

Input by civil society organisations to the Asylum Report 2025

Fields marked with * are mandatory.

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.

Contact details

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Name and title of contact person

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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:

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

There is a new government in the Netherlands that aims at creating the 'strictest asylum policy ever' that does not help solving serious capacity problems with IND and COA. The result is an increasing waiting list (often more than a year) for the processing of asylum claims, shortages in the capacity of reception centres in spite of reduced influx of asylum seekers, and the increased use of emergency shelters that fall below European Standards for living conditions.

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

- (1) The poor quality of decisions in religion-based asylum claims in the Netherlands, owing to lack of expertise in this field, is not being addressed.
- (2) There are some positive developments re the religious freedom of religious minorities in the context of the reception centres (i.e. re non-Muslim groups like Christians, atheists and apostates from Islam in general), but implementation tends to be slow.

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?

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)

Registration of newly arrived asylum seekers can be rather chaotic owing to lack of capacity with IND and COA.

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

We hear from asylum lawyers that their work load has increased to worrying levels and that there is a serious risk of future shortages in legal assistance owing to low payments.

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)

IND has compiled an Arabic and Farsi list of Christian terminology. Yet there are still worries about interpreters who are not familiar with Christian vocabulary sometimes resulting in serious misunderstanding during interviews and errors in interview reports of religion-based asylum claims. Also there is too little awareness that an apostate from Islam may feel insecure or even intimidated in the presence of a Muslim interpreter. Advice of the EUAA Practical Guide on Interviewing Applicants with Religion-based Asylum Claims seems hardly being implemented.

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)

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)

Religious freedom, intimidation and harassment against non-Muslims is an ongoing tough issue that requires more attention by the government. There are positive steps with COA that the religious freedom of all inhabitants of the reception centres should be respected but the implementation is very slow with location managers applying own policies that do not always comply with the principles of religious freedom.

Following a court decision of November 2023, applicants have now much better access to the labour market. A bottle neck is still the slow process for the necessary administrative paper work.

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)

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, decisionmaking, timeframes, case management - including backlog management)

We notice an increasing lack of understanding of religious issues in the processing of and decision making in religion-based asylum claims that is not being dealt with. Case workers apparently receive too little training in this field and have too little time to prepare for the interview. A serious bottle neck is the lack of capacity with IND and, as it seems, a lack of experienced case workers.

We also notice that the waiting time for the actual procession of religion-based is asylum claims is often much longer than average. It can take two years or longer before a decision is made.

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

Same as at 8 above.

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)

12. Content of protection (including access to social security, social assistance, healthcare, 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)

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)

In December 2024 Parliament accepted a motion that the government should give preference to vulnerable religious minorities in the national resettlement and humanitarian admission programme. On the other hand, the present government decreased the number of annual invitations under this scheme from 500 to 200.

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](#))

On 24th December 2024 the Council of State ruled that COA must consider the principle of religious freedom in a decision whether or not to allow an inhabitant to attend a religious conference if this would clash with the legal requirement of weekly presentation: <https://www.raadvanstate.nl/uitspraken/@147747/202402909-1-v1/>

On 24th December the Council of State ruled that an apostate can not be expected to hide his apostasy in case of return to his country of origin on the grounds that he hid his apostasy in the past out of fear for persecution. Instead, the authorities must assume that the apostate will wish to express his apostasy on return in the same way as he does in the country of asylum if he has not stated otherwise: <https://www.raadvanstate.nl/uitspraken/@147729/202306746-1-v2>

16. Other important developments in 2024

The Secretary of State published revised country policies on Iran and Iraq. In both cases he decided that there is less need for international protection for Christians, apostates, and (in Iraq) Mandaeans, Jews, and Yazidis.

As to the country policy Iran, the new policy was solely based on the increasing secularization of Iranian society, ignoring the fact the chief actor of religious persecution in Iran is not society but the government.

As to the country policy Iraq, the new policy was exclusively based on the diminishing influence of ISIS, ignoring the various other actors of persecution, such as militias, families of converts and the social (tribal) environment.) Also, the new policy fails to understand the different position of Christian converts compared with those who are Christians by birth.

