

Northern Ireland Human Rights Commission (NIHRC) and the Equality Commission for Northern Ireland (ECNI) – Joint supplementary written evidence

Submission of the NIHRC and ECNI on the UK and EU proposals and the prospects for Agreement to the House of Lords Sub-Committee on the Protocol on Ireland/Northern Ireland

12 November 2021

Executive Summary

In summary, the Commissions recommend that:

UK Government Command Paper

- there are no changes to the Protocol that would result in a weakening of either the Article 2 (1) commitment or the Protocol's rights, safeguards and oversight mechanisms relating to this commitment;
- there is adequate and sustained resourcing of the two Commissions;
- the NI Executive and Departments ensure effective and regular engagement with civil society, including human rights/equality groups.
- the NI Executive work with the UK Government and on a North-South basis to build strong open channels of communication;
- the Commissions are kept informed of any future EU equality law developments relevant to the Annex 1 equality Directives in the Protocol, and have the opportunity to highlight in advance any implications of those changes for equality law in Northern Ireland.

EU proposals

- the EU makes clear on its proposed website whether the proposed/updated EU law is applicable to any of the Annexes in the Protocol;
- proposals on increased transparency relating to the JCWG are extended to include the publication of agendas in advance of meetings;
- any proposals on the development of "structured groups" within the JCWG considers establishing a group focused on Article 2 issues;
- fora for dialogue with NI stakeholders should include engagement with the Commissions and equality and human rights stakeholders;
- further clarification is provided by the UK Government/EU as to how the Specialised Committee will engage with the Commissions;
- the UK Government and the supervisory bodies under the UK-EU Withdrawal Agreement and the UK-EU Trade & Co-Operation Agreement establish formal structures for open, transparent and regular engagement with equality/human rights stakeholders;
- any agreed proposals on structured engagement with NI civil society include those working on equality/human rights cross border issues;
- the UK Government and EU urgently reach agreement on long-term, sustainable solutions relating to the supply from GB to NI of medicines and foods affecting faith communities in NI, and on assistance dogs travelling from Great Britain to NI.

1. Introduction

- 1.1 The Northern Ireland Human Rights Commission (the NIHRC), pursuant to section 69(1) the Northern Ireland Act 1998, reviews the adequacy and effectiveness of law and practice relating to the protection of human rights in Northern Ireland (NI).
- 1.2 The NIHRC bases its advice on the full range of internationally accepted human rights standards, including the European Convention on Human Rights (ECHR), as incorporated by the Human Rights Act 1998 and the treaty obligations of the Council of Europe (CoE) and United Nations (UN) systems. In addition to these treaty standards, there exists a body of 'soft law' developed by the human rights bodies of the CoE and UN. These declarations and principles are non-binding but provide further guidance in respect of specific areas.
- 1.3 The Equality Commission for Northern Ireland (ECNI) is an independent public body established under the Northern Ireland Act 1998. Its powers and duties derive from a number of equality statutes providing protection against discrimination on the grounds of age, disability, race, religion and political opinion, sex and sexual orientation. Its remit also includes overseeing the statutory duties on public authorities on the promotion of equality of opportunity and good relations under Section 75 of the Northern Ireland Act 1998.
- 1.4 The EU (Withdrawal Agreement) Act 2020 empowers the Commissions to monitor, advise, report on, promote, and enforce the implementation of Article 2(1) of the Ireland/Northern Ireland Protocol ('the Protocol') to the UK-EU Withdrawal Agreement.
- 1.5 In accordance with these functions, the Commissions provide this joint submission to the House of Lords Sub-Committee on the Protocol on Ireland/Northern Ireland.
- 1.6 The Commissions welcome this opportunity to provide written evidence on the UK and EU proposals and are available to provide a further oral briefing if this could provide further assistance to the Sub-Committee. In this briefing, the Commissions have focused on addressing only those questions in the Sub-Committee's call for evidence which fall within the scope of our respective roles and remit.
- 1.7 This evidence follows a previous written submission by the Commissions to the Sub-Committee's Introductory Inquiry into the Operation of the Protocol and oral evidence to the Sub-Committee on Article 2 of the Protocol (rights of individuals).

