Committee on Economic, Social and Cultural Rights

Concluding observations on the second periodic report of Latvia*

1. The Committee considered the second periodic report of Latvia (E/C.12/LVA/2) at its 13th, 15th and 17th meetings (see E/C.12/2021/SR.13, 15 and 17), held virtually due to the coronavirus disease (COVID-19) pandemic, on 23–25 February 2021, and adopted the present concluding observations at its 27th meeting, held on 5 March 2021.

A. Introduction

2. The Committee welcomes the submission of the second periodic report by the State party, and the supplementary information provided in the replies to the list of issues (E/C.12/LVA/RQ/2). The Committee appreciates the constructive dialogue held with the State party’s interministerial delegation.

B. Positive aspects

3. The Committee welcomes the legislative, institutional and policy measures taken by the State party to enhance the realization of economic, social and cultural rights, as referred to in the present concluding observations. In particular, the Committee welcomes the national plans and strategy on climate change and the considerable improvement in women’s access to employment opportunities. It further welcomes the ratification of a number of international human rights treaties, including the Convention on the Rights of Persons with Disabilities, on 1 March 2010, and the European Social Charter (revised), on 26 March 2013.

C. Principal subjects of concern and recommendations

Domestic application of the Covenant

4. The Committee notes with appreciation the examples provided by the State party about cases in which the Constitutional Court has directly referred to articles 9, 11, 12 and 13 of the Covenant and to the Committee’s general comments No. 13 (1990), No. 14 (2000) and No. 19 (2007). However, the Committee notes with concern that certain rights enshrined in the Covenant are not, as such, fully incorporated into the Constitution, such as the right to work and the right to an adequate standard of living (art. 2 (1)).

5. The Committee recommends that the State party fully incorporate all the Covenant rights as such into its domestic legal order with a constitutional rank equal to other human rights and fundamental freedoms. It also recommends that the State party continue its efforts for training of judges, lawyers and prosecutors on the Covenant and on the justiciability of economic, social and cultural rights. The Committee draws the

* Adopted by the Committee at its sixty-ninth session (15 February–5 March 2021).
attention of the State party to its general comment No. 9 (1998) on the domestic application of the Covenant.

National human rights institution
6. While noting with satisfaction the mandate of the Ombudsman’s Office to receive complaints of economic, social and cultural rights violations, the Committee is concerned that the Ombudsman’s Office lacks sufficient resources to fully exercise its mandate, including with regard to investigating and resolving complaints of discrimination in access to economic, social and cultural rights (art. 2 (1)).

7. The Committee recommends that the State party continue to take measures to increase the effectiveness and the independence of the Ombudsman’s Office in light of the observations and recommendations made in March 2015 by the Global Alliance of National Human Rights Institutions. It should further ensure the allocation of sufficient human, technical and financial resources to the Ombudsman’s Office to enable it to fully exercise its mandate in relation to economic, social and cultural rights.

Corruption
8. While noting the policy and awareness-raising measures undertaken by the State party’s Corruption Prevention and Combating Bureau, the Committee notes with concern cases of corruption – including in transportation procurement, the construction sector and waste management – and illicit financial flows, which can negatively affect the realization of economic, social and cultural rights (art. 2 (1)).

9. The Committee recommends that the State party intensify its efforts to combat corruption, illicit financial flows and related impunity, including by investigating and prosecuting high-level corruption. It further recommends that the State party continue to enhance the independence of the judiciary with a view to strengthening its capacity to combat corruption effectively, as well as the investigative capacity and independent functioning of the Corruption Prevention and Combating Bureau and the public prosecutors.

Climate change
10. The Committee welcomes the adoption of the State party’s strategy for achieving climate neutrality by 2050, its national energy and climate plan for up until 2030 and its national plan for adaption to climate change that runs until 2030. However, it notes with concern that the State party is not on track to meet its nationally determined contribution under the Paris Agreement or its targets for reduction in greenhouse gas emissions, particularly due to projected gas emissions caused by land use, land use change and forestry (art. 2 (1)).

11. The Committee recommends that the State party enhance its efforts to mitigate the adverse impacts of climate change on economic, social and cultural rights, including by taking measures to achieve its nationally determined contribution under the Paris Agreement and for the implementation of its transition to a net zero greenhouse gas emissions economy by 2050. The Committee refers the State party to its statement on climate change and the Covenant (E/C.12/2018/1), adopted on 8 October 2018.

