



Input by civil society organisations to the Asylum Report 2026

Dear Colleagues,

The production of the *Asylum Report 2026* 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 2025 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 2025 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: Similarly to last year, this year's edition of the Asylum Report will be leaner and more analytical, 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. It will also feature prominently as info boxes in the [country overviews](#).

Your input matters to us and will be much appreciated!

*Please submit your contribution to the Asylum Report 2026 by **Friday, 9 January 2026**.*





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X 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?

In 2025 and early 2026, several relevant developments were observed the EU Member States covered by AIDA, notably in the areas of access to asylum procedures, reception conditions, detention and restrictions affecting beneficiaries of international protection.

Regarding access to the territory and to the asylum procedure, Poland suspended access to the asylum procedure at the Belarusian border throughout 2025, while Slovenia reinforced operational cooperation at its borders. In Ireland, procedural adaptations were introduced to anticipate the Pact's border procedure. In Hungary, changes were introduced regarding access to the embassy procedure for unaccompanied minors. Developments concerning the application of safe country concepts were also notable in several countries, including the Netherlands and Sweden.

Some Member States introduced changes (in law or practice) regarding asylum procedures, often aimed at accelerating decision-making or adapting national systems in anticipation of the Pact on Migration and Asylum. In Ireland, the determining authority introduced staged processing models that mirror components of the Pact's border procedure, including designated processing locations and accelerated handling for specific nationalities. In the Netherlands, legislative and administrative changes responded to CJEU case law on time-limits for the processing of asylum applications.

Reception conditions and capacity constraints remained a remained a central and persistent challenge and continued giving rise to litigation across several countries. In the Netherlands and Belgium, reception capacity remained under pressure, with policy measures aimed at





reducing or restructuring reception systems. In a case concerning Ireland, the CJEU ruled that a Member State which fails to provide an applicant lacking sufficient means with material reception conditions, even on a temporary basis, manifestly and gravely exceeds the discretion afforded to it under the RCD and found that such failure gives rise to State liability. The Court found that such a failure can constitute a sufficiently serious breach of EU law, thereby giving rise to State liability. In Spain, particularly in the Canary Islands, a sharp increase in arrivals in recent years has placed severe strain on reception centers, with occupancy levels exceeding capacity and prompting legislative measures to relocate thousands of unaccompanied minors to the Spanish mainland to alleviate the crisis.

Detention and deprivation of liberty constituted another area in which some developments were observed. Some countries expanded detention capacity (e.g. Poland and Belgium), while legislative proposals in Sweden aimed at extending detention grounds and time limits. At the same time, important judicial rulings at national and European level addressed the detention of vulnerable applicants, including unaccompanied minors and families with children (e.g. Poland). Concerns regarding detention conditions were reported in multiple countries, including Portugal and Hungary.

Some Member States adopted restrictive reforms regarding the rights of beneficiaries of protection. In Belgium, new family reunification rules entered into force in August 2025, affecting beneficiaries of subsidiary protection by restricting parents from sponsoring minor children unless family ties existed prior to arrival, and shortening grace periods for refugees. Financial thresholds for family reunification were elevated, and criteria for family members' eligibility were tightened. In Sweden, ongoing national reforms linked to Pact implementation and broader asylum system changes included plans to limit access to permanent residence and to introduce stricter conditions for maintaining residence permits, which may impact long-term stability for beneficiaries of protection. In the Netherlands, beneficiaries of international protection continued to encounter practical barriers to accessing education and to securing stable housing, while backlogs in family reunification processing remained unresolved in 2025. These developments signal an increased focus by several Member States on tightening rights attached to protection status.

Resettlement and complementary pathways saw reductions in various Member States, including Belgium and Sweden, with some programmes discontinued or scaled back.

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

Across the countries covered by AIDA, several structural issues persisted in 2025 and early 2026 with limited or no substantive reform. In many instances, longstanding shortcomings continued without meaningful legislative or policy change.

Access to the asylum procedure remained problematic in several Member States without significant corrective action. In Poland, pushbacks at the Belarusian border continued to be reported, alongside the ongoing ban on access to the buffer zone. In Malta, applicants were systematically detained upon arrival and faced obstacles in accessing legal assistance. In Spain, persistent delays in obtaining appointments to register asylum applications continued to leave applicants without documentation or access to reception. In Portugal, the temporary





concentration of registration in a limited number of cities remained in place. In Hungary, the “embassy procedure” and the state of crisis due to “mass migration” were prolonged, with continued non-compliance reported in relation to relevant CJEU case law.

Procedural delays persisted across several countries. In the Netherlands, waiting times for substantive interviews and decisions remained significant, with an increasing backlog at first instance; backlogs in family reunification procedures and in housing for beneficiaries of protection also remained unresolved. Portugal continued to experience processing delays in regular asylum procedures, while in Spain access to registration of asylum application remained lengthy. In Belgium, difficulties in accessing legal aid for appeals and problems regarding waiting periods for registration persisted. Significant delays in the processing of regular asylum applications continued in Portugal and the Netherlands, including prolonged waiting periods for substantive interviews and decisions.

Use of admissibility and safe country concepts generally continued in line with existing practice, without major shifts. Malta maintained its practice of declaring applications inadmissible for beneficiaries of protection in another Member State, regardless of the practical accessibility of protection there. Dutch courts continued to examine the situation of beneficiaries of protection in Greece, while confirming the possibility of certain Dublin transfers. In the Czech Republic and Slovenia, safe third country concepts remained unused.

Vulnerability and safeguards for specific groups remained an area with limited structural reform. In Malta, NGOs and lawyers continued to face obstacles in obtaining information on vulnerability assessments realised by national authorities. In Portugal, concerns remained regarding age assessment procedures and the lack of systematic mechanisms to identify and support women and girls who are victims of violence. In Poland, age assessment procedures continued to raise concerns, particularly considering their relevance for access to procedural guarantees. In Sweden, criticism regarding the quality of decision-making in SOGIESC-related asylum claims persisted. In Spain, difficulties in transferring unaccompanied minors from the Canary Islands to mainland regions continued.

Reception conditions and capacity constraints showed limited structural improvement in several countries. In Ireland, severe shortages of accommodation persisted throughout 2025, with single male applicants frequently left without housing and reliant on increased financial allowances. In Belgium and the Netherlands, reception networks remained under strain, with continued reliance on emergency facilities and insufficient capacity for certain categories of applicants. Substandard conditions for unaccompanied minors were also reported in the Netherlands. In Malta and Slovenia, concerns regarding reception standards and overcrowding remained.

Overall, while some Member States introduced reforms in specific areas, many longstanding structural deficiencies - particularly regarding access to the procedure, reception capacity, procedural delays, and safeguards for vulnerable applicants - remained largely unchanged in 2025 and early 2026.





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?

The observations below draw primarily on information shared by ECRE member organisations and national civil society actors in late 2025 and early 2026, complemented where relevant by findings from AIDA country reports. As the Pact will apply from July 2026, public information on implementation remains limited regarding certain national contexts.

Formal implementation steps are underway in most EUMS. All Member States save for Hungary submitted their national implementation plans (NIPs), and several have presented or are preparing draft legislation to transpose and implement the new instruments. At the same time, transparency and stakeholder engagement have varied considerably. While some authorities opened channels of dialogue with civil society, in other contexts access to draft laws or NIPs has been restricted or denied. Limited public access to NIPs, contingency plans and national strategies has constrained external scrutiny and, in several cases, limited the possibility for relevant stakeholders to engage with national authorities in the implementation phase.

Across several Member States, implementation efforts appear to prioritise border management, screening infrastructure and the establishment of the new Eurodac system, with comparatively limited emphasis on strengthening procedural safeguards or improvement of reception and detention conditions. In Belgium and Italy, attempts have been reported to “frontload” certain Pact elements prior to its formal applicability, including provisions related to subsequent applications or safe country concepts.

In a number of countries (e.g. Germany, the Netherlands, Denmark, Finland, Sweden), draft legislation foresees expanded use of border and accelerated procedures, including the possibility of detention in the context of screening and border procedures. Civil society organisations have expressed concern that draft laws or implementation plans in various countries do not sufficiently detail safeguards for vulnerable applicants. In particular, questions arise regarding:

- the identification of vulnerabilities during screening and border procedures, including the absence of multidisciplinary assessments;
- the use of age assessment methods and the risk of insufficient child-specific safeguards;
- the detention of unaccompanied children or families with children;
- the scope, independence and funding of legal counselling and legal aid mechanisms;
- the absence of clear provisions on legal counselling during screening or in the administrative procedure, including restructuring of legal counselling in the administrative phase that could lead to excluding civil society organisations from the provision of free legal counselling at the national level (e.g. Czech Republic, Germany).

In some contexts (e.g. the Netherlands, Sweden), reforms linked to Pact implementation coincide with broader national reforms reducing access to free legal representation at first instance compared to the level at which it is currently provided.





Uncertainty remains in most Member States regarding the establishment and composition of the independent monitoring mechanisms required under the Screening Regulation and the Asylum Procedures Regulation.

Although the Pact aims to enhance harmonisation and convergence, the current developments regarding implementation suggests that several countries might not be fully prepared to implement the new rules by June 2026. Member States are proceeding at different speeds, and in several contexts, there is limited clarity on how key guarantees - such as effective access to legal assistance, safeguards for children, or independent monitoring - will function in practice. In addition, implementation efforts in some countries appear to focus on restrictive elements of the Pact (e.g. border procedures, detention, safe country concepts) without parallel investments in reception capacity, inclusion measures or complementary pathways. This selective approach, combined with uneven transparency and differing political positions on solidarity, may result in continued disparities in access to protection and procedural safeguards across the Union.

PART A: Contributions by topic

Please share **your reporting on developments in asylum law, policies or practices in 2025 by topic**. Kindly make sure that you provide information on:

- ✓ New developments and improvements in 2025 and new or remaining challenges;
- ✓ Changes in legislation, policies or practices, or institutional changes during 2025.

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)

Germany: In 2025, access to the German territory for asylum seekers became increasingly contested. In May 2025, Federal Minister of the Interior Alexander Dobrindt issued an administrative instruction authorizing the rejection of asylum seekers at Germany's borders. Less than four weeks later, the Administrative Court of Berlin found this practice to be unlawful in a case brought by three Somali asylum seekers, ruling that they must be allowed to enter Germany and that the authorities were obliged to conduct an asylum procedure. The court emphasized the binding nature of European asylum law, a position subsequently reaffirmed by the District Court of Pasewalk in two cases in which it rejected detention orders sought by the federal police for the purpose of removal, citing the primacy of the Dublin III Regulation once an asylum application has been made. Despite these judicial decisions, the federal government maintained its policy of border rejections, arguing that these decisions have no broader implications beyond the individual cases, for which in turn, the government has been criticized. According to official figures, more than 21,589 people have been turned back at Germany's borders between May and 30 November 2025. Civil society organization Pro Asyl reported that in many cases individuals were unable to lodge an asylum claim, that claims were disregarded, or that people were returned despite having formally expressed a wish to seek asylum.

(...) Between 16 September 2024, and 30 November 2025, deployed federal police officers recorded 63,935 unauthorized entries, with 43,575 persons being directly turned back at the border or in connection with illegal border crossings, and 2,344 persons being prevented from entry due to existing re-entry bans for Germany. According to the Federal Polices, during these operations, authorities





provisionally arrested 1,834 smugglers, detained 10,751 persons with outstanding arrest warrants as collateral findings, and identified 1,651 individuals associated with left-wing, right-wing, foreign extremist, or Islamist backgrounds. These border controls have faced widespread criticism in 2025 for being ineffective, with the Police Union (Gewerkschaft der Polizei) pointing to the substantial operational burden they impose, resulting in millions of overtime hours for officers while producing relatively few deportations in relation to the effort expended. The enhanced controls have also strained diplomatic relations, notably drawing criticism from the Polish government over their implementation and impact. (...) The expanded internal border controls to all land borders have received extensive criticism by NGOs and academics. Pro Asyl, for example, has criticised Germany's expanded border controls, arguing they risk violating existing laws and could lead to frequent rejections of asylum seekers who need protection. Legal scholars contend the measures are not only legally questionable but also ineffective, suggesting they serve more as a blanket approach to migration rather than a targeted security response as allowed under the Schengen Borders Code. Concerns are growing that Germany's actions could undermine the European integration project by prompting other countries to reinstate internal borders, which could weaken mutual trust within the EU. The NGO, Flüchtlingsrat Niedersachsen e.V. (Lower Saxony Refugee Council) has criticized practices regarding access to territory and asylum procedures, particularly the handling of illegal border crossing cases at the end of 2024. The organization reports that criminal investigations into illegal border crossings are not discontinued even when immigrants subsequently apply for asylum, resulting in fines of several hundred euros. The Flüchtlingsrat further notes that adequate legal representation is typically unavailable due to the poor financial circumstances of the accused and the considerable distances between the courts hearing border crossing cases and the locations where refugees are distributed under the EASY allocation system. According to the organization, refugees who cannot afford train travel to attend court proceedings or secure legal representation are left with no option but to accept fines that far exceed their available financial resources, creating a situation where access to legal remedies is effectively denied based on economic constraints.

