



Input by civil society organisations to the Asylum Report 2025

Dear Colleagues,

The production of the *Asylum Report 2025* is currently underway. The annual [Asylum Report](#) presents an overview of developments in the field of international protection in Europe.

The report includes information and perspectives from various stakeholders, including experts from EU+ countries, civil society organisations, researchers and UNHCR. To this end, we invite you, our partners from civil society, academia and research institutions, to share your reporting on developments in asylum law, policies or practices in 2024 by topic as presented in the online survey (**'Part A' of the form**).

We also invite you to share with us any publications your organisation has produced throughout 2024 on issues related to asylum in EU+ countries (**'Part B' of the form**).

These may be:

- reports;
- articles;
- recommendations to national authorities or EU institutions;
- open letters and analytical outputs.

Your input can cover information for a specific EU+ country or the EU as a whole. You can complete all or only some of the sections.

Please note that the Asylum Report does not seek to describe national systems in detail but rather to present key developments of the past year, including improvements and challenges which remain.

All submissions are publicly accessible. For transparency, contributions will be published on the EUAA webpage and contributing organisations will be listed under the Acknowledgements of the report.

All contributions should be appropriately referenced. You may include links to supporting material, such as:

- analytical studies;
- articles;
- reports;
- websites;
- press releases;
- position papers.

Some sources of information may be in a language other than English. In this case, please cite the original language and, if possible, provide one to two sentences describing the key messages in English.





The content of the Asylum Report is subject to terms of reference and volume limitations. Contributions from civil society organisations feed into EUAA's work in multiple ways and inform reports and analyses beyond the Asylum Report.

NB: This year's edition of the Asylum Report will be significantly revamped to achieve a leaner, more analytical report with streamlined thematic sections. The focus will be on key trends in the field of asylum rather than on individual developments. For this reason, information shared by respondents to this call may be incorporated in the Asylum Report in a format different than in the past years.

Your input matters to us and will be much appreciated!

*Please submit your contribution to the Asylum Report 2025 by **Friday, 10 January 2025**.*





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I accept the provisions of the EUAA [Legal and Privacy Statements](#)

General Observations

Before sharing information by thematic area, please provide your general observations on asylum developments as indicated in the following three fields:

1. What areas would you highlight where important developments took place in the country/countries you cover?

Greece:

The [hostile environment](#) towards [NGOs](#) and human rights defenders continued to be amplified by certain media outlets, politicians and government officials in Greece, as 2024 was marked by concerning developments regarding the rule of law and continued impunity for rights violations and the [treatment](#) of refugees and migrants¹.

¹ UN experts commend Greece on certain human rights aspects but highlight ongoing challenges, including harassment and criminal prosecution of human rights defenders. <https://www.un Geneva.org/en/news-media/meeting-summary/2024/10/examen-de-la-grece-devant-le-comite-des-droits-de-lhomme-la> Liberties Rule of Law Report 2024: the decline in press freedom in Greece and the prevalence of strategic lawsuits against public participation (SLAPPs) targeting activists and journalists.

https://dq4n3btxmr8c9.cloudfront.net/files/jz677y/GREECE_Liberties_RuleOfLaw_Report_2024.pdf The European Parliament expressed profound concerns over the decline in the rule of law and democratic norms in Greece, particularly regarding corruption, media freedom, and judicial independence.

<https://eucrim.eu/news/ep-resolution-on-rule-of-law-and-media-freedom-in-greece/>

-Human Rights Watch discusses threats to the rule of law in Greece, including surveillance scandals and pressures on media freedom. <https://www.hrw.org/news/2024/02/06/greece-rule-law-threatened>

European Commission's 2024 Rule of Law Report. https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/upholding-rule-law/rule-law/annual-rule-law-cycle/2024-rule-law-report_en

RSA: challenges faced by human rights defenders in Greece, including a progressively hostile environment towards NGOs and volunteers assisting refugees. https://rsaegean.org/en/human-rights-defenders/?utm_source=chatgpt.com





The hostile environment for NGOs and human rights defenders in Greece is marked by a troubling combination of public smear campaigns and restrictive regulations. Politicians and media have amplified anti-NGO rhetoric, accusing them of profiting from migration or collaborating with traffickers, fostering public mistrust. Legislative measures have imposed burdensome requirements on NGOs, leading to operational shutdowns, while activists face intimidation, surveillance, and threats, as seen with lawyers representing victims of pushbacks. Reports of systematic pushbacks and impunity for human rights violations, including the tragic deaths of migrants like [Muhammad Kamran Ashiq](#) in police custody, further underscore the erosion of accountability. The European Court of Human Rights recently condemned Greece for illegal deportations, describing such practices as systematic, while international agencies criticized the lack of investigations into catastrophic events, such as the migrant shipwreck off Greek waters in 2023, which claimed hundreds of lives. Together, these developments reflect a concerning decline in the rule of law and democratic norms in Greece.

