

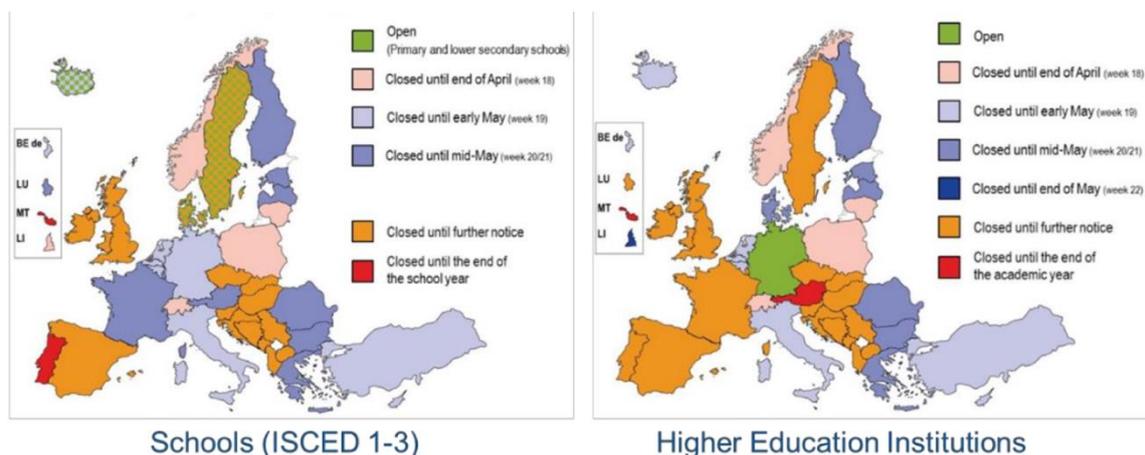
# Report COVID-19 responses by Higher education in Europe, 2020

Report drawn by the European Association of Distance Teaching Universities (EADTU)

This section concentrates on the European region. It reports on the scale of growth; perceived issue of quality; assessment and examination; reputation of open, online, blended and flexible learning in this area, its inclusivity in access concluding with some perspectives for the future.

## Scale of growth

Figure 1 shows the situation in Europe in relation to the schools and Higher Education Institutions (HEIs) closure from April 2020. This closure has inevitably impacted on the growth of online and blended delivery solutions for both HEIs and schools in Europe. In accordance with an ongoing online survey carried out by EUA - European Universities Associations, in April/May 2020, almost **90% of the European HEIs** have been required to modify their delivery mode to an online and/or blended approach due to the COVID-19 outbreak.



Source: EURYDICE (2020)

Figure 1 - Schools and HEIs closing in April 2020 - source EURYDICE (2020)

This situation has impacted over 1.5 billion students. In accordance with a UNESCO survey of national education systems undertaken in 61 countries it has been highlighted that governments around the world are making efforts to rapidly deliver distance education at scale in an attempt to ensure continuity of learning.

Between June 18th and September 4th, 2020, the European Commission has launched an Open Public Consultation (OPC) with the purpose of capturing the lessons learned from the COVID-19 crisis and ensuring a feasible and durable Action Plan for the upcoming future of Education. The OPC was available on 'Have your say portal'<sup>1</sup> and collected respondents (population/sample of 2.716) "from 60 countries, with the top 10 countries being Romania (58.03%), Portugal (9.61%), Spain (4.82%), Belgium (4.16%), Italy (3.98%), Germany (3.65%), Bulgaria (2.03%), the Netherlands (1.33%), France (1.51%) and Greece (0.96%)"<sup>2</sup>.

<sup>1</sup> <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12453-Digital-Education-Action-Plan>

<sup>2</sup> [https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020\\_en.pdf](https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020_en.pdf)

Among others, the results of the OPC contributed to contextualising the extent of digital technology used for education and training during the crisis. The majority (66.6%) of consulted groups reported that the use of distance and online learning had increased during the crisis (Figure 2)<sup>3</sup>.

However, the scale of growth of online and blended online solutions vary across countries' income level: "90% of high-income countries/territories reported that they were using existing online learning platforms while only 53% from low and lower-middle income countries/territories are doing so. Insufficient Internet capacity is a concern for all education systems"<sup>4</sup>.