Non-discrimination
12. The Committee recognizes the amendments to the State party’s legislative framework that prohibit discrimination in the performance of economic activities for remuneration. However, the Committee is concerned about the absence of a comprehensive anti-discrimination legislation and policy framework aimed at ensuring equality and non-discrimination in access to all economic, social and cultural rights. It is also concerned about the reported prevalence of prejudice and discrimination based on colour, language, religion, national or ethnic origin, sexual orientation and gender identity that hinder disadvantaged and marginalized groups’ access to economic, social and cultural rights (art. 2 (2)).
13. The Committee recommends that the State party:

(a) Adopt and implement a comprehensive anti-discrimination legislation and policy framework aimed at ensuring equal access to all economic, social and cultural rights without discrimination, taking into account the Committee’s general comment No. 20 (2009) on non-discrimination in economic, social and cultural rights;

(b) Take effective measures to combat prejudice and discrimination based on colour, language, religion, national or ethnic origin, sexual orientation and gender identity and facilitate disadvantaged and marginalized groups’ access to economic, social and cultural rights, paying particular attention to employment, health and education;

(c) Systematically collect disaggregated statistics on the level of enjoyment of Covenant rights by disadvantaged and marginalized individuals and groups.

Roma

14. While noting the State party’s efforts to facilitate access by Roma to economic, social and cultural rights, the Committee is concerned that members of the Roma community continue to face stigmatization, and widespread discrimination, especially in access to public services (art. 2 (2)).

15. The Committee recommends that the State party intensify its efforts for the social and economic integration of Roma, paying particular attention to Roma women and children. It recommends, in particular, that the State party strengthen its policy measures, including by adopting and implementing a national Roma integration strategy, with a view to addressing the socioeconomic disparities and discrimination faced by Roma people in accessing public services, employment, adequate housing, education and health care. The Committee also recommends that the State party proactively address stigmatization and prejudice against Roma, including through awareness-raising campaigns.

Non-citizens

16. The Committee welcomes the entry into force in 2019 of the Law on the Discontinuation of Non-Citizen Status for Children, which applies to children born on or after 1 January 2020, and the progress made by the State party in the naturalization of people residing in Latvia with no nationality, who are considered to be in a separate legal category of non-citizens. However, the Committee is concerned that, in 2021, there were still approximately 209,000 non-citizens in the State party, and that discrimination against non-citizens persists in, inter alia, the enjoyment of economic, social and cultural rights (art. 2 (2)).

17. The Committee recommends that the State party intensify its efforts to facilitate access to naturalization and phase out the separate legal category of non-citizen, thus reducing gradually and finally eliminating the number of persons without nationality. It also recommends that the State party take targeted measures to ensure that those who currently hold non-citizen status have non-discriminatory access to economic, social and cultural rights, including equality of opportunity and treatment in employment.

Asylum seekers and refugees

18. The Committee is concerned about the low levels of integration of asylum seekers, refugees and beneficiaries of subsidiary protection into society and their limited enjoyment of certain economic, social and cultural rights. It is particularly concerned about the high levels of poverty among asylum seekers, refugees and beneficiaries of subsidiary protection, as social benefits afforded to them remain well below the poverty line (art. 2 (2)).

19. The Committee recommends that the State party develop a strategy for social and economic integration of asylum seekers, refugees and beneficiaries of subsidiary protection, which supports their non-discriminatory access to public services, and provides targeted support for language learning, securing adequate housing and finding
employment. It also recommends that the State party take targeted measures to protect them from poverty, and ensure that when needed, social protection measures are available and sufficient to provide them with an adequate standard of living.

Equality between men and women

20. The Committee recognizes the State party’s efforts to address gender inequality, which include its gender equality policy, plans and programmes, and its achievements in relation to the representation of women in managerial positions and women’s access to and participation in the field of science. However, the Committee remains concerned that the gender pay gap persists and that the majority of women continue to work in sectors with a low average wage, including the hospitality sector and domestic work. It is also concerned that despite efforts undertaken by the State party, women are still underrepresented in senior and decision-making positions in both the private and public sectors, including in the civil service (art. 3).