Poland:

- Amendments to the Act on Assistance for Ukrainian Citizens

The Polish government introduced [amendments to the existing Act on Assistance for Ukrainian Citizens](#), which extends the temporary directive from June 30, 2024, to September 2025. These amendments open the possibility for certain groups of Ukrainian citizens in Poland to apply for a three-year temporary residence permit through a simplified procedure (CUKR). The CUKR residency card will offer Ukrainian refugees a simpler way to move from temporary protection to a more secure, three-year residency. By streamlining the process through an entirely online system, the aim is to reduce bureaucracy - the system is already overstretched - and provide greater stability and flexibility, including the ability to stay outside Poland for up to six months. It is expected that the card will also support economic integration, and will make it easier for holders to start their own businesses or change jobs without additional paperwork.

However, this solution will not offer the same scope of rights and benefits as temporary protection, and thus will not meet the needs of the most vulnerable individuals. Concerns arise regarding the exclusion of most vulnerable individuals, such as pensioners, individuals aged 50 and above, and single mothers, people with disabilities with more difficult access to labour market, who under this scheme will not be able to access residency, while they may be the ones who need it the most. Moreover, there is lack of access to simplified procedure for the new arrivals, who reached Poland after 4th March, and who very often are even in the more vulnerable position due to longer exposure to the war.

Moving to CUKR status will also result in losing some benefits, including free healthcare via Poland's National Health Fund (NFZ), which may affect retirees or those Ukrainian refugees not currently working. There's partial uncertainty regarding what rights the card will grant, like qualification for the 800+ family allowance, thereby keeping some people from applying. While this card is expected to bring in stability for three years, its transition into standard residency permits may bring back the very administrative problems it attempts to solve. Still unclear whether the new status will offer access to loans and credit lines with private banks.





Moreover, the new regulations mandate municipal offices to **verify the identity of Ukrainian citizens based on valid travel documents** and enter the data into the PESEL registry (**Art.4, Ust. 11**). Consequently, all Ukrainian citizens holding UKR status are required to update their data, while new arrivals must present travel documents for registration, with only owners of valid travel documents eligible to apply for temporary residence.

The government has decided to **withdraw the program that previously provided private citizens, institutions, and organizations with 40 PLN per day for hosting refugees (Article 13)**. As a result, private households no longer receive financial support. Additionally, all collective accommodations must be registered in voivodeships², which will issue decisions on whether they can continue operating or need to be closed. As a result, many collective accommodation centres were closed, and the decisions about closing these centres were often made on very short notice. Individuals who are/were forced to leave their current accommodation were supposed to receive support through dedicated a helpdesk, on where they can find the free spaces in other collective accommodations. However, the information was not always available and the offered spaces were often provided in distant locations, which disrupts education of children or jobs the refugees might have. It also contributes to the growing risk of home eviction and homelessness among refugees from Ukraine as described in [Protection Monitoring Report](#). Obstacles related to the availability of adequate housing particularly affect the older refugees and other *vulnerable* groups (including single mothers with children and people with disabilities). One of the IRC-identified related risks are also premature returns, signalled by about 10% of respondents, as a coping strategy for the lack of a place to live.

Moreover, the Amendment has introduced a compulsory schooling requirement for children from Ukraine, linking compliance with this obligation to receiving the 800+ benefit (**art. 26, 2**).

- Migration Strategy and the following Draft Act Amending the Act on Granting Protection to Foreigners on the Territory of the Republic of Poland

On October 15, 2024, the Polish government unveiled a migration strategy it had been working on since February 2024. The strategy was presented earlier than planned, as October and November were originally slated for public consultations on the document, with its adoption scheduled for December. The stage of public consultation did not take place, sparking significant opposition from civil society organisations and academia. Academic researchers, who had conducted studies intended to inform the strategy's development, [criticized](#) the government for not adequately considering their findings. Commentators noted that the strategy was overly vague, lacking clear timelines, implementation tools, and methods for evaluating proposed actions. The language of the document also stirred controversy, emphasizing the risks associated with migration and the presence of migrants in Poland. Additionally, the use of the term "integration" to describe practices resembling assimilation, and the reduction of NGOs' roles to merely providing Polish language education services, drew sharp criticism. The strongest opposition came in response to the proposed introduction of the possibility to temporarily and territorially suspend the right to asylum in

² A **voivodeship** is a territorial division or administrative region in Poland. It is the highest-level administrative unit in the country and functions similarly to a province or state in other countries.





Poland. This provision, heavily criticized during public hearings and in numerous NGO statements, was nevertheless followed by the government's publication of a draft bill amending the law on granting protection to foreigners in Poland, which also bypassed public consultation.

