

Input by civil society to the 2021 EASO Asylum Report

Fields marked with * are mandatory.

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C o l l e a g u e s ,

The production of the *EASO Asylum Report 2021* is currently underway. The annual [Asylum Report series](#) present a comprehensive overview of developments in the field of asylum at the regional and national levels.

The report includes information and perspectives from various stakeholders, including experts from EU+ countries, civil society organisations, UNHCR and researchers. To this end, we invite you, our partners from civil society, academia and research institutions, to share with us your reporting on developments in asylum law, policy or practice in 2020 (and early 2021) by topic as presented in the online survey.

Please note that the EASO Asylum Report does not seek to describe national systems in detail but rather to present key developments of the past year, including improvements and challenges which remain. Your input can cover practices of a specific EU+ country or the EU as a whole. You can complete all or only some of the sections.

All submissions are publicly accessible. For transparency, 2021 contributions will be published on the EASO webpage. Contributions to the 2020 EASO Asylum Report by civil society organisations can be accessed [here](#), under 'Acknowledgements'. All contributions should be appropriately referenced. You may include links to supporting material, such as analytical studies, articles, reports, websites, press releases or position papers. If your organisation does not produce any publications, please make reference to other published materials, such as joint statements issued with other organisations. Some sources of information may be in a language other than English. In this case, please cite the original language and, if possible, provide one to two sentences describing the key messages in English.

The content of the EASO Asylum Report is subject to terms of reference and volume limitations. Contributions from civil society organisations feed into EASO's work in multiple ways and inform reports and analyses beyond the Asylum Report.

Your input matters to us and will be much appreciated!

Nina Gregori - *EASO Executive Director*

*Please complete the online survey and submit your contribution to the 2021 EASO Asylum Report by **Thursday, 25 February 2021**.*

Instructions

Before completing the survey, please review the list of topics and types of information that should be included in your submission.

For each response, only include the following type of information:

- New developments and improvements in 2020 and new or remaining challenges; and
- Changes in policies or practices, transposition of legislation or institutional changes during 2020.

Please ensure that your responses remain within the scope of each section.

Contributions by topic

1. Access to territory and access to asylum procedures (including first arrival to territory and registration, arrival at the border, application of the non-refoulement principle, the right to first response (shelter, food, medical treatment) and issues regarding border guards)

Access to territory

Land pushbacks

Greece to Turkey:

In 2020, BVMN has reported a total of 80 pushbacks from Greece to Turkey affecting approximately 4,275 people on the move (POM), a figure which accounts for only a fraction of the violent daily removals at the border. Almost 90% of the pushback testimonies contained one or more types of torture or ill-treatment [1].

An alarming trend identified was a rise in arbitrary arrests and pushbacks, deep inside the mainland, as well as in city areas like Thessaloniki. People who are in possession of an asylum applicant's card also face arbitrary detention and then mass expulsion across the strongly militarized Evros region to Turkey as documented in multiple reports by BVMN [2] [3].

Since March there have been multiple reports, showing the connection between the rise of this trend with the global COVID-19 pandemic considering increased police presence and absence of oversight from civil society organizations [4]. Throughout spring of last year BVMN documented multiple cases evidencing the pushbacks from Diavata refugee camp of people on the move who were residing in the camp informally [5]. People on the move were promised documents by officers to regularize their stay, according to the procedure to apply for asylum, but experienced instead beating with batons, detention and pushbacks over the Evros river. In a video, published by Are You Serious, police officers are shown removing people in a van from Diavata Camp [6]. This trend was documented by BVMN throughout the year, counting 11 pushbacks from Diavata Camp, involving 517 people, [7]. Furthermore the number of arbitrary arrests in Thessaloniki combined with destruction of valid asylum applicants cards and pushbacks increased. [8]. A case, reported by The New Humanitarian, documented a story of a 24-year-old registered Afghani asylum seeker, who was pushed back despite having a valid international Protection Applicants Card [9].

The growingly systematised practice of pushbacks by Greek authorities, including pushbacks to Turkey from deep inside the Greek mainland [10], hinders POM from accessing the asylum procedure in Greece. An exemplary case reported in August 2020 even documents the pushback of a family that was pushed back to Turkey by Greek authorities when they applied for asylum at a police station in Thessaloniki [11]. The lockdown restrictions in Greece, regulating curfews allowing only certain reasons to be outside, are used by Greek police to stop and target POM. This concerns especially those without a permanent home [12].