21. The Committee recommends that the State party intensify its efforts to decrease the gender pay gap between men and women, by addressing the vertical and horizontal gender-based segregation in the labour market, including through awareness-raising campaigns and education and training for equal career opportunities. It also recommends that the State party promote increased representation of women at all levels of the public administration, particularly in senior and decision-making positions, and continue to promote their participation in management positions in the private sector. The Committee also notes the recommendations of the Committee on the Elimination of Discrimination against Women to that effect (CEDAW/C/LVA/CO/4-7).

Unemployment

22. The Committee recognizes that informal employment dropped in the State party by 55 per cent between 2012 and 2019, and that the unemployment rate has decreased from 15 per cent in 2012 to 6.5 per cent in 2019. Despite the efforts by the State party, the Committee is concerned that:

(a) There are still limited employment opportunities in some regions, as the majority of economic activity is concentrated in Riga and nearby regions;

(b) Certain groups continue to be disproportionately affected by unemployment, including Roma, non-citizens, persons belonging to minority groups, persons over 50 years of age and persons with disabilities;

(c) The amendments made to the Labour Law in 2018 provide for weaker protections for employees’ rights, including in the event of termination of the employment contract by the employer (art. 6).

23. The Committee recommends that the State party:

(a) Continue its efforts to reduce unemployment, including long-term unemployment, in all regions of the country;

(b) Continue its efforts to support Roma in gaining access to employment, including by implementing targeted positive measures and facilitating their access to technical and vocational training opportunities, and ensure that programmes promoting the integration of Roma into the labour market do not perpetuate their concentration in low-skilled jobs and in the informal economy;

(c) Take measures to ensure that its language laws and policies do not lead to direct or indirect discrimination against persons belonging to minority groups in gaining access to employment;

(d) Continue to address challenges faced by persons over 50 years of age in gaining access to employment;

(e) Facilitate access to employment for persons with disabilities, including by adopting temporary special measures such as quotas and creating incentives for employers to employ persons with disabilities and by guaranteeing reasonable
accommodation for persons with disabilities in the workplace in both the private and public sectors and across all areas of the economy;

(f) Consider revising the Labour Law in consultation with social partners in order to ensure that employees’ rights are sufficiently protected, including in cases of termination of the employment contract by the employer.

Minimum wage

24. The Committee recognizes the recent increase to the minimum wage. However, it is concerned that the minimum wage remains insufficient to ensure a decent living for workers and their families and that it is not regularly adjusted to the cost of living (art. 7).

25. The Committee recommends that the State party undertake, in consultation with social partners, a periodic review of the minimum wage in order to index it to the cost of living, thereby ensuring that it enables workers and their families to enjoy a decent living. The Committee draws the attention of the State party to its general comment No. 23 (2016) on the right to just and favourable conditions of work.

Occupational safety and health

26. While noting the information about decreasing numbers of occupational injuries and fatalities in recent years, the Committee remains concerned about the high number of occupational accidents, particularly serious and fatal accidents, and the concentration of occupational fatalities in the manufacturing, transportation and storage, and wholesale and retail sectors (art. 7).

27. The Committee recommends that the State party redouble its efforts to reduce occupational injuries and fatalities, with a focus on accident-prone sectors, including by raising awareness among employers and workers about workplace safety, ensuring that enhanced protection measures are put in place in the workplace, and strengthening labour inspections, including in small and medium-sized workplaces and in the informal sector. The Committee also recommends that the State party consider ratifying the International Labour Organization (ILO) Prevention of Major Industrial Accidents Convention, 1993 (No. 174).

Social security

28. The Committee is concerned about the decrease in the level of public expenditure allocated to social security programmes, and notes that the amount of the State pension is insufficient and remains below the relative poverty line. The Committee is also concerned that the minimum social support afforded in cases of incapacity for work, disability, unemployment and old age are too low and are insufficient to provide recipients with an adequate standard of living (art. 9).

29. The Committee recommends that the State party:
   (a) Increase its budget allocation for social security;
   (b) Conduct a review of its social security system and ensure that social benefits are regularly indexed to the real cost of living, in order to provide beneficiaries with an adequate standard of living;
   (c) Ensure that the level of the State pension is sufficient to provide beneficiaries with an adequate standard of living and to reduce the prevalence of pensioners at risk of poverty;
   (d) Increase the minimum level of social benefits in cases of incapacity for work, disability and unemployment, and for old age.