- Ustawa Kamilka Act in February 2024

Poland does not have a coordinated child protection public service alike to some other European countries. Child safeguarding and protection is handled by multiple state - run agencies, like police, social service offices, schools, medical facilities, etc.

The situation improved substantially over the course of past year, as Poland's legislative introduced a comprehensive set of amendments to various Acts), jointly labelled as "Kamilek Act" and aimed at improving child safeguarding solutions applicable for the public service providers, and any actors delivering services or otherwise interacting with children within the scope of their mandate/statutory activities. Newly introduced obligations, among other measures, require said actors to adopt robust safe recruitment solutions, primarily in terms of verifying the criminal past of their newly hired personnel. All the entities delivering services for children are required to implement child safeguarding policies applicable to all employees and associates, and setting clear procedures and responsibilities of taking appropriate response measures to any signs of violence against children they become aware of. This is an important step for shifting the paradigm for collective safeguarding accountability, and creating safer environment for children in Poland. However, significant gaps remain in terms of raising awareness of obligated entities about the Act, creation of policies, and training needs, especially in the field of legal intervention and receiving disclosures safely between different entities. Some gaps also remain in terms of improving coordination between different public actors involved in responding to harm against children, and systemic solutions for more child - centered social service delivery.

The new regulations safeguarding the rights of children are vital for ensuring the safety of children with a refugee or migrant background, given their heightened vulnerability. Their young age combined with the experience of migration makes them particularly susceptible to various risks. This concern is even more critical for unaccompanied children, those living with distant relatives or family friends, or those lacking proper guardianship and care. In such circumstances, it is essential that the adults these children encounter—whether in collective shelters, reception centers, humanitarian aid organizations, community centers, or even through the media and photographers—have undergone background checks for criminal history. This is crucial because situations often arise where there is a significant power imbalance between the actors involved, leaving children with a migration background without safe adults to report to or seek help from when they sense something is wrong.

2. What are the areas, where only few or no developments took place?

Poland:





There are notable gaps in procedures, particularly at collective accommodation sites, as well as in implementing systemic safe recruitment practices, with many volunteers still operating without adequate safeguarding measures. There is still a lack of sufficient and accessible communication of information regarding changes in the status of refugees under temporary protection (the changes on the CUKR status described above).

Additionally, there is a lack of awareness among affected populations about how social services, protection services, and justice systems in Poland function. Furthermore, there have not been many developments in terms of National Implementation of EU Pact.

3. Would you have any observations to share specifically about the implementation of the Pact on Migration and Asylum in the national context of the country/ countries you cover?

In the countries where the IRC works, no consultations with civil society have taken place, except for a call for written inputs in Greece in early December. This is despite the fact that many projects are implemented by CSOs, incl. outsourced by states themselves. Reception for unaccompanied children in Greece for example, is provided almost entirely by NGOs in Greece, including the [IRC](#). . Other important and relevant services NGOs provide are legal aid, medical, mental health and psychosocial support, and education support.

In Italy, civil society organizations have not been involved at all in drafting nor consultations regarding the National Implementation Plan which the Italian government has been working on.³ The lack of involvement of CSOs by the Italian authorities has been criticized by several organisations.

In Greece, civil society was not included in the national implementation consultation process, while UNHCR, IOM, EUAA, NCHR and EPLO were invited as observants. On 20 September, IRC in cooperation with 20 other CSOs working on the field, asked the Minister of Migration and Asylum with a private letter to be included in the relevant consultation and discussions. In early December, the Greek Ministry on Migration and Asylum requested feedback from CSOs in writing, but it is not clear if it has been taken into account.

In Poland, IRC Poland participated in a meeting on the Pact on Migration and Asylum with Director Silvia Michelini of DG HOME in September 2024. A representative of the Ministry of Interior, responsible for the implementation of the Pact in Poland, attended the meeting but did not express a willingness to cooperate more closely with civil society organizations or make the process participatory. They stated that recommendations could be submitted and promised to review them. There was a sense among CSOs that their participation in the process was not fully embraced or encouraged, and organizations felt that the government would likely do only the bare minimum required by the European Union. The Implementation Plan and any further communication regarding the National Implementation Plan (NIP) have not been shared, as attention has shifted to the Migration Strategy.

³ Forum per Cambiare l'Ordine delle Cose, Attuazione del Patto UE, in Italia manca un piano di consultazione civica, available at: <https://www.percambiarelordinedellecose.eu/2024/12/09/attuazione-del-patto-ue-in-italia-manca-un-piano-di-consultazione-civica/>.





PART A: Contributions by topic

Please share **your reporting on developments in asylum law, policies or practices in 2024 by topic**. Kindly make sure that you provide information on:

- ✓ New developments and improvements in 2024 and new or remaining challenges;
- ✓ Changes in legislation, policies or practices, or institutional changes during 2024.

