

**CERD/CMW Europe Consultation 2024 – Xenophobia and its impact on migrants, their families and other non-nationals – CERD GR38/CMW GC7 & CERD GR39/CMW GC8**

**ENS recommendations**

**Summary**

- Statelessness should be mainstreamed across both draft general recommendations, including through the use of more inclusive terminology as it relates to nationality (or the lack thereof), as well as across more substantive areas, such as migrant detention and migration-related communication policies, and the international legal definition of a stateless person should be added.
- A section on antigypsyism as a specific form of racism and its nexus with statelessness and nationality rights should be added. This would also strengthen the inclusivity of these recommendations.
- The recommendations should better reflect international standards and good practice as it relates to statelessness in a migratory context. Areas where this should be synthesised are, *inter alia*, identification of statelessness, migrant detention, birth registration for children born to migrants, and safeguards to prevent statelessness in a migratory context.

**General Recommendation 38/General Comment 7**

The following recommendations are ordered by relevant paragraph of the draft general recommendation/comment (GR/GC) and should be read together. Where possible, the recommendations include concrete edit suggestions, as well as resources to inform these edits.

- We very much welcome the references and focus on statelessness across the GR/GCs. However, it would be beneficial to include more inclusive language concerning stateless persons and those with undetermined nationality. In **paragraph 2**, we suggest rephrasing the inclusion of ‘*nationality*’ as one of the factors forbidden by the principle of non-discrimination to ‘*nationality (or statelessness)*’ or change it to ‘*nationality status*’. This would further mainstream statelessness across the documents. This is a comment that applies throughout the GC/GRs.
- In **paragraph 16**, we suggest a minor formal edit: change ‘*statelessness*’ to ‘*stateless people*’, as well as including a reference to migrants with undetermined nationality (*‘Therefore, it is a broad term that contemplates different categories of “migrants”, including asylum seekers, refugees, **stateless people and those with undetermined nationality**, victims of trafficking, and other people in the context of international migration.’*)
- **Between paragraphs 16 and 17**, we suggest adding a paragraph on statelessness, including the definition of a stateless person with reference to Article 1 of the 1954 Convention Relating to the Status of Stateless Persons (‘1954 Convention’). Many stateless people around the world are denied basic rights most people take for granted.

Statelessness affects both migrants and refugees and people who have lived in the same place for generations (*in situ* statelessness). We suggest adding the following paragraph: ‘A stateless person is someone ‘who is not considered as a national by any State under the operation of its law’.<sup>1</sup> This definition is part of customary international law and has been authoritatively interpreted by UNHCR as requiring ‘a mixed question of fact and law’.<sup>2</sup> For the millions of stateless people around the world, not having a nationality can mean denial of basic rights most people take for granted: to go to school or work, get married or register the birth of your child, to legally ‘exist’.<sup>3</sup> Statelessness affects both migrants and refugees and people who have lived in the same place for generations (*in situ* statelessness).<sup>4</sup> It can be intertwined with other root causes of displacement,<sup>5</sup> such as the persecution of minority groups, armed conflict, discrimination and gaps in nationality laws, and deprivation of nationality practices. Many in Europe are also stateless *in situ*, or “in their own country”.<sup>6</sup> *In situ* statelessness is often linked to State succession and discriminatory laws or practices against certain communities trapped in intergenerational statelessness. For example, thousands of Romani people in Europe lack any identification documents to assert their nationality, and hundreds of thousands of people (a significant number of whom belong to Russian-speaking minority groups) are excluded from citizenship in the Baltic States.<sup>7</sup>’

- We also suggest consistently adding an explicit reference to ‘stateless persons’ throughout both recommendations/comments when the term ‘non-nationals’ is included in a list, to ensure that stateless persons are also captured in addition to foreign nationals.
- In **paragraph 30**, we suggest that more explicit emphasis should be placed on access to birth registration procedures as a fundamental right that is inhibited by xenophobia. Many groups in a migratory context, such as undocumented, stateless, and/or other affected groups such as Romani communities, can face difficulties in accessing birth registration procedures for their children.<sup>8</sup> In part, this is due to the cyclical nature of xenophobia, where individuals may not be able to access healthcare or identity documents, which in turn, leads to barriers to birth registration. The lack of birth registration can create a risk of statelessness for affected children and limit their access to fundamental rights.<sup>9</sup> We believe that a greater focus on birth registration in the recommendations would

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<sup>1</sup> UN Convention Relating to the Status of Stateless Persons, 28 September 1954, Article 1(1).