Pushbacks to Greece from North Macedonia and Albania

In 2020, BVMN reported 25 pushbacks from North Macedonia to Greece, affecting approximately 480 people [13]. From Albania to Greece, BVMN has documented 7 pushbacks involving 80 people [14]. The pushbacks were carried out with various forms of police violence towards the affected people, including severe beating, use of firearms, dog attacks and death threats.

The use of a quasi-official gate in the border fence between North Macedonia and Greece was broadly reported, including in BVMN testimonies. The police seem to benefit from the remote location of the gate, west of the official border crossing in Evzoni, allowing them to perpetrate unchecked violence [15]. The practice of pushbacks has become a permanent fixture of the Greek-North Macedonian border.

Due to denial of access to asylum by Greek authorities, POM are becoming increasingly reluctant to approach Greek authorities as POM are aware or have witnessed instances of pushbacks,. When POM try to register an asylum application in Greece, they are required to call Skype, an ineffective and 'restrictive system' [16], which has limited capacity or approach police officers and express their willingness to apply for asylum [17]. This leads to people being forced to live in precarious conditions. As a consequence, many POM see themselves coerced to move on to other countries.

2. Access to information and legal assistance (including counselling and representation)

CONTINUED FROM SECTION ONE:

Chain Pushbacks

Chain pushbacks have become a routine fixture of the EU border regime. This trend increasingly often leads to POM being removed not only from one territory to the next, but being violently refouled through several countries.

Serbia-North Macedonia-Greece

Multiple instances of chain pushbacks from Serbia to North Macedonia and further on to Greece occurred in 2020. Serbian authorities misled POM who were residing in Serbian camps with promises of new camp cards or transfers due to COVID-19, but instead pushed them back to North Macedonia. There, the people were apprehended by local police and pushed back to Greece [18]. In October, BVMN documented an event where a group of 20 POM were violently pushed back to North Macedonia, where they were apprehended by army and police officers, driven to the N.Mac-Greek border and pushed back [19].

Bulgaria-Greece-Turkey

BVMN observed a trend in chain pushbacks via the Orestiada area, geographically positioned as a section of Greek territory sandwiched between Bulgaria and Turkey. POM are pushed back from Bulgaria in the knowledge that they will be easily intercepted by Greek police and returned to Turkey. For instance, a Tunisian man was caught in Bulgaria, robbed of all his possessions, attacked by a police dog and pushed to Greece [20] where he was captured by local police, detained with 50 others, and pushed back to Turkey.

Another group was beaten, bitten by police dogs, forced to undress, and had their belongings stolen in Bulgaria before being pushed back to Greece [21] where they were apprehended and forcibly detained before being pushed back to Turkey with hundreds of others. Subsequently, this group was subjected to another trend identified in 2020: those who arrived in Turkey were violently forced back to Greek territory by Turkish military where Greek authorities proceeded to push them back again.

Chain pushbacks carried out in the tri-border area involved Bulgarian and Greek officials, unidentified “masked men” as well as allegedly Frontex personnel [22].

Sea Pushbacks

In 2020, BVMN partner Mare Liberum recorded 321 pushbacks on the Aegean Sea, concerning 9,798 POM [23]. BVMN took testimonies of nine maritime pushbacks from Greece, involving 250 people. All described Greek authorities apprehending POM, conducting body searches and taking their belongings. Two-thirds recalled instances of physical violence.

In March, first reports emerged of POM being intercepted at sea, placed on unmaneuverable inflatable liferafts and left adrift [24] (described in five of the nine BVMN testimonies [25]). The rafts are also used to expel people who have arrived on Greek islands where they are captured, taken back to sea and left adrift [26]. Other reports described a known tactic of the Hellenic Coast Guard (HCG) of driving close to dinghies at high speeds to create large waves [27] in order to push them towards Turkish territorial waters. The reports describe that the HCG are usually removing or breaking the engines of dinghies [28] or puncturing holes in inflated rubber sections [29].