2. Merits and drawbacks of the specific aspects of the UK and EU proposals

- 2.1 As set out below in more detail, the Commissions welcome a number of the proposals of the UK Government in its July Command Paper and the EU's "non-papers" published on 13 October 2021 in response to the

ongoing issues facing Northern Ireland in relation to the operation of the Ireland/Northern Ireland Protocol

UK Government Command Paper

- 2.2 In relation to Article 2 of the Protocol the Commissions welcome the UK Government's acknowledgment in its Command Paper that:

"...the provisions that ensure there is no diminution of human rights in Northern Ireland as a result of the UK's withdrawal from the European Union are not controversial."¹

Importance of Article 2 (1) commitment

- 2.3 As we made clear in our earlier submission to the Sub-Committee, the Commissions consider that the commitment by the UK Government in Article 2 of the Protocol is a positive one, as it recognises the centrality of equality and human rights in the Belfast (Good Friday) Agreement. In addition, the establishment, resourcing, and new powers and duties of the Commissions as the dedicated mechanism framework to oversee the implementation of this commitment is another positive development.
- 2.4 It is therefore essential, in light of the positive aspects of the Article 2 (1) commitment, and its 'non-controversial' nature, as indicated in the Command Paper, that the UK Government remains committed to upholding its commitment set out in Article 2(1), as well as to the adequate and sustained resourcing of the dedicated mechanism framework.
- 2.5 We welcome the fact that the Sub-Committee has recently written to the Secretary of State NI and sought the Government's commitment 'to upholding the Article 2 provisions and the dedicated mechanism framework for their implementation, come what may', and to provide assurances that the Commissions will have adequate and continuing resources to fulfil their monitoring role².
- 2.6 We also mentioned, as part of our previous evidence to the Sub-Committee, the value of the Article 2(1) commitment being contained within the framework of the Protocol, with its associated oversight mechanisms. This includes the Specialised Committee to the Protocol, to which the Equality Commission for Northern Ireland and the Northern Ireland Human Rights Commission³, and the Joint Committee of the

¹ UK Government Command Paper, [Northern Ireland protocol - next steps](#), P.15, paragraph 37, 21 July 2021

² European Affairs Sub-Committee on the Protocol on Ireland/Northern Ireland letter to the Secretary of State for Northern Ireland, [Article 2 of the Protocol on Ireland/Northern Ireland \(Rights of Individuals\)](#), Page 3, paragraph 9, 25 October 2021

³ Article 14 on the Specialised Committee of the [Protocol on Ireland/Northern Ireland](#) states: "The Committee on issues related to the implementation of the Protocol on Ireland/Northern Ireland established by Article 165 of the Withdrawal Agreement ('Specialised Committee') shall: ...(c) consider any matter of relevance to Article 2 of this Protocol brought to its attention by the

NIHRC and Irish Human Rights and Equality Commission (IHREC) can refer matters relating to the implementation of Article 2.

- 2.7 It is clear from the UK Government's NIO Explainer document on Article 2 (2020) that individuals have the right to bring challenges alleging a breach of the Article 2(1) commitment directly before the domestic courts⁴. The UK Government has also confirmed that it is of the view that Article 2 has direct effect and that individuals, and not solely the Commissions, can rely directly on Article 2 before domestic courts⁵.
- 2.8 These are important rights and safeguards that ensure that the UK Government's commitment is upheld and we would be concerned if any changes to the Protocol resulted in a weakening of either the Article 2 (1) commitment or the rights of individuals or safeguards and oversight mechanisms relating to this commitment.