1. **Access to territory and access to the asylum procedure** (including first arrival to territory and registration, arrival at the border, application of the *non-refoulement* principle, the right to first response (shelter, food, medical treatment) and issues regarding border guards)

Greece:

Access to territory, and therefore access to asylum, in Greece remains challenging, with persistent reports of pushbacks at land and sea, violence at borders, shipwrecks.

There have been increased arrivals from Egypt to the island of Crete, with [around 1,324 people](#) having arrived since January 2024, up from 860 in the whole of 2023. This is likely an indication that people are trying to find alternatives to the dangerous Balkan Route and land entry through Greece and Bulgaria. [Some sources](#) indicate that some people arriving in Crete believe they are arriving in Italy, having been deceived by smugglers.

Cases of pushbacks were brought before European and national Courts, an important step towards accountability as they create precedent. In June, [two of the most well-documented pushback cases](#) – one of a woman and one of an unaccompanied child who had been forcibly expelled to Türkiye by Greek authorities in 2019 and 2020 respectively, were heard before the European Court of Human Rights in Strasbourg. ([G.R.J. and A.E. v. Greece](#)). These are landmark cases, as it is the first time Greece has been subject to a court hearing for illegal pushbacks. In addition, the Court will examine Greece's practice of "drift-backs" – abandoning asylum-seekers at sea in inflatable rafts. In Greece, at the end of July, the Prosecutor's Office in Samos ordered a criminal prosecution for serious felonies against unknown persons, regarding a deadly operation to push back refugees in September 2021. Two people drowned after being thrown into the sea by the Hellenic Coast Guard without life jackets. The prosecution followed the BBC documentary [Dead Calm: Killing in the Med?](#) and an [investigation](#) by the Guardian, Lighthouse Reports, der Spiegel, and the Greek Helsinki Monitor (GHM), showcasing the importance of visual evidence and testimonies.

Italy:

In Italy, many people are still unable to effectively exercise their right to apply for asylum. In many cities, people willing to apply for asylum are turned away from the Immigration Offices of Police Headquarters (*Questure*) or told to wait, resulting in significant delays that violate EU and national law. These delays leave individuals in vulnerable situations, unable to access housing, formal employment, healthcare, or other protections provided during the application process.

Challenges and barriers to accessing asylum are particularly concerning in the biggest cities in Italy. In April 2023, Milan's Police Headquarters introduced an online registration system to





address these challenges. While the system aimed to reduce barriers and delays, it has primarily shifted rather than resolved these issues. Previously, long physical queues and incidents of force against applicants were visible outside the police offices. The new system, however, has introduced digital barriers, including limited access to technology, lack of translations, and system errors. This has led to new physical and virtual queues that have continued in 2024, particularly at underfunded civil society organizations now tasked with helping people access the system. Additionally, some asylum seekers are turning to third parties for assistance, often being charged for services that should be free.

Civil society organizations assisting asylum seekers in Trieste, Turin, Imperia, Bologna, Florence, Rome and Naples reported similar barriers and delays for people trying to access the asylum system in the rest of Italy. These included limited appointment slots and months-long delays, undisclosed, discretionary practices in selecting applicants for appointments, and requests for documentation not legally required.

In Trieste, the average waiting time to access the premises of Questura to apply for asylum has been around 7-20 days in 2024. It has been reported that cultural mediators at the Questura informally interview people waiting in line to apply for asylum and allegedly check messages or photos on people's phones, looking for useful evidence to redirect individuals to other Questura in other cities. For example, if someone waiting in line has a train ticket showing they arrived in Trieste from a different Italian city, the mediators may instruct them to return to such city, arguing that their asylum claim cannot be processed in Trieste.

Poland:

- **Draft Amendment to the Law on Granting Protection to Foreigners in Poland (10.12.2024)**

The Polish Government's planned temporary suspension of the right to asylum and the extension of the so-called "buffer zone" has faced criticism from civil society organisations, and legal organizations, including IRC's partners. Key concerns raised regarding the draft amendment and its justification include:

- Violation of international and EU law, and the Polish Constitution: the proposed provisions undermine basic protection guarantees, particularly the principle of non-refoulement.
- Lack of democratic oversight: no mechanisms are provided to assess the proportionality, legality, or necessity of the proposed measures.

Legal experts highlight specific issues, including:

- Breach of the hierarchy of legal norms by effectively bypassing the non-refoulement principle and treating Belarus as a "safe country," contrary to available evidence and court rulings.
- Logical inconsistencies and disinformation in the justification, particularly the lack of causal links between denying asylum access and alleged risks to state stability.
- Use of biased and unverifiable statistical data due to restricted access for monitoring entities in border areas.





