

The Influence of the Decisions of the European Court of Human Rights on EUNAVFOR MED Operation Sophia

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Abstract: Operation Sophia was launched in 2015 with the main goal of eradicating migrant smuggling and human trafficking from Libya. The decision of the European Court of Human Rights (ECtHR) in *Hirsi Jamaa and Others v. Italy* required the migrants given aid at sea to disembark in Italy. The lack of progression of the mission as a consequence of due respect for international law, in addition to Italian attitudes towards the influx of migrants, resulted in the end of the mission's maritime operation as it was initially conceived.

Keywords: EUNAVFOR MED Sophia · *Hirsi Jamaa and Others v. Italy* · European Court Human Rights · Trafficking of Migrants · UNCLOS · SOLAS.

(A) INTRODUCTION

For hundreds of years, Europe has been the preferred destination for countless numbers of people, primarily from Africa, seeking nothing more than to escape from ongoing armed conflicts, dire poverty and a lack of basic resources in their countries of origin, or simply to find better opportunities for themselves and their families.¹

The institutional and political weakness in Libya since 2011, in addition to its geographical proximity to the European coasts, strengthened criminal organizations within its borders. The Mediterranean Sea thus became not only a channel for human trafficking and the smuggling of migrants to Europe in the mafias' relentless pursuit of business development, but also the place where thousands of these migrants were killed. Indeed, the death of more than 800 migrants off the Libyan coast on 18 April 2015 was a turning point for European institutions, governments and non-governmental organizations. This event encouraged the European Union to launch EUNAVFOR MED Operation Sophia through Council Decision (CFSP) 2015/778, of 18 May 2015, to disrupt the business model arising from the smuggling of people from Libya.

In a parallel effort, United Nations Security Council (UNSC) Resolution 2240 (2015) of 9 October authorized states to act against vessels suspected of being used for human smuggling or trafficking on the high seas or those originating from the Libyan coast. It also urged Member States to fulfil their obligations regarding the protection of international human rights and refugee law.

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¹ A. Poncela Sacho, 'EUNAVFOR MED Operación Sophia: un instrumento de la Política Exterior y de Seguridad Común de la Unión Europea', 13 *Boletín del Instituto Español de Estudios Estratégicos* (2019), at 361-362.

To this end, the resolution reaffirmed the need to protect and enforce the human rights and fundamental freedoms of all migrants, regardless of their political or social status, thereby emphasizing that migrants should be treated with humanity and dignity.

In this regard, in recent years, Operation Sophia has been conducted off the Libyan coasts, where many players have tried to protect migrants from risking their lives trying to reach Europe, even though this mission was not included in Decision 2015/778. War vessels, state vessels, vessels chartered by non-governmental organizations, merchant vessels and all other types of vessels have provided aid to individuals endangered at sea, including traffickers, pursuant to the 1982 United Nations Convention on the Law of the Sea (UNCLOS), the 1974 International Convention for the Safety of Life at Sea (SOLAS Convention), and the 1979 Search and Rescue Convention (SAR Convention).

Unfortunately, the treatment received by these migrants during and after the assistance cannot be considered fair. Due to their status as migrants or refugees and the perception of them as potential criminals, respect for their human rights has been, at times, a function of whether they were lucky enough to be rescued.

One common denominator of the aid provided by vessels not belonging to the coast guards or to the Libyan navy has been the application of the principle of *non-refoulement* of potential refugees or their delivery to a "safe port". In the author's view, this is based, amongst other things, on the 2012 decision of the European Court of Human Rights (ECHR), in the case *Hirsi Jamaa and Others v. Italy*.

The limitations on how Operation Sophia could be conducted, due to respect for both international public law and Libyan sovereignty, coupled with the social and political implications of the relocation to Europe of thousands of migrants rescued at the sea, were key to preventing it from fulfilling the mission's objectives, resulting in the end of the naval mission in accordance with Decision 2019/535, of 29 March 2019, of the Council of the European Union.