(...) As of January 2026, Germany is preparing to implement the new EU Screening Regulation, part of the reform of the Common European Asylum System (GEAS), which will introduce mandatory, rapid identity and security checks at EU external borders for irregular entrants, allowing quicker allocation to asylum or return procedures. The German government has drafted legislation, including the GEAS Adjustment Act, to transpose these rules into national law; the draft was approved by the cabinet on 3 September 2025, but the law has not yet entered into force as of mid-January 2026. Under the reform, arrivals at airports and seaports may undergo a border procedure to decide on asylum claims, followed, if protection is denied, by a return border procedure to ensure return to the country of origin within 12 weeks. All irregular entrants will be subject to screening, including identification, health and security checks, collection of biometric data, and registration in EURODAC, which is being expanded into a comprehensive migration database storing biometric, identity, and travel document information to improve monitoring of migratory movements.

Spain: In 2025, 36,775 migrants arrived in Spain by land and sea, which represents a decrease of 42.6% compared to the 64,019 arrivals in 2024. Most arrivals were by sea (32,925) and the main route for sea arrivals were still the Canary Islands, with 46,843 persons reaching the archipelago by sea. Despite remaining the main route of arrival to Spain, in 2025, the route to the Canary Islands experienced an important decrease (-62%) of arrivals compared to the previous year, while the route to the Balearic Islands faced an increase of 24.5% compared to 2024, with 7,321 migrants who reached the archipelago in 2025.

(...) In January 2025, 21 people from Pakistan were identified among the survivors of a boat shipwrecked off the Canary Islands. According to investigations, it seems that a "new Asian route" to Europe might be emerging. In the same month, a boat with 19 bodies was found off the costs of St. Kitts and Nevis (in the Caribbean). The authorities believed that the vessel originated off the West African coast with migrants on board. According to the information released by the Moroccan Minister of Interior, in 2024 Morocco stopped almost 80,000 attempts of migrants to reach the EU.





According to a report published in March 2025, the Western Mediterranean Route has become increasingly inaccessible to sub-Saharan Africans considering the strict measures adopted by Morocco to prevent them from entering the country. Concretely, the report stressed that a key risk on this route continued to be the levels of hostility towards Sub-Saharan African migrants in Morocco. In June, the National Police of Alicante started an investigation in relation to the discovery of the bodies of 31 migrants – with tied hands and feet - found in the Balearic Islands. The investigators have linked the bodies to a small boat that arrived in Alicante. During the same month, the Guardia Civil, supported by Europol, reported having dismantled a criminal network smuggling migrants by boats from Algeria to Spain and to other EU countries. In August, around 600 migrants arrived in the Balearic Islands in around thirty small boats in one week. The figures on arrivals in 2025 showed a change in trends until August, with a slight decrease in arrivals and a shift in sea routes — a rise in the Balearic Islands and a decrease in the Canary Islands. Already in July the State Secretary for Migration held a mission in the Balearic Islands to find and set up facilities for the initial reception and temporary care of migrants after their arrival on the archipelago. A report published by Human Rights Watch denounced the violence and the serious human rights violations committed against migrants and refugees by local authorities in Mauritania between 2020 and 2025, linking these episodes to the decrease in the number of boats arriving to the Canary Islands. According to Frontex, smugglers are switching their operations from Morocco to Algeria due to perceived less stringent controls and are using faster boats, being the Balearic Islands their main destination. Departures from Algeria represent the 75% of people using the Western Mediterranean route, while in 2024 it was 40%, behind Morocco. Frontex consolidated its presence in the Canary Islands since 2020, counting with 70 agents and specialised staff on the islands, including 18 interpreters and cultural mediators by the summer 2025. Following the reinforcement of migration controls by Senegal, Mauritania and Morocco, migrants turned to Guinea as a new departure point in 2025. In addition, an increase of departures from The Gambia to the Canary Islands has been registered.

Arrivals in the enclaves of Ceuta and Melilla

The number of persons arriving in Ceuta and Melilla by land in 2025 was 3,850, marking an increase compared to 2024, when 2,647 persons entered the enclaves. In addition, 29 people arrived by sea to the enclaves, with 25 reaching Melilla (representing a 19% increase compared to 2024), and 4 Ceuta (representing a 85.7% decrease compared to the previous year).

(...) Similarly to the previous update of the report, which provided a list of incidents at the border in 2024, the following list provides an overview of several incidents that were reported at the border in 2025:

- ❖ In March 2025, the High Court of Justice of Andalusia (*Tribunal Superior de Justicia de Andalucía*) ruled on a case that was considered a pushback. The case regarded man who was trying to reach the coast of Ceuta by swimming in March 2023, while the Guardia Civil's boat intercepted him. The officers took him on board and transferred him to Ceuta, where he was attended by the Red Cross. Immediately afterwards, the Guardia Civil brought the migrant to the Tarajal border and handed him over to the Moroccan authorities. A year later, the Contentious Administrative Court of Ceuta declared this action illegal, and the High Court of Justice of Andalusia confirmed the decision.
- ❖ In June, CEAR denounced the impunity still existing after three years since the incident occurred in Melilla on 24 June 2022, when around 2,000 persons attempted to enter the city from Morocco by jumping the fence, resulting in 37 persons dead and hundreds injured, while 133 individuals managed to enter the Spanish enclave. CEAR condemned the lack of justice for the victims after three years, as well as the lack of news on the whereabouts of 70 missing persons, due to the refusal by Morocco to provide the list of deceased persons and its obstruction to the attempts made by families and organisations to access hospitals and morgues.
- ❖ In July, around 50 unaccompanied Moroccan children reached Ceuta by swimming.
- ❖ In August, the Guardia Civil prevented a Moroccan man to enter Melilla by sea.
- ❖ During the same month, Morocco informed it would investigate a Moroccan soldier for beating a child who was trying to reach Ceuta by swimming.





- ❖ On 15 August, around 300 migrants and refugees attempted to reach Ceuta by swimming from Morocco. In addition, authorities informed that the bodies of 21 persons have been found so far since the beginning of the year.
- ❖ In October, a young sub-Saharan migrant managed to enter Ceuta by paragliding, despite the rain and strong wind.

Arrivals by sea

In 2025, persons and 1,235 boats reached Spain via sea routes. Out of the total number of persons arriving by sea, the vast majority (17,788 persons) were disembarked on the Canary Islands, which has become one of the main destinations for boats since the last months of 2019, while a total of 15,108 persons arrived on the mainland (7,787 persons) and the Balearic Islands (7,321 persons). Only a few migrants disembarked in Ceuta (4 persons) and Melilla (25 persons).

(...) boats arrivals to the Canary Islands continued in significant numbers throughout 2025. It is very likely that the Canary Islands will continue to be one of the main points of entry to Spain for migrants and refugees throughout 2026.

(...) According to a report published in March 2025, migrants travelling along the Atlantic route are primarily West Africans and include nationals from the countries of embarkation, i.e. Senegal, Mauritania and Morocco. The number of Malians using the Atlantic route has increased due to ongoing conflict and insecurity, with 10,000 arrivals between January and September 2024. The report informed also on the increasingly use of the Atlantic route by nationals of south-Asian countries. Reports of violence on the ships during the crossing of the Atlantic route have also been described. In addition, a rising number of boats have been departing from other parts of Africa (i.e. Guinea-Conakry), implying dangerous sea journeys surpassing 2,000 kilometres.

Access to the asylum procedure

UNHCR observed that challenges to access the asylum procedure continued to negatively impact the rights of persons who wished to apply for international protection, and in particular access to reception, leaving asylum seekers, including those with specific needs, at risk. In a context of high numbers and reduced capacity, accessing the asylum procedure remained challenging in 2025.

(...) In February 2025, the Minister of Interior indicated having been working on the implementation of a system allowing for the possibility to present online applications for asylum.

Hungary: Only people belonging to the following categories are not required to go through the Embassy procedure to access asylum. Categories that can directly apply for asylum in Hungary:

- Beneficiaries of subsidiary protection who are staying in Hungary;
- Family members of refugees and beneficiaries of subsidiary protection who are staying in Hungary;
- Those subject to forced measures, measures or punishment affecting personal liberty, except if they have crossed Hungary in an illegal manner. This exception was modified with the Gov. Decree 494/2024, which entered into force on 1 January 2025, and the illegal entry was removed. The current exemption therefore reads: A person subject to forced measures, measures or punishment affecting personal liberty – excluding cases of apprehension and petty offence confinement. This in practice means that persons detained or those under compulsory place of stay can submit an asylum application, despite the illegal entry, but those just apprehended by the police cannot (push backs are therefore not affected with this modification).
- Unaccompanied minors residing in Hungary (this exception was introduced by Act L of 2025, which entered into force on 20 August 2025).

(...) In 2025, the ECtHR issued a judgement in 3 joint cases and for the first time directly called on the Hungarian authorities to immediately stop collective expulsions and to ensure effective access to asylum. The joint judgement is also relevant, as the ECtHR considers that the “embassy procedure” did not provide for “genuine and effective access to means of legal entry” (ECtHR, *H.Q. v. Hungary*, Application





No. 46084/21, *Z.A. v. Hungary*, Application No. 40185/22 and *A.S.A. v. Hungary*, Application No. 53952/22, Judgment of 24 June 2025, available [here](#)).

(...) In 2025, the Hungarian Helsinki Committee wrote a submission to the UN Special Rapporteur on Torture on Experience of Victims and Survivors, addressing the risk of abuse and inhumane treatment at the borders.

(...) In 2025, several judgements obliged the NDGAP to start asylum procedures on the merits (For example: 11.K.704.816/2024/7., 7.2.2025, 11.K.701.082/2025/5., 5.5.2025, 10.K.701.992/2025/5, 19.6.2025, 14.K.701.522/2025, 24.6.2025, 20.K.701.898/2025/4., 1.7.2025). As the NDGAP was not initiating new procedures, the Hungarian Helsinki Committee submitted an action for enforcement of the judgement. Before the court ruling on the enforcement action, the NDGAP started to initiate the in-merit asylum procedures, but only for the clients, who already got a court judgement obliging the NDGAP to do so. In the enforcement appeal the court found that the NDGAP failed to comply with the judgment and imposed a 100.000 HUF fine on the NDGAP and ordered that the NDGAP shall issue an in-merit decision within 30 days (14.Kpk.750.171/2025/11., 5.11.2025).

Malta: Access to the procedure was hindered to some applicants in 2025 through a speedy channelling into the Home Affairs Ministry's voluntary return procedure. This situation was made possible due to a number of factors, including: limited information to detained persons on the right to seek protection, challenges for NGOs and other information-providers to access and monitor detention centres, active presence in detention of Ministry officials promoting voluntary return including by informing particular nationalities of their limited chances of receiving international protection with the consequential detention for a number of months. In December 2025, a group of 48 migrants returned to their countries of origin only two weeks after their rescue. They spent their two weeks in Malta in a detention centre where they were prevented from communicating with UNHCR or NGOs. It is unclear what information was provided to them regarding the right to seek asylum and other rights. (...) In 2024 and 2025, NGOs continued to receive reports of applicants being urged to apply for voluntary return, being told that an asylum application would be automatically rejected due to Bangladesh being deemed safe and that pending the asylum procedure they would remain locked up in detention. Similar reports were also received from Bangladeshi UAMs. These practices continued throughout 2024 and 2025 despite the recent decision of the ECtHR where the Court found that the asylum procedure undertaken by the Bangladeshi applicant and examined under the accelerated procedure did not offer effective guarantees protecting him from an arbitrary removal.

(...) Throughout 2023, 2024 and 2025, it was reported on several occasions that Malta continued its policy of preventing access to its territory for persons arriving by sea. This is generally seen as a political win for the Home Affairs Minister, who in 2025 commented that irregular arrivals had decreased by 93% in the past five years. (...) Throughout 2025, UNHCR was able to maintain its presence at all disembarkations, monitoring the registration process.