- Disproportionate restrictions on the rights of asylum seekers, including unjustified assumptions of use of violence by those seeking protection.
- Delegation of decision-making on asylum access to inappropriate authorities, violating constitutional norms.
- Failure to establish safeguards for assessing protection claims, undermining fairness, , and access to appeal mechanisms.
- Procedural gaps in identifying vulnerable groups, including the exclusion of unaccompanied children from necessary protections.
- Removal of family members from asylum applications without clear justification or legal basis.
- Insufficient time between the law's announcement and implementation, disregarding democratic standards and the scale of rights restrictions.

2. Access to information and legal assistance (including counselling and representation)

Poland:

Legal professionals providing information and legal assistance highlight that the needs oscillate around the following topics:

- Legal stay under the Act on Foreigners,
- Employment and labour law in Poland,
- Childcare benefits (800+ program),
- Polish educational system,
- Contact with various institutions – Social Insurance Institution (ZUS), Border Guard, MOPR, other administrative offices,
- Disability status rulings and related benefits (care allowance, caregiving benefits),
- Temporary protection in Poland,
- Temporary protection in other countries in the EU,
- Health-related issues, including health insurance,
- Residence at collective accommodation facilities,
- Applying for documents issued by Ukrainian authorities (especially in the case of male Ukrainians who face more obstacles due to military conscription),
- Concluding a marriage/divorce on the territory of Poland,
- Preparation a power of attorney,
- Temporary/permanent residence permit procedure,
- Reinstating the temporary protection status in Poland.

Greece:

Registry lawyers have faced prolonged payment delays, prompting direct action and abstentions from duties. Payments began in late November 2024, covering invoices for about 20 lawyers up to June 2024, with 7–8 payments processed daily. However, many lawyers remain unpaid, and no concrete plan has been shared to prevent future delays.





The Plenary of Greek Bar Associations proposed extending the abstention until the end of the year, with the Athens Bar Association agreeing to continue until all payments are resolved. The Coordination Committee is authorized to declare an earlier end if payments are completed sooner.

- 3. Provision of interpretation services** (e.g. introduction of innovative methods for interpretation, increase/decrease in the number of languages available, change in qualifications required for interpreters)

Greece:

Significant [gaps](#) in interpretation services have hindered the Asylum Service and refugee facilities across Greece for 8 months. These issues arose following the suspension of services by METAdrasi, the exclusive provider under an agreement with the Ministry of Migration and Asylum. METAdrasi ceased interpretation for the Asylum Service on 29 April 2024 and for refugee facilities on 15 May 2024 due to delayed payments and the termination of its contract. Notably, these services are financed through EU funds under AMIF 2021–2027.

In response to these challenges, the European Union Agency for Asylum (EUAA) stepped in to partially address the gaps. On 3 June 2024, following a request from the Ministry on 22 May, the EUAA deployed 257 interpreters across Greece—93 in Asylum Offices and 164 in RIS facilities—and provided limited remote interpretation services. However, this emergency support conflicted with the EUAA's 2022–2024 Operational Plan, which envisioned phasing out interpretation support to Greek authorities. While the EUAA extended its assistance until mid-September 2024, it noted that further extensions were not feasible due to resource constraints.

- 4. Dublin procedures** (including the organisational framework, practical developments, suspension of transfers to selected countries, detention in the framework of Dublin procedures)

- 5. Special procedures** (including border procedures, procedures in transit zones, accelerated procedures, admissibility procedures, prioritised procedures or any special procedure for selected caseloads)

Italy:

Italy adopted multiple measures to expand the use of accelerated procedures, and focused specifically on the issue of safe countries of origin.

On May 7, 2024, the Ministry for Foreign Affairs published a [decree](#) updating the list of safe countries of origin to include 6 new countries. The updated [list](#) included the following countries (with newly-added countries in bold): Albania, Algeria, **Bangladesh**, Bosnia and Herzegovina, **Cameroon**, Cape Verde, **Colombia**, Gambia, Georgia, Ghana, **Egypt**, Ivory Coast, Kosovo, Nigeria, North Macedonia, Montenegro, Morocco, **Peru**, Senegal, Serbia, **Sri Lanka**, Tunisia. The “safe country of origin” concept was introduced in the Italian legislation





by [decree law no. 113/2018](#). Asylum applications filed by people from a safe country of origin are channeled into a [fast-track asylum procedure](#), whereby the Territorial Commission takes a decision within 9 days, as provided for by article 28-bis of [legislative decree no. 25/2008](#).

Subsequently, on 23 October 23, 2024, the government passed an [urgent decree-law](#) aimed at overcoming court objections to its migration management plan in Albania ([decree-law no. 158/2024](#), so-called “safe countries decree”). The government [amended the legal status of its list of safe countries](#), making it an act of primary law instead of a ministerial decree, in an attempt to allegedly make it harder for courts to challenge it. It also removed 3 of the original 22 countries on the list - Nigeria, Columbia and Cameroon - because of specific concerns about the safety situation in those countries. As a result, the list of safe countries of origin includes the following 19 as of January 9, 2025: Albania; Algeria; Bangladesh; Bosnia and Herzegovina; Cape Verde; Ivory Coast; Egypt; Gambia; Georgia; Ghana; Kosovo; North Macedonia; Morocco; Montenegro; Peru; Senegal; Serbia; Sri Lanka; Tunisia. The list will be updated periodically with primary law and notified to the European Commission.