(B) OPERATION SOPHIA: AN OVERVIEW OF THE MISSION

On 18 April 2015, several vessels coming from the Libyan coast tried to cross the Mediterranean Sea to Italy. The adverse weather conditions and the precarious nature of the vessels led to the shipwreck and drowning of more than 800 people. This shipwreck was not an isolated event, but the sheer number of deaths prompted the European Union to take action.² Hence, the launch of Operation EUNAVFOR MED, a military operation promoted within the framework of the European Union's Common Security

² "EU has never taken the issue of migration as seriously as we are doing now. With this operation, we are targeting the business model of those who benefit from the misery of migrants. But it is only a part of a broader strategy including the cooperation with our partners in Africa, particularly in the Sahel region, and the work with the International Organization for Migration and the UNHCR. As EU, we are determined to contribute to save lives, dismantle the networks of the smugglers of human beings and address the root causes of migration." "The target, let me be very clear, are not the migrants, the targets are those who are making money on their lives and too often on their deaths. It is part of our efforts to save lives". ([Statement by High Representative/Vice-President Federica Mogherini on the European Union Council decision to launch the naval operation EUNAVFOR Med – 22 June 2015](#)).

and Defense Policy with the objective of responding to the impunity of the mafia networks operating from Libya and trafficking humans across the Mediterranean Sea.

(1) Phases

The mission was founded pursuant to Council Decision (CFSP) 2015/778, of 18 May 2015.³ However, it was amended over the years, including the addition of new mandates (combating trafficking in arms and weapons, training and monitoring the coast-guards and Libyan navy, etc.). Its main aim has always been to contribute to “the disruption of the business model of human smuggling and trafficking networks in the Southern Central Mediterranean, achieved by undertaking systematic efforts to identify, capture and dispose of vessels and assets used or suspected of being used by smugglers or traffickers, in accordance with applicable international law, including UNCLOS and any UN Security Council resolution”.

To that end, Operation Sophia was divided into four phases. The first phase was geared towards the exercise of freedom of navigation on the high seas in order to gather information regarding the mafia networks’ activities. The second phase allowed Operation Sophia war vessels on the high seas to exercise the rights of boarding, search, seizure and diversion of vessels suspected of being used for human smuggling or trafficking, in accordance with the applicable international law, including Article 110.1.d) of the United Nations Convention of Law of the Sea of 1982 and Articles 8.1 and 8.7 of the Protocol against the Smuggling of Migrants of 2000. The third phase authorized the boarding, search, seizure and diversion, in Libyan Sea territory, of vessels suspected of being used for human smuggling or trafficking, with the consent of the Libyan government or in accordance with any applicable UNSC resolution. The last phase’s objective was the adoption of necessary measures, including the removal or disablement of vessels suspected of being used for human smuggling or trafficking in state (Libyan) territory, in accordance with the conditions established in the relevant applicable UNSC resolution or with the consent of the relevant coastal state.

(2) Points of Action of the War Vessels during the Operation

The second phase of Operation Sophia, which was undertaken only on the high seas, immediately triggered a twofold response or consequence.

On one hand, the mafias altered their *modus operandi* in the maritime areas. These organizations ceased to accompany the migrants to the high seas, restricting their to wing of vessels to within the 12 nautical miles comprising the border of Libya’s sea territory and, thus, stopping short of the maritime area where the Operation Sophia vessels were located. This situation made it impossible to board the mafias’ vessels without infringing upon the limits imposed by international law (i.e. the need for the consent of the Libyan government or the issuance of an executive resolution by the UNSC).⁴

³ Council [Decision \(CFSP\) 2015/778, of 18 May 2015](#).

⁴ At present, the Libyan coastguard’s increasing operational capacity has led mafia networks not to tow migrants’ vessels to the outer limit of the Libyan territorial sea, but rather operate directly from land. This allows them to maintain their lucrative business, whilst at the same time minimizing the risk of being arrested.

On the other hand, due to the greater security this new position afforded them, the mafias significantly increased the number of vessels from Libya to Europe. Taking into account the location of the European war vessels beyond Libya's territorial sea and the duty under international law to provide assistance to vessels and persons in distress at sea,⁵ human traffickers stopped towing the migrants and began simply to supply the precarious vessels with the minimum fuel required to go beyond the territorial sea and be rescued before sinking.