The Netherlands: The Dutch government announced in November 2024 that it would reintroduce border controls at the internal borders with Belgium and Germany. This measure has been introduced temporarily for six months (from 9 December 2024 until 8 June 2025), in line with Article 25 of the Schengen Borders Code. This measure was extended, and will – as far as known at the moment of writing – end on 8 June 2026. Border controls are executed by the KMar. This measure are intended to contribute, amongst other things, to combating irregular migration. A report shows that between 9 December 2024 and 8 September 2025, 470 foreigners were denied entry into the Netherlands. Whether the internal border controls have had effect on the decline of irregular border crossings at the external borders and the number of asylum applications in the Netherlands cannot be determined. In a report published by the Netherlands Court of Audit (Algemene Rekenkamer) on 3 June 2025, it was noted that 400 people were referred to the asylum procedure by these border controls or the 'regular' controls performed by the MTV, which amounts to 0.9% of the total number of asylum requests. In addition, it was concluded that these border controls did not differ significantly from the work of the MTV and that





this measure did not contribute to achieving the national goals of decreasing the pressure on the asylum and accommodation systems.

(...) A third country national that wishes to apply for asylum and who crosses the Dutch border by land has to register their wish for asylum in AC Ter Apel. The identification and registration of the applicant was, up until the end of 2024, conducted by either the AVIM (AC Ter Apel) or KMar (AC Schiphol). As of 1 January 2025, a new organisation has been set up to deal with the identification and registration process. This new organisation, the Asylum Seekers Identification and Screening Service (Dienst Identificatie en Screening Asielzoekers, DISA), will carry out the same obligations related to the identification and registration process as AVIM did before.

Poland: In 2025, the authorities continued pushbacks at the Polish-Belarusian border. This applied both to foreigners crossing the border irregularly and to those presenting themselves at the official border crossing point in Terespol. In 2025, the ban on entering the buffer zone – the area close to the border – was still in force. It has been extended several times. With access to the Polish-Belarusian border restricted, civil society organisations called on the Polish government to address the ensuing humanitarian crisis, because the restriction prevents the provision of humanitarian assistance to people seeking international protection. Based on reports from civil society organisations, in 2025 migrants reported the use of violence on both the Polish and the Belarusian sides. For example, according to the organisation We Are Monitoring, which collects data and testimonies of migrants who experienced pushbacks, in January 2025 migrants seeking protection reported violence, emphasising the brutality and ruthlessness of border guard officers in both countries. They reported physical and verbal violence, humiliation, intimidation, as well as theft and destruction of property, and described cases of use of pepper spray and being held in freezing conditions after being forced to remove their clothes. Many individuals encountered at the border presented with multiple extensive lacerations caused by razor wire, as well as orthopaedic injuries resulting from falls or jumps from the fence. From January to the end of September 2025, 'We are Monitoring' recorded a total of 2,872 requests from individuals. Among these were persons belonging to vulnerable groups: organisation recorded requests from 227 minors, of whom 191 (84%) were traveling unaccompanied. As of 10 December 2025, it is reported that at least 103 people have lost their lives at the Polish–Belarusian border, including 14 in 2025. Crucially, in 2025 the Law on Protection was amended and the changes introducing the term "instrumentalisation" of the procedure and allowing the government to temporarily suspend the asylum procedure at the Belarusian border entered into force on 26 March 2025. On 27 March 2025 on the basis of the regulation, the right to apply for international protection at the Belarusian border was suspended for 60 days. In practice, the new provisions result in applications from persons crossing the Polish-Belarusian border not being accepted. In accordance with the regulations, the suspension does not apply to persons belonging to certain categories of vulnerable individuals, including unaccompanied minors. However, according to Grupa Granica, on the very first day the suspension of the right to asylum came into effect, a 17-year-old unaccompanied Somali boy was removed from a hospital near the border, despite belonging to a vulnerable group.

The suspension of the right to international protection also applies at the only operational border crossing with Belarus, at Terespol. Since the introduction of the suspension of applying for international protection at official border crossings, it has become impossible for most people to submit applications at Terespol, with few exceptions, such as pregnant women or unaccompanied minors. The Rule of Law Institute reported that the Border Guard at Terespol violated regulations requiring the acceptance of applications from vulnerable groups. For most people, also those to whom the suspension of the right to asylum should not have been applied, the only chance to avoid being pushed back to Belarus in Terespol was to obtain an interim measure.

(...) In 2025, individuals crossing the Polish-Belarusian border with the intention of seeking international protection submitted requests for interim measures to the ECtHR. The increase in such applications is linked to the introduction of the suspension of the right to apply for international protection and the resulting heightened risk that foreign nationals may be returned to Belarus without an individual assessment of their situation. In 2025, it was reported that not all interim measures granted by ECtHR





were respected by authorities. In April 2025, SIP reported a case of applicants who attempted to cross the border at the Terespol border crossing with Belarus. They expressed the intention to apply for international protection and possessed documents indicating they belonged to a vulnerable group, on the basis of which their application should have been accepted despite the suspension of the right to apply for international protection. Nevertheless, they were pushed back to Belarus. Subsequently, they presented themselves at the border crossing again with an interim measure issued in their case. This measure was ignored by the authorities, and the applicants were turned back to Belarus once more. SIP reported that a complaint in the case had been submitted to the ECtHR. The Commissioner for Human Rights noted that the Border Guard considers individuals who present themselves at the Terespol border crossing without undergoing passport control as not formally on Polish territory, and thus outside Poland's jurisdiction. In response, the Commissioner wrote to the Commander-in-Chief of the Border Guard, requesting assurances that interim measures will be respected by authorities. The Commissioner also recalled that in *M.K. and Others v. Poland*, the Court rejected the Border Guard's claim that interim measures could not be applied to foreigners denied entry, and regretted that judgements of ECtHR have not been properly implemented by the Border Guard over the past eight years. In response, it was reported that isolated cases of non-compliance with interim measures were due to delays in the Court sending its decision to grant the measure. Cases of non-compliance with interim measures also concerned foreigners crossing the border in an irregular manner - HFHR filed a complaint concerning a Sudanese national who had been hospitalised due to an arm injury and was removed from the hospital to Belarus, despite an interim measure having been issued in his case.

(...) According to HFHR, all judgments issued by the Voivodeship Courts in 2022-2024 on pushbacks are coherent and confirm that the way of returning migrants to Belarus by the Polish Border Guard was unlawful, regardless of whether the return was based on the Regulation or on the Law on Foreigners. These judgements were also described in the HFHR and SIP third party intervention in the case *R.A. and Others v. Poland* presented before the Grand Chamber of the ECtHR. Nevertheless, still in 2025, this domestic case law appears to have had no influence on the practice of the relevant authorities. Another measure adopted in response to the border crisis in 2025 was the suspension of the right to seek asylum. The legality of this measure has so far been examined by the Voivodship Administrative Court in Białystok (judgements of Voivodeship Administrative Court in Białystok, no II SA/Bk 1221/25), which held that the new provisions comply with the principle of proportionality and do not infringe upon the essence of the right to asylum. In its judgments, the court found that, in situations involving the instrumentalisation of migration, the state may introduce limitations to the principle of *non-refoulement* with regard to a foreign national who becomes part of a group aiming to destabilise the situation within the state. According to the court, such circumstances fall within the scope of Article 33(2) of the 1951 Geneva Convention. However, the judgments are not yet final. Consequently, the cases will be examined by the Supreme Administrative Court. In 2025, the SIP reported the awarding of the first compensation for an obviously unlawful apprehension of a foreigner and pushback across the Polish-Belarusian border. The case concerned an Afghan citizen who was pushed back to Belarus in 2021. In 2025, HFPC reported that the court decided that the Prosecutor's Office should investigate the pushback of an Afghan man from a hospital. The incident occurred in 2024. Initially, the Prosecutor's Office had refused to open an investigation into the case. In 2025, the courts also delivered significant judgments concerning the criminalisation of humanitarian assistance at the Polish-Belarusian border. On 8 September 2025, the 'Hajnowka Five' were acquitted. The trial concerned five activists who were providing humanitarian assistance at the Polish-Belarusian border. They had been accused of facilitating illegal residence in Poland for the purpose of obtaining a benefit. In the same month, a volunteer who had tried to assist a Somali man in submitting an application for international protection, who was pushed back, was also acquitted.

(...) Under the Amendment to the Law on Protection of 21 February 2025, the law was amended to allow for the temporary suspension of the right to apply for international protection. Provisions were introduced in response to the crisis at the Polish-Belarusian border. As of 26 March 2025, the right to submit an application for international protection may be temporarily restricted where:

- ❖ instrumentalisation is occurring, and



- ❖ actions undertaken as part of such instrumentalisation pose a serious and real threat to the security of the State or society, and
- ❖ imposing this restriction is necessary to eliminate the aforementioned threat, and other measures are insufficient to do so.

The provisions were adopted despite strong opposition from non-governmental organisations, national and international institutions. In a letter addressed to the Marshal of the Senate of the Republic of Poland, the Council of Europe Commissioner for Human Rights expressed concern regarding the draft law, pointing to serious doubts as to whether the provisions are compatible with Article 3 of the ECHR. He noted in particular that the new legislation would restrict access to the territory for persons in need of protection and would result in the expulsion of foreigners from Poland prior to any examination of whether they are in need of international protection. In this context, he referred to the case of *M.K. and Others v. Poland*. UNHCR in its position indicated that, although migration is clearly being instrumentalised at the Poland–Belarus border and the situation remains highly complex, Poland should respect binding and universal principle of non-refoulement, from which no derogation is permitted, even in situations of war or other emergencies. The suspension of the right to apply for international protection is decided by the Council of Ministers by way of a regulation. The provisions stipulate that such a suspension should not exceed 60 days; however, with the consent of the Sejm, it may be extended. Since the law does not specify a maximum number of such extensions, in practice they may be applied an unlimited number of times. (...) In August 2025, the Commissioner for Human Rights and the Commissioner for Children’s Rights, in a joint statement, called for an amendment of the provisions and for the regulation of the procedure under which an assessment is carried out as to whether a given person qualifies as vulnerable. According to information obtained by the Commissioners, such assessments are currently conducted by Border Guard officers using an internal form completed after a foreign national declares an intention to apply for international protection. The Commissioners also expressed concern that children travelling with their caregivers were not included among the categories of vulnerable persons. They emphasised that children do not lose their status as persons requiring special care and protection merely by virtue of being under the care of adults. Accordingly, they called for the extension of the catalogue of vulnerable persons whose applications for international protection are accepted to include minor foreign nationals. However, in 2025, the regulations in this regard were not changed. (...) In September 2025, SIP reported that Polish authorities were unlawfully refusing to accept asylum applications from people who had crossed the Polish–Belarusian border nationwide, even in locations hundreds of kilometres away from the border. Similarly, the Commissioner for Human Rights indicated that the Office had been receiving complaints about refusals to accept applications for international protection across the country, including in guarded centres for foreigners. According to the Commissioner, the basis for such actions is a position communicated to the Border Guard by the Ministry of the Interior and Administration. Under this position, a refusal to accept an application should occur in every case where the Border Guard has information that a foreign national crossed the border illegally, even if the application is submitted in a different Voivodship. The Commissioner stated that applying such an interpretation is contrary to the Constitution, as well as to the very provisions introducing the suspension of the right to asylum. Moreover, the Ministry does not have statutory authorisation to determine the territorial scope of the restriction.

(...) In August 2025, the Ombudsman announced that it is conducting an inquiry into an incident that allegedly occurred in the night of 10–11 July 2025, in which a soldier stationed at the Polish–Belarusian border reportedly fired rubber bullets at an Afghan national and then struck him multiple times with the butt of his rifle. Between August 2021 and February 2024, at least 55 persons died at the border. According to data from We are Monitoring, at least 11 people died on the Polish side of the border in 2025, while the number of people who have died on both sides of the border since the beginning of the crisis, as of 10 December, is at least 103. In January 2023, the body of a Yemeni doctor was found in the woods near the Polish–Belarusian border. The third-country nationals that were accompanying the ill Yemeni national informed the Border Guard about his location and critical condition. Their requests to send medical assistance were ignored and they were instead pushed back to Belarus. The Yemeni national was found only when another patrol was informed about his serious condition, but he was



already dead by then. In 2023, the death of an Ethiopian woman raised particular concerns as reportedly the Polish Police and Border Guard were informed by other third-country nationals about her bad medical condition, but – instead of transporting her to the hospital – they pushed her back to Belarus. The Human Rights Commissioner is investigating this case; however, the Border Guard and Police seem to be unwilling to cooperate. At the end of November 2024, the body of another person was found. It is likely that the man died from hypothermia. The man was reportedly from Eritrea. In April 2025, several bodies were pulled from the Bug River on the border. There are reports of migrants being pushed into the river by Belarussian authorities or being forced to cross it by swimming or using inflatable boats.