<sup>2</sup> UNHCR (2014), *Handbook on Protection of Stateless Persons Under the 1954 Convention Relating to the Status of Stateless Persons*, para. 23: <https://www.unhcr.org/dach/wp-content/uploads/sites/27/2017/04/CH-UNHCR-Handbook-on-Protection-of-Stateless-Persons.pdf>.

<sup>3</sup> For more information about statelessness around the world, see: <https://www.unhcr.org/ibelong/>.

<sup>4</sup> For more information on statelessness in Europe, see: [www.statelessness.eu](http://www.statelessness.eu).

<sup>5</sup> Of the over seven million people who applied for asylum for the first time in the European Economic Area and Switzerland in 2015-2023, 135,280 were recorded as ‘stateless’ or of ‘unknown nationality’. On average, nearly 2% of first-time asylum applicants are recorded as being stateless or of unknown nationality. See: [Statistics | Eurostat](#).

<sup>6</sup> International Covenant on Civil and Political Rights, Article 12(4).

<sup>7</sup> For more information about the minorities affected by statelessness in Europe, see: <https://www.statelessness.eu/issues/stateless-minorities>

<sup>8</sup> ENS, [No child should be stateless: Ensuring the right to a nationality for children in migration in Europe](#) (2 April 2020).

<sup>9</sup> ENS, [Thematic briefing on Birth registration and the prevention of statelessness in Europe: identifying good practices and remaining barriers](#) (5 May 2020), upcoming update.

emphasise the intergenerational impact of xenophobia and call attention to this issue that requires action from States and local governments, which are often responsible for providing such procedures, in line with the principle of non-discrimination. We suggest adding the following recommendation ‘g) *Provide universal access to birth and civil registration to ensure that all people have a legal identity, which, in addition to ensuring access to fundamental rights, is also in the interest of fostering social inclusion*’.

- In the **section on Xenophobia and Racism**, we suggest adding a paragraph on antigypsyism as a specific form of racism and its nexus with statelessness and nationality rights. Antigypsyism can be defined as a ‘*specific form of racism, an ideology founded on racial superiority, a form of dehumanisation and institutional racism nurtured by historical discrimination, which is expressed, among others, by violence, hate speech, exploitation, stigmatisation and the most blatant kind of discrimination*’.<sup>10</sup> Deep-rooted discrimination and antigypsyism against certain ethnic and minority groups, such as Romani populations, may affect their right to a nationality and access to certain services and procedures and identity documents, as authorities are more likely to challenge their belonging to the country and thereby exclude them through direct discrimination or through low civil registration rates from nationality policies to ensure continuity, often requiring proof of permanent residence or citizenship and privileging a dominant ethnic group. Moreover, due to a lack of trust rooted in historical and current negative experiences, many people from these communities may be reluctant to engage with the authorities.<sup>11</sup> Moreover, while many ethnic and minority communities affected by antigypsyism remain *in-situ*, the impact of xenophobia is also felt in a migratory context (e.g. in Italy, France) and should not be excluded from this recommendation.<sup>12</sup> If accepted, further consultation should be undertaken with Roma organisations when drafting this sub-section.
- In **paragraph 75**, we suggest that the very important considerations on gender should extend to addressing gender-related discrimination in nationality matters. For example, 24 countries discriminate in their nationality laws, denying women the ability to confer their nationality to their children on an equal basis with men.<sup>13</sup> This results in children being born stateless if the father is also stateless or unknown or cannot otherwise confer a nationality to the child. In a migratory context, host/destination countries often do not

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<sup>10</sup> See European Commission Against Racism and Intolerance, [General Policy Recommendation No. 13 on combatting antigypsyism and discrimination against Roma](#), CRI(2011)37rev, December 2020, p. 3.