Recommendations

2.9 **The Commissions recommend that:**

- **there are no changes to the Protocol that would result in a weakening of either the Article 2 (1) commitment or the Protocol's rights, safeguards and oversight mechanisms relating to this commitment;**
- **there is adequate and sustained resourcing of the two Commissions to fulfil their responsibilities as the dedicated mechanism framework.**

UK Government/NI Executive Engagement with stakeholders

- 2.10 The Commissions also welcome the UK Government's proposals in the Command Paper on stronger engagement for stakeholders, including civil society, in relation to consultation and legislative processes⁶.
- 2.11 In particular, we welcome the UK Government's indication that it intends to provide a stronger role for those in Northern Ireland, including wider NI civic society.

Northern Ireland Human Rights Commission, the Equality Commission for Northern Ireland, and the Joint Committee of representatives of the Human Rights Commissions of Northern Ireland and Ireland..."

⁴ NI Office, '[UK Government Commitment to "No Diminution of Rights, Safeguards and Equality of Opportunity" in Northern Ireland: What does it Mean and How will it be Implemented?](#)' (NIO, 2020)

⁵ [Letter from Robin Walker MP](#) 26 February 2020, Minister of State for Northern Ireland to Christopher McCrudden contained within Christopher McCrudden's evidence on Parliamentary scrutiny of the Joint Committee and the application of the Northern Ireland Protocol at, page 19-21

⁶ UK Government Command Paper, [Northern Ireland protocol - next steps](#), P.21, paragraph 71, 21 July 2021

- 2.12 However, we note that there is no specific mention to engaging with equality and human rights stakeholders in the Command Paper. It is essential, as we made clear in our evidence to the Sub-Committee, that any engagement with civil society organisations includes transparent, structured, and regular engagement with equality and human rights stakeholders.
- 2.13 We welcome that the Sub-Committee has asked the Secretary of State NI in its recent letter to detail the work being done to foster engagement with equality and human rights stakeholders and civil society groups in Northern Ireland⁷.
- 2.14 We made clear in our earlier submission to the Sub-Committee that, alongside the UK dimension, the NI Executive should also be working, on a North-South basis, including through the institutions established in line with the Belfast (Good Friday) Agreement, in relation to those aspects of upholding the Article 2 commitment which have an all-island dimension.
- 2.15 In the context of any future changes to EU equality law that the UK Government must keep pace with in Northern Ireland, under the terms of the Protocol, it is important for both the Commissions and equality and human rights stakeholders in Northern Ireland, that the implications for Northern Ireland are considered. To achieve this there is a requirement for sustained and regular engagement by the UK Government with the Commissions and equality and human rights stakeholders to ensure a full understanding of the implications of any EU law that applies to Northern Ireland.
- 2.16 It is also essential that the Commissions have the opportunity, not only to be kept informed of any future EU equality law developments relevant to the Annex 1 equality Directives in the Protocol, including through the Joint Consultative Working Group, but also to highlight in advance, any implications of those changes for equality law in Northern Ireland.

Recommendations:

2.17 The Commissions recommend that:

- **the NI Executive, and NI Departments, ensure effective and regular engagement with a range of NI stakeholders, including civil society and human rights and equality groups, to identify impacts of the implementation of the Protocol on people living in Northern Ireland in relation to human rights and equality considerations;**
- **the NI Executive work with the UK Government and on a North-South basis to build strong open channels of**

⁷ European Affairs Sub-Committee on the Protocol on Ireland/Northern Ireland letter to the Secretary of State for Northern Ireland, [Article 2 of the Protocol on Ireland/Northern Ireland \(Rights of Individuals\)](#), Page 3, paragraph 9, 25 October

communication to keep informed of key developments of relevance to Article 2;

- **the Commissions are not only kept informed of any future EU equality law developments relevant to the Annex 1 equality Directives in the Protocol, but also have the opportunity, in the context of any new arrangements being taken forward by the UK Government, to highlight in advance any implications of those changes for equality law in Northern Ireland.**