A HCG spokesperson denied that these accusations had connections to the HCG [30]. Footage obtained and investigated by BVMN partners Josoor & No Name Kitchen disproves this statement [31]. Several testimonies collected by BVMN mentioned Frontex involvement in maritime pushbacks [32]. The Greek government continues to deny the reality of pushbacks while boasting about a 95% decrease in arrival numbers on Greek islands [33].

3. Provision of interpretation services (e.g. introduction of innovative methods for interpretation, increase/decrease in the number of languages available, change in qualifications required for interpreters)

4. Dublin procedures (including the organisational framework, practical developments, suspension of transfers to selected countries, detention in the framework of Dublin procedures)

5. Special procedures (including border procedures, procedures in transit zones, accelerated procedures, admissibility procedures, prioritised procedures or any special procedure for selected caseloads)

POM arriving through the Greek-Turkish land border in order to register their asylum application, they are required to call Skype, an ineffective and 'restrictive system', [34] which has limited capacity [35]. Asylum seekers may have to wait for months for a response, risking potential arrest while deprived of assistance provided to asylum seekers [36]. An alternative way to apply for asylum is to approach police officers or a police station and express one's will. The police officer has an obligation to register the will and issue documentation containing a willingness number that would subsequently serve to obtain an appointment at the closest Asylum Office to register the asylum application.

Due to the lockdown, the Ministry of Migration and Asylum has set up an e-Service page, the Electronic Self-Register [37] to register asylum applications once the willingness number has been issued. However, throughout 2020, the Electronic Self-Registration platform has been non-functional. Additionally, POM encounter difficulties in obtaining a willingness number, as often the police departments issue documentation without a willingness number. As of April 2020, we have also observed that POM are reluctant to approach police officers, police stations or other authorities due to fear of being pushed back. BVMN respondents told how they were informed by registered asylum seekers to approach a police station once arrived in Thessaloniki and how they were subsequently pushed back to Turkey, after an organized transfer from the police station to the border area, the same day they had arrived [38].

POM can submit an asylum application also directly at the Asylum Office. Access to the Asylum Office is generally challenging to access, with informal and arbitrary acceptance of persons queuing for days in a row in front of the offices. Throughout 2020, due to closure of the asylum offices, and then the partial re-opening of services, has further restricted the possibility to register an asylum application.

In Northern Greece, a pathway to register an asylum application, available only to vulnerable POM, is through the Thessaloniki Κέντρο Ένταξης Μεταναστών (KEM), a public office designated to integration. POM arriving in Northern Greece do not have access to information about the various ways they could apply

for asylum. Most POM who have access to the pathway are through referrals from organizations providing services such as food distribution, or non-food items, medical services, or others.

Late February 2020 saw an increase in POM attempting to cross the Greek-Turkish land border [39]. In March, Greece responded by closing the land border and increasing, 'security around islands in the Aegean Sea' [40]. At the land-border, police and military fired teargas and rubber bullets at POM approaching the Pazarkule crossing, with reports of live fire to push people back [41]. During this period, there were at least two confirmed deaths [42].

On 2 March, Greece issued an Emergency Legislative Order, suspending access to asylum for those who 'irregularly' arrived in Greece until 31 March 2020, [43] stipulating that they would be subject to return to their country of origin or transit 'without registration' [44]. The Order resulted in thousands being blocked from claiming asylum and being held in detention, as well as some being faced with penal prosecution for 'illegal entry' [45]. As further elaborated in section 5, the Greek state has also used the excuse of COVID-19 to keep its borders closed, suspend the Asylum Service's public services and increasingly restrict access to asylum [46].

POM in Greece who had arrived in 2020 have further witnessed restrictions from applying for asylum and their human rights being violated. One account describes the pushback of a family of Iraqi Kurds who entered on Greek territory and resided informally in Lagadikia camp, a refugee camp located in North Greece. When the authorities were notified, the family was picked up by the police and subsequently pushed back to Turkey. The respondent stated that they were handed over from the police jail, to plain-clothed men. However, when asked if the men were police officers, the respondent denied in disbelief stating, "They were like mafia. They came there [at the police station] and take us. They look like mafia" [47].

The current Ministry of Migration and Asylum created a black fund for managing migration, allegedly for dismantling smuggling networks, [48] although it is not transparent how it is being used in practice. In October 2020, the government announced the building of a fence along the land border [49]. In addition, it vowed to hire up to 800 border guards by spring 2021 to be deployed to the Eastern land border with Turkey [50] to further militarise its borders without safeguards for those seeking asylum.