(...) In an increasing number of judgments issued between 2022 and 2025 courts condemned pushbacks at the Polish-Belarusian border, also in cases concerning pushbacks from Polish hospitals. (...) In May 2025, the Regional Court in Bielsk Podlaski (case no. VII Kp 200/24), the court ordered the prosecutor's office to conduct an investigation into the pushback of an Afghan man, who was reportedly taken to hospital after being beaten by uniformed men and then pushed back to Belarus shortly after his discharge.

Portugal: As of 31 December 2025, there are no published reports by NGOs about cases of actual refoulement at the border of persons wanting to apply for asylum.

(...) It is publicly known that since late October/beginning of November 2023, asylum applicants and other migrants refused entry into national territory at Lisbon airport were frequently detained in the transit zone of the airport in appalling conditions due to the lack of capacity of the corresponding detention facility. This practice resumed in 2025, with asylum applicants remaining detained in the transit area of Lisbon airport for a few days until they were placed in administrative detention centres.

Slovenia: In 2025, the police detected 28,200 irregular crossings of the Slovenian border. This is a decrease in comparison to the previous year when the police detected 46,217 irregular crossings. The most common countries of origin of people who were apprehended for irregular border crossing were: Afghanistan (4,046), Egypt (3,203), Bangladesh (3,148) Morocco (2,846), Türkiye (1,935), Pakistan (1,864), Syria (1,421) and Nepal (1,136) followed by other nationalities. In practice, Ukrainians are allowed entry and are not processed for irregular border crossing even if they do not fulfil the entry requirements (*e.g.*, a valid passport), which is evident from the statistics. According to the statistics, 22,519 individuals expressed their intention to apply for international protection in 2025 (a decrease from the 44,408 individuals who applied in 2024). Out of these, 8,368 were minors. Data on the number of unaccompanied minors expressing the intention to apply for international protection is not gathered. (...) In 2025, only 123 individuals were readmitted to another country. Out of 123 readmitted individuals, 13 were from Serbia, 7 were from Morocco, 7 were from Afghanistan, 4 were from Albania, 4 were from Bosnia and Hercegovina, 4 were from Kosovo, 3 were from Egypt, 3 were from Iran, 2 were from China and 2 were from Türkiye. Out of 123, 54 individuals were readmitted to Croatia. In 2025, Slovenia also accepted readmissions into its territory for 345 individuals under readmission agreements. This is an increase from the 287 individuals it readmitted in 2024. 254 were readmitted through the airport, 14 from Italy, 65 from Austria, 7 from Croatia and 5 from Hungary. Out of 345 individuals, 73 were from Morocco, Afghanistan, 40 from Algeria, 19 from Syria, 14 from Türkiye, 14 from China, 9 from Serbia, 8 from Palestine and 7 from Kosovo.

(...) The average time for registration of the application has increased steadily. Although the number of arrivals decreased in 2025, asylum seekers continued to wait for up to 20 days to lodge the application. The waiting period varied during the year, depending on the number of new arrivals, but people usually had to wait 3–20 days.

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





Czechia: Free legal assistance is currently provided by two main entities: (a) NGOs (OPU and SIMI), and (b) a private law firm. Access is not restricted based on the applicant's financial circumstances or the potential success of their application. However, asylum seekers with sufficient financial resources may also hire a lawyer of their choice for legal assistance. Legal assistance provided by the private law firm is funded from the State budget, based on the results of a public procurement process. The activities of the NGOs are partially funded by UNHCR and the MoI (distributing EU AMIF funds). However, these programs have faced significant budgetary cuts following the U.S. elections in 2024 and are expected to further reduce funding for free legal aid to asylum seekers following the Czech elections in 2025. At the time of writing this report, it is not sure whether NGOs will receive sufficient funding for provision of legal aid to asylum seekers from 2026 on. The (free) legal assistance provided by NGOs or the selected law firm mainly includes advice on procedural rights and obligations, consultations regarding issues related to the individual circumstances of the case or help with drafting an appeal against a negative decision. Lawyers from NGOs as well as selected attorneys may also, within the limits of their current funding, provide representation (e.g. at the interview, when accessing the file, or during the familiarisation with the case file before the decision is issued) to applicants they themselves consider suitable or necessary. This option is used primarily by NGO lawyers providing legal assistance. Staff of the contracted law firm, on the other hand, limit their activities to counselling and assistance with drafting remedies.

Hungary: Access to state legal aid is ineffective in practice, especially for people held in detention centre. State legal aid in asylum procedures must be first requested from the general legal aid system at government offices. Applicants have to fill out a form (in Hungarian) and send it by post. This is almost impossible in a detention centre, where there is no assistance available for this purpose. The procedure is not adapted to short deadlines in the asylum procedure. The application for state legal aid does not suspend the deadline for the appeal. The low financial compensation for legal assistance providers might be an obstacle for lawyers and other legal assistance providers to engage effectively in the provision of legal assistance to asylum seekers. According to the Justice Minister decree 11/2004. (III. 30.) on the remuneration of legal assistance, the hourly fee is set in the Act on the Annual budget (currently it is 7,000 HUF/hour (approx. 18 EUR)). The available hours are set individually in the decision granting legal aid. Legal aid providers are also entitled to the cost reimbursement, as a flat rate amount equal to 25% of the total hourly fees. Lack of foreign language skills and remote locations of detention or reception centres is also an obstacle. As a result, while legal aid exists in law, it is often inaccessible in practice, and asylum seekers largely rely on NGO-provided legal assistance instead. The HHC is the only NGO that provides free legal assistance and representation in asylum procedures, but not through state funded legal aid, but based on the organisation's own fundraising. The resources are limited, therefore the provision of legal aid has to be very selective.

Sweden: Legal aid was granted in 3,228 cases in 2025. All appointments of legal counsellors are registered in the Swedish Migration Agency's system under the removal or expulsion case, regardless of the type of the main case. To determine the case type of the main matter, the Migration Agency would need to review each individual case separately and therefore there is no reliable data on this for Dublin cases. Asylum seekers can also approach NGOs for advice. It should be noted that some NGOs have cut back their services to asylum seekers. The Swedish Refugee Law Center offers legal support through e-mail and telephone. The Swedish Red Cross offers legal support through a hotline as well as by appointment, and its lawyers can act as legal counsel. The Red Cross prioritises cases concerning family reunification, persecution due to risk of torture and gender-based persecution. In addition to its plans to increase financial incentives to encourage voluntary returns, the Swedish government is also considering limiting the right to legal aid for people seeking asylum and removing the possibility for them to receive permanent residence permits. According to the Swedish Refugee Law Center this will lead to "multiple erroneous decisions and people being deported to countries where they risk persecution or other serious violations of their human rights". "It also means a significant deterioration in the possibility of a fair hearing, not least for people with special needs in the asylum process, such





as children, people with disabilities or people with trauma,” it added. Regarding the proposal to eliminate the possibility of receiving permanent residence permits, the organisation said: “Such a system will create great psychological stress, especially for children, families and others who need security to be able to establish themselves in society”. In 2026, the Legislative Council should issue an opinion on the proposal and preparatory works should start.

(...) *Provision of information on reception*

The Swedish Migration Agency has a responsibility to arrange suitable activities for applicants during the examination of their asylum claim. What was previously stipulated in the Government’s appropriation directions (“regleringsbrev”) to the Swedish Migration Agency is now, as a result of legislative amendments, codified in law: the Agency is required to organise mandatory social orientation classes. Starting from 1 March 2025, it is mandatory by law to participate in such classes. However, no sanctions are yet being imposed on those who do not join the sessions. A provision making it possible to decide on sanction in this situation is proposed in a report published in November 2025, on the implementation of the EU-pact on migration- and asylum. The induction is now more comprehensive and delivered to all applicants over the age of 15 through two half-day sessions, while the material is adapted and in written format for accompanied children and studied with the case officer for unaccompanied children. The sessions are organised in different languages in first reception centres or through videoconference for persons who have their own accommodation. The Swedish Migration Agency offers childcare while parents follow the course.

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)

Hungary: In 2025, the HHC reported occasional poor Hungarian and Spanish language skills of interpreters. For example, in a case of an asylum seeker from Cuba, the NDGAP found him not credible, but the contradictions turned out to be due to the mistranslation of a Spanish translator, who did not speak Cuban Spanish. The HHC attorney submitted corrected translation at the appeal and the court considered the applicant credible. The requests to change the interpreter was sometimes accepted, sometimes not. Some interpreters ask questions themselves, instead of just translating the questions. Inappropriate and/or insulting comments from certain interpreter were also reported (e.g. “you are lying” or “your God should be cursed”).

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

Germany: In 2025, Germany established “Dublin Centres” in the two towns of Hamburg and Eisenhüttenstadt to speed up the transfer of asylum seekers to the identified responsible EU under the Dublin Regulation, aiming for faster processing and preventing repeated applications, with the Eisenhüttenstadt centre focusing on transfers to Poland and Hamburg on preparing returns to other responsible EU states. These centres provide basic necessities but involve strict residency requirements and limited freedoms for residents, causing mental strain for some individuals in these centres, according to legal experts and human rights groups. Germany opened dedicated Dublin centres in to manage and accelerate transfers of asylum seekers under the Dublin Regulation. However, according to InfoMigrants, since their inauguration, very few migrants have actually been returned to the EU countries responsible for their asylum claims, highlighting ongoing challenges in implementing Dublin transfers despite the efforts to streamline the process.

(...) Germany’s Federal Cabinet adopted a draft GEAS-Adaptation Act in early September 2025 to transpose the EU’s Common European Asylum System into national law, aiming to align German asylum and migration legislation with the new EU framework that becomes applicable in mid-2026. Under this





draft, the government envisages the establishment of “secondary migration centres”, facilities intended for asylum seekers subject to the Dublin regulation and those granted protection in other Member States, from which they could be transferred or returned to the responsible state, potentially with restrictions on freedom of movement as part of efforts to manage secondary movements within the EU. However, final agreement between the governing parties was not reached before the end of 2025, and the legislation is now expected to be passed in 2026.

(...) In 2025, no individual was removed from church asylum in Germany, according to a survey across the federal states. The Federal Office for Migration and Refugees (BAMF) reported that between January and November 2025, 2,139 people were staying in church asylum. While media reports earlier in the year, mentioned an Afghan individual being transferred to Sweden under Dublin rules after seeking church asylum in Berlin, the individual was reportedly arrested outside church premises, not within the sanctuary itself. At the same time, some churches highlighted a decline in new church asylum cases but raised concerns over increasing political pressure and restrictive practices. These reports indicate ongoing forced removals from churches and deportations of vulnerable individuals, including well-integrated persons, reflecting growing tensions between authorities and church-based measures.

(...) In 2025, the UN Committee on Economic, Social and Cultural Rights (CESCR) issued an interim measure requiring German authorities to provide basic housing, healthcare, and minimum subsistence support to individuals who had been denied all benefits under the expanded exclusion rule in §1(4) AsylbLG following an inadmissibility decision due to Dublin. The committee acted after national remedies were exhausted, highlighting that the German provision risked violating social human rights obligations under the International Covenant on Economic, Social and Cultural Rights (ICESCR). The decision marks the first individual complaint from Germany to the UN Social Committee on this issue and underscores serious concerns about the practical and legal effects of the AsylbLG exclusion on access to essential support.