- 6. Reception of applicants for international protection** (including information on reception capacities – increase/decrease/stable, material reception conditions – housing, food, clothing and financial support, contingency planning in reception, access to the labour market and vocational training, medical care, schooling and education, residence and freedom of movement)

Greece:

Greece’s reception system revealed systemic deficiencies, emblematic of broader concerns regarding the implementation of the EU Pact on Migration and Asylum. The [suspension of cash assistance to asylum seekers](#) since May 2024, and the delays of payments to lawyers in the Asylum registry, interpretation services, guardians, and NGOs running shelters for unaccompanied children are all attributed to funding mismanagement by the Ministry of Migration and Asylum. Meanwhile, IOM launched the [IPPOKRATIS I](#) project, delivering medical and psychosocial support in refugee camps in September, with only 50% of the planned staff recruited, including a severe shortage of doctors and interpreters. Simultaneously, the Secretary-General for Reception of Asylum-Seekers, and the Director of the Reception and Identification Service, resigned, adding to the challenges of managing reception and increasing instability. This context underscores critical governance challenges in meeting the EU Pact’s promise of dignified and humane reception conditions.

Italy:

In Italy, challenges in accessing reception for asylum seekers are particularly concerning in Trieste, at the Italian-Slovenian border. After the clearing of Trieste’s Silos—once an emergency shelter for refugees— in June 2024, the situation worsened, with hundreds, including unaccompanied children, women, and families sleeping on the streets near the train station. Lacking shelter, hot meals, or toilets, they rely solely on humanitarian aid. On average, 100-120 people sleep rough each night, peaking at 150, with some arriving late in the night and leaving at dawn. These include people facing obstacles in applying for asylum at the Immigration Office of the Questura, asylum seekers waiting to access the reception system, and people in transit to other destinations. Despite plans announced in April 2024 to





expand the capacity of existing reception facilities in the city, no progress has been made. The removal of public toilets in the area of the Trieste train station, where people first arrive, has further worsened hygiene conditions.

Poland:

According to [IRC Protection Monitoring](#) among Ukrainian Refugees in Poland the risk of homelessness and housing insecurities has been flagged over the past three IRC quarterly reports. Moreover, the need for housing still remains in the top three most urgent needs among respondents.

- 7. Detention of applicants for international protection** (including detention capacity – increase/decrease/stable, practices regarding detention, grounds for detention, alternatives to detention, time limit for detention)

Italy:

Italy kept strengthening its immigration detention system through both operational and legislative developments.

On August 14, 2024, a new detention center for asylum seekers was opened in Porto Empedocle (Agrigento, Sicily). The center will remain open for 7 months to hold [up to 70 asylum seekers](#) undergoing the fast-track asylum procedure. In the first cases of asylum seekers detained in this center, the detention orders for asylum seekers in the center of Porto Empedocle were [confirmed](#) by the Court of Palermo, causing [concerns](#) among civil society organizations that stressed the risks of the application of the fiction of “non-entry” into the Italian territories in these cases. In other instances, the detention orders in Porto Empedocle [have not been confirmed](#) by the Court because they lacked an individual assessment of the personal situation of each asylum seeker.

During the conversion into law of [decree-law no. 145/2024](#), several amendments have been included that radically altered the original text of the bill. The most notable one is the amendment that [transfers the competence](#) for confirming immigration detention orders for asylum seekers from the specialized Immigration Sections of Civil Courts to appeals courts. Another amendment has halved (from 14 to 7 days) the time limit for appealing detention orders issued against asylum seekers involved in fast-track asylum procedures at borders. These changes place significant additional burden on the already overworked appeals courts, raising questions about its rationale. The National Association of Magistrates, which represents judges in Italy, has called for the [immediate suspension](#) of these changes, which are likely to have [severe impact](#), including slowing the analysis of asylum applications and creating severe bottlenecks for the appeals courts.

- 8. Procedures at first instance** (including relevant changes in: the authority in charge, organisation of the process, interviews, evidence assessment, determination of international protection status, decision-making, timeframes, case management – including backlog management)

Greece:





For asylum applications by Syrians, the Asylum Service has halted decisions on the merits while continuing to notify previously issued decisions, renew residence permits, and process family reunification and Dublin cases. However, no withdrawals of international protection status have been reported. The RIS has not lifted geographical restrictions for Syrians in island CCACs unless vulnerability considerations apply, raising concerns about congestion on the islands.