<sup>11</sup> ENS, [Legal briefing: Statelessness and the prohibition on discrimination against Romani communities](#) [Statelessness](#) (5 June 2024); ENS, European Roma Rights Centre (ERRC) and the Institute for Statelessness and Inclusion (ISI), [Roma Belong: Statelessness, Discrimination and Marginalisation of Roma in the Western Balkans and Ukraine](#) (October 2017). See also ERGO Network, Valeriu Nicholae, [Policy Paper: Towards a Definition of Antigypsyism](#) (2007) and [other publications on antigypsyism from the ERGO Network](#). See also Report of the Special Rapporteur on minority issues, Rita Izsák, [Comprehensive study of the human rights situation of Roma worldwide, with a particular focus on the phenomenon of anti-Gypsyism](#) (2015).

<sup>12</sup> [Statelessness Index](#).

<sup>13</sup> [The Global Campaign for Equal Nationality Rights](#), The Problem (2024); ENS, [Submission to the UN Special Rapporteur on violence against women and girls](#) (13 May 2023), p. 3. For more information on gender equality in nationality laws regarding conferral of nationality on children globally, see UNHCR, [Background Note on Gender Equality, Nationality Laws and Statelessness 2023](#) (7 March 2023).

have full safeguards in their nationality laws to ensure that a child born on their territory who would otherwise be stateless acquires their nationality. This means that gender discriminatory laws in a mother's country of nationality can result in children being born stateless elsewhere. Where safeguards do exist, they may apply only in certain circumstances, or may not be fully implemented in practice.<sup>14</sup> We suggest including a sentence at the end of the paragraph that emphasises this point: *'The awareness of a gender perspective should include a consideration of how laws in origin and transit countries, can have a lasting impact on women and their families. For example, States should recognise that discriminatory nationality laws in a woman's country of nationality may prevent her from conferring her nationality to her children. An example of measures to combat gender discrimination would therefore include the introduction and implementation of full safeguards in transit and destination countries' nationality laws to ensure that all children born on the territory who would otherwise be stateless acquire nationality.'*

- In **paragraph 75**, we also suggest including an explicit reference to how discrimination can impact on access to reproductive healthcare for refugee women and women from minoritised communities. This can in turn impact on access to birth registration, legal identity, and confirmation or acquisition of nationality. There are reports that women and children may be excluded from healthcare services because of their statelessness, lack of health insurance or financial means, or due to discrimination.<sup>15</sup> We suggest editing the list of affected measures to include this point: *'...and access to economic, social, and cultural rights, **healthcare, including reproductive healthcare, among others...**'*
- In **paragraph 75**, in line with our recommendation concerning access to healthcare, we believe that it would be beneficial to include an explicit reference to the requirement in some countries for public services to report people with irregular residence status to immigration authorities.<sup>16</sup> Such measures represent additional barriers to accessing essential services including healthcare and civil registration. In Europe, very few countries have explicit firewalls prohibiting the exchange of information between public authorities, and in some countries public officials are required to report certain immigration matters to immigration authorities.<sup>17</sup> These measures may disproportionately impact on women, deterring those with irregular residence status from registering their children or attending a public health institution to give birth. This in turn can increase the risk of statelessness for children and may disproportionately impact women affected by statelessness who may be more likely to be undocumented or have irregular residence status. We suggest adding the following reference to this paragraph to foreground this issue: *'including visa regulations and other channels for regular migration, border governance, **lack of firewalls to prevent sharing of information by public services with immigration authorities, grounds for getting a residence permit**'*.

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<sup>14</sup> [Statelessness Index](#).

<sup>15</sup> ENS, [Submission to the UN Special Rapporteur on violence against women and girls](#) (13 May 2023), p. 2.

<sup>16</sup> ENS, [Submission to the UN Special Rapporteur on violence against women and girls](#) (13 May 2023), p. 2; See also [Statelessness Index](#).

<sup>17</sup> [Statelessness Index](#).