Thus, unable to act against the mafia organizations without consent or a resolution allowing them to act in Libyan seas, the Operation Sophia vessels were forced to limit their activities to providing assistance to vessels and persons in distress in SOLAS scenarios,⁶ transferring the rescued migrants to European ports and triggering an involuntary call effect.⁷

(3) Limits Imposed by Public International Law: Possible Causes

In order to carry out Operation Sophia in accordance with the planned phases, the consent of the Libyan government or a UNSC resolution covered by Chapter VII of the Charter of the United Nations was required as *a sine qua non*. Otherwise, any action by the European Union could have been considered a hostile act of interference and violation of the sovereignty of Libya and its territory.⁸

The consent of the Libyan government for the Operation Sophia vessels to act in its territory has always been regarded as an unfeasible option given the country's status as a "failed" state since 2011.⁹ Additionally, the existence of multiple opposing factions supporting various centres of power¹⁰ has been of little to no help, although these factions do agree on the need to find a solution without external interference.

⁵ Art. 98 of the United Nations Convention on the Law of the Sea: "Every State shall require the master of a ship flying its flag, in so far as he can do so without serious danger to the ship, the crew or the passengers: (a) to render assistance to any person found at sea in danger of being lost (...)". Regulation 33 of the Convention for the Safety of Life at Sea: "The master of a ship at sea which is in a position to be able to provide assistance on receiving information from any source that persons are in distress at sea, is bound to proceed with all speed to their assistance, if possible informing them or the search and rescue service that the ship is doing so. This obligation to provide assistance applies regardless of the nationality or status of such persons or the circumstances in which they are found (...). Masters of ships who have embarked persons in distress at sea shall treat them with humanity, within the capabilities and limitations of the ship."

⁶ The rescue of migrants is only provided for in the second paragraph of the sixth recital of Council Decision (CFSP) 2015/778: "The UNCLOS, SOLAS and SAR Conventions include the obligation to assist persons in distress at sea and to deliver survivors to a place of safety, and to that end the vessels assigned to EUNAVFORMED will be ready and equipped to perform the related duties under the coordination of the competent Rescue Coordination Centre".

⁷ C. González Enríquez, '[Detener inmigración en el Mediterráneo, un imposible para Europa](#)', 2 June 2015.

⁸ In the Atalanta Operation against piracy there was express support not only from the Somali Transitional Government, but also from the UNSC through various resolutions.

⁹ C. Ramón Chornet, '[Sobre el impacto de la crisis de refugiados en la PCSD de la Unión Europea](#)', 31 *Anuario Español de Derecho Internacional* (2015), at 248-249. Ramón Chornet identifies the following requirements for a state to be considered failed: (i) an inability to provide basic services; (ii) an inability to interact with other states; (iii) the loss of physical control of the territory or of the monopoly of the use of force; and (iv) a strong detriment to the decision-making capacity of the constituted and legitimate authority.

¹⁰ I. Fuente Cobo, '[Libia, la guerra del General Jalifa Haftar](#)', *Instituto Español de Estudios Estratégicos*, No. 70 (2017).

The lack of a UNSC resolution, despite Libya's inability (and perhaps unwillingness) to control illegal trafficking from its coasts, can be explained by multiple factors: first, a reinterpretation of its powers;¹¹ second, the potential for such a resolution to be used to sow discord amongst the various militias; and third, its politicization by the permanent members of the Security Council due to the application, with little consent among the states, of the principle of the responsibility to protect in 2011. That year, the UNSC issued Resolution 1973 (2011), of March 17, in response to the use of widespread and systematic force by the Gaddafi regime against the civilian population,¹² authorizing a military action in Libyan territory without the country's consent.¹³

(C) THE JUDGMENT OF THE EUROPEAN COURT OF HUMAN RIGHTS IN THE CASE OF *HIRSI JAMA A AND OTHERS V. ITALY*

The rescue of migrants has been a constant throughout Operation Sophia, even though it was not, strictly speaking, part of the mission. The systematic transfer of rescued migrants to European ports is based on the judgment delivered on 23 February 2012 by the Grand Chamber of the European Court of Human Rights (27765/09) in the case *Hirsi Jamaa and Others v. Italy*.¹⁴

(i) Facts

On 6 May 2009, three vessels carrying about 200 migrants were intercepted by three vessels from the Italian Revenue Police (*Guardia di finanza*) and the Coastguard 35 nautical miles south of the island of Lampedusa (i.e. within the Maltese Search and Rescue region of responsibility). As a result, the migrants

¹¹ "[T]his resolution (UNSC 2270/2015) provides us with a great opportunity to reflect upon the worrying tendency among states to resort to the authority of the UNSC under Chapter VII in order to permit the use [of] force and violation of state sovereignty in the suppression of transnational criminality". M. Bo, ['Fighting Transnational Crimes at Sea under UNSC's Mandate: Piracy, Human Trafficking and Migrant Smuggling'](#), *EJILTalk*, October (2015).