(...) *Suspension of transfers and individualised guarantees for specific Member States*

Transfers to Bulgaria: In 2025, several administrative courts in Germany addressed Dublin transfers to Bulgaria with varying outcomes. The Administrative Court Würzburg, for example prevented with its decision of 13 January 2025, an Armenian mother and her disabled daughter from being removed to Bulgaria. The applicants had challenged the BAMF’s order to transfer them to Bulgaria (Administrative Court Würzburg, 13 January 2025 – W 6 K 24.50451, available [here](#)). The court found that Bulgaria’s asylum and reception system contained systemic deficiencies for highly vulnerable individuals, including inadequate medical care, poor living conditions, and lack of protection mechanisms. These deficiencies created a real risk of inhuman or degrading treatment under Art. 3 ECHR and Art. 4 EU Charter, justifying Germany’s assumption of responsibility for examining their asylum claims. Similarly, the Administrative Court Düsseldorf prevented the transfer of an Armenian man in a wheelchair to Bulgaria due to serious health conditions requiring treatment unavailable there (Administrative Court Düsseldorf, 21.07.2025 – 29 K 1083/25, available [here](#)). Both decisions emphasized that Dublin transfers can be blocked when systemic shortcomings in the receiving country expose highly vulnerable persons to risks of extreme material deprivation or threats to human dignity, even if general economic hardship alone would not suffice. On the other hand, in three publicly available decisions, administrative courts held that transfers could proceed when the risk of inhuman or degrading treatment was not sufficiently high. The Administrative Court Saarland in a case pertaining to a family with minor children concluded that the living conditions and childcare options did not amount to a risk of inhuman or degrading treatment and the family could be transferred to Bulgaria (Administrative Court Saarland, 07 November 2025, 3 L 1857/25, available [here](#)). Similarly, the Administrative Court Cologne held in May 2025 that a family seeking international protection in Germany could not prevent their transfer, with the court noting that while Bulgaria’s asylum system was imperfect, it did not create a real risk of violations of fundamental rights (Administrative Court Cologne, 15 May 2025, 23 L 1145/25.A). Finally, the Higher Administrative Court Baden-Württemberg upheld a removal order, as the court found no systemic deficiencies in Bulgaria sufficient to trigger protection (Higher Administrative Court Baden-Württemberg, 12 March 2025, A 4 S 256/24, available [here](#)). The Bavarian Refugee Council, a local NGO, reported about a dramatic case relating to a transfer to Bulgaria unfolding in spring of 2025. A seriously ill Syrian woman





in her 60s with cancer was deported from Germany to Bulgaria on March 26, 2025, despite her medical condition and family ties to Germany, where her two sons live and one works as a doctor who had pledged to cover all her medical costs (Bayerischer Flüchtlingsrat, "Krebskranke Frau aus Krankenhaus nach Bulgarien abgeschoben," April 11, 2025, available [here](#) and Bayerischer Flüchtlingsrat, "Update Abschiebung nach Bulgarien: Fataler Fehler der Ausländerbehörde," April 2025, available [here](#)). After a court in Würzburg ruled on April 7 that she should be allowed to return, her repatriation became impossible because the Central Foreigners Authority had retained her Syrian passport during the deportation—a critical error that prevents the German embassy in Sofia from issuing the necessary visa for her return. Weeks later, she remained stranded in Bulgaria in deteriorating health, urgently needing tumour surgery and authorities have failed to respond to repeated requests to return the passport or provide assistance.

Transfers to Greece: In 2025, German administrative courts issued 46 [publicly available](#) decisions concerning Dublin transfers to Greece. The vast majority of these cases resulted in successful challenges by the person concerned. In 40 out of the 46 cases, the appeal to the administrative courts was successful. Most successful claims involved applicants with recognized protection status, particularly vulnerable groups such as women, minors, or individuals with serious health conditions or psychological disorders. Courts repeatedly highlighted risks of inhuman or degrading treatment under Article 4 of the EU Charter, often linked to inadequate reception conditions, homelessness, or lack of access to the labour market in Greece. Only a small number of cases—around five to six—were unsuccessful, typically involving healthy, adult, male applicants for whom no concrete risk of ill-treatment could be established. These 2025 decisions demonstrate a clear judicial tendency to grant suspensive effect or block transfers when systemic or individualized protection concerns in Greece are substantiated, especially for vulnerable populations.

Transfers to Italy: In 2025, German administrative courts continued to [issue](#) mixed rulings on Dublin transfers to Italy. Of the eight publicly available cases on this issue, four were successful in blocking transfers, often involving applicants willing to return voluntarily or cases invoking procedural irregularities. The unsuccessful cases generally concerned non-vulnerable applicants where no concrete risk of inhuman or degrading treatment could be established. Overall, the decisions illustrate the ongoing tension between the BAMF's systematic issuance of Dublin transfer requests to Italy and courts' scrutiny of conditions on the ground, including reception standards and potential systemic deficiencies. In August 2025, the Federal Administrative Court suspended six revision cases regarding Dublin transfers to Italy for families with small children pending the outcome of the CJEU preliminary ruling in C-458/24 ("Daraa"). These cases concern applicants whose protection claims were rejected by the BAMF as inadmissible due to Italy's supposed responsibility, raising the question of the legal effect of a member state's failure to accept Dublin transfers (BVerwG, Pressemitteilung Nr. 59/2025, 28.08.2025).

Transfers to Poland: In its 15 October 2025 decision the Administrative Court Hannover, (15 A 5036/24), blocked a planned Dublin transfer to Poland, emphasizing systemic deficiencies in the Polish asylum system. It found that the applicant would likely be denied meaningful access to the asylum procedure, in part due to Poland's strict nine-month rule for Dublin returnees, widespread pushbacks at the Belarus border, and the denial of registration for asylum seekers arriving irregularly. The court highlighted documented reports of violence, inadequate reception conditions, and restricted access to legal assistance, concluding that these structural shortcomings create a real risk of inhuman or degrading treatment and render the transfer incompatible with non-refoulement obligations under both the ECHR and EU law.

Hungary: *Situation of Dublin returnees*

In April 2025 a Syrian woman was returned from Austria, and she did not immediately apply for asylum, as she believed that her transfer might be still reviewed and annulled by the sending Member State. The NDGAP considered this uncertainty as an indication that she did not apply for international protection. Since she no longer had a valid residence permit in Hungary, the NDGAP ordered her expulsion and detention. The treatment reserved to Dublin returnees appears sometimes only dependent on the discretionary decision of the NDGAP. According to the HHC, individual assurances





should therefore be obtained in each case. A transfer acceptance letter, without concrete individual assurances that a person returned under Dublin will actually be accepted in the asylum procedure in Hungary according to the Asylum Procedures Directive and be provided reception conditions according to the Reception Conditions Directive is not enough. Usually there is no one from the police or NDGAP awaiting those who are being returned under Dublin and to inform them about the next steps. Dublin returnees have to find the client service of the NDGAP to submit their application for international protection on their own.

Poland: In March 2025, the Prime Minister of Poland announced that Poland would not accept migrants under the Dublin III Regulation due to the migratory pressure faced by the country. However, in 2025 there is no information indicating that Poland has formally ceased to enforce the Regulation. In 2025, media outlets began reporting on the alleged transfers of migrants outside formal procedures into Poland by German authorities. Following these reports, “citizen patrols” began to appear along the German border, aiming to guard the border against migrants. The situation on the Polish–German border raised concerns from the Commissioner for Human Rights, who questioned the Ministry of the Interior and Administration, among other things, about the activities of these “patrols” as well as the scale of the transfer of migrants from Germany to Poland. According to the Ministry’s response, third-country nationals from Germany are transferred exclusively under the Dublin III Regulation or within the framework of readmission procedures. It was emphasised that each case is assessed individually. The Ministry further stated that, since the introduction of border controls, German border authorities have refused entry to persons who do not meet the entry requirements. The majority of these persons are reportedly Ukrainian nationals. With regard to the activities of the “patrols”, the Ministry noted their presence in the border regions and indicated that these individuals have no authority to verify identities, issue orders, or use coercive measures. On 7 July 2025, border controls were reinstated by Poland on the borders with Germany and Lithuania. They are to remain in force at least until April 2026. According to information from 1 October 2025, since the beginning of 2025 the Border Guard had apprehended 2,100 people at the Polish–German border for illegal border crossing, including 550 migrants who had previously crossed the Polish–Belarusian border. In 2025, the Rule of Law Institute reported cases in which returns to Poland under the Dublin III Regulation were annulled, inter alia, by courts in Germany and the Netherlands. The court in The Hague reportedly stated that “there are serious grounds to fear that his (the applicant’s) asylum procedure contains systemic flaws resulting in inhuman or degrading treatment within the meaning of Article 4 of the Charter.” Accordingly, the court ordered the Dutch authorities to bring the applicant back from Poland as the transfer was annulled post-factum and process his asylum application.

The Netherlands: *Suspension of Dublin transfers*

Transfers to Poland: In 2025, as a response to new legislation in Poland suspending the right to asylum for migrants entering Poland at the Polish–Belorussian border, the question whether transfers to Poland could continue was once again a matter of discussion in the Netherlands. The Regional Court of Amsterdam ruled on 6 May 2025 that the Minister had to further investigate the situation in Poland and what would happen to Dublin returnees (Regional Court of Amsterdam, ECLI:NL:RBDHA:2025:18967, 6 May 2025). However, following this and other positive judgments, the Council of State ruled on 14 August 2025 that, even though the law itself was problematic, because it did not concern Dublin returnees transfers could once again continue.

(...) **Transfers to Cyprus:** On 26 March 2025, the Council of State ruled that even though the situation in Cyprus was worrying, the situation did improve over recent years and there was no indifference with regard to the situation of asylum seekers in Cyprus. As such, the principle of mutual trust was upheld and transfers to Cyprus are possible (Council of State, ECLI:NL:RVS:2025:1109, 26 March 2025).

(...) **Transfers to Belgium:** Due to a worsening of the accommodation situation in Belgium, the Council of State ruled on 23 July 2025 that single men were not to be transferred to Belgium, as the number of accommodation places were not increased as previously promised by the Belgian authorities. In addition, it was considered that Belgian authorities seemed to be indifferent as to the situation of these





asylum seekers, reaching the threshold of the *Jawo* judgment (Council of State, 23 July 2025, ECLI:NL:RVS:2025:3305). As a result, there have been no transfers to Belgium for single men since the judgment was issued in July 2025.

Sweden: In 2025, Sweden received 2,475 Dublin incoming requests and issued 1,230 outgoing requests to other Dublin States. A total of 470 Dublin transfers were carried out to another Dublin country in 2024. The average processing time for all Dublin cases in 2025, i.e., until a transfer decision was issued, was 41 days, down from 42 days in 2024 and 50 days in 2023.

(...) *Suspension of transfers*

The Swedish Migration Agency continues to make the request and take transfer decision if Hungary is determined to be the responsible Member State. In 2025, 83 requests were made to Hungary. However, the transfer decisions may not be enforced if the current conditions in Hungary remain. All transfer decisions to Hungary in accordance with the Dublin regulation are therefore suspended until further notice. This means that after six months have passed, their asylum process continues in Sweden, and they can apply for asylum here. (...) In 2025, Sweden submitted 3 requests for Dublin transfers to Greece. Sweden does not transfer applicants to Greece unless individual guarantees have been obtained by Greek authorities. The Swedish Migration Agency barely receives individual guarantees from the Greek authorities, which in practice means that Sweden does not transfer applicants to Greece under the Dublin Regulation. Instead, Sweden assumes responsibility for examining the application after the six months have passed.

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

Czechia: The 'safe third country' concept is a ground for inadmissibility of the asylum application. This concept, however, is not being applied in practice as of 2025, and there is also no list of safe third countries in the Czech Republic.

Germany: In December 2025, the Bundestag adopted a new law fundamentally reshaping the procedure for designating "safe countries of origin" (SCO) in Germany. Under the new framework, the Federal Government may now classify countries as safe by statutory ordinance (Rechtsverordnung), whereas previously such designations required a formal law adopted by parliament with the consent of the Bundesrat. The law also introduces a two-year reporting obligation for the Federal Government to the Bundestag and requires submission of the classification to the Federal Administrative Court in the event of judicial doubts about a country's status as "safe." For nationals of countries newly designated as safe who were already residing in Germany under tolerated or permitted status before the classification, exceptions to work bans are provided. These changes are set to take effect on 1 February 2026. Civil society organisations such as Der Paritätische or PRO Asyl have repeatedly criticised the concept of safe countries of origin in principle, highlighting that it imposes a reversal of the burden of proof in asylum proceedings and severe legal restrictions, including residence obligations and work prohibitions. The association, alongside several academics also warn that the new regulation circumvents democratic debate over the designation of safe countries and creates the risk of inconsistent treatment of asylum claims due to the coexistence of multiple national and EU-wide safe country lists. This shift applies, however, only to protection grounds derived from EU asylum law; the constitutional regime under Article 16a (3) of the Basic Law (GG), which governs safe countries of origin in the constitutional sense, continues to require parliamentary legislation. However, the practical relevance of the constitutional regime is expected to be limited, as the conditions for reviewing asylum claims under Article 16a (3) of the Basic Law apply in only a few cases. The move is grounded in EU law, notably the Asylum Procedures Directive, which allows Member States to designate safe countries subject to defined substantive and procedural safeguards. In a key judgment of 1 August 2025, the Court of Justice of the





EU clarified that Member States must disclose the sources underlying their safety assessments and that safety must extend to the entire population and the whole territory of the country concerned - a requirement that will be modified from June 2026 onwards under the reformed Common European Asylum System (GEAS). In the justification of the new legislation, the government argues that allowing the federal cabinet to designate SCO by executive decree accelerates asylum procedures and signals that applications from these countries are unlikely to succeed. According to the government, faster processing by the Federal Office for Migration and Refugees and quicker implementation of negative decisions will make Germany less attractive for asylum claims submitted for non-protection-related motives, reflecting past trends of declining applications from designated states. The compatibility with German constitutional law is disputed and opinions on it are divided.