- Between **paragraph 75 and 76**, we suggest a paragraph could be added to ensure an intersectional approach to understanding women’s experiences of migration policies. For example, stateless women may face increased difficulties in regularising their status if they are unable to access legal advice due to other compounding issues, for example if they have caring responsibilities, an abusive partner, or limited economic means.<sup>18</sup> This may also limit their ability to meet the income requirements or pass language and citizenship tests often required for naturalisation, as they may face additional barriers to learning the local language and culture. Not having a nationality often results in a perceived lack of identity and sense of belonging, which may lead to psychological harm. We suggest adding a separate paragraph to ensure an intersectional approach to understanding the impact of migration policies (a new paragraph 76), in addition to the mention of intersectionality in paragraph 74 that centres on narratives.
- In **paragraph 83**, in line with our previous recommendation relating to birth registration (paragraph 30) and in addition to what is already provided for in GR39/GC8, we suggest including information on States’ legal duties to provide for birth registration under the Convention on the Rights of the Child.<sup>19</sup> All signatories to the CRC must implement Article 7 to guarantee the right of every child to be registered immediately after birth and to acquire a nationality, and Article 8 to respect the right of the child to preserve their identity, including their nationality. Obligations deriving from the 1961 Convention on the Reduction of Statelessness require States to grant nationality to children who would otherwise be stateless and must be interpreted in light of the CRC.<sup>20</sup> This includes the underlying principles of (i) non-discrimination (Article 2) and (ii) that all actions concerning children, including in the area of nationality, must be undertaken with the best interests of the child as a primary consideration (Article 3). Birth registration is key to preventing statelessness and securing the child’s right to a nationality, due to the information it provides about a person’s links to a State.<sup>21</sup> It is therefore key to implementing both the Convention on the Rights of the Child and the 1961 Convention. We suggest including the following recommendation: ‘*c) ensuring that all children have access to immediate birth registration and a nationality, including by eliminating barriers caused by direct and/or indirect discrimination*’.
- In the section on ‘Persons with disabilities’, we suggest adding in **paragraph 89** ‘Discriminatory regulations for access to visas **and naturalisation** for migrant workers...’ and in **paragraph 90** ‘States parties should abstain from including disability as a ground for denying or restricting visas **or access to nationality**...’. This would allow to include a reference to nationality laws that discriminate on the ground of disability, for example by

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<sup>18</sup> ENS, [Submission to the UN Special Rapporteur on violence against women and girls](#) (13 May 2023), p. 5.

<sup>19</sup> ENS, [Thematic briefing on Birth registration and the prevention of statelessness in Europe: identifying good practices and remaining barriers](#) (5 May 2020), upcoming update.

<sup>20</sup> UNHCR, [Guidelines on Statelessness No. 4: Ensuring Every Child’s Right to Acquire a Nationality through Articles 1-4 of the 1961 Convention on the Reduction of Statelessness](#) (21 December 2012).

<sup>21</sup> UNHCR and UNICEF, [Convention on the Rights of the Child Quick Reference Guide: Statelessness and Human Rights Treaties](#) (January 2017).

imposing requirements such as those related to having a ‘sound mind’, absence of ‘burden’ on health and social services, language tests, and income requirements.<sup>22</sup>

- The inclusion of the section on ‘**Stateless people in the context of migration**’ is very welcome. However, to strengthen this section, we recommend that it is broadened in scope beyond children in migration to include a paragraph on the importance of identification of statelessness and protection routes for stateless migrants to align with standards set out in the 1954 Convention Relating to the Status of Stateless Persons and related norms.<sup>23</sup> We suggest explaining the importance of identification and protection routes for stateless migrants and recommending that State parties establish statelessness determination procedures (SDP) and raise awareness of statelessness among relevant national authorities. We suggest that a new paragraph is added to explain this issue and explicitly recommend that State parties establish a statelessness determination procedure, in line with international norms and good practice, to identify and protect stateless people, and facilitate their naturalisation.
- The important recommendation about preventing statelessness through cooperation between host, transit, and origin States (**paragraph 101**) could be strengthened by also recommending that States implement safeguards where such communication breaks down or is ineffective.<sup>24</sup> This is an important safeguard in line with the principle of the best interests of the child. Moreover, there should be a safeguard where communication between authorities relates to refugee children and families. States must not communicate with other States about the status of the child where that child and/or their parents are refugees, to ensure primacy of the asylum claim and the principle of confidentiality.<sup>25</sup> In practice, this means that children at risk of statelessness and their parents should be informed of the importance of raising potential refugee-related concerns and States must not disclose the identity of a refugee or asylum-seeker to the authorities of countries with which they have a link.<sup>26</sup>
- In addition, **paragraph 101** should clearly include that States have the obligation to establish a safeguard to prevent statelessness among children, in line with the 1961 Convention on the Reduction of Statelessness. This safeguard should be included in a provision in law to ensure that anyone born on the territory who would otherwise be stateless acquires the nationality of that country. Conferral of nationality to otherwise stateless children born on the territory should ideally be automatic at birth and not subject to the outcome of lengthy procedures aiming to resolve a child’s nationality status

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<sup>22</sup> See [Statelessness Index](#).