EU proposals – non-paper: Engagement with Northern Ireland Stakeholders and Authorities

- 2.18 As set out in more detail below, the Commissions welcome a number of the EU's proposals set out in its non-paper on [Engagement with Northern Ireland Stakeholders and Authorities](#) . We note that these have been developed based on discussions with Northern Ireland civic society and business stakeholders and seek to address the concerns raised on the need for greater transparency and for EU measures to take account of implications for Northern Ireland.
- 2.19 We welcome the EU proposals to ensure greater stakeholder engagement with civic society. In our joint written evidence to the Sub-Committee, the Commissions noted that there has been some engagement between the UK Government and the EU supervisory bodies with civil society groups in Northern Ireland.
- 2.20 We also welcome the recent engagement by the EU with Northern Ireland stakeholders. In Belfast in September 2021 the Commissions jointly hosted a meeting of a number of civil society stakeholders and the EU Vice-President Maroš Šefčovič. The purpose of the meeting was to enable Vice-President Šefčovič to hear views from across Northern Ireland's civil society about the impact of Brexit and the Protocol.
- 2.21 The Commissions have consistently raised the importance of regular, structured and transparent engagement with a broad range of equality and human rights stakeholders, including, during our recent oral evidence session to the Sub-Committee on Article 2 of the Protocol.

Increased transparency

- 2.22 The Commissions welcome the EU proposal aimed at increasing transparency to establish a website to publish EU legislation applicable in Northern Ireland (covering also dynamic alignment aspect), and public consultations applicable to Northern Ireland⁸.

⁸ EU Protocol on Ireland and Northern Ireland, [Non-paper engagement with Northern Ireland stakeholders and authorities](#), P.2, paragraphs 10-12, 13 October 2021

- 2.23 This will be a useful resource that will assist all relevant parties, including the Commissions, in their role in monitoring and scrutinising the UK Government's compliance with its Article 2 obligations, and its obligation to keep pace with any future EU changes that amend or replace provisions in the Annex 1 Directives. It will also help improve transparency.
- 2.24 Further to the EU's aim of increasing transparency, it is important that the proposed website includes the publication of proposed or updated EU legislation that is relevant to the Article 2 (1) commitment, including EU law that amends or replaces provisions in the Annex 1 Directives. It would be helpful, in the interests of clarity and certainty, if the proposed website also clearly stated whether the proposed/updated EU law is applicable to any of the Annexes in the Protocol.

Recommendation

The Commissions recommend that, when the EU publishes proposed or updated EU legislation that is relevant to Article 2, including EU law that amends or replaces provisions in the Annex 1 Directives, the EU makes clear on its proposed website whether the proposed/updated EU law is applicable to any of the Annexes in the Protocol.

Joint Consultative Working Group

- 2.25 The Commissions welcome the EU's proposals for increased transparency around the work of the Joint Consultative Working Group (JCWG) in facilitating the exchange of information and mutual consultation, specifically on legislation relevant for the implementation of the Protocol⁹. We consider it would increase both transparency and accountability if confidentiality requirements were lifted for deliberations on certain specific legislative proposals.
- 2.26 We note, however, the EU proposals do not provide for advanced notification of items to be discussed at JCWG meetings, on which stakeholders, including the Commissions, civil society and human rights and equality stakeholders in Northern Ireland may wish to engage with the UK Government and/or NI Executive and Assembly.

Recommendation

- 2.27 **The Commissions recommend that proposals on increased transparency relating to the JCWG are extended to include the publication of agendas in advance of meetings.**

⁹ In paragraph 15 it is stated: " ...we do see merits in lifting this confidentiality requirement for deliberations on specific legislative proposals (and in particular when expert explanations are given in the JCWG) and their impact on the Northern Ireland. The co-chairs of the JCWG may also decide to publish the summary of the minutes...".

