Delegations are kindly invited to use this template to share their comments on any of the draft country programme documents being presented to the Executive Board during the second regular session.

Delegation name: European Commission

Draft country programme document: Bosnia Herzegovina

In accordance with Executive Board decision 2014/1, country programme documents are considered and approved in one session, on a no-objection basis. All comments received by the Office of the Secretary of the Executive Board before the deadline will be made public on the Executive Board website, and considered by the respective regional office, in close consultation with the country office and the concerned Government.

**General comments**

Based on the European Commission’s assessment, children in BiH are facing with many challenges. To overcome such problems, the Commission would recommend to BiH to develop and adopt  
1) a new action plan on child protection (there are around 1,640 children without parental care in the country),  
2) make efforts to strengthen children’s right (the Ombudsman received 198 complaints in 2019 and 216 in 2018),  
3) improve preschool education (which the lowest in Europe, only 17%),  
4) improve childcare capacities

Over the recent years, difficulties could be observed in terms of administrative capacities, including data-collection, and concerning migration in terms of providing basic needs for migrant and refugee children.

**Comments on specific aspects of the country programme document**

(Delegations providing comments may wish to include details, such as the page number, paragraph number, or page of the annexed results and resources framework).

**Administrative/institutional support/capacity**

8. “In recent years, Bosnia and Herzegovina has taken important steps towards reforming its child protection system, most notably with the adoption and implementation of specialized laws on the protection of children involved in criminal justice proceedings.”

**EC comment:** BiH is reforming its child protection system (community-based care). The administrative capacities of the centres for social welfare need to be strengthened. Besides, care and alternative measures should be taken to prevent family separation.

**Data-collection**

7. “...Although the concept of inclusive education has been widely introduced, every third Roma child or child with a disability has experienced some form of discrimination during their education”

**EC comment:** Marginalised groups, such as the Roma, face multiple forms of discrimination and as a result, not all children are covered by compulsory health insurance. Therefore, the authorities should collect accurate data on child poverty and violence against children.

**EC comment:** in BiH, only a small number of cases of violence against children were reported. Not only children, but vulnerable groups, such as Roma, or migrants children face forms of discrimination. The authorities need to collect data.

**Migration**

5. “Since early 2018, Bosnia and Herzegovina has experienced a rapid influx of refugees, migrants and asylum-seekers. Of the 8,600 refugees and migrants stranded in the country at the end of 2019, approximately 8 per cent were families with children, and 12 per cent were unaccompanied and separated children, who still lack the basic social services.”

**EC Comment:** In BiH, unaccompanied migrant children face specific difficulties, when it comes to accessing to safe accommodation and asylum procedures. 533 migrant children were identified in 2019, up from 324 in 2018; only 304 of them were appointed a legal guardian. Alternatives must be found to the detention of irregular migrant families with children, as well as to find a way to ensure the registration of births of children of undocumented migrants.