### Use of distance and online learning before, during and after the COVID-19 crisis

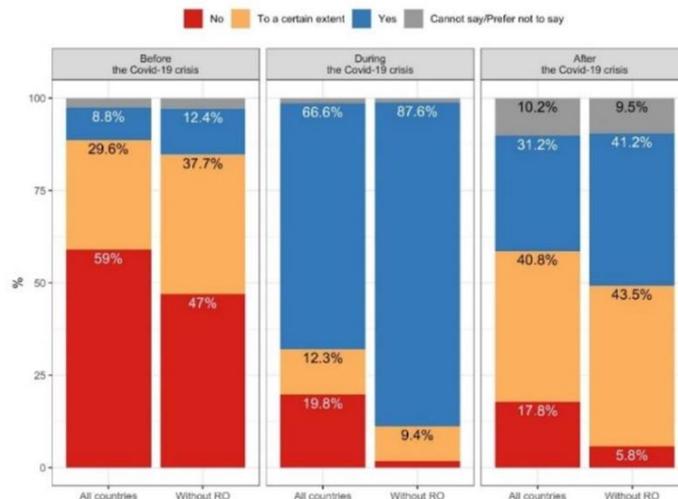


Figure 2 - Source: Open public consultation on the new Digital Education Action Plan (2020)<sup>5</sup>

### Perceived issues of Quality

The perceived (and actual) quality of learning experienced by students, as well as teachers, across the European Member States during the pandemic varied in relation to "the availability of infrastructure and devices, the presence of digitally competent educators, including capacity to adapt pedagogical methods, and the existence or not of usable and accessible digital content, tools, services and platforms"<sup>6</sup>.

Overall a lack of "innovative instructional approaches, which stimulate learner autonomy, motivation and engagement" were registered. As practice and research on the topic shows, high-quality and inclusive digital education requires time, skills and appropriate resources for planning and design, all prerequisites not matched at the beginning of the pandemic. Despite the emergency situation, HEIs performed slightly better compared to schools because of their prior experience in "providing blended learning options and online digital content in their courses and programmes. In most cases, their lessons continued virtually through streaming and use of existing learning management systems but this happened with a wide degree of quality regarding the learning design. On the other hand, schools and VET providers had to pivot rapidly, under similarly difficult circumstances and in most cases for the first time, to remote emergency education. In this rushed and unplanned situation, the production of new

<sup>3</sup> <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12453-Digital-Education-Action-Plan>

<sup>4</sup> <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12453-Digital-Education-Action-Plan>

<sup>5</sup> 'Without RO' are the data representation made excluding the Romanian respondents that due to their large representation can false the data

<sup>6</sup> [https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020\\_en.pdf](https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020_en.pdf)

online learning content was rarely an option, especially because of time constraints. Most educators and students were confined in their homes at short notice and, as long as they had internet access and digital devices, in most cases a synchronous technology-mediated virtual classroom was considered the most practical and feasible approach”<sup>7</sup>.

The results of a School Education Gateway survey<sup>8</sup> confirmed what was detailed above: for the majority of teachers in schools (66.9% of 4,859 respondents), their first experience with online learning was during the COVID-19 pandemic. Quality of online education was further challenged because many of them also reported problems in accessing technology (computers, software, reliable internet connection, etc.)<sup>9</sup>.

Due to the time constraints, many educators belonging from traditional universities and schools have mostly just ‘replaced face to face teaching and learning with synchronous online classes’.

As a consequence, at the beginning of the academic year 2020/2021 in many European countries, students have protested for the right to access to quality education<sup>10</sup>.

## Assessment and examinations

Due to the COVID-19 outbreak, and the closure of schools and university buildings, it was necessary to find viable alternatives to on-site exams. “This has raised many issues about how to ensure that different assessment methods can be introduced in ways that assess students fairly, without detriment to their performance. Universities have tried to embrace these changes as quickly as they could, without sacrificing quality and fairness for speed of implementation”<sup>11</sup>. Issues related to assessment and examination have affected also Erasmus students, who like the doctoral candidates saw their online examinations and thesis defense ceremonies being rescheduled, causing study delays<sup>12</sup>.

Referring to the UNESCO working document released in April 2020<sup>13</sup>, it is possible to present a more accurate picture of the coping strategies adopted by the European countries in relation to examination and assessment.

Despite the fact that Europe on March 14th, 2020 was declared by WHO (World Health Organization) the epicentre of the COVID-19 pandemic, several European countries decided to **continue holding the exams on the dates originally set**. Among these were Germany, Finland, Hungary, France<sup>14</sup>, Luxembourg, Poland and Slovenia<sup>15</sup>.