¹² On 22 February 2011, the United Nations High Commissioner for Human Rights, Navi Pillay, issued a statement stating that Libya has the obligation to protect the right to life, liberty and security of the civilian population. She enjoined the Libyan authorities to cease the illegal use of force against protesters, as such actions constitute crimes against humanity. ['UN Human Rights Chief Pillay Calls for International Inquiry into Libyan Violence and Justice for Victims'](#).

¹³ A.J. Bellamy, ['Libya and the responsibility to protect: the exception and the norm'](#), *Ethics & International Affairs* (2011); E. Menendez del Valle, ['Responsabilidad de proteger: la ONU en acción'](#), *Real Instituto Elcano*, Documento de Trabajo No. 2 (2016); A Cocchini, ['Tráfico ilícito de migrantes y operación Sophia: ¿Podría aplicarse de nuevo la responsabilidad de proteger en Libia?'](#), 35 *Revista Electrónica de Estudios Internacionales* (2018).

¹⁴ [Case Hirsi Jamaa and others v. Italy](#); J.A. Carrillo Salcedo, ['Reflexiones en torno a la Sentencia del Tribunal Europeo de Derechos Humanos en el caso Hirsi Jamaa y otros contra Italia \(sentencia de 23 de febrero de 2012\)'](#), 32 *Teoría y realidad constitucional* (2013) at 285-291; M.D. Bollo Arocena, 'Push back, expulsiones colectivas y non refoulement. Algunas reflexiones a propósito de la sentencia dictada por la gran sala del TEDH en el caso Hirsi Jamaa y otros c. Italia (2012)', in *El Derecho Internacional en el Mundo Multipolar del Siglo XXI: Obra Homenaje al Profesor Luis Ignacio Sánchez Rodríguez* (2013), at 647-666; C. de Castro Sánchez, ['Tribunal Europeo de Derechos Humanos – TEDH – Sentencia de 23.02.2012 \(Gran Sala\), Hirsi Jamaa e. c. Italia, 27765/09. Artículo 3 y 13 del CEDH; Artículo 4 del Protocolo nº 4 – Tortura y tratos inhumanos y degradantes – derecho a un recurso efectivo – prohibición de las expulsiones colectivas de extranjeros'](#), 46 *Revista de Derecho Comunitario Europeo* (2013) 1119-1135.

were transferred to Italian military vessels and to the Libyan authorities,¹⁵ in accordance with the Bilateral Cooperation Agreement signed in 2007 (and amended in 2009) between Italy and Libya to combat illegal immigration from Libya. Under that agreement, the states undertook to patrol the Libyan territorial sea and international waters, repatriate illegal migrants, and conclude agreements with their countries of origin to limit illegal immigration.¹⁶

(2) Lawsuit

Several of the migrants who were returned to Libya (11 Somalis and 13 Eritreans) filed a lawsuit against the Republic of Italy on the grounds that there had been a violation of, *inter alia*, Article 3 of the European Convention on Human Rights, which states that “no one shall be subjected to torture or to inhuman or degrading treatment or punishment”, and of Article 4 of Protocol No. 4, whereby “collective expulsions of foreigners are prohibited”.

(3) Relevant Issues

The Article 3 violation was based on the fact that the plaintiffs' lives and physical integrity were put at risk due to the possibility of being subjected to inhuman or degrading treatment in Libya, the country from which they fled, as well as in Eritrea and Somalia, their countries of origin.

The Court asserted its awareness of the difficulties that states forming the external border of the European Union faced in dealing with the arrival of immigrants and asylum seekers. Consequently, in its judgment, it stated that the High Contracting Parties have the right to control the entry, stay and expulsion of foreigners as a matter of consolidated international law, without prejudice to the obligations resulting from the treaties they have signed, including the Convention.¹⁷

Notwithstanding the above, the Court clarified that any measure aimed at expelling a foreigner could pose difficulties from the perspective of Article 3 when there are reasonable grounds to believe that the individual in question, if expelled, could be exposed to a real risk of being tortured or subjected to inhuman treatment.

