaires-de-chachipe/
	Source and type	By Chachipe, voluntary organisation
	Education	
	Housing	✓
area	Employment	
Thematic area	Health	
hem	Poverty	✓
T	Migration	✓
	Active citizenship	
	Sample	n.a.
	Location	Luxembourg
	Target population	-
	Key findings	Examines the strategies of Luxembourg's government regarding
		the integration of Roma. Main findings:
		1) Discrimination of Roma on camping places
		2) campaign against organised begging by the Police risks to focus on Roma.
		3) Roma who settle in Luxembourg have to give up their identity.
		4) recent arrivals of Roma AIPs
		Conclusion: Luxembourg still states to have no Roma population

	and no Roma problem
Methodology	Administrative data, documents of all type and expert interviews
Representativeness, transferability of findings	-

5. Roma networks

Type of Associations, Organisations, NGOs	Name of Organisation	Email/Website	Roma involvement	Main area of expertise
Asbl: voluntary organisation	Chachipe	http://romarights.wordpress.com/luxembourg/ e-mail: chachipe.info@gmail.com	Chachipe is a voluntary organisation, launched in 2007 as an internet platform, in 2008 as Romano Them and in 2009 as a non-profit organisation named Chachipe (in Romany: right, justice and truth), a lobby and advocacy organisation working for Roma tackling mainly fundamental rights They receive no funding by the state as compared to other voluntary organisations or NGOs	As lobby and advocacy organisation they provide press review and a comprehensive list of Parliamentary questions concerning asylum issues and more specifically Roma issues.(cf. link)
NGO	Caritas: service réfugiés	http://www.croix-rouge.lu/blog/tag/migrants-et-refugies/ e-mail: caritas@caritas.lu	Service has been launched in the beginning of the '90 in order to take care of refugees from Bosnia. Within the framework of the services Caritas provides for refugees, Roma AIPs are also cared for. Caritas runs projects for the European Refugee Fund.	Caritas offers housing, educational programmes (for youngsters and for adults), counselling regarding several areas (school, health, etc.), runs projects in the European Refugee Fund. Most of the services are financed or co-financed by the State.
Auxiliaire Haut Pouvoir Public	Red Cross: migrants et Réfugiés	http://www.croix-rouge.lu/missions-du- service-migrants-et-refugies/ e-mail: info@croix-rouge.lu	Service has been launched in 2004 Within the framework of their refugee service they also take	Red Cross offers housing (counselling, runs projects in the European Refugee Fund Most of the services are financed or co-financed by the State.

			care of Roma. They run the only centre for newcomers and 3 other centres for AIPs. They also run projects for the European Refugee Fund.	
Voluntary organisation	ASTI: association de soutien aux travailleurs immigrés	http://www.asti.lu/ e-mail: mailto:zerktouni@asti.lu	Launched in 1979, ASTI is a lobby organization in order to achieve better conditions for Portuguese migrants; third country nationals before the EU-accession of Portugal.	ASTI offers counseling (legal and other areas) after school care, runs Projects (European Refugee Fund)
Voluntary organization	CLAE: Comité de liaison des associations d'étrangers	http://www.clae.lu/ e-mail: migrations@clae.lu	Launched in 1985, they offer counseling, they do lobby work and run several European Refugee projects.	CLAE was active in 2001/2002 within a campaign by the government to legalize undocumented migrants and rejected asylum applicants. They run projects in the European refugee Fund.
Platform of voluntary organizations and NGOs	Collectif Réfugiés	http://www.clae.lu/html/m1sm3ssm3.html e-mail: currently it is the adress of ASTI. The different member NGOs / voluntary organisations function as chair of the "collectif réfugiés".	A platform run by 9 voluntary organizations or NGOs including the aforementioned plus others with exception of Chachipe.	A collective lobby organization, which issues declarations and opinions on draft bills.