The strategy to **cancel exams** at the beginning of the pandemic was followed by Ireland, France, Norway, the Netherlands, Sweden, The United Kingdom and Slovakia. The latter cancelled, for the academic year 2019/2020, both the written part of the school-leaving examination (State Matura) as well as the written test for 15-year-olds, “Test-9”. Similarly, Sweden cancelled the SweSAT (Swedish Scholastic Aptitude Test - högskoleprovet), with consequences for the admittance to various HEIs and university programs. Also, the United

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<sup>7</sup> [https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020\\_en.pdf](https://ec.europa.eu/education/sites/education/files/document-library-docs/deap-swd-sept2020_en.pdf)

<sup>8</sup> <https://www.schooleducationgateway.eu/en/pub/viewpoints/surveys/survey-on-online-teaching.htm> conducted between 9 April and 10 May 2020, with 4,859 respondents from more than 40 countries (of whom 86% were teachers or school heads)

<sup>9</sup> <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf>

<sup>10</sup> <https://www.dutchnews.nl/news/2020/09/students-take-protest-against-online-education-to-the-museumplein-on-friday/>

<sup>11</sup> <https://www.the-guild.eu/news/2020/impact-of-covid-19-for-university-students.html>

<sup>12</sup> [https://eacea.ec.europa.eu/sites/eacea-site/files/brochure\\_surveyreporterasmusmundusprogrammecovid19\\_03.pdf](https://eacea.ec.europa.eu/sites/eacea-site/files/brochure_surveyreporterasmusmundusprogrammecovid19_03.pdf)

<sup>13</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

<sup>14</sup> Specifically, the national teacher recruitment competition

<sup>15</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

Kingdom cancelled the school exams including the General Certificate of Secondary Education (GCSEs).

Using **continuous assessment** as alternative to final exams has been an approach preferred by Norway, France, and by the Netherlands where both the exams at the end of the primary school (to access the second) and at the end of the secondary were cancelled, taking decision on the students' performance in accordance to the grades collected during the year.

Many exams were **rescheduled** by the end of May / beginning of the summer for Estonia (the upper secondary final school exams); Germany (the Abitur, the German Baccalaureate); Bulgaria; France (the written tests for national competitions); Greece, (the exams to access universities); Ireland (the Leaving Certificate, the terminal exam for post-primary education); Latvia (foreign language examinations for 12th grade); Lithuania (graduation exams); Malta (A-level exams); the Netherlands (enrolment in higher education, for special cases); Spain (the official examinations to access university); Slovakia, (the oral part of the school-leaving examination; the final post-secondary examinations and the graduation examinations); Estonia, Finland and Turkey (high-stakes exams)<sup>16</sup>.

**Online modality** for high-stakes exams was the option for The United Kingdom (Oxford and Cambridge moved the summer exams online); Belgium - the Wallonia and Brussels regions; Estonia and Italy (here each university decided the modalities for exams and final degrees for their own students)<sup>17</sup>. Apart from high-stakes exams, the online modality was chosen also in Finland, Germany, Hungary, Latvia, Lithuania, the Netherlands, Sweden, and Spain<sup>18</sup>.

Whether specific examinations were “maintained, postponed, rescheduled on-site or transferred on-line, or whether they were cancelled and replaced by alternative modalities of continuous assessment or alternative approaches to exams and validation of learning, decisions must be driven by concern for **fairness, equity and inclusion**”<sup>19</sup>. In this sense, continuous assessment appears to be a relevant choice and according to UNESCO it should be encouraged, “with measures to mitigate the risks of inequalities, for example by considering additional measures to offset bias from teachers in grading (e.g. make students work anonymous online, peer grading), and to support teachers, supervisors, invigilators to conduct exams in an unconventional way (e.g. organize exam boards or a jury online, make reference to and recognize student learning in previous years/semesters, etc.)”<sup>20</sup>.

## Reputation of open, online, blended and flexible learning

The responses from the Open Public Consultation (OPC) group, launched by the EU Commission this year, enable to highlight the reactions to the strategies adopted by several EU countries. These reactions show that many of the stakeholders involved, mainly: learners; educators, training staff, parents, HE and training institutions, private sectors and digital technology providers and public authorities, were not satisfied. As a consequence, the mismatch between population needs and the solutions provided (see Table 1) have given open, online, blended and flexible learning a bad reputation.

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<sup>16</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

<sup>17</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

<sup>18</sup> More details here: [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

<sup>19</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

<sup>20</sup> [https://en.unesco.org/sites/default/files/unesco\\_review\\_of\\_high-stakes\\_exams\\_and\\_assessments\\_during\\_covid-19\\_en.pdf](https://en.unesco.org/sites/default/files/unesco_review_of_high-stakes_exams_and_assessments_during_covid-19_en.pdf)

**Table 1: Top three unsatisfied needs during the COVID-19 crisis per respondent category (population/sample size 2.716)<sup>21</sup>**