EU Protocol on Ireland and Northern Ireland, [Non-paper engagement with Northern Ireland stakeholders and authorities](#), P.2, paragraph 15, 13 October 2021

2.28 The Commissions welcome the EU proposal to:

“...set up structured groups with the participation of experts from respective authorities to discuss aspects of Union measures that are important for the implementation of the Protocol.”¹⁰

2.29 The Commissions made clear in its evidence to the Sub-Committee that the UK Government should give consideration to putting in place appropriate arrangements to ensure that there is regular and meaningful engagement between the Joint Consultative Working Group and the Commissions, as well as with equality and human rights stakeholders in Northern Ireland, in relation to the commitment set out in Article 2 of the Protocol.

2.30 We welcome that the Sub-Committee has recently raised this matter with the Secretary of State for Northern Ireland in its letter on Article 2 (rights of individuals), including stressing the importance of meetings between the Commissions and the JCWG.

2.31 The establishment of an Article 2 “structured group” within the JCWG could assist with ensuring regular and structured engagement and information exchange between the JCWG and the Commissions, as well as wider equality and human rights stakeholders.

Recommendation

2.32 **The Commissions recommend that any proposals between the UK Government and EU on the development of “structured groups” within the JCWG includes consideration being given to establishing a group that focuses on issues relating to Article 2 of the Protocol.**

Fora for structured dialogue with Northern Ireland stakeholders

2.33 The EU has proposed direct and structured fora for dialogue with NI stakeholders, experts working in EU institutions, bodies and agencies and their UK counterparts, including Northern Ireland authorities.

2.34 Whilst, in general, the Commissions welcome this proposal we note that there is no specific mention in the proposal for structured dialogue on matters relating to equality and human rights issues, or with equality and human rights stakeholders/bodies.

2.35 We consider that a direct and structured forum for equality and human rights stakeholders, including the Commissions, provides an opportunity to discuss potential Article 2 impacts and/or issues and concerns. It also presents an opportunity to inform stakeholders about any changes to Annex 1 Directives and/or proposed new EU legislation relevant to Northern Ireland and Article 2 of the Protocol. We consider it could be helpful, as proposed by the EU, for those meetings with stakeholders to be

¹⁰ EU Protocol on Ireland and Northern Ireland, [Non-paper engagement with Northern Ireland stakeholders and authorities](#), P.2, paragraph 14, 13 October 2021

structured around the meetings of the Specialised Committee and/or JCWG.

Recommendation

- 2.36 **The Commissions recommend that the EU proposals for direct and structured fora for dialogue with NI stakeholders, include open, transparent and regular engagement with the Commissions and equality and human rights stakeholders in Northern Ireland.**

Specialised Committee /Joint Committee

- 2.37 The Commissions welcome the EU proposal on the participation of civil society stakeholders in the Specialised Committee and proposals for more structured dialogue between civil society and business stakeholders and the co-chairs of the Joint Committee.¹¹ Again, we note that there is no specific reference to engagement with equality and human rights stakeholders in these proposals.
- 2.38 The House of Lords EU Committee has previously invited the UK Government to clarify how the Specialised Committee would engage with the Commissions, as well as NI Executive, the North-South Ministerial Council, and the North-South Implementation bodies¹².
- 2.39 Aligned to this request by the Committee, the Commissions consider that there is a need for clarification of how the Specialised Committee will engage with the Commissions in their role as the dedicated mechanism framework.
- 2.40 This includes clarity on processes to ensure that there is transparency in terms of recommendations of the Specialised Committee as regards matters raised with it by the Commissions and/or Joint Committee of the NIHRC and IHREC.