Ireland: In October 2025, the Irish Court of Appeal issued further clarification with respect to the safe country of origin concept and the manner in which it interacts with the concept of state protection. The Court, giving judgment in the case of Z.M and N.G v. The International Protection Appeals Tribunal [2025] IECA 208, determined that the Tribunal had not erred in law in relying on the safe country designation of Georgia and Albania in concluding that effective State protection was available to the applicants concerned. The Court held that having regard for the designation of a particular State as a safe country was merely an additional factual matter which could support the Tribunal's conclusion regarding the availability of State Protection while not, in itself, determining the outcome. The Tribunal was thus entitled to consider the fact that Georgia and Albania were on the safe country list as part of a broader factual assessment of conditions and protections in those countries, provided it was not the exclusive or dispositive reason for refusal.

(...) *Safe third country concept*

Following the judgment, on 30th April 2024, the Minister for Justice obtained Cabinet approval to progress legislative changes to allow the resumption of returns to the UK. In March 2025, International Protection Act 2015 (Safe Third Country) Order 2025 was signed into law. However, it was not known at the time of updating (January 2026) whether any returns to the United Kingdom have occurred in practice.

Malta: 2025 saw an increase in the rate of returns of international protection beneficiaries to the MS originally granting protection. Throughout the year, immigration authorities together with the Detention Services, organised roadblocks, house searches and bus searches arresting anyone without a permit to stay in Malta. The vast majority of arrested and removed persons held documentation from other MS, generally Italy or Greece. Arrested people were detained for some days and quickly removed.

(...) Throughout 2024 and 2025, the vast majority of people coming from countries designated as safe were detained upon arrival, channelled through an accelerated procedure that rejected them, denied appeal, and served with a removal order. Their cumulative detention experience could reach and at times exceed two years.

Portugal: According to CPR's observation, as of December 2025 the common information leaflet set out in Article 4(3) of the Dublin III Regulation is distributed to asylum applicants by AIMA, but it is not clear when. According to AIMA, the leaflet is distributed at the appropriate stage of the procedure. The information contained in these leaflets does not include all the information included on the Annex X (partially includes Part A but not Part B) of the corresponding Implementing Regulation.

Sweden: The inquiry published on 24 November 2025 concerning Sweden's implementation of the Pact proposes that Sweden, in accordance with Article 64(1) of the Asylum Procedures Regulation, should be entitled at national level to designate safe third countries and safe countries of origin in addition to those designated at Union level. Consequently, the existing authorisation to establish a national list of safe countries of origin should be retained and extended to also cover safe third countries. It is further proposed that an explanatory reference to the provisions on the designation of such countries contained in the Asylum Procedures Regulation be incorporated into the Aliens Act. The final Government Bill is





expected to be presented on 26 March 2026. Practice shows that the safe third country concept is regularly applied by the Swedish Migration Agency.

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)

Belgium: At the end of 2025, the Fedasil reception network consisted of 34,878 reception places in total. The network comprises collective and individual reception structures. It consists of a 'first phase' where applicants for international protection are accommodated for the first days/weeks of their procedure. After this short period, applicants are transferred to a more definitive place in the second phase of the reception network that corresponds to their needs. At the end of 2025, the first phase had 2,618 places in 12 different reception structures and the second phase 32,260 places. Collective reception (29,916 places at the end of 2025, including first phase places) consists of reception centres managed by Fedasil, the Belgian Red Cross or other entities. Individual reception (4,562 places at the end of 2025) comprises housing managed by the Public Social Welfare Centre ('local reception initiatives' or LRI; 3,868 places at the end of 2025) or NGOs. The current reception model, the implementation of which started in 2016, generally assigns people to collective reception centres (87% of the places). Only asylum applicants with specific vulnerabilities or reception needs are directly transferred to specialised NGO reception structures or individual structures.

Since September 2021 and up to the time of writing, the reception network is under significant pressure and is unable to accommodate all applicants for international protection. Families and children get priority, while single men are systematically refused access to a reception place. At the start of 2026, 1,759 people were on the waiting list to get access to reception. (...) Since May 2022 and until the time of writing this report, single male applicants for international protection are systematically deprived of their right to reception. After registering their application for international protection, single men with a need for accommodation are not given an individually motivated decision that refuses them a reception place. They are merely informed about the shortage of places and instructed to register themselves on a waiting list of Fedasil.

Czechia: In the Czech Republic, there are good practices facilitating access to the labour market for asylum seekers and other third-country nationals, in particular through targeted integration and employment-support projects implemented by specialised NGOs with EU funding. A recent notable example is the project 'Integration of Foreigners and Refugees into the Czech Labour Market' (*Integrace cizinců a uprchlíků na český trh práce*), launched by the Czech Labour Office and implemented by OPU, between 1 September 2023 and 31 August 2025. The project was supported under the OPZ+ (Operational Programme Employment Plus), which is financed from the European Social Fund Plus (ESF+). This project was targeted at all migrants with legal residence in the Czech Republic, including EU citizens, asylum applicants, and beneficiaries of international and temporary protection. The main objective of the project was to reduce inequalities in access to the labour market for at least 200 participants (including asylum seekers). The support provided included individual employment counselling and career guidance, mentoring and coaching, assistance with job search and placement, Czech language courses, support in finding suitable requalification courses, and assistance with the recognition (nostrification) of foreign education and qualifications. The project was implemented in several regions, specifically in Prague, Plzeň, Hradec Králové, Ostrava, and Brno, which enhanced its accessibility and regional coverage. The project ended in 2025.

Germany: The receipt of cash (and its amount) is a heavily debated issue in German public discourse, but in 2023-2025, the debate became especially heated. Some parties find it a pull factor and want to





further cut the benefits. To reduce the reputed 'pull factors', the Federal States have decided to introduce the so-called *Bezahlkarte* ('payment card') for asylum applicants. On 16 May 2024, the *Bezahlkarte* officially became a way of providing social benefits under the Asylum Seekers' Benefits Act. Fourteen Federal States decided to coordinate the introduction of the payment card, while Bavaria and Mecklenburg-Western-Pomerania decided to organise their own procedure. In Bavaria, the payment card has been introduced and was fully implemented by June 2024; Mecklenburg-Western-Pomerania started to roll out the payment card in January 2025. Because the EU-wide tender procedure (*Ausschreibungsverfahren*) for the issuance of the payment card was delayed, some districts in Rhineland-Palatinate, Brandenburg, Saxony and Thuringia started to implement their own systems throughout 2024, leading to a variety of different practices. As of January 2025, the payment card had been introduced by almost all Federal States, with only Berlin delaying the rollout to 2026.

(...) While the monthly allowance for asylum applicants had been adjusted upwards at the beginning of 2024, the benefits were reduced again as of 2025.

(...) In 2025, the government introduced the Benefits Law Adjustment Act, shifting newly arriving Ukrainian refugees (after 1 April 2025) into the Asylum Seekers' Benefits system and introducing stronger obligations to seek work or attend integration courses.

(...) Historically, the Asylum Seekers' Benefits Act did not provide for a complete withdrawal of benefits. However, following the 2019 amendments, foreign nationals who have already been granted international protection in another EU Member State are excluded from all benefits under the Asylum Seekers' Benefits Act. In 2024, the government extended the exception to so-called Dublin cases, meaning individuals for whom another EU Member State is responsible under the Dublin III Regulation. Persons affected by this provision will only receive limited benefits for a maximum of two weeks and only once every two years (*Überbrückungsleistungen*). Further benefits may only be provided when necessary 'in exceptional circumstances' to avoid particular hardship. With Berlin and Rhineland Palatinate, at least two Federal States have limited the scope of application of this rule to make sure the exclusion does not apply to minors and does not undermine the state obligation to provide a minimal subsistence level of benefits. This exclusion applies to persons whose asylum application in Germany has been finally rejected and whose obligation to leave the territory is enforceable (*vollziehbar ausreisepflichtig*). This can include persons whose appeal against a return decision is pending, if their request for suspensive effect has been rejected. The provision does not, however, cover situations in which a removal is impossible in fact or in law, e.g., if the Member State that has granted protection is not accepting the returnee or if necessary identity documents are missing. In such cases, the person affected has to be issued a *Duldung* and remains entitled to benefits under the Asylum Seekers' Benefits Act. In 2025, social courts in Germany issued at least 60 interim decisions declaring the benefit exclusion for Dublin cases under Section 1(4)(2) AsylbLG unlawful, forming a consistent and established line of case law in urgent proceedings (Gemeinnützige Gesellschaft zur Unterstützung Asylsuchender (GGUA), 'Mindestens 60 Sozialgerichtsbeschlüsse halten Leistungsausschluss in Dublin-Fällen für unzulässig' (06 August 2025), available [here](#)). Moreover, in October 2025, the UN Committee on Economic, Social and Cultural Rights issued interim measures requesting that Germany restore subsistence benefits to an applicant whose AsylbLG benefits had been fully withdrawn, highlighting concerns about access to a minimum standard of living (Informationsverbund Asyl & Migration, 'UN-Sozialausschuss fordert existenzsichernde Unterstützung für einen Geflüchteten nach Leistungsausschluss' (31 October 2025), available [here](#)).

(...) The GEAS Adaptation Act (*GEAS-Anpassungsgesetz*) will significantly restrict the freedom of movement for refugees and asylum seekers. It allows authorities to prohibit individuals from leaving reception centres and newly established secondary migration centres for extended periods, based on a broad assumption of flight risk that applicants must disprove. The act introduces new detention types, including asylum and return detention at borders, raising concerns about disproportionate interference with fundamental rights. Additionally, the law ties these restrictions to severe cuts in social benefits to pressure individuals into "voluntary" departure. These measures have sparked extensive criticism from human rights organisations for their harshness and potential violations of constitutional and EU law provisions. As the Act is still in the process of parliamentary discussion and is set to take effect in 2026,





the following chapters continue to lay out the reception conditions under the current regulations in 2025.

(...) At the beginning of November 2025, out of 58 branch offices listed on the BAMF website 17 were integrated in arrival centres in 12 different Federal States, and 9 were part of AnKER centres in three Federal States.

(...) In early 2025, Germany established its first Dublin centres for the expedited return of asylum applicants to other Dublin Member States. The initial centre opened in Hamburg in February 2025 as part of a pilot project to accelerate Dublin procedures, followed by a second centre in Eisenhüttenstadt, Brandenburg. These centres are designed to accommodate individuals for whom another EU state is responsible under the Dublin Regulation, holding them temporarily and providing only limited benefits during this period. As of mid-2025, there are two operational Dublin centres, with capacities of several hundred places, although only 20 asylum applicants were housed in Eisenhüttenstadt in July 2025. The establishment of these centres reflects efforts to speed up the return process, though actual transfers remain limited due to procedural and practical obstacles across the EU.

(...) With a significant reduction in arrivals in 2025, the occupancy rates in initial reception centres dropped as well, although some regional differences persist. The decline in occupancy was particularly stark in Thuringia, where only 12.46% of places were filled in May 2025, compared to 81% in May 2024. North Rhine–Westphalia also experienced a significant drop: occupancy fell from 65% in May 2024 to the current 46.2%. In Berlin, on the other hand, where facilities were nearly full at 97% in May 2024, they remained at just under 90% in May 2025. According to the administration of Berlin, the city will increase its net capacity of accommodation by 2,000 in 2025, and another 4,400 in 2026.