Legal organizations have highlighted procedural gaps, including the lack of transposition of Articles 31(4) and 12(1)(d) of the Asylum Procedures Directive, and the questionable legal basis for suspending decision-making on Syrian cases. Concerns have also been raised about interviews in Syrian cases focusing on the current security situation despite no decisions being issued. Monitoring of first-instance interviews has been recommended.

RAO Crete has dismissed two subsequent Syrian applications as inadmissible, but new elements related to safe third country considerations could substantiate further applications.

9. Procedures at second instance (including organisation of the process, hearings, written procedures, timeframes, case management – including backlog management)

10. Issues of statelessness in the context of asylum (including identification and registration)

11. Children and applicants with special needs (special reception facilities, identification mechanisms/referrals, procedural standards, provision of information, age assessment, legal guardianship and foster care for unaccompanied and separated children)

Greece:

An [investigation](#) by Solomon and The New Humanitarian found that **unaccompanied children seeking asylum in Greece, Italy and the UK have been wrongly and repeatedly classified as adults**. It is difficult to know how many children have been affected because many cases were never documented. In Greece, [data](#) from the Ministry of Migration and Asylum shows that between April 2021 and March 2023, there were 1,024 age dispute cases and in 37% of them, the people involved were found to be children. This age misclassification not only denies children the protections and services they are entitled to but also shows the critical need for better identification and referral procedures.

Safe areas in island CCACs, designated for unaccompanied children, are hosting more than double their capacity, severely affecting children's living conditions, hygiene, and daily needs. Instances of overcrowding include unaccompanied infants and young children, such as a baby on Kos. On Lesbos, arrivals of unaccompanied and separated children rose by 130% in September compared to August, exacerbating the strain.

On Chios, overcrowding has forced children to sleep in quarantine and leisure areas, with some on mattresses on the floor. Similar conditions were reported on Leros, where





overcrowding has left unaccompanied minors without beds in safe areas. Reports indicate up to 20 people sharing rooms intended for unaccompanied girls, with inadequate hygiene and prevalence of skin conditions.

The guardianship programme for unaccompanied children, managed by METAdrasi and PRAKSIS, faces financial issues, leaving guardians unpaid for months. Although an extension for 2025 has been verbally confirmed, the current 145 guardians are insufficient to meet the needs of all children. Each guardian manages up to 15 children, with delays in Prosecutors' appointments further impacting registration, asylum processes, and family reunification. Additionally, significant delays in transferring children to the mainland persist due to funding shortages.

- 12. Content of protection** (including access to social security, social assistance, health care, housing and other basic services; integration into the labour market; measures to enhance language skills; measures to improve attainment in schooling and/or the education system and/or vocational training)

Poland:

- **Education: Obligatory enrolment to Polish schools for children from Ukraine**

As of 1st September 2024, refugee children from Ukraine are covered by the obligation of annual preschool preparation, school obligation, and the obligation of learning in the Polish education system, similar to Polish students. Children in 8th grade are not required to take the final exam in Polish, and entry into high school is based on grades in Polish language classes.

Online learning is allowed only for students who, during the 2024/2025 school year, were studying in the highest program class at a school operating within the Ukrainian education system.

The family benefit 800+⁴ and the "Good Start"⁵ program are provided to Ukrainian refugees on the condition that their child attended a preschool preparation, primary school, or secondary school (for children aged 6-18 years).

The directions of the state's educational policy for the 2024-2025 school year focus on working with students with a migration background, including teaching Polish as a foreign language.

The Government Program for Equalizing Educational Opportunities for Children and Youth from Ukraine, "School for All," will be introduced for the years 2025-2027. The ministerial

⁴ The **Family Benefit 800+** is a Polish government program aimed at providing financial support to families with children. The benefit is provided regardless of the family's income and is available for every child under the age of 18.

⁵ The **Good Start** program is another Polish government initiative that provides financial assistance to families with school-aged children. It offers a one-time payment of **300 PLN per child** at the beginning of each school year to help parents cover the costs of school supplies such as books, stationery, and uniforms.





program, valued at PLN 500,000,000, will be adopted by the Council of Ministers. It targets children and youth from Ukraine who:

- arrived in Poland as a result of the Russian Federation's aggression against Ukraine,
- are legally residing in Poland in accordance with national regulations, and
- are fulfilling school attendance or education obligations at the primary or secondary school level in Poland during 2024–2027.

The goal of the program is to support Ukrainian students, including those of Roma origin and those with disabilities, in functioning within the Polish education system by enabling the entities indicated in the program to carry out a range of support activities. Additionally, the program's implementation will positively impact children and youth from other countries with migration experience pursuing education in Polish schools.