Recommendations:

- 2.41 **The Commissions recommend that:**
- **further clarification is provided by the UK Government/EU as to how the Specialised Committee will engage with the Commissions in their role as the dedicated mechanism framework;**
 - **the UK Government and the supervisory bodies established under the UK-EU Withdrawal Agreement and the UK-EU Trade and Cooperation Agreement establish formal**

¹¹ EU Protocol on Ireland and Northern Ireland, [Non-paper engagement with Northern Ireland stakeholders and authorities](#), P.3, paragraph 22, 13 October 2021

¹² House of Lords European Union Committee, '[The Protocol on Ireland/Northern Ireland](#)' (2020), Report 9, para 281

structures for open, transparent and regular engagement with equality and human rights stakeholders in Northern Ireland.

Additional points

- 2.42 The EU has proposed structured engagement with Northern Ireland stakeholders, specifically identifying civil society. However, we note that proposals for structured dialogue and engagement do not include specific reference to those working on cross border issues.
- 2.43 **The Commissions recommend that any agreed proposals between the UK Government and EU on structured engagement with stakeholders, include those working on cross border issues relating to equality and human rights.**

3 Points of agreement and disagreement and implications if agreement is not reached

Supply of Medicines

- 3.1 The Commissions welcome the commitment of both the UK Government and EU to resolving the issues relating to the supply of medicines from Great Britain to Northern Ireland. However, we note that agreement is yet to be reached with significant differences within the proposed approaches.
- 3.2 The UK Government's Command Paper acknowledges the issue¹³ and significant steps taken to address outstanding issues, including on medicines, and their relevance to the protection of the Belfast/Good Friday Agreement¹⁴.
- 3.3 The EU non-paper on the [Uninterrupted security of supply of medicines from Great Britain to Northern Ireland for the long-term](#) sets out the EU's proposed solution to provide a long-term perspective for undisrupted medicines supply from or through Great Britain to Northern Ireland for the benefit of patients in Northern Ireland.
- 3.4 In its non-papers the EU refers to the end of the grace period expiring on 31 December 2021 and seeks to reach agreement to ensure predictability and legal certainty for businesses.
- 3.5 Concerns have been raised with the Commissions from organisations including those in the disability sector, who raised the potential impact of disrupted medicines supply on those who may be reliant on the uninterrupted access to medicines to maintain/improve their health.

¹³ The UK Government [Command Paper](#) States: "Medicines are at risk of discontinuation because the hurdles to clear to reach the small Northern Ireland market make supply unviable." P.12, paragraph 20, 21 July 2021

¹⁴ UK Government Command Paper, [Northern Ireland protocol - next steps](#), P.15, paragraph 36, 21 July 2021

- 3.6 Finding agreement on these issues will allay fears held by disabled people living in Northern Ireland about the future supply of medicines.
- 3.7 Issues around the supply of medicines may have potential equality and human rights implications and impact negatively on the day to day lives of disabled people in Northern Ireland. It is important that there is no-diminution of rights for disabled people in relation to their access to health and treatment.

Recommendation

- 3.8 **The Commissions recommend that the UK Government and EU undertake urgent constructive engagement to reach agreement on a long-term, sustainable solution relating to the supply of medicines from Great Britain to Northern Ireland in order to allay fears relating to future availability, especially for disabled people who are reliant on medication to improve or maintain their health.**

Pet passport arrangement and Assistance dogs

- 3.9 The Commissions welcome the steps taken by both the UK Government and EU to resolving the issues relating to pet passports/assistance dogs, which have the potential to impact disabled people. However, we note agreement is yet to be reached with significant differences within the proposed approaches.
- 3.10 In the Command Paper, the UK Government has welcomed and recognised the significant efforts and movements made to reach agreement on the issue of assistance dogs¹⁵, as well as issues related to medicines, and noted the importance of reaching agreement¹⁶.
- 3.11 The EU has in its non-paper on [Sanitary and Phytosanitary \(SPS\) issues](#) reiterated its position on the issue of assistance dogs, as previously stated in its [June 2021 paper on SPS](#).
- 3.12 The Commissions note that issue of travel arrangements for assistance dogs between Great Britain and Northern Ireland may have potential equality and human rights implications both domestically and internationally, including in relation to Article 2 commitments in the Ireland/ Northern Ireland Protocol, Article 8 ECHR and the United Nations Convention on the Rights of Persons with Disabilities.
- 3.13 Concerns about the potential impact of additional requirements for those travelling with assistance dogs between Great Britain and Northern Ireland have been raised with the Commissions by disabled people. The Commission raised the issue of assistance dogs in its evidence to the Sub-Committee. It had raised the issue previously with the Northern Ireland