In both cases, the new policies are not supported by the findings of the newest country reports Iran and Iraq and other relevant sources, including the EUAA Country Guidance Iraq of 14th November 2024.

PART B: Publications

1. If available online, please provide links to relevant publications produced by your organisation in 2024

<https://juridisch.gave.nl/nieuws/is-de-complexiteit-veranderd> (In December 2023, the IND published the report 'Has the complexity of asylum decision-making changed? - Experiences, causes and action perspectives'. Gave wrote a response focusing in particular on complex asylum applications on religious grounds. On one hand, we agree with the IND's findings, e.g. the perpetual shortage of capacity that prevents sufficient training of case worker. On the other hand, we see that the IND itself has unnecessarily contributed to increase in complexity and has too little regard for the influence of its own policy choices. In particular, their working instruction for the assessment of religion-based asylum claim is in itself

unnecessarily complex and lacks clarity.)

<https://juridisch.gave.nl/bibliotheek/levensbeschouwing-op-azcs> (COA has improved its policy and working instruction on religious liberty in the reception centres. Gave explains the implications for the inhabitants and the churches that organize activities for the inhabitants.)

<https://juridisch.gave.nl/bibliotheek/wbv-2024-3-landenbeleid-iran> (On 23 January 2024, the Secretary of State announced a new country policy Iran regarding the position of some groups of Christians and apostates who, according to the Secretary of State, face less risk of persecution and serious harm than before. This was prompted by information from the General Country Report Iran of September 2023. A report by our Gave Foundation argues that the policy change is not supported by the information from the aforementioned Country Report and other relevant sources.)

<https://juridisch.gave.nl/bibliotheek/landenbeleid-irak-27-5-2024> (On 27 May 2024, the Secretary of State announced a new country policy Iraq. For Christians, this means they will no longer be identified as a vulnerable minority group. The reason is the diminished influence of ISIS. However, we note that insufficient attention has been paid to other actors of persecution, such as militias, families of converts and the social (tribal) environment.)

<https://juridisch.gave.nl/bibliotheek/doop-is-afvalligheid> (A baptismal certificate will not be accepted as proof of conversion. However, it should be accepted as a proof of apostasy from, because from a Muslim point of view, baptism is the ultimate renouncement of Islam. Thus, it can be said that is unthinkable that who still adheres to the Islamic religion would ask for baptism.)

<https://juridisch.gave.nl/bibliotheek/toelating-somalische-kerk> (Unlike e.g. Iranians, Somali's face serious risks if other Somali's see them attending any church, even in the Netherlands. For that reason the (underground) Somali Church in the Netherlands has a strict and careful procedure for the admittance of converts, for which reason admittance to the Somali Church should be accepted as a strong evidence of a genuine conversion.)

2. If not available online, please share your publications with us at: Asylum.Report@euaa.europa.eu or upload your file using the functionality below (max. file size 1MB).

Please upload your file

The maximum file size is 1 MB

3. For publications that due to copyright issues cannot be easily shared, please provide references using the table below.

	Title of publication	Name of author	Publisher/Organisation	Date
1				
2				
3				
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Useful links

[EUAA Asylum Report 2024 \(https://euaa.europa.eu/asylum-report-2024\)](https://euaa.europa.eu/asylum-report-2024)

[Executive Summary -Asylum Report 2024 \(https://euaa.europa.eu/asylum-report-2024/executive-summary\)](https://euaa.europa.eu/asylum-report-2024/executive-summary)

[Sources on Asylum 2024 \(https://euaa.europa.eu/publications/sources-asylum-2024\)](https://euaa.europa.eu/publications/sources-asylum-2024)

[National asylum developments database \(https://euaa.europa.eu/national-asylum-developments-database\)](https://euaa.europa.eu/national-asylum-developments-database)

[International Protection in Europe: 2023 in Review \(https://euaa.europa.eu/international-protection-europe-2023-review\)](https://euaa.europa.eu/international-protection-europe-2023-review)

Background Documents

[Word template to submit input](#)

Contact

[Contact Form](#)