Protection of children

30. The Committee notes with appreciation the development and implementation of programmes by municipalites for protection of children in street situations. It also welcomes the State party’s efforts to strengthen its foster care system for children without parental care
and children who cannot stay with their families. However, it remains concerned that the quality of care and the material conditions in residential care institutions for children deprived of a family environment are not sufficiently monitored and are reportedly inadequate (art. 10).

31. The Committee recommends that the State party:

(a) Enhance the implementation of programmes for protection of children in street situations and support municipalities in their efforts;

(b) Support and facilitate family-based care for all children wherever possible, and allocate further resources to expand the system of foster care, and enhance its quality, for children without parental care and children who cannot stay with their families;

(c) Phase out institutionalization through a concrete plan of action, and ensure the periodic review of the quality of alternative care and access to complaints procedures, including in residential care institutions while these facilities continue to exist.

Poverty

32. While noting the information provided by the State party’s delegation in relation to its consumer price index, the Committee is concerned that more than 20 per cent of the State party’s population has been at risk of poverty since 2013. It is also concerned that the number of persons living in extreme poverty or at risk of poverty is disproportionately high among children, single-parent families, pensioners, older persons, persons with disabilities, migrants and Roma (art. 11).

33. The Committee recommends that the State party intensify its efforts to eradicate poverty, and in particular:

(a) Adopt a national action plan to eradicate poverty and address its root causes;

(b) Take immediate measures to alleviate the negative social and economic impact of the COVID-19 pandemic on people’s livelihoods and protect people from poverty as a result of loss of income due to the COVID-19 pandemic;

(c) Take effective measures to guarantee targeted support to groups who are disproportionately affected by poverty, in particular children, single-parent families, older persons, persons with disabilities, migrants and Roma;

(d) Pay attention to the Committee's statement on poverty and the Covenant (E/C.12/2001/10), adopted on 4 May 2001.

Right to adequate housing

34. The Committee acknowledges that the State party has adopted plans to improve the availability of social housing under its National Development Plan for 2021–2027. However, it is concerned at the shortage of affordable housing, and at the insufficiency of social housing, noting that it reportedly makes up less than 1 per cent of the housing stock. It is also concerned about the prevalence of long-term homelessness in the State party, and that although municipalities provide homeless persons with emergency accommodation, there are no measures in place for their transition to temporary and permanent housing (art. 11).

35. The Committee recommends that the State party increase the availability of adequate and affordable housing, in particular by expanding the supply of social housing and by expanding the provision of housing subsidies. It further recommends that the State party address the root causes of homelessness and pursue long-term solutions for homeless individuals.

Security of tenure for housing

36. The Committee is concerned that the new draft Law on Residential Tenancy, which is expected to be adopted soon, since Parliament has completed its third reading, weakens
the rights of the tenants considerably, and that landlords will be allowed to bring actions before domestic courts requesting the eviction of tenants on a no-contest basis.

37. The Committee recommends that the State party monitor the effects of the new legislation, and in consultation with all stakeholders, including tenants, take measures to eliminate the possible negative effects on the rights of tenants in a balanced manner. The Committee also recommends that the courts apply a proportionality analysis in their decisions on eviction of tenants, in cooperation with the social services offices concerned, so that tenants who fail to pay the rent under difficult circumstances will not become homeless.

Access to health care

38. The Committee is concerned that the public health-care system is characterized by a low and decreasing level of expenditure as a percentage of gross domestic product (GDP), long waiting lists for specialist care, high levels of out-of-pocket health-care expenses, and insufficient numbers of doctors and nurses, particularly in rural areas. It is also concerned that health services and information are not accessible to persons with disabilities across the State party (art. 12).

39. The Committee recommends that the State party:

(a) Increase its public expenditure on health care as a percentage of GDP, with a view to progressively achieving full realization of the right to health;

(b) Increase the coverage of health-care services by public expenditure, in order to address the high proportion of out-of-pocket payment by patients;

(c) Mobilize more resources for the recruitment of doctors and nurses, particularly in public and local hospitals, to decrease the waiting times for accessing specialist care;

(d) Ensure the accessibility of health-care infrastructure, services and information for all, including for persons with disabilities.