Target group	Most unsatisfied needs	Other unsatisfied needs
Learners	Regular interaction and clear instruction by educators (53.3%).	<ul style="list-style-type: none"> <li>Regular communication with other learners (40.1%);</li> <li>Regular and clear communication from the management of the education institution (35.5%)</li> <li>Support for mental health (33.6%)</li> </ul>
Educators	High-speed and stable connection at home (38.4%).	<ul style="list-style-type: none"> <li>Training and guidance to adapt the class material and the teaching methodology to distance and online learning (36.1%);</li> <li>More regular clear communication, guidance and support from public authorities and lack of digital devices suitable for distance and online learning (34.3% each).</li> </ul>
Education and training staff	Lack of a high speed and stable internet connection at home for learners and teachers (44.4%).	<ul style="list-style-type: none"> <li>Lack of digital devices suitable for distance and online learning (33.8%);</li> <li>Financial support at national or regional level (33.1%).</li> </ul>
Parents	More regular interaction, instruction and guidance from teachers/trainers/educators (57.4%).	<ul style="list-style-type: none"> <li>More regular and clear communication, guidance and support from the educational institutions of their child(ren) (45.6%);</li> <li>Easy to use platforms (32%).</li> </ul>
Education and training institutions	Lack of digital devices suitable for distance and online learning (58.2%).	<ul style="list-style-type: none"> <li>High speed and stable internet connection (49.5%);</li> <li>Guidance how to support the mental health and well-being of staff and learners (38.6%).</li> </ul>
Private sector and digital technology providers	More cooperation with public authorities during the COVID-19 crisis (47.7%)	<ul style="list-style-type: none"> <li>More cooperation with education and training institutions (31.8%);</li> <li>Opportunities to scale existing business (29.5%).</li> </ul>

<sup>21</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0624&from=EN>

Public authorities	Financial support to address the immediate challenges of the COVID-19 crisis (36.4%)	<ul style="list-style-type: none"> <li>• Easy to use platforms, digital devices that can be used for online and distance learning and high-speed and stable internet connection (27.3% each).</li> </ul>
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Source: Open public consultation on the new Digital Education Action Plan (2020)<sup>22</sup>

As highlighted in the previous section, for many teachers at schools the first experience of online teaching was matured during the COVID-19 pandemic. As a consequence, to this ‘emergency online teaching and learning’, many students as well as educators felt overloaded, demotivated, and developed a negative idea about online/distance teaching. However, as underlined by Hodges C. et al (2020)<sup>23</sup>, there is a big difference between what students and teachers have experienced during the COVID-19 pandemic, and actual online education. The authors use the term *emergency remote teaching* to underline this distinction.

Online as well as blended education require planning, time, training of the educators, resources available at institutional and policy levels and much more. Many resources have been made available online to help teachers/educators in this emergency time, examples in this sense can be found here: [https://ec.europa.eu/education/resources-and-tools/coronavirus-online-learning-resources\\_en](https://ec.europa.eu/education/resources-and-tools/coronavirus-online-learning-resources_en) and <https://empower.eadtu.eu/coronacrisis>. Moreover, frameworks for the development and evaluation of Blended education have been developed, such as the European Maturity Model for Blended Education, available as open source here: <https://embed.eadtu.eu>.

## Access and inclusion

The sudden and large-scale shift to distance and online learning during the COVID-19 outbreak has been far from simple. Despite being a positive experience for some institutions with high levels of digital capacity, it raised significant challenges in terms of equity and quality.

According to the data collected<sup>24</sup>, it is expected that COVID-19 will negatively impact students’ learning, see Figure 3, due to four main factors.

<sup>22</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0624&from=EN>

<sup>23</sup> <https://er.educause.edu/articles/2020/3/the-difference-between-emergency-remote-teaching-and-online-learning>