6. Reception of applicants for international protection (including information on reception capacities – increase/decrease/stable, material reception conditions - housing, food, clothing and financial support, contingency planning in reception, access to the labour market and vocational training, medical care, schooling and education, residence and freedom of movement)

Fining of homeless people-on-the-move

The Greek state response to Covid-19 has created various difficulties for the homeless people on the move living on the streets and in squats in urban areas. During the national lockdown, there has been an SMS text system in place to grant confirmation for people to leave their house for necessary excursions. This system is particularly difficult for people on the move to navigate due to a lack of phones, information, and language barriers. Field teams have noted the indiscriminate fining of homeless people on the move. In Thessaloniki, the Mobile Info Team (MIT) documented in April how a large number of homeless people on the move were fined on their way to get food or looking for shelter or water facilities [51]. This institutional response has effectively criminalised hunger for marginalised groups, a further suspension of their basic human rights, in addition to restrictions to access asylum as described in previous sections.

7. Detention of applicants for international protection (including detention capacity – increase /decrease/stable, practices regarding detention, grounds for detention, alternatives to detention, time limit for detention)

Detention, both formal and informal, has become an increasingly prevalent part of migration management in Greece. BVMN observed pushbacks affecting large groups of POM from Pre-Removal Detention Facilities (PRDF), along with poor detention conditions that are not consistent with respect for human dignity.

Under the new International Protection Act (IPA), entered into force in January 2020, expanded detention measures were introduced. Asylum seekers can be detained in PRDFs for a period of up to 18 months with no action on their case – in which previous periods of pre-removal detention are not counted [52]. The new law was heavily criticised by human rights organisations like Amnesty International [53] and the Greek Council for Refugees [54].

Detention Conditions

Throughout 2020, BVMN observed detention conditions in Greek PRDFs that consistently contravene the state's human rights obligations. For the Paranesti PRDF in Drama, BVMN reports describe deplorable conditions such as insufficient access to food and clothing [55], as well as violent actions such as 'mass beatings' [56] and severe individual assaults of detainees by the guards [57]. In April, a detained person was reportedly hospitalised 5 times after violence from the guards over the course of 45 days [58]. Similar patterns of violence have been observed in the Petrou Ralli PRDF as well as the Keratea police station in Athens [59].

Pushbacks from PRDFs

Reports collected by BVMN in 2020 documented several pushbacks occurring from the Paranesti PRDF. In April, after a hunger strike carried out by detainees to protest against the inhuman conditions in the detention center, allegedly up to 400 individuals were taken and pushed back to Turkey, over the Evros river, by Greek authorities [60]. In July, another mass pushback to Turkey, reportedly affecting 120 POM, was carried out from the Paranesti PRDF [61]. In two other cases, POM were detained in the Paranesti PRDF for a short period of time before being pushed back to Turkey [62].

More reports have surfaced recently of similar events in the Xanthi PRDF, where people who had been detained were reportedly removed and pushed back to Turkey [63].

Use of informal detention sites

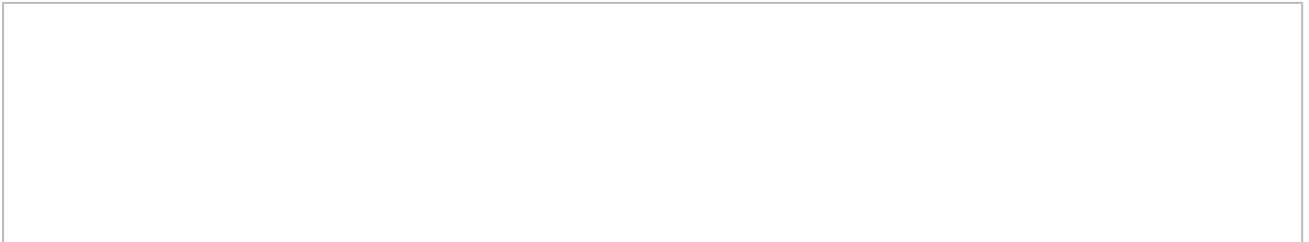
Another concerning practice of Greek authorities observed by BVMN in 2020 is the use of informal detention sites, usually with very poor conditions. In a large number of testimonies, POM have been detained at detention sites such as discarded police stations or military buildings close to the Greek-Turkish land border.

