Dear EUAA colleagues,

We are reaching out in the context of the call for input on the annual Asylum Report. While we are not in a position to complete the questionnaire, we believe that our work, findings and analyses can significantly contribute to several areas of the asylum report including on, among others, access to territory and asylum procedure, access to information and services, and reception and detention conditions.

European National Human Rights Institutions (NHRIs), working jointly through ENNHRI, have focused on a project on protecting the human rights of migrants at borders.

In collaboration with European NHRIs, ENNHRI has published several guidance papers including on: [monitoring at borders](https://ennhri.org/wp-content/uploads/2020/03/ENNHRI-Guidance-Monitoring-Rights-at-Borders-March-2020.pdf), [human rights scrutiny of public funds for migration and asylum](https://ennhri.org/wp-content/uploads/2021/07/Profundo-Background-Paper.pdf), and on [cooperation opportunities between NHRIs’ and regional stakeholders](https://ennhri.org/wp-content/uploads/2021/07/Profundo-Background-Paper.pdf).

ENNHRI also published an [Opinion on Independent Human Rights Monitoring at Borders under the EU Pact on Migration and Asylum](https://ennhri.org/our-work/topics/asylum-and-migration/opinion-on-independent-human-rights-monitoring-mechanisms-at-borders-under-the-eu-pact-on-migration-and-asylum/). It calls for all monitoring mechanisms to be truly independent, adequately resourced and have appropriate expertise and powers.

Under the project, five NHRIs from [Croatia](https://ennhri.org/news-and-blog/croatian-nhri-presents-the-state-of-human-rights-of-migrants-at-borders-in-its-new-report/), [France](https://ennhri.org/news-and-blog/french-nhri-reports-illegal-pushbacks-lack-of-access-to-essential-services-for-migrants-and-detention-of-unaccompanied-minors/), [Greece](https://ennhri.org/news-and-blog/greek-nhri-sheds-light-on-the-situation-of-migrants-at-its-borders-and-challenges-of-ngos-assisting-refugees/), [Serbia](https://ennhri.org/news-and-blog/serbian-nhri-publishes-report-on-monitoring-the-treatment-of-migrants-at-the-borders/), and [Slovenia](https://ennhri.org/news-and-blog/slovenian-nhri-report-on-migrants-rights-reveals-several-shortcomings-in-the-application-of-border-procedures-by-national-authorities/) published national reports including their findings, recommendations, and good practices. ENNHRI’s focus on monitoring at borders culminated in a [regional report](https://ennhri.org/news-and-blog/ennhris-regional-report-examines-the-human-rights-of-migrants-at-borders/), which highlighted trends, challenges and good practices relating to four key areas: returns and violence, access to relevant procedures, reception conditions and deprivation of liberty, and human rights accountability. The report closes with [ten recommendations](https://ennhri.org/wp-content/uploads/2021/10/ENNHRI-Recommendations-Infographic.pdf) for achieving human rights sensitive policies at borders.

Among other findings in the regional report, European NHRIs pinpointed a lack of accountability for violations of migrants’ human rights. Building on these findings, ENNHRI has [shifted focus](https://ennhri.org/news-and-blog/nhris-and-strengthening-human-rights-accountability-at-borders/) from border monitoring to strengthening human rights accountability at borders. As a first step, ENNHRI has put together a report identifying and analysing the underlying causes of [gaps in accountability at borders](https://ennhri.org/news-and-blog/report-human-rights-accountability-at-borders/). Based on NHRIs reporting, ENNHRI found shortcomings in five key areas: structural gaps, gaps in investigations, gaps in access to justice, gaps in revision and prevention, and gaps in promoting a culture of rights.

This report serves as starting point for NHRIs to exchange practices, develop solutions to overcome the identified gaps, and formulate recommendations to strengthen human rights accountability at national and regional levels.

We remain available and committed to close engagement with the EUAA and the Consultative Forum.