The program will be implemented in a modular format:

Module I – Intercultural Assistant

Module II – Well-being of the School Community

Module III – Professional Development of Education Staff

- **Labour Market**

Refugees who have been granted temporary protection under UKR status have been allowed to work without the necessity of special work permits, which indeed facilitates their recruitment, which is seen as a very positive and important step not observed in other host countries. Employers would still be required to inform labor offices about refugee employment. One of the biggest announcements this year was the CUKR residency card, to be introduced in 2025. It ensures a three-year residency and is expected to make life easier administratively-speaking, such as when changing jobs and having to update documents. Ukrainian refugees can also start their own businesses more easily and access vocational training to boost their skills. Access to loans and credit lines remain an obstacle in business development and growth.

Despite these benefits, challenges remain as refugees transitioning to CUKR status must arrange their own health insurance, and the digital application process could exclude those less familiar with technology.

13. Return of former applicants for international protection

14. Resettlement and humanitarian admission programmes (including EU Joint Resettlement Programme, national resettlement programme (UNHCR), National Humanitarian Admission Programme, private sponsorship programmes/schemes and ad hoc special programmes)





Germany:

The German government has launched an additional humanitarian admission program for Afghans at risk in October 2022, this program allowed the admission of 1000 persons per months and was supposed to last until the end of the legislative term (i.e. September 2025). After two years, merely 3.000 admission letters have been granted of which around 1.000 persons had arrived in Germany by the end of 2024.

The program has not met the expectations set in the [admission order](#) published by the German government in 2022 nor the number of [humanitarian admissions pledged for 2024 and 2025](#).

This is caused by a lengthy and bureaucratic procedure as well as technical difficulties as applicants had to be in Afghanistan to be considered for the program while the visa procedure took place in Pakistan.

IRC has evaluated the admission program, the full report can be found [here](#). Additionally, the draft for the budget for [2025 did not include any budget to continue the admission program](#). Due to the lack of financial stability, new admission orders were not issued after July 2024. The budget committee of the German parliament has granted [approximately 50 million Euros](#) to be used to issue and implement further admissions. However, the governing coalition dissolved and elections were set for February 2025, consequently a budget for 2025 has not been formally approved, the budget for 2025 is therefore, a [preliminary budget which includes the committee decision on the admission program for Afghans](#). However, the Ministry for Inner Affairs has not officially announced whether these available funds will be used to continue the admission of Afghans at risk.

15. National jurisprudence on international protection in 2024 (please include a link to the relevant case law and/or submit cases to the [EUAA Case Law Database](#))

- [Joint Ministerial Decision 305652/2024 on the list of safe countries of origin, 20 Dec 2024, \[new countries: Angola, Moldova\]](#)
- [Joint Ministerial Decision 152733/2024 on the composition of the Appeals Committees, 9 Dec 2024](#)
- [Ministerial Decision 190267/2024 amending Ministerial Decision 457538/2023 on the Home Affairs Funds Monitoring Committee, Gov. Gazette B' 4413/29.07.2024](#)
- [Ministerial Decision 205912/2024 on the composition of Appeals Committees, Gov. Gazette YOΔΔ 870/12.08.2024](#)
- [Joint Ministerial Decision 199769/2024 on the System for Management and Review of Home Affairs Funds, Gov. Gazette B' 4817/21.08.2024](#)
- [Circular 218389/2024 on extension of arrangements for AAU Vulnerable Groups in Athens and Thessaloniki, currently responsible only for unaccompanied children, 23 Aug 2024](#)
- Circular 175900/2024 of the Secretary-General for Vulnerable Persons on services prior to appointment of a guardian, 20 Jun 2024 (circulated)





16. Other important developments in 2024

Part B: Publications

1. If available online, please provide links to relevant publications produced by your organisation in 2024:
 - [Safeguarding the rights of unaccompanied children at EU Borders under the EU Pact on Migration and Asylum | International Rescue Committee \(IRC\)](#)
 - IRC Italy, [Please wait: Barriers to access the procedure for international protection in Italy](#), April 2024.
 - IRC Italy, [Empty Silos, Crowded Streets - A Report on the Humanitarian Situation in Trieste Three Months After the Closure of the Silos. An Overview of Needs and Possible Solutions](#), October 2024.
 - IRC Italy, [Protection Monitoring Report, July-September 2024](#).
 - IRC Italy, [Protection Monitoring Report, April-June 2024](#).
 - IRC Italy, [Protection Monitoring Report, January-March 2024](#).
 - IRC Germany, [Mid-term review of the Federal Admission Program Afghanistan, April 2024](#)
 - [One year since the Pylos shipwreck: Inhumane migration policies continue to cost lives at sea](#)
 - [Joint NGO policy brief: The EU Pact risks failing to protect unaccompanied children](#)
 - [Safeguarding the rights of unaccompanied children at EU Borders under the EU Pact on Migration and Asylum](#)
 - [Hundreds of unaccompanied children in Unsafe Zones: Need for an Immediate Activation of Relocation](#)