Detention sites were described in testimonies as “a dirty place that looked like a little camp or garage with only a roof, surrounded by a fence and located in the middle of a forest” [64]; “not an official police station but a ‘one room prison’” [65]; “a building somewhere in the woods” that “looks more like a squat than an official police station” [66], “a hidden army base, [where] ... they [the Greeks] don't want anyone to know about it or [that] journalists put it in the media” [67]; “not [...] like a normal prison or police station but more like a stable” [68]; “like a storage room” [69]; “a temporary building made of plastic and metal” [70]; or, in the case of an unofficial detention site in the city of Thessaloniki, a “residential building with no flags or any signs of an official state office” [71].

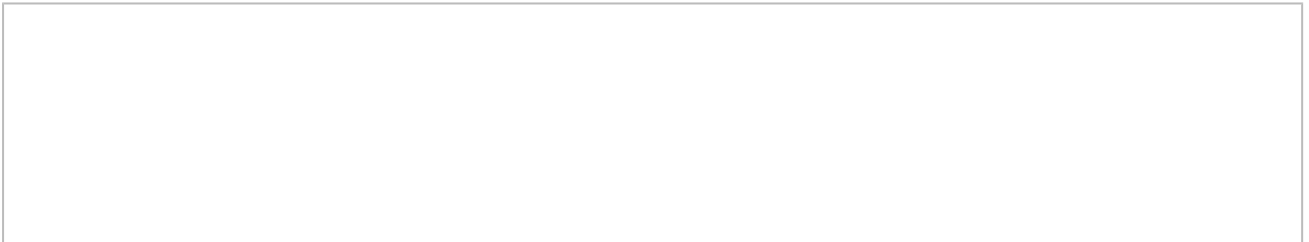
Most sites were lacking sanitary facilities or equipped with toilets in “awful conditions”, described as “very stinky” [72]. POM reported drinking from toilets as they were often the only source of water [73]. Regularly, large groups of approx. 100 and up to 280 [74] POM were detained in one room for a duration ranging from several hours up to three [75] days, before being pushed back to Turkey.

Men, women, children and elderly people [76] were regularly detained together, and were often forced to undress. In September, a group of 110-120 including both men and women was reportedly held completely naked in an unfurnished room for one day [77]. Several reports documented how women were forced to undress and body searched by male officers [78]. Repeatedly, POM were subject to various forms of abuse such as beating [79], refusal of food and water [80] or having their hair cut [81]. The ill-treatment was usually carried out by officers wearing balaclavas , and sometimes plain clothes [82] instead of uniforms. An alarming concern is the growing use of incommunicado detention and that detention of POM has become an intrinsic part of Greek pushback processes.

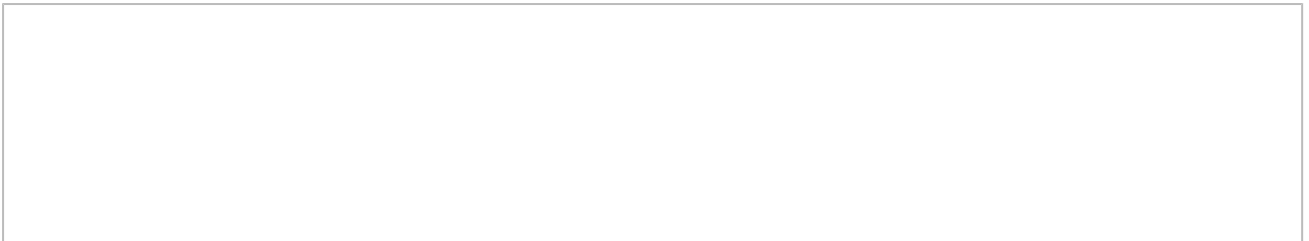
8. Procedures at first instance (including relevant changes in: the authority in charge, organisation of the process, interviews, evidence assessment, determination of international protection status, decisionmaking, timeframes, case management - including backlog management)