Health-care response to the COVID-19 pandemic

40. The Committee welcomes the information provided by the State party’s delegation about plans to provide access to the COVID-19 vaccines free of charge for all residents in Latvia without discrimination on the basis of residence or documentation status. It also notes the efforts of the State party to contain the spread of COVID-19 and to provide patients with the necessary medical care. However, the Committee is concerned that the insufficient investment in the public health-care system over the past years has negatively affected the State party’s preparedness to effectively and expeditiously respond to the COVID-19 pandemic. Furthermore, the Committee notes that the State party has not so far played an active role in advocating for universal, equitable and affordable access to COVID-19 vaccines and drugs in regional and international organizations of which it is a member (arts. 2 and 12).

41. The Committee recommends that the State party:

(a) Ensure that health-care resources in both the public and the private sectors are mobilized and shared during the pandemic among the whole population to ensure a comprehensive, coordinated health-care response to the crisis;

(b) Strengthen its efforts to facilitate universal and equitable access to COVID-19 testing, treatment and immunization;

(c) Regularly collect and disseminate to the public reliable information and statistical data in relation to the COVID-19 pandemic, including information on vaccines;

(d) Take measures to ensure that constraints on health-care resources owing to the COVID-19 pandemic do not significantly hinder the provision of other health care and services, including for pre-existing conditions, for mental health care and for sexual and reproductive health-care services;
Make every effort to exercise its leverage in regional and international organizations of which it is a member to advocate for universal, equitable and affordable access to COVID-19 vaccines and drugs, including through the possibility of supporting the proposals made in the World Trade Organization of establishing a temporary waiver for some intellectual property rights for vaccines at least for as long as the pandemic continues;

Pay particular attention to paragraph 82 of the Committee’s general comment No. 25 (2020) on science and economic, social and cultural rights, and to the Committee’s two statements – on the COVID-19 pandemic and economic, social and cultural rights (E/C.12/2020/1), adopted on 6 April 2020, and on universal and equitable access to vaccines for COVID-19 (E/C.12/2020/2), adopted on 27 November 2020.

Sexual and reproductive health

While noting the progress made by the State party in decreasing the maternal and infant mortality rates, the Committee is concerned about the difficulties reportedly faced by women and girls in accessing sexual and reproductive health information and services. It is particularly concerned about the limited access to free contraception by adolescents and the prevalence of teenage pregnancies (art. 12).

The Committee recommends that the State party strengthen its efforts to ensure the availability and accessibility of sexual and reproductive health services and access to affordable, safe and effective contraceptives and emergency contraceptives, including for adolescents. It also recommends that the State party improve comprehensive, age-appropriate sexual and reproductive health education, including on contraception, for girls and boys in primary and secondary schools. The Committee refers the State party to its general comment No. 22 (2016) on the right to sexual and reproductive health.

Mental health

The Committee recognizes the State party’s efforts to promote access to mental health care under its Plan for Improving Access to Mental Health Care for 2019–2020. However, it remains concerned that community-based mental health care is not widely available and accessible across the State party. It is also concerned about the insufficient number of trained medical personnel to provide adequate care to persons requiring mental health care, and to persons with intellectual or psychosocial disabilities, including the shortage of child psychiatrists and psychologists (art. 12).

The Committee recommends that the State party increase the availability, accessibility, acceptability and quality of professional mental health-care services. In particular, it recommends that the State party step up its efforts to transition from the placement of persons requiring mental health-care services and of persons with intellectual or psychosocial disabilities in psychiatric institutions towards a comprehensive, integrated, interdisciplinary system of community-based mental health services. It also recommends that the State party increase the availability of trained medical personnel to provide adequate care to persons requiring mental health care and persons with intellectual or psychosocial disabilities, including medical personnel specializing in mental health care for children.