In the present case, in order to affirm that the plaintiffs had run a real risk of being subjected to torture or inhuman treatment, the Court examined the probative material at its disposal, especially the reports of human rights organizations (Amnesty International). In these reports, the organizations warned that in Libya, Somalia and Eritrea there were serious and widespread problems of insecurity due to arbitrary

¹⁵ At a press conference on 7 May 2009, the Italian interior minister declared that the operations were carried out in compliance with the principle of cooperation between states. He said that the return policy was very effective in combating illegal immigration (more than 471 illegal migrants had been intercepted on the high seas and returned to Libya under these bilateral agreements).

¹⁶ In this regard, the Court ruled that “in accordance with the principle of ‘pacta sunt servanda’, a State cannot evade its obligations under the Convention by invoking commitments derived from bilateral or multilateral agreements related to the fight against illegal immigration”.

¹⁷ See, amongst other examples of case law, *Abdulaziz, Cabales and Balkandali v United Kingdom*, 28 May 1985 (paragraph 67, A Series, no. 94) and *Boujlifa v France*, 21 October 1997 (paragraph 42, Judgments and Decisions Book 1997-VI).

detentions, torture, and lack of medical or hygienic assistance, coming not only from public officials, but also from individuals or groups of individuals.

Thus, the expulsion of a person, regardless of whether he is an illegal immigrant, would be subject to the principle of *non-refoulement* (referred to in Article 19.2 of the Charter of Fundamental Rights of the European Union¹⁸) to countries where there could be a real risk of being subjected to torture or inhuman treatment.¹⁹

On the other hand, the possible violation of Article 4 was based on collective expulsion, performed without evaluating the individual circumstances of each affected party. The Court held that the expulsion of foreigners as a result of their interception on the high seas in order to prevent them from reaching the borders of the relevant state implied a responsibility of the corresponding state pursuant to Article 4 of Protocol No.4.

The Court found that the breach of Article 4 of Protocol No.4 was due not to the collective expulsion of the intercepted group of migrants, but to the failure to conduct a preliminary review of the individual situation of each claimant. In the Court's opinion, the military vessels were not prepared to carry out individual interviews or provide the assistance of interpreters or legal advisers, which would have provided sufficient safeguards to carry out an actual methodical evaluation of the individual circumstances of each of the people involved and allowed for a decision on the expulsion of each one.

(D) EFFECTS OF THE ECHR RULING ON THE SOPHIA OPERATION

Despite the arrest of some suspects at the beginning of the mission,²⁰ the operation's stagnation resulted in the prohibition of navigating within Libyan territorial seas and, consequently, in a drastic reduction in the number of arrests of persons linked to migrant smuggling. These facts, together with the mission's similarity to previous and similar naval operations carried out by Italy and Frontex (the European Border and Coast Guard Agency) in the same area of the Mediterranean Sea, generated scepticism about Operation Sophia's effectiveness.²¹ However, these were not the only reasons for the end of the operation.

The author's experience on board the operation's vessels indicates that they lacked the necessary mechanisms to thoroughly individualize the personal circumstances of each migrant. Therefore, in accordance with the ECHR's criteria, the migrants could not be expelled from the high seas. To a greater

¹⁸ "No one may be removed, expelled or extradited to a State where there is a serious risk that he or she would be subjected to the death penalty, torture or other inhuman or degrading treatment or punishment".

¹⁹ E. Carli, 'Operation EUNAVFOR MED Sophia in the Framework of the European Agenda on Migration: Practical Aspects and Questions of International Law', 2 *Freedom, Security & Justice: European Legal Studies* (2018) 135-151.

²⁰ According to [official sources](#), since 2015 (when the EUNAVFOR MED operation began) and until the end of 2018, it has only been possible to arrest and transfer to the Italian authorities 173 suspects of trafficking with migrants or other persons and to neutralize 545 vessels used for such trafficking.