<sup>23</sup> ENS, [Statelessness determination and protection in Europe](#) (September 2021)

<sup>24</sup> ENS, [No child should be stateless: Ensuring the right to a nationality for children in migration in Europe](#) (2 April 2020).

<sup>25</sup> UNHCR, ‘Handbook’.

<sup>26</sup> ENS, [Thematic briefing on Statelessness determination and protection in Europe: good practice, challenges, and risks \(14 September 2021\)](#), upcoming update.

with other States, in accordance with the 1961 Convention and the principle of the best interests of the child.<sup>27</sup>

- Suggested edit: *‘States should adopt all appropriate measures, including legislative reforms, directed to effectively prevent statelessness and ensure the right to a nationality for all children born to migrant parents, regardless of their nationality, migration or residence status. States must establish a safeguard to ensure that children born on their territory who would otherwise be stateless acquire the nationality of that State. The Committees encourage States parties to promote bilateral or multilateral cooperation mechanisms aimed at preventing and eradicating statelessness of children born in the context of migration –e.g., articulation between civil registration and related authorities between States of origin of migrant parents, transit States where a child was born, and States where family is residing, and ensuring that conferral of nationality to otherwise stateless children born on the territory is in accordance with the 1961 Convention and the best interests of the child principle and not subject to the outcome of lengthy procedures aimed at resolving a child’s nationality status with other States.. Moreover, there should be a safeguard where communication between authorities relate to refugee children and families, so that States do not communicate with other States about the status of the child where they and/or their parents are refugees, to ensure primacy of the asylum claim and the principle of confidentiality.’*

#### **General Recommendation 39/General Comment 8**

The following recommendations are ordered by relevant paragraph of the draft general recommendation/comment and should be read together. Where possible, the recommendations include concrete edit suggestions, as well as resources to inform these edits.

- As with GC38/GC7, it would be beneficial to include more inclusive language concerning stateless persons and those with undetermined nationality. In **paragraph 5**, we suggest rephrasing the inclusion of ‘nationality’ to ‘nationality (or statelessness)’ or change it to ‘nationality status’. This also applies throughout this draft general recommendation/comment.
- In **paragraph 9**, we suggest adding ‘antigypsyism’ to the list of forms of discrimination that should be connected to efforts to tackle xenophobia and including an explanation of this term.<sup>28</sup> See our comments on this in the section on Xenophobia and Racism on p. 3 above.
- In **paragraph 36**, the recommendation to address the impact of xenophobia and discrimination on irregularity and migration policy is welcome. We recommend that it is strengthened by extending its scope to cover **procedural rather than merely substantive actions, ensuring that non-discrimination not only exists in law but also in practice**. For instance, based on the example provided – family reunification – this

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<sup>27</sup> UNHCR, [Guidelines on Statelessness No. 4: Ensuring Every Child's Right to Acquire a Nationality through Articles 1-4 of the 1961 Convention on the Reduction of Statelessness](#) (2012).

<sup>28</sup> [ERGO Network, Valeriu Nicholae, Policy Paper: Towards a Definition of Antigypsyism](#) (2007). See also [other publications on antigypsyism from the ERGO Network](#).

would include calling on States to ensure that family reunification procedures are non-discriminatory as well as **facilitate equitable access** to such procedures when certain groups may not be able to access them on equal grounds.<sup>29</sup> Stateless people, for example, may not be able to satisfy evidentiary requirements to access family reunification procedures in the same way as other migrants who have a nationality – but they should not be denied access to family reunification and other procedures based on circumstances resulting from their statelessness. We suggest that the following sentence is included at the end of paragraph 36: *‘To meaningfully target all forms of discrimination within migration policies, State parties should actively facilitate non-discriminatory, equitable access to procedures, for instance by allowing for flexibility within documentary requirements for certain groups, such as stateless people, who may have challenges in fulfilling them.’*