<sup>24</sup> <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf>

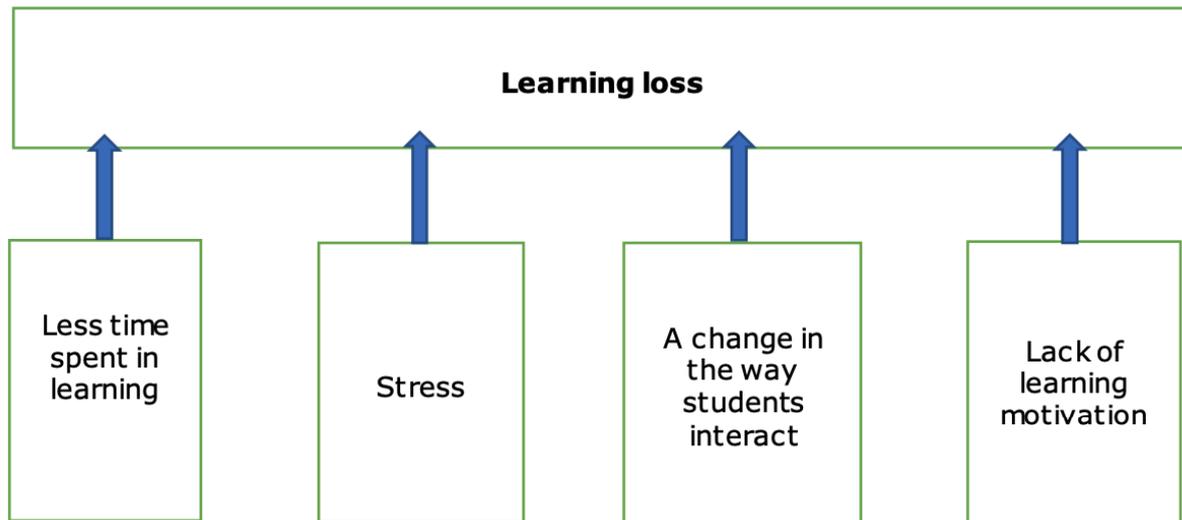


Figure 3 - effect of COVID-19 on students' learning through four main channels<sup>25</sup>

“First, there is evidence showing that quarantined students tend to spend less time in learning compared to when schools are open. Second, many students confined at home due to COVID-19 may feel stressed and anxious, and this may negatively affect their ability to concentrate on schoolwork. Third, physical school closure causes a lack of in-person contact, which may, fourth, impact students' motivation to engage in learning activities”<sup>26</sup>.

Figures 4 and 5, which are based on OECD<sup>27</sup> data, show, respectively, what percentage of the 15-year-old surveyed students have a quiet place to study and a computer for accessing education from home.

<sup>25</sup> Figure from <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf> page 28