(...) Until 30 September 2025, authorities recorded 115 attacks on asylum accommodations and 1,069 attacks on refugees/asylum applicants outside of their accommodations. This number is still preliminary at the time of writing this report (January 2026), and is expected to rise, as numerous records from the third quarter are likely to be submitted later.

(...) *Access to the labour market*

Persons from countries of origin considered as safe (e.g., some Western Balkan countries) and those whose asylum applications have been rejected as manifestly unfounded or inadmissible (without suspensive effect of the appeal) are generally completely excluded from the labour market. In July 2025, the government introduced a draft law on designating safe countries of origin by statutory order and abolishing mandatory legal representation in detention pending deportation, which would allow the government to unilaterally expand the list of “safe countries of origin”. Civil society organisations criticize this law, as they expect the list of countries determined “safe” to grow considerably, in turn increasing the situations of asylum seekers being blocked from integration and residence prospects due to the employment ban. Further, the 2025 proposed GEAS Adaptation Act is likely to sharply tighten labour market access by banning work after a negative BAMF decision even during appeals and by enabling additional work bans for alleged cooperation failures. Human rights organisations warn that these measures would deprive thousands of legally resident asylum seekers of their right to work.

(...) In November 2025, 424,752 persons in the context of refugee migration were registered as unemployed, which represents a share of 14.72% of all unemployed people in Germany. Out of these, 212,000 were people originating from Ukraine. Another statistic of the Employment Agency only differentiates between those that have, inter alia, German citizenship (Deutsche) and those that do not (Ausländer). Accordingly, 14.1% of all people without German citizenship were unemployed in November 2025. This is a slight decrease from 14.6% in November 2025. However, it has to be kept in mind that the data encompasses also people that are born and raised in Germany but always kept the citizenship of their parents or people that migrated for other reasons to Germany besides asylum.

(...) *Access to education*

A study published in 2025 (Johanna Funck and Markus Ciesielski, ‘Bildungsrechte und Schulbildung für geflüchtete Kinder und Jugendliche in Erstaufnahmeeinrichtungen – Verfügbarkeit und Zugänglichkeit in den Bundesländern. Forschungsbericht zur BiSKE-Studie’ (AbIM-Arbeitspapier, Universität Bremen, 2025), available [here](#)) found that many refugee children in German reception centres have no or only limited access to formal schooling, with 19% of centres offering no education at all and the rest providing





either restricted school access or highly variable, often low-quality alternative programmes. States with inclusive compulsory-schooling laws provide significantly better educational access and quality. Overall, long stays in reception centres create substantial risks for the educational development of refugee children, and more inclusive schooling regulations are a key mechanism to improve access and uphold the right to education.

(...) Integration courses

At the end of November 2024, the German cabinet passed a new Integration Course Ordinance (IntV), introducing several cuts that continue to shape the system in 2025. The option to repeat courses has been largely removed, travel cost reimbursements are granted beyond a range of 5 km instead of 3 and only to a limited group of people, and special courses for youth, parents, and women were phased out in 2025. These changes have been criticised by several organisations working in the field of integration courses who warn of longer waiting times, exclusion of slower learners and women with childcare responsibilities, and a significant deterioration in integration prospects. While the passing of the federal budget had to be postponed following the premature ending of the government coalition in November 2024, during the provisional budget management the federal integration courses remained in place and continue on the basis of the new Integration Course Ordinance. In November 2025, the Bundestag's Budget Committee raised the originally proposed budget for integration courses by approving an additional expenditure of 267 million euros for 2025 and an extra 110 million euros for 2026. This means that a total of around 1.06 billion euros will be available for integration courses in 2026.

(...) Health care

In 2025, only 3.1% of the persons potentially in need of psychological treatment due to traumatic experiences such as torture, war, and displacement receive the appropriate care. In psychological care facilities whose personnel is not specifically trained for assisting refugees and victims of torture, persons in need may face language or cultural barriers which may lead to misunderstandings with non-trained interpreters or psychologists. The BAFF has persistently criticised the German government for not meeting their obligations under international law concerning the treatment of asylum applicants and victims of torture. They further criticise that the Psychological Support Centres for Refugees and Victims of Torture are all based on private initiatives and have no stability in funding. They run on annual funding from the Federal states (36% in 2022), from the Federal government (14.2%) and only 6.3% are financed through the regular social insurance system. In 2023, the Federal government announced to cut the funding from EUR 17.5 million to EUR 7 million, constituting a cut of nearly 60%, which would heavily affect the already insufficient structures, according to the BAFF. After political negotiations, the cuts were reduced to EUR 4 million, leading to a funding sum of EUR 13.5 million for 2024. In 2025, the government announced its intention of another budget cut of about 50 %. The mental health care of refugees has become a widely discussed topic in public debates, as recent attacks in Aschaffenburg and Munich led to the framing of refugees with psychosocial treatment need as a "security threat".

(...) In 2025, civil society organisations launched the project "Rainbow Shelter – Arriving without Violence", a website dedicated to provide free counselling, training, and information on violence prevention and the rights of LGBTQI* refugees. It targets staff in initial reception centres, the police, counselling organisations, and other institutions working closely with LGBTQI* refugees, while also offering multilingual information (in 12 languages) directly to affected individuals.¹ The project is funded by the Federal Ministry for Education, Family Affairs, Senior Citizens, Women and Youth (BMBFSFJ).

Spain: A report published by the State Secretary for Migration at the Ministry of Inclusion, Social Security and Migration underlined that almost 50,000 people have been accommodated within the asylum reception system from January to June 2025, almost 70% of the total number of asylum applicants accommodated throughout 2024 (65,321). In addition, the report revealed that over the last ten years, the system has grown from 1,920 places in 2015 to 34,062 in June 2025, with 32,142 new places available.

¹ Ibid.





(...) Cases of asylum seekers living on the streets because of the saturation of the reception system and the delays in the formalisation of the asylum applications continued to be reported in 2025. In May, more than 400 persons were sleeping at the Madrid Barajas Airport, many of them being asylum applicants. In June, 22 out of 61 persons living in the streets in Zaragoza were applicants of international protection. This number increased during the following months until September, when the Government-Delegate started to refer 60 asylum applicants to asylum facilities. Despite that, the situation continued in the following months: in November, the municipality reported that 29 persons in need of international protection were living on the streets of the city. In July, tens of Malians asylum seekers were living on the streets in Donostia (País Vasco) due to administrative obstacles to access asylum. During the same month, a family with two children and one baby with Down syndrome experienced the same situation due to the denial of their asylum application. Since July, a group of almost 20 refugees from Mali, Burkina Faso and Ghana were living on the streets in Segovia while waiting to receive an appointment to apply for asylum. In January 2026, part of a group of Malians living on the streets of Vitoria (País Vasco) were transferred to reception facilities.

(...) Since the 2015 increase of available places for refugees' reception, the Spanish government has reformed the system regarding financing for NGOs service providers for asylum seekers and refugees. In 2025, the asylum reception system counted 24 organisations, which were granted direct funding for the reception of asylum seekers. (...) According to available data, the Spanish reception system counted with 34,062 reception places for asylum seekers and 24,532 within the humanitarian assistance program as for June 2025.

(...) Despite the increase in reception capacity, as mentioned, various asylum seekers were still left homeless in 2025 also due to the mentioned problems in accessing asylum procedure and appointments to register asylum applications. Shortcomings in the reception system are chronic and have been registered by various sources in recent years. In September 2025, the Council of Ministers approved an additional allocation of €190.7 million to the Ministry of Inclusion, Social security and Migration for the humanitarian assistance and the international protection programme. This measure will allow to guarantee the functioning of the existing 53,500 reception places until the end of June 2026, as well as to strengthen the services to transfer migrants and asylum seekers from the Canary Islands to mainland. Thus, from 1 July 2025 to 30 June 2026 a total budget of €1,035 million has been allocated to the reception system.

(...) In 2025, the construction of new migrants and refugees' centres continued, in some cases with the opposition of the local population, such as for the case of the facility in Churriana (Málaga), or those in Vitoria, Villalbino and Azuqueca de Henares opposed by right and right-wing parties.

(...) During the summer of 2025, the CETI in Ceuta registered overcrowding by reaching between 900 and 1,000 residents. Despite transfers to mainland being organised, overcrowding continued to be a challenge at the beginning of 2026. (...) In March 2025, fourteen asylum seekers were denied access to accommodation at the CETI of Melilla and had to camp outside the facility, following a decision of the police establishing that applications for asylum in Melilla had to be made online and no longer in person. The Bar Association of the City, together with other stakeholders, tried to find accommodation solutions for them, such as accommodating the asylum applicants at a hotel. Following calls by the President of the City of Melilla and the Ombudsperson, the asylum applicants were finally transferred to a reception facility in Málaga. In April, different organisations denounced that at least nine Moroccan nationals were living in the streets in Melilla after arriving by swimming to the enclave and being denied entry to the CETI. They denounced this fact as a serious discrimination on the basis of nationality, which prevails in the CETI's admission criteria.

(...) The situation in informal settlements across Spain (especially in Andalucía) continued to be a concern in 2025. Many migrants, asylum seekers/refugees/persons in need of international protection and seasonal migrant workers live in these settlements in poor living conditions and with no access to basic services. Many of them are victims of trafficking, forced labour and forced prostitution. In its 2025 annual report on Southern borders, the NGO 'Asociación Pro Derechos Humanos de Andalucía – APDHA' denounced the serious violations of the human rights of migrant workers in the informal settlements of Almería and Huelva. It reported that migrant workers live in substandard housing conditions without





electricity and water, far away from city centres, at risk of suffering fires, with difficulties in accessing health care and schooling for their children and are victims of any kind of abuses in the workplace.

Ireland: Throughout the course of 2025, reception standards continued to deteriorate. In 2025, the State continued to rely on so-called 'emergency centres' and tented accommodation. Applicants continued to be accommodated in congregated and overcrowded settings without access to basic public services. Plans for an additional tented accommodation facility to be located at Thornton Hall, Co. Dublin were temporarily suspended on 5 November 2024, after the State indicated its intention not to contest judicial review proceedings instigated in respect of the proposed development. The proceedings were instigated by local residents who alleged that a Ministerial Order made in respect of the site ought not to be allowed to stand due to a lack of adequate environmental screening having been conducted in advance of establishment of the facility. Subsequently, on 18 November 2024, it was reported that a revised Ministerial Order would be issued 'within weeks', however, development of the site remained suspended at the time of updating. The proceedings followed several months of disruptive protests at the site by locals who objected to the development. In late 2025, the High Court formally quashed the ministerial order that had allowed the centre to be set up without full planning and environmental approval, declaring the centre's fast-tracked approval legally invalid. However, the judge allowed a four-month stay on the order taking effect and on this basis, the Government has until early March 2026 to pass corrective legislation. Throughout the course of proceedings, the centre continued to operate, albeit at a significantly reduced capacity. However, as of late 2025, the temporary structures on the site were dismantled and the site was cleared. Citywest Hotel and Convention Centre also continued to operate throughout the year as both a transit hub for the processing of beneficiaries of Temporary Protection, as well as for the accommodation of newly arrived international protection applicants. In June 2025, it was announced that the State had approved plans to proceed with the purchase of the Citywest Hotel and Convention Centre for a sum of €148.2m. The State had been leasing the property from a private contractor since 2020, when it was initially used as a site for administering Covid vaccinations and later converted for use as a transit hub. As of December 2025, there were 385 international protection applicants residing at Citywest Convention Centre. As of January 2026, there were 33,215 persons accommodated within the IPAS system, 25,662 of which were accommodated in emergency accommodation. While there is no obligation on an asylum applicant to remain in Direct Provision during the status determination process, if they do opt to leave or stay elsewhere Direct Provision allowance payments are withdrawn. Applicants who opt to reside in Direct Provision centres are accommodated until they are granted some form of status and are subsequently integrated into the community. However, in practice, a significant number of individuals who have been granted status have been unable to move out of Direct Provision owing to a lack of available and affordable housing. The housing crisis in Ireland continues to exacerbate the situation. According to latest available figures, as of January 2026, there were approximately 5,000 individuals with status residing in Direct Provision centres around the country.