- In **paragraph 59**, relating to migrant detention, we suggest including ‘stateless people’ in the list of people in vulnerable circumstances for which States should take measures to prevent their detention, especially when detained for removal purposes. In such detention proceedings, stateless people can be exposed to disproportionate risks of arbitrary and prolonged detention due to the absence of documentation and the inability to return stateless people where such decisions have been made, as there often is no reasonable prospect of removal.<sup>30</sup> This can result in situations of limbo and fundamental deprivations of liberty for stateless people. The Committees should also consider recommending that State parties consider statelessness to be juridically relevant in decisions to detain and to establish safeguards against detention when there is no reasonable prospect of removal. The vulnerability of stateless people in detention is recognised in CMW GC5 (paragraph 52),<sup>31</sup> which this GR/GC has acknowledged to be an authoritative guideline on this issue. It should therefore be included.
- In **paragraph 69**, it is important to recognise that stateless individuals may face additional barriers to accessing economic, social and cultural rights and civil and political rights. This can be due to *inter alia*, a lack of identity documents, an inability to regularise their status, a lack of awareness of statelessness from national authorities, as well as xenophobia and discrimination.<sup>32</sup> In order for stateless people to access their rights under the 1954 Convention relating to the status of Stateless Persons, **there needs to be a dedicated procedure in place to identify who is stateless, determine their statelessness, and grant them access to protection and rights**. This is a crosscutting issue and should be integrated across section IV, as well as signposted by adding information on the identification of statelessness, determination procedures and status in **paragraph 69**. We suggest the following addition: *‘The Committees recognise that an existing barrier to accessing economic, social, and cultural rights is the lack of available routes for migrants to receive and regularise their status. For instance, many State parties*

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<sup>29</sup> ENS, The AIRE Centre (Advice on Individual Rights in Europe), ECRE, and the Dutch Council for Refugees, [Intervention before the ECtHR on \*Suji v. Greece\*](#) (application no. 13250/20), 23 February 2024.

<sup>30</sup> ENS, [Protecting Stateless Persons from Arbitrary Detention](#) (April 2017)

<sup>31</sup> CMW, [General comment No. 5 \(2021\) on migrants’ rights to liberty and freedom from arbitrary detention](#)

<sup>32</sup> ENS, [Statelessness determination and protection in Europe](#) (September 2021)

*lack a dedicated statelessness determination procedure, which is the most effective method to identify and determine statelessness and grant to stateless people the rights enshrined in the 1954 Convention Relating to the Status of Stateless Persons. The Committees recommend States parties establish such a procedure in order to grant access to rights in a non-discriminatory manner.’*

- In **paragraphs 89-90**, while the inclusion of a section relating to birth registration and the right to a nationality is very welcome, the draft could be strengthened to better reflect international norms and standards in this area.<sup>33</sup> For example, best practice includes a flexible approach to documentation requirements in cases where a child’s parent/s may be undocumented or unable to meet standard documentation requirements due to their migration status or other aspects of their identity. Late birth registration should be facilitated and parents should not be penalised for not registering their children if they have been unable to do so, such as due to their migration or other status. This emphasis is in line with Joint general comment No. 4 (2017) CMW and No. 23 (2017) CRC, paragraphs 20-22.<sup>34</sup> Suggested edit to **paragraph 90**: *‘to ensure that any child that is born within their jurisdiction effectively has access to a nationality, without any discrimination due to parents’ nationality (or statelessness), migration or documentation status, or any other aspect of their identity.’*
- Paragraph **90** could be strengthened to include safeguards for children born in-transit to ensure that no child is left without access to a legal identity and nationality, in line with the CRC, including the best interests of the child, as exemplified in recent jurisprudence from Spain.<sup>35</sup> A sentence could be included here to emphasise this: *‘[...status]. State parties should establish safeguards to ensure that children born in-transit are not left without birth registration or access to a nationality. [Effective, accessible, ...]’.*

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<sup>33</sup> ENS, [Thematic briefing on Birth registration and the prevention of statelessness in Europe: identifying good practices and remaining barriers](#) (5 May 2020), upcoming update.

<sup>34</sup> CMW/CERD, [Joint General Comment - No. 4 of the CMW and No. 23 of the CRC \(2017\) - on State obligations regarding the human rights of children in the context of international migration in countries of origin, transit, destination and return](#)

<sup>35</sup> [Spain - Statelessness Index. See e.g. a summary of a case of the Spanish Court of Appeal of Gipuzkoa on the Statelessness Case Law Database: Spanish Court of Appeal of Gipuzkoa, appeal no. 2209/2022, 11 May 2022.](#)