<sup>26</sup> <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf>

<sup>27</sup> <https://www.oecd.org>

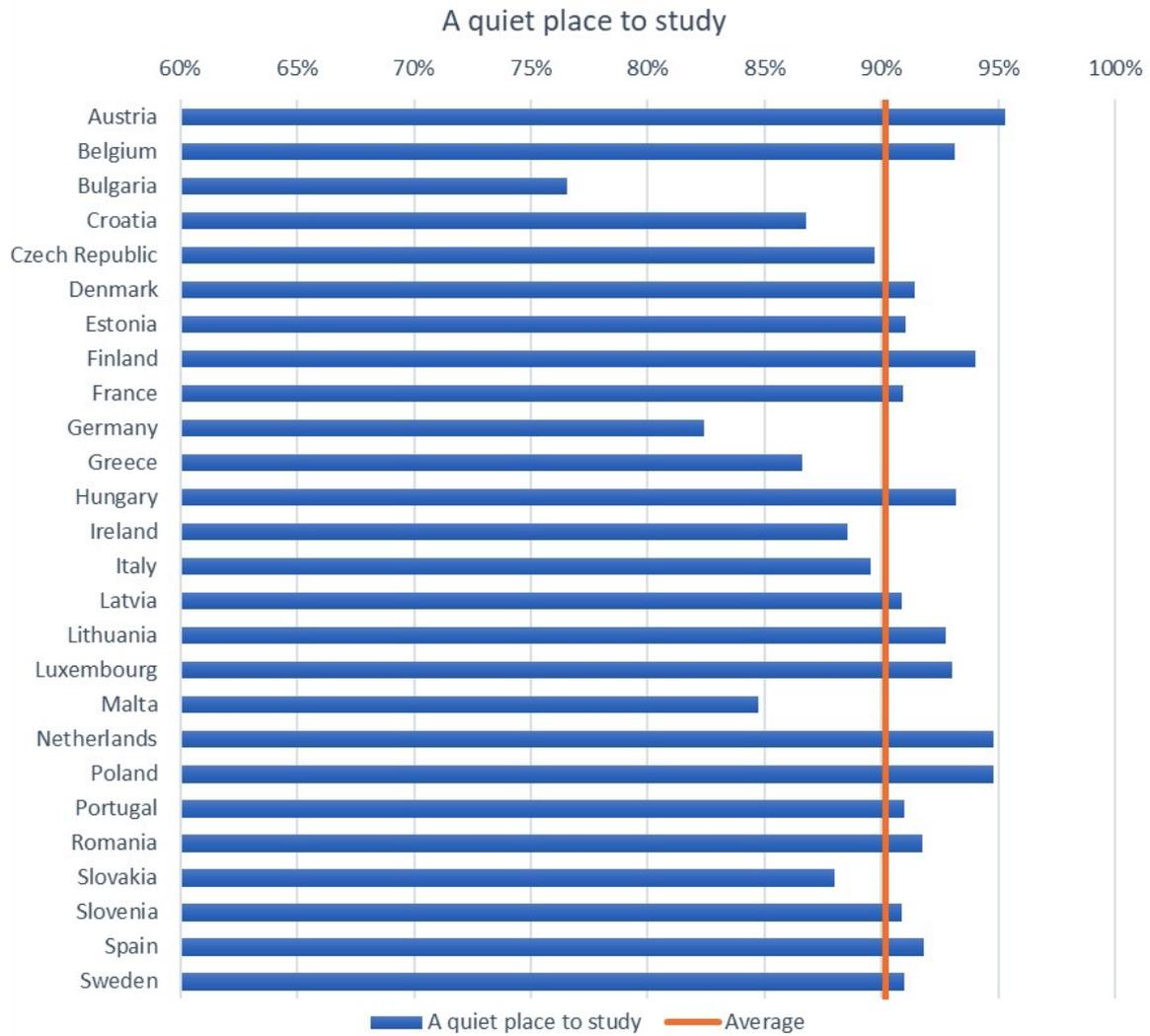


Figure 4 - percentage of students divided per country that have reported to access to a quiet place to study<sup>28</sup>

<sup>28</sup> Figure from <https://www.europeandataportal.eu/en/impact-studies/covid-19/education-during-covid-19-moving-towards-e-learning>

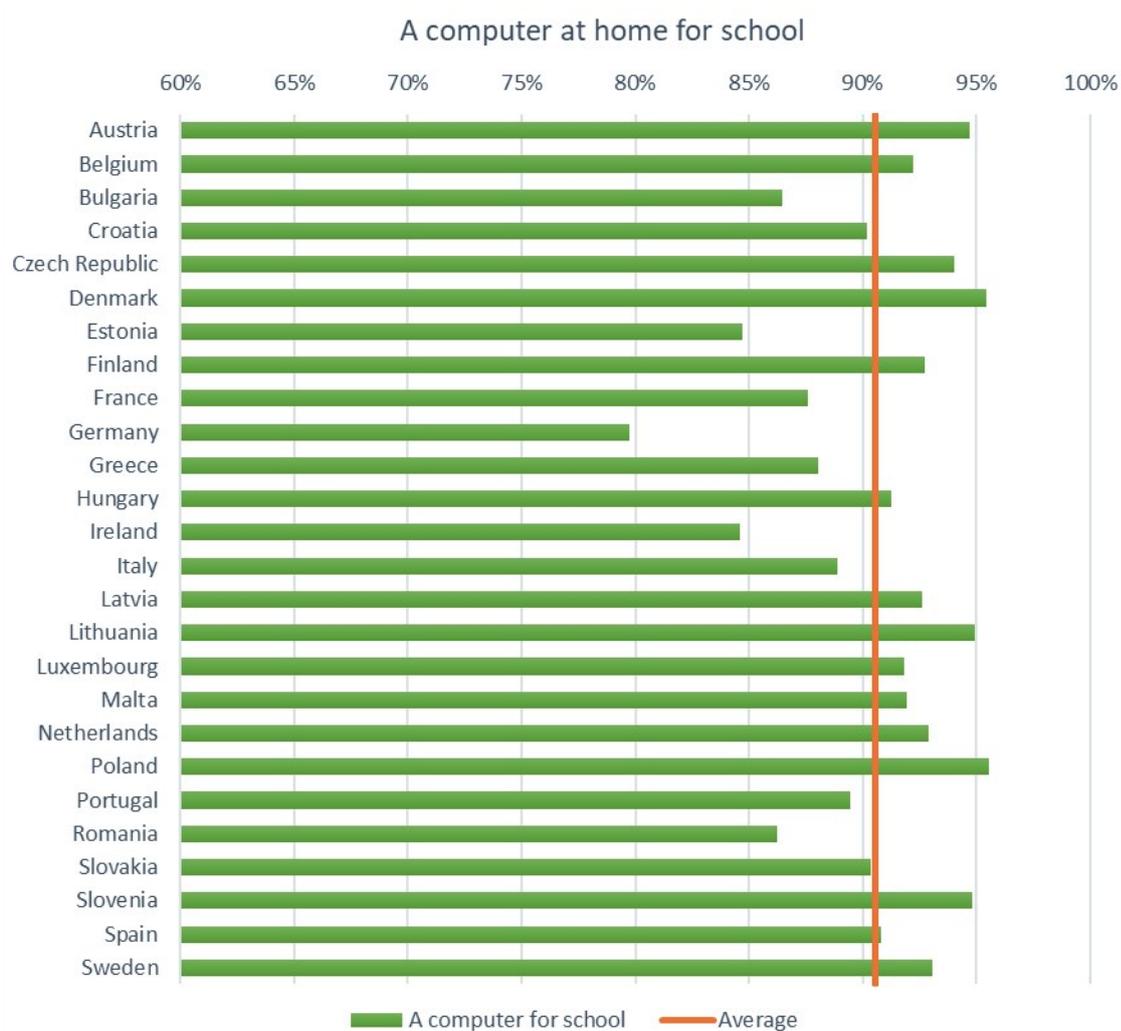


Figure 5 - percentage of students divided per country that have reported to have a computer at home to study<sup>29</sup>

Students belonging to less advantaged families, who are less likely to have access to relevant digital learning resources (e.g., laptop/computer, internet connection); a suitable home learning environment and parental support (e.g., in homework management), are most likely to have worse learning/academic performance. COVID-19 has enhanced the effects of socio-economic inequities on learning, see Figure 6.