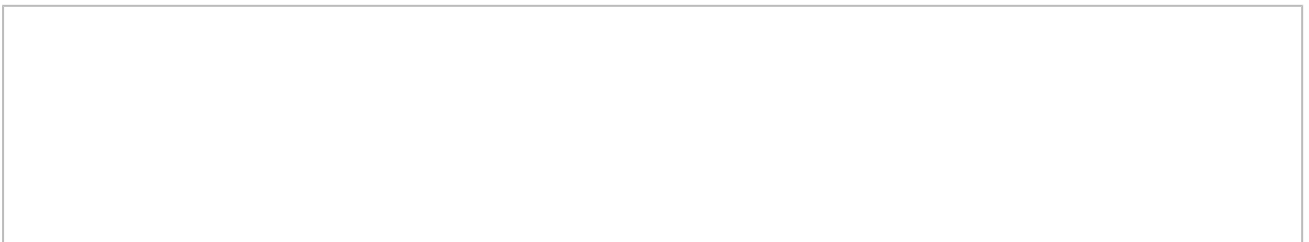
9. Procedures at second instance (including organisation of the process, hearings, written procedures, timeframes, case management - including backlog management)



10. Availability and use of country of origin information (including organisation, methodology, products, databases, fact-finding missions, cooperation between stakeholders)



11. Vulnerable applicants (including definitions, special reception facilities, identification mechanisms/referrals, procedural standards, provision of information, age assessment, legal guardianship and foster care for unaccompanied and separated children)



12. Content of protection (including access to social security, social assistance, healthcare, housing and other basic services; integration into the labour market; measures to enhance language skills; measures to improve attainment in schooling and/or the education system and/or vocational training)

13. Return of former applicants for international protection

14. Resettlement and humanitarian admission programmes (including EU Joint Resettlement Programme, national resettlement programme (UNHCR), National Humanitarian Admission Programme, private sponsorship programmes/schemes and ad hoc special programmes)

15. Relocation (ad hoc, emergency relocation; developments in activities organised under national schemes or on a bilateral basis)

16. National jurisprudence on international protection in 2020 (please include a link to the relevant case law and/or submit cases to the [EASO Case Law Database](#))

17. Other important developments in 2020

Use of Third Country Nationals to facilitate pushbacks

2020 saw an emergent trend in the use of POM to perform illegal pushbacks on the Greek-Turkish land border [83]. The 14 testimonies of pushbacks across the Evros river published by BVMN in September included the practice of outsourcing the ferrying of POM to members of the transit community. Respondents told BVMN that individuals - from Pakistan [84], Afghanistan [85] and Syria [86] - are being used by Greek police to operate the dinghies which return people to the Turkish shore.

One Afghan national [87] shared how he spoke to a Pakistani dinghy driver. He had been offered “documentation” by the Greek authorities in exchange for two months’ work ferrying people back to Turkey. Other respondents have stated similar agreements [88]. One described the Greek police asking the group if anyone spoke English and escorting away the three Afghan men who did [89]. These individuals later operated the dinghies during the pushback. These accounts suggest that such outsourcing has become an unofficial policy at the Evros border.

Islands in the Evros/Meriç river

In December [90] BVMN reported about a trend of POM stranded on islands in Evros river after being pushed back from Greece. First cases had been documented when a 16 year old Pakistani was presumed to have drowned after he was left on an island [91]. Since October, transit groups regularly find themselves stranded on such islands, usually for days in freezing temperatures, without food or water. BVMN published testimonies of several such cases and was able to identify two of the islands [92].

In November, BVMN partner Josoor was contacted by a group of 70 people. Greek and Turkish officers threatened them with gunshots whenever they tried to cross to either side of the island. Josoor published footage [93] and reached out to authorities and MEPs to alert them of the ongoing incident. BVMN also alerted Frontex in an urgent letter [94] and several follow-ups. Eventually, the Executive Director shirked responsibility.

Several of these testimonies mention potential drownings. All efforts from BVMNs side to find missing people have gone to no avail.

Criminalisation

There has been a significant rise in criminalisation cases in Greece. In September, Greek police issued a press release about criminal investigations into 33 human rights defenders from four international grassroots organizations, including two BVMN members, Josoor and Mare Liberum [95]. Accusations include espionage, violating state secrets, belonging to a criminal organisation, facilitating illegal entry [96]. The commonality between these organizations is their reporting on sea pushbacks from Greece. The government embarked on a defamation campaign, with police leaking information on the case to the media and government spokespersons publicly convicting the organisations without pressing charges. Greek and foreign media fed into this false narrative, claiming these organisations are “de facto Mafia” [97], “government spies” [98] and “directing smuggling” [99]. It is still unclear whether charges will be pressed, but the looming threat affects the work and mental health of human rights defenders. Additionally, two asylum seekers were arrested on Lesbos on July 25th and detained without charges. One of them, an Iranian national, was released in December based on medical conditions. The second, an Afghan national and minor, was released in February 2021.