¹⁵ The [UK Government Command Paper](#) states: "...pet owners, including those reliant on assistance dogs, have faced the prospect of unnecessary vaccinations and treatments, and bureaucratic certification hurdles simply to travel within the United Kingdom." P.12, paragraph 20, 21 July 2021

¹⁶ UK Government Command Paper, [Northern Ireland protocol - next steps](#), P.15, paragraph 36, 21 July 2021

Executive Committee, with the Agriculture, Environment and Rural Affairs Minister and with the Northern Ireland Affairs Committee.

Recommendation

- 3.14 **The Commissions recommend that the UK Government and EU work together to ensure issues relating to assistance dogs travelling from Great Britain to Northern Ireland are urgently addressed and to ensure that there are no adverse impacts on assistance dog owners in Northern Ireland in terms of requirements on pet passport arrangements as a result of Brexit.**

Faith communities in Northern Ireland

- 3.15 The UK Government Command Paper and EU non-paper on [Customs](#) and [Sanitary and Phytosanitary \(SPS\) Issues](#) recognise that there has been constructive engagement on issues relating to the movement of goods from Great Britain to Northern Ireland, food, plant and animal health, which has included joint engagement with businesses and civic society in Northern Ireland.
- 3.16 Though not specifically referred to in the UK Government Command Paper or the EU non-paper, as mentioned in our evidence to the Sub-Committee, concerns have been raised with us by representatives from the Jewish community and the Islamic faith groups in Northern Ireland about difficulties in accessing some kosher and halal food from Great Britain.
- 3.17 For example, concerns have been raised by representatives from the Jewish community that the new arrangements have meant that the Jewish community has been struggling to get some types of Kosher food and if this is not addressed soon, this will impact on the viability of their historic community in Belfast.
- 3.18 Concerns have also been raised regarding the potential impact on the Muslim community in Northern Ireland on accessing halal food and ritual items should further checks on goods be introduced when the grace period ends.

Recommendation

- 3.19 **The Commissions recommend an early and permanent resolution by the UK Government and the EU to these food supply matters affecting the day to day lives of faith communities in Northern Ireland.**

Conclusion

- 3.20 The Commissions have included recommendations related to: ensuring the Article 2(1) commitment is upheld; and the need for regular and sustained engagement by the UK Government, NI Executive and EU with equality and human rights stakeholders, and additional measures to increase

transparency of the operation of the JCWG. We have also included recommendations relating to key human rights and equality issues which are relevant to ongoing negotiations between the UK Government and EU, including the supply of medicines between Great Britain and Northern Ireland, pet passport arrangements and assistance dogs, and impacts on food supply issues on faith communities in Northern Ireland.

- 3.21 The Commissions urge the UK Government and EU to continue to undertake constructive engagement to reach timely agreement on sustainable, long-term solutions for all ongoing issues which have the potential to impact the rights of people in living in Northern Ireland.
- 3.22 While the recommendations in this joint submission are directed primarily at the UK Government and EU, the Commissions would encourage the Sub-Committee to consider raising these recommendations with the UK Government and/or EU.
- 3.23 The Commissions welcome the opportunity to provide evidence to the Sub-Committee on the Ireland/Northern Ireland Protocol on the UK and EU proposals on the Protocol and their potential Article 2 implications and remain available to the Sub-Committee to provide additional information if required.

12 November 2021