

**From:** Dragana Drndarevska <dragana.coalition@gmail.com>  
**Sent:** 02 March 2020 16:29  
**To:** TACSO-MK@tacso.eu  
**Subject:** suggestions/ comments on IPA 3

Dear Beti,

I am writing in the name of the Network for protection from discrimination.

As you can imagine, It is quite hard for us to give the right input and comments since the process is quite complicated and we haven't been included from the start. So inclusion of the Network for protection from discrimination earlier in the process is our first suggestion, especially if we have in mind the volume and the precision of EU anti-discrimination law.

We have noticed that in the part "Rule of Law and Fundamental rights" Anti-discrimination is not separated as a thematic priority. Also specific marginalized communities are not mentioned. We do not insist on opening a separate thematic priority for every group such as people with disabilities, LGBTIs, Roma, women, but perhaps recognizing them in one theme, from the perspective of social policy and fundamental rights. Access to justice, is also a topic that we believe needs more focused attention. Gender mainstreaming should be replaced with Gender equality, as a much broader concept. We also believe that gender equality must not be only a crosscutting issue, but a thematic priority as well.

We are also concerned about "Improve migration management, including border management". We believe that this approach towards migration is contributing towards violation of fundamental rights, not its advancement.

I am sorry that our input is not based on appropriate knowledge on the process and the program. So If you feel that it will be useful we can meet and discuss about further inclusion of the Network in your work.

Best regards,

**Драгана Дрндаревска**

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