Mare Liberum reported instances of fascist attacks and intimidation on Lesbos. On 5th September, their ship was searched and their devices confiscated by the Hellenic Coast Guard [100]. Greek media published false information regarding their arrest [101].

On 17 November, civil society actors on Lesbos were arrested. A Canadian journalist, who distributed water

to a group of POM that had arrived and were hiding in fear of being pushed back was arrested and charged with facilitation of illegal entry, as well as insubordination and obstruction of a police investigation [102]. Two other journalists were arrested but released the next day without charges [103]. Acts as described above have forced many NGOs and grassroots organizations to stop operating on Greek islands due to significant threats and danger of criminalisation [104] as well as hostility and violence against humanitarian workers, human rights defenders and journalists [105].

On 5 June, 20 police officers arrived at a food distribution site for asylum seekers in Thessaloniki. 40 beneficiaries were arrested and subsequently pushed back to Turkey [106]. This incident illustrated a pattern of violence identified by BVMN where POM were taken from inland and pushed back.

On 30 November, legislation came into force banning NGO and state employed personnel working with asylum seekers or refugees from disclosing information related to their work [107].

References and sources

18. Please provide links to references and sources and/or upload the related material in PDF format

19. Feedback or suggestions about the process or format for submissions to the EASO Asylum Report

Please upload your file

The maximum file size is 1 MB

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I accept the provisions of the EASO [Legal and Privacy Statements](#)

Useful links

[EASO Asylum Report 2020 \(https://easo.europa.eu/asylum-report-2020\)](https://easo.europa.eu/asylum-report-2020)

[Executive Summary -EASO Asylum Report 2020 \(https://easo.europa.eu/sites/default/files/EASO-Asylum-Report-2020-Executive-Summary.pdf\)](https://easo.europa.eu/sites/default/files/EASO-Asylum-Report-2020-Executive-Summary.pdf)

[Bibliography for the EASO Asylum Report 2020 \(https://easo.europa.eu/sites/default/files/easo-asylum-report-2020-bibliography.pdf\)](https://easo.europa.eu/sites/default/files/easo-asylum-report-2020-bibliography.pdf)

[Summary of legislative, institutional and policy developments in asylum in EU+ countries in 2019 \(https://easo.europa.eu/sites/default/files/easo-asylum-report-eu-developments.pdf\)](https://easo.europa.eu/sites/default/files/easo-asylum-report-eu-developments.pdf)

[Online database with data and latest asylum trends \(https://easo.europa.eu/asylum-trends-easo-asylum-report-2020\)](https://easo.europa.eu/asylum-trends-easo-asylum-report-2020)

[Online database for EU+ developments \(https://easo.europa.eu/eu-developments\)](https://easo.europa.eu/eu-developments)

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- [9] The New Humanitarian. 2020. Greece's 'new tactic' of migrant expulsion from deep inside its land borders [Online]. [Accessed 19/02/2021]. Available from:

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<https://www.thenewhumanitarian.org/news-feature/2020/10/07/Greece-migrant-pushbacks-expulsion-Evros-Turkey>

[10] See above.

[11] Border Violence Monitoring Network. 2020. *Respondents requested asylum in a police station and were subsequently pushed back*. [Online]. [Accessed 22/02/2021]. Available from: <https://www.borderviolence.eu/violence-reports/august-28-2020-0000-meric-river-ipsala-turkey/>.

[12] See question 7 below.

[13] Border Violence Monitoring Network. 2020. *Testimony Database*. [Online]. [Accessed 19/02/2021]. Available from: <https://www.borderviolence.eu/violence-reports/>

[14] Ibid.

[15] Border Violence Monitoring Network. 2020. *Balkan Region Report – December 2020*. [Online]. [Accessed 19/02/2021]. Available from: <https://www.borderviolence.eu/balkan-region-report-december-2020/#more-16685>

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