<sup>29</sup> Figure from <https://www.europeandataportal.eu/en/impact-studies/covid-19/education-during-covid-19-moving-towards-e-learning>

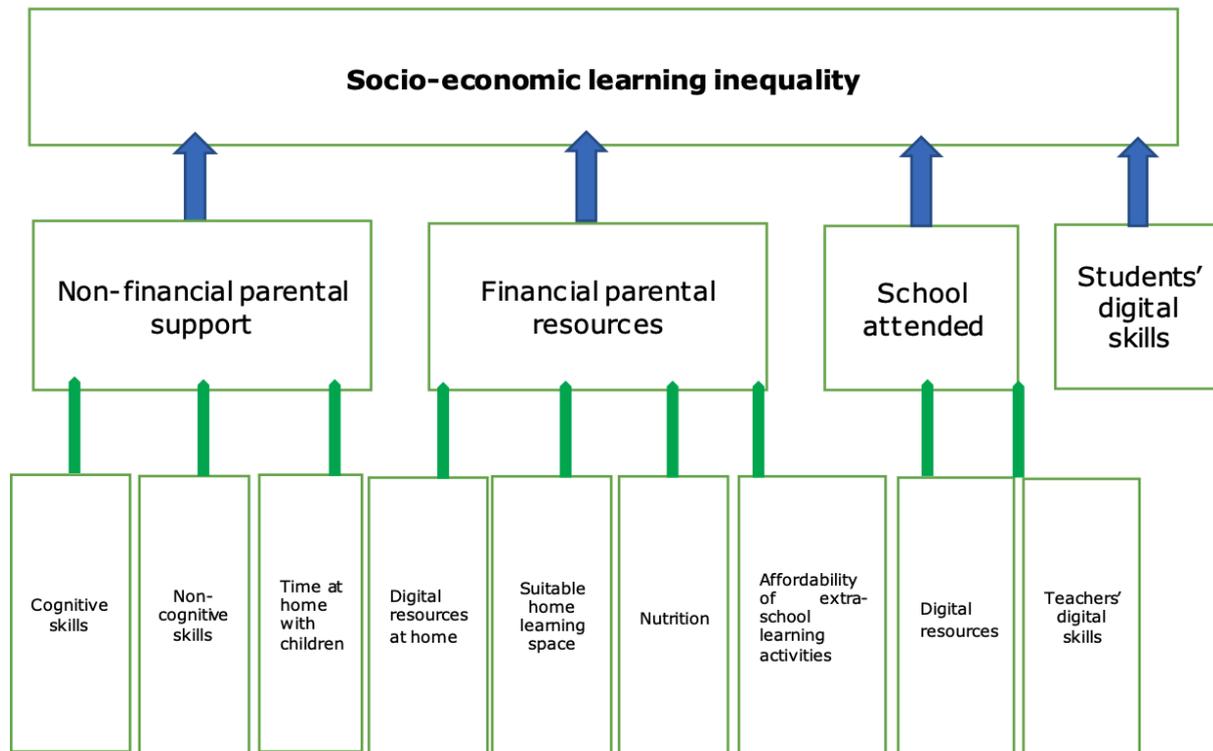


Figure 6 - Inequity on socio-economic level in learning- European Area<sup>30</sup>

Digital inequalities for both students and learners are also the cause of disparities. Before COVID-19, very few (30%) of the teachers interviewed have declared to feel 'well or very well prepared to use digital technologies for teaching'<sup>31</sup>. Investments on teachers' digital skills development are thus essential for the implementation of the future European digital plan for education.

## Acceleration of digital transition

The COVID-19 pandemic highlighted the importance of digital connections on many levels (smart-working, teleworking, online education and remote emergency teaching, etc.). In her speech, the current executive vice-president on the digital package Margrethe Vestager<sup>32</sup> (sept 2020), presented the review of digital agenda with two proposals: "The first proposal is a new regulation for the European High Performance Computing Joint Undertaking. The second proposal is a recommendation for Member States to boost investment in connectivity infrastructure"<sup>33</sup>.

She proposed to invest 20% of the Recovery Fund in digital transformation, and concluded with the "hope that many member States will invest in digital skills. Over 40% of Europeans do not even have basic digital skills today. If we want everybody to benefit from the advantages of digital education, if we want to use digital applications in our daily lives, we need to create these skills. If we want to lead in digital technologies, we have to step up investments in advanced digital knowledge and well-trained digital innovators"<sup>34</sup>.