²¹ C. Espaliú Berdud, 'The Spanish Maritime Security: Main Challenges', 35 *Revista Europea de Derecho de la Navegación Marítima y Aeronáutica* (2018), at 28-29.

extent, the instability in Libya was enough evidence to suggest that disembarking the migrants at Libyan ports would pose a danger to their life and integrity.²²

As a result of the above, and considering that, from the start, the most important part of the mission was located in Italy (perhaps because of its proximity or its interests in the region), the Italian ports were designated as safe ports to receive the migrants rescued by Operation Sophia vessels.²³

The conclusions reached in the ECHR judgment in *Hirsi Jamaa and Others v. Italy* on one hand, and the prohibition of entry into Libyan territorial seas on the other, forced the war vessels involved in Operation Sophia to transfer rescued migrants to Italian ports, due to their status as a "place of safety". Notwithstanding the above, the perception of the Italian ports as the only "place of safety" has not been unanimous. As the Court stated in its judgment, referring to Resolution 1812 (2011) of the Parliamentary Assembly of the Council of Europe regarding the interception and rescue at sea of asylum seekers, refugees and irregular migrants, "certain Member States also questioned the application of the principle of 'non-refoulement' on the high seas". And "while the absolute priority in the event of interception at sea is the swift disembarkation of those rescued to a 'place of safety', the notion of 'place of safety' does not appear to be interpreted in the same way by all Member States".

However, the Assembly noted that "place of safety" should be interpreted as "meaning a place which can meet the immediate needs of those disembarked and in no way jeopardizes their fundamental rights, since the notion of 'safety' extends beyond mere protection from physical danger and must also take into account the fundamental rights dimension of the proposed place of disembarkation."

The problem can be explained by the fact that the safeguarding of the human rights of migrants, in accordance with the ECHR ruling, has collided frontally and sharply with the fear of the massive and uncontrolled arrival of migrants to their territory held by a significant part of Italian public opinion.

Security issues (such as the safeguarding of external borders or the need to guarantee national security against possible terrorist attacks or criminal acts) and social aspects (such as the existence of limited resources, lack of social adaptation or discrimination) have caused Italy to close its borders, preventing the arrival of rescued migrants,²⁴ which has resulted in the end of the participation of warships in Operation Sophia.²⁵

In other words, the impossibility of disembarking rescued migrants in Libyan territory due to the threat it would pose to them, as the ECHR ruled, together with the operation's suspension due to the lack

²² Regulation (EU) No 1168/2011 of the European Parliament and of the Council of 25 October 2011 amending Council Regulation (EC) No 2007/2004 establishing a European Agency for the Management of Operational Cooperation at the External Borders of the Member States of the European Union, provides that "in accordance with Union and international law, no person shall be disembarked in, or otherwise handed over to the authorities of, a country in contravention of the principle of 'non-refoulement', or from which there is a risk of expulsion or return to another country in contravention of that principle."

²³ N. Arenas-Hidalgo, 'Flujos masivos de población y seguridad: La crisis de personas refugiadas en el Mediterráneo', 36 *Revista Iberoamericana de filosofía, política y humanidades* (2016), at 353-356.

²⁴ 'Firmato divieto di ingresso per la Sea Watch', *Repubblica.it*, 15 June 2019.

²⁵ This raises the question of whether only European ports meet the safety requirements mentioned by the ECHR or if other ports close to the area of operations (such as those of a Westernized country like Tunisia) could also have been used as safe ports.

of consent by Libya or a UNSC resolution, as well as the recent decision of the Italian interior minister to prohibit the massive and indiscriminate arrival of rescued migrants to “safe” Italian ports, have caused Operation Sophia, as initially proposed, to fail.

Rights violations have occurred many times at sea and even after the migrants reach the coasts. Fear of the unknown, the concern for safeguarding borders, the need to preserve national and international security, the occasional unfounded prejudices against various backgrounds, and the alarm over the constant and increasing threat of terrorism are some of the reasons that led Italy to close its border to migrant disembarkation.

Be that as it may, the failure to move forwards on the different phases of Operation Sophia due to the observance of binding international law, in other words, the absence of the consent of a failed state such as Libya for it to enter its territory or of a UNSC resolution, and the Italian interior minister’s decision to prohibit the massive and indiscriminate disembarkation of rescued migrants to Italian “places of safety”, triggered the failure of Operation Sophia as it was first created in accordance with its initial mandate.²⁶

As a consolation, there is still hope that the training of coastguards and the Libyan navy, which is also part of the mission, will take on a central role in the fight to end human smuggling and trafficking from Libya.

²⁶ [Council Decision \(CFSP\) 2019/535 of 29 March 2019](#) amending Decision (CFSP) 2015/778 on a European Union military operation in the Southern Central Mediterranean (EUNAVFOR MED operation SOPHIA).