Right to education

The Committee notes with appreciation the increase in the number of Roma students completing compulsory primary education in the State party and the increase in teachers’ salaries in recent years – in line with the Committee’s previous recommendations to that effect (E/C.12/LVA/CO/1, paras. 30, 31, 55 and 56). However, the Committee remains concerned about the insufficient availability of preschool education in some municipalities, discrimination against children belonging to minority groups and against undocumented migrant children in education, the placement of persons with disabilities in so-called special schools and their exclusion from mainstream education, and the disproportionately high number of Roma children enrolled in special needs programmes (art. 13).
47. The Committee recommends that the State party:

(a) Continue to improve the quality of education by allocating sufficient resources to the education sector, increasing the number of qualified teachers and improving infrastructure and teaching materials;

(b) Guarantee universal access to primary education and firmly address the causes of non-completion and dropping out, paying particular attention to disadvantaged and marginalized children;

(c) Take effective measures to support the completion of secondary and tertiary education, paying particular attention to disadvantaged and marginalized children;

(d) Ensure that quality preschool education is accessible to all children across the State party, irrespective of the financial status of their families and of the municipality or the region that they are in;

(e) As a matter of priority, expedite its efforts to address the overrepresentation of Roma children in special schools and special classes in mainstream schools, which should include a review of the classification criteria and the adoption of inclusive and integrated education programmes;

(f) Remove legal and administrative barriers to school enrolment for undocumented migrant children and take effective measures to provide them with non-discriminatory access to education;

(g) Adopt and implement a coherent strategy on inclusive education to facilitate access by children with disabilities to mainstream schools, supplemented by sufficient human, technical and financial resources, and ensure the provision of accessible and inclusive learning environments, buildings and educational materials, and of individualized support.

Minority languages

48. While noting the information from the State party’s delegation about support provided for the teaching of minority languages and teaching in minority languages, the Committee is concerned that current language policies in the State party may have a discriminatory impact against persons belonging to minorities as regards their enjoyment of economic, social and cultural rights, especially in the fields of education, employment, and access to services. The Committee notes the explanations provided by the State party’s delegation that the education reform itself is not discriminatory. However, the Committee remains concerned that the recent amendments to the Education Law, and Cabinet Regulation No. 716 of 21 November 2018, have a discriminatory effect on minority groups and that they create undue restrictions on the teaching of minority languages and teaching in minority languages in preschool and primary education in both public and private schools (art. 15).

49. The Committee recommends that the State party take measures to ensure that its language policies and laws do not create direct or indirect discrimination against persons belonging to minority groups as regards their enjoyment of economic, social and cultural rights, and that they do not impede the ability of these persons to find employment in the public and private sectors. It also recommends that the State party consider revising its language policies and laws in the area of education in order to promote the teaching of minority languages and teaching in minority languages and to ensure that such policies and laws do not negatively affect the educational performance of children belonging to minority groups.

D. Other recommendations

50. The Committee encourages the State party to ratify the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights.
51. The Committee recommends that the State party take fully into account its obligations under the Covenant and ensure the full enjoyment of the rights enshrined therein in the implementation of the 2030 Agenda for Sustainable Development at the national level. Achievement of the Sustainable Development Goals would be significantly facilitated by the State party establishing independent mechanisms to monitor progress and by treating beneficiaries of public programmes as rights holders who can claim entitlements. Implementing the Goals on the basis of the principles of participation, accountability and non-discrimination would ensure that no one is left behind. In this regard, the Committee draws the State party’s attention to its statement on the pledge to leave no one behind (E/C.12/2019/1).

52. The Committee requests that the State party disseminate the present concluding observations widely at all levels of society, including at the national and municipal levels, in particular among parliamentarians, public officials and judicial authorities, and that it inform the Committee in its next periodic report about the steps taken to implement them. The Committee encourages the State party to engage with the Ombudsman’s Office, non-governmental organizations and other members of civil society in the follow-up to the present concluding observations and in the process of consultation at the national level prior to the submission of its next periodic report. Furthermore, the Committee recommends that the State party consider establishing a national mechanism to coordinate and follow up on the implementation, on an ongoing basis, with the participation of the Ombudsman’s Office and civil society organizations.

53. In accordance with the procedure on follow-up to concluding observations adopted by the Committee, the State party is requested to provide, within 24 months of the adoption of the present concluding observations, information on the implementation of the recommendations contained in paragraphs 11 (climate change), 33 (poverty) and 41 (health-care response to the COVID-19 pandemic) above.

54. In line with the Committee’s planned predictable review cycle, the State party will be notified of the new due date of its next periodic report, which will replace the current due date of 31 March 2026. The State party will receive the Committee’s list of issues prior to reporting at least one year before the new date. The replies to that list will constitute the third periodic report, in accordance with article 16 of the Covenant. In accordance with General Assembly resolution 68/268, the word limit for the report is 21,200 words.