<sup>30</sup> Figure from <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf> page 29

<sup>31</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0624&from=EN> page 34

<sup>32</sup> [https://ec.europa.eu/commission/presscorner/detail/en/speech\\_20\\_1704](https://ec.europa.eu/commission/presscorner/detail/en/speech_20_1704)

<sup>33</sup> [https://ec.europa.eu/commission/presscorner/detail/en/speech\\_20\\_1704](https://ec.europa.eu/commission/presscorner/detail/en/speech_20_1704)

<sup>34</sup> [https://ec.europa.eu/commission/presscorner/detail/en/speech\\_20\\_1704](https://ec.europa.eu/commission/presscorner/detail/en/speech_20_1704)

## Assessment of new perspectives on Quality for open, online and flexible learning in Europe for the future.

A dialogue on innovation and quality assurance between institutions, quality assurance agencies and governments should be organized. This dialogue should support the development of new perspectives on quality open online and flexible education for the future, leading to concerted actions towards innovation and quality in online education. The stakeholders mentioned should act in the following direction:

**Institutions:** developing and implementing policies and strategies for digital education in blended degrees and extended continuation of education provisions, an internal quality framework with a maturity model for online/blended learning and for continuous and open education.

**Quality assurance agencies:** adapting and fine-tuning criteria/indicators and presenting guidelines for innovation and digital modes of teaching and learning, and sharing good practices of internal and external quality assurance.

**Governments:** developing drivers for innovation and quality, and reviewing regulatory frameworks and practices for quality assurance and accreditation in online higher education, encouraging and accelerating innovation. A vision for change should be expressed through national strategies.

Key figure in the development of new perspectives for quality open, online and flexible learning is the teacher/educator who needs to be trained not only on digital technologies but also on innovative pedagogical approaches that can be suitable for the actual emergency situation and the future. Three pedagogical approaches and methodologies are suitable in this sense, and are online, blended and synchronous-hybrid education. They are suitable to manage teaching during a total lock-down scenario (online), partial (blended and hybrid), and also post pandemic.

- *Synchronous hybrid learning:* based on settings that have in common that both on-site or 'here' students and remote or 'there' students are simultaneously included;
- *Blended learning:* based on a course design with a deliberate combination of online and offline learning activities;
- *Online distance learning:* based on a course design with a continuous physical separation between teacher and learner, synchronously and asynchronously.

To be taken under consideration for a successful strategy is the *students' voice, perspective and - readiness for digital learning*, which refers to the preparedness for digital education when starting digital courses.

The EU Commission, in September 2020 have drafted the *renewed Digital Education Action Plan* (DEAP) requiring **reinforced coordination and collaboration actions at the EU level** in order to:

- "Promote digital education as a strategic EU policy response to the COVID-19 crisis and to transform Europe's education and training systems in a lifelong learning perspective for the digital age;
- Share knowledge, good practices and experience across the education and training sectors, and amongst the diverse stakeholders in the digital education ecosystem, in

order to cross- fertilise, exploit synergies and encourage new collaboration and partnerships;

- Address key issues that would benefit from reflection and action across levels and sectors of education and training and on the basis of a common European approach (e.g. AI in education, quality of online content, ethical use of big data, etc.);
- Analyse data, monitor results, report on progress and offer strategic foresight and research on digital education in order to feed policy making, strategies and decisions at regional, national and EU level;
- Experiment with new and innovative co-creation methods, support agile development and trials, and ensure early involvement of educators and learners with innovative learning tools, practices and processes;
- Provide easy access to European online learning tools, content and learning support that is multilingual, of high quality and respectful of European values, legislation and standards, for instance, regarding accessibility and equity, data use and protection, privacy and ethics<sup>35</sup>.

A consequence of the DEAP is the availability of dedicated funding programmes that will facilitate the study/assessment, design and implementation of new perspectives for quality open, online flexible education.

[EADTU](#) the European Association of Distance Teaching Universities is very active in the field of Open, Online flexible education via many services (i.e. [EMPOWER](#) and the [e-xellence](#)) and via EU funded projects, such as [EMC-LM](#); [E-SLP](#); [EMBED](#), which aim at providing resources and strategies/guidelines to lifelong learners and policy makers in the frame of continuous education and continuous professional development, as well as to the need of knowledge exchange among experts (EMPOWER) and students ([OpenVM](#); <http://virtualmobility.eadtu.eu/>). Through these projects and activities, EADTU contributes to solutions for challenges faced in the context of the current COVID crisis, and supports innovation in education in general.

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<sup>35</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0624&from=EN> page 58