(...) During 2025, HIQA continued to exercise its statutory oversight function in relation to permanent IPAS centres, conducting inspections to assess compliance with the National Standards. HIQA's inspections focused on quality, safety, governance and the lived experience of residents in permanent accommodation settings. HIQA published multiple inspection statements over the course of the year, with inspection reports released in January, February, May, June, August, November and December 2025. These covered a broad range of permanent IPAS centres located in counties across the country. Several were found to have no non-compliances identified against the National Standards. However, several non-compliance issues were also identified across inspections. Common themes included instances where leadership structures, reporting systems or awareness of responsibilities amongst centre staff were insufficient, inadequate implementation of safeguarding procedures, substandard accommodation arrangements, inadequate contingency planning and emergency preparedness, and ineffective systems for identifying and responding to the special needs of residents. For each instance of non-compliance, HIQA required that service providers submit comprehensive compliance plans





outlining how deficits would be addressed in order to achieve full compliance with the national standards.

(...) Throughout 2025, accommodation capacity remained extremely constrained. On the 4th of December 2023, the International Protection Accommodation Service announced that it would not be in a position to provide accommodation to all international protection applicants due to a severe shortage in accommodation capacity. As a result, throughout 2024, all single male international protection applicants who presented to the International Protection Office were assessed by IPAS and HSE staff for any significant vulnerabilities or health issues and prioritised for accommodation as necessary. Whereby no significant vulnerabilities were identified, male applicants were not provided with accommodation. This resulted in many applicants having no option but to sleep on the street for prolonged periods, often during bouts of inclement weather conditions and amidst a period of increased anti-immigrant sentiment. At the time of updating (January 2026), there were 405 applicants awaiting an offer of accommodation from IPAS. Families with children and single women continued to be offered accommodation throughout 2025. IPAs who were not provided with accommodation received a temporary increase of €75 to their Daily Expense Allowance (DEA). This increased the allowance to €113.80 a week for eligible applicants. Families with children and single women continued to be offered accommodation throughout 2025. IPAs who were not provided with accommodation received a temporary increase of €75 to their Daily Expense Allowance (DEA). This increased the allowance to €113.80 a week for eligible applicants. Applicants were also advised that they could make an application for an Additional Needs Payment (ANP), to cover essential needs such as food, transport, or accommodation, however, in the experience of the Irish Refugee Council, the extent to which this was made available to applicants in practice remained inconsistent throughout 2025.

(...) The Minister for Justice and Equality may exceptionally provide the material reception conditions in a manner that is different to that provided for in these Regulations where (a) an assessment of a recipient's specific needs is required to be carried out, or (b) the accommodation capacity normally available is temporarily exhausted. However, it remains to be seen whether the use of such accommodation meets an applicant's 'basic needs' as is required by Regulation 4(6) (b) the Reception Conditions Regulations 2018. As of February 2024, a total of 18,702 protection applicants, 3, 924 of whom were children, were accommodated in 216 emergency accommodation centres throughout the State. As of February 2025, there were 265 emergency centres accommodating 24,974 international protection applicants, 7,031 of whom were children. As of January 2026, there were a total of 259 centres accommodation accommodating 25,662 international protection applicants, 7, 472 of whom were children. In 2023, the State paid out €651.75 million in respect of the Direct Provision system. In 2024, spending increased by 54% to €1.005 billion, including all accommodation and ancillary costs such as facilities management and other related expenditure. Figures in respect of spending for 2025 were not yet available as of January 2026, however, the State projected spending of around €1.17 billion on accommodation for international protection applicants as part of International Protection Accommodation Service (IPAS) costs for 2025. The exact location of emergency accommodation is not publicly available in order to protect the identity of international protection applicants. Some emergency accommodation centres have been in place for longer than five years.

(...) violent incidents targeting people seeking international protection occurred throughout 2025. On 22 October, a violent protest took place outside Citywest Convention Centre. Approximately 2,000 people attended the protest, which was organised following an alleged sexual assault of a child in the locality of the hotel the previous day. Numerous arrests were made and a police van was set on fire during the ensuing violence. Subsequently, on 31 October, a building accommodating asylum applicants in Drogheda, Co. Louth was deliberately set on fire. Four children, including a baby, and an adult were rescued from the top floor. Several people, including two children, were taken to hospital for assessment while an additional 23 people were relocated to alternative accommodation.

(...) As of January 2026, capacity within the Direct Provision accommodation system remained a significant and ongoing issue. 2025 saw the continued reliance on the use of emergency centres. Such centres are often comprised of disused offices, large conference rooms, schools, and sports halls in order to accommodate international protection applicants. The Irish Refugee Council has been alerted





to numerous grievous risks to vulnerable residents accommodated in these centres, including to women and minor children. These reports included significant child protection issues and serious privacy concerns.

(...) Financial allowances

In November 2025, the Department of Justice proposed significant policy changes aimed at requiring international protection applicants residing in IPAS centres who are engaged in paid employment to make financial contributions toward the cost of their accommodation. The proposed contribution model is means-tested, and applicants will be required to contribute based on their weekly earnings. Those earning up to approximately €150 per week would pay a relatively modest contribution (e.g., €15 weekly). Contributions increase with higher earnings, with those earning more than €600 per week facing weekly charges of up to €238. The Irish Refugee Council criticised the changes, noting that many applicants residing in IPAS centres are in part-time or precarious employment, moving in and out of work, and supporting their families on very limited incomes. It was further emphasised that it is unreasonable to expect people to contribute financially when the accommodation they are placed in is often of substandard and poor quality. As of January 2026, protection applicants received a weekly allowance of € 38.80 per adult and € 29.80 per child.

(...) Access to the labour market

According to the latest available statistics, throughout 2025, there were 22,416 applications for labour market access made by international protection applicants

Malta: Freedom of movement

The only restriction on freedom of movement envisaged in the law relate to public health risks, whereby the Superintendent for Public Health may issue an order restricting the free movement of any person. Since 2019, this was the basis for Malta's health-based detention, a practice denounced by the ECtHR in *A.D. v. Malta*. Possibly in response to this judgement and/or in preparation of the EU Pact implementation, in 2025 the relevant provision of the Prevention of Disease Ordinance was deleted and Malta adopted the Order for Restriction of Movement (Public Health) Regulations. These Regulations empower the Superintendent of Public Health to issue a Restriction of Movement Order on anyone they suspect may spread a disease, lasting for a period not longer than four weeks yet extendable to a continuous period of 12 weeks. The aim of this Order is to finalise "*diagnostic tests*". The Order should be issued in Maltese or English as also a language the person is reasonably expected to understand. Practitioners noted that in 2025 a small number of applicants had their free movement restricted on health grounds. These were returned to Malta via the Dublin Regulation and held at the Hal Far Initial Reception Centre until medically cleared.

(...) Access to education

A landmark decision (Civil Court (Constitutional Jurisdiction), Ghandura Shumary vs. Minister for Education, Sport, Youth, Research and Innovation, 150/2025/1, 9 September 2025. The Interim measure decision is not publicly available) was delivered by Malta's Civil Court (Constitutional Jurisdiction) on 9 September 2025 in relation to access to education. The case involved children of a Syrian woman who had been granted international protection in Greece, where the Maltese authorities refused to enrol the children in State schools. Relying on Article 2 of the ECHR Protocol 1 read in connection with the EU Charter and other relevant human rights instruments on the rights of the child, the Court underlined that observance of the right to education is "*fundamental to the minor's present and future development.*" It noted that access to education should not be linked to nationality, emphasising the best interests of the child. Whilst the case remains pending, the Court ordered an interim measure requiring the education authorities to allow the two children to attend public education services. (...) In recent years, NGOs noticed an increase in the number of children not granted free access to State education, as a result of a stricter approach by the relevant authorities towards this entitlement. Most cases seen involved children granted protection in other EU MS, present in Malta as part of attempts to reunite with family or community members.





Where such children are not formally entitled to free State education, they are required to pay the relevant fees which are, as of January 2025, a total of € 465.88 for Primary School, € 559.05 for Secondary School and € 652.22 for High Secondary School.

Poland: The media reported that in April 2025, people hostile to migrants gathered in front of the foreigners' centre in Czerwony Bór. The applicants accommodated in the centre were said to feel threatened and met with hostility from the local community. In response to emerging disinformation, the Office for Foreigners stated that the foreigners accommodated in the centre do not pose a threat to state security and assistance is provided to them in accordance with the applicable regulations. Generally, racism and xenophobia within Polish society also remain a serious challenge. One person describes their experience as follows: "When I was in Biała Podlaska and later in Łuków... it was the same everywhere. As soon as you go outside, Poles immediately start staring at you, as if you were someone foreign, strange. (...) Even drivers—when they see a Black man on the street, they immediately look, they stare. Even when riding a bicycle, when they see you, they have to look... I don't understand why."

Reduction or withdrawal of reception conditions

In 2025, in order to comply with the CJEU's preliminary ruling in *Haqbin*, provisions allowing for the withdrawal of material reception conditions in cases of serious breaches of reception centre rules or violent behaviour were repealed (previous Article 76 Law on Protection). However, since 1 January 2026, an applicant who seriously breaches the rules of stay in a reception centre, behaves aggressively towards others, destroys property, or refuses required medical examinations, sanitary procedures, compulsory treatment, or epidemiological supervision may receive social assistance only in the form of a cash allowance. This rule does not apply to persons with disabilities, elderly persons, pregnant women, or single parents caring for a child. Moreover, the decision granting a cash benefit expires, inter alia, if a foreigner has failed to collect the due cash benefit for two consecutive calendar months or, despite a written notice, has failed to appear at the designated location. In such a case, assistance provided in a reception centre is reinstated, provided that the person is entitled to receive social assistance. As of 1 January 2026, the provision allowing for the reduction of the financial allowance to half in cases of refusal to undergo medical examinations or necessary sanitary treatment was repealed (Article 81(3) Law on Protection). Under the current provision, in such cases the Head of the Office is required to inform the State Sanitary Inspector. Moreover, in case an asylum applicant stays outside the reception centre for a period exceeding two days, material reception conditions should be withheld by law until the moment of their return.

Access to education

In July 2025, the Government Programme for Equalising Educational Opportunities for Children and Young People "Friendly School" for the years 2025–2027 came into force. The program is aimed at schools attended by pupils from Ukraine, but it is also intended to support the integration of children with a migration background from other countries into the Polish education system. Within the program, funding is provided for the support of an intercultural assistant, for assistance to children or parents with a migration or refugee background through selected non-governmental organisations, and for the professional development of staff in working with children with migration or refugee experiences. A condition for receiving support under the program is that, on the day the support begins, at least one pupil from Ukraine is attending the school.

The Netherlands: In 2025, the capacity problems continued in Ter Apel. While extra space became available in the reception facilities for unaccompanied minors in early 2025 as a result of less arrivals of unaccompanied minors in the first quarter of 2025, the Minister of Asylum and Migration reported in September 2025 that the dependency on emergency facilities remains as great as ever. Multiple locations were set up to relieve the location at Ter Apel, although in some locations there were concerns about the adequateness of the some locations for children. As a result, children will not be placed in two of these new locations anymore.





(...) The country has been in a reception crisis since September 2021, which continued throughout 2025. Less than half of the people entitled to reception conditions (i.e., asylum seekers) as well as beneficiaries of international protection who have not been offered housing yet, were staying in (crisis) emergency centres over the course of 2025 (32,842 out of 79,984 people). All other residents stayed at regular asylum centres and/or temporary reception locations managed by municipalities. Different reports highlight how the majority of the (crisis) emergency locations still largely fail to meet the State's obligations under EU law. While some (crisis) emergency locations have adequate facilities, these are exceptions, and conditions elsewhere are equally distressing. The inadequate reception conditions at (crisis) emergency locations are especially alarming due to the long period of stay for up to one and a half years. People suffer severely from a lack of privacy, tranquillity, and suitable nutrition. Sanitary facilities are inadequate and particularly unhygienic at too many locations. Problems with healthcare accessibility exist in almost half of the (crisis) shelters. Additionally, the majority of the (crisis) shelters are detrimental to children, who experience a decline in health and weight loss due to a lack of activities, safe play areas, and healthy food. Large differences between (crisis) shelters reveal that whether asylum seekers are able to experience decent reception in the Netherlands is subject to arbitrariness.

(...) The occupancy in Ter Apel dropped below 2,000 people between November 2024 and September 2025, due to the opening of several emergency reception centres and the prevention of closures of existing locations. On 9 September 2025, the maximum capacity of 2,000 was exceeded again for the first time in 10 months. This was due to a combination of factors, including the closure of a few temporary locations, permit holders that cannot move onward to Municipality housing, and a peak in new applications. Calls from COA for more spots were insufficiently answered. Subsequently, the occupancy rate in Ter Apel has fluctuated between September and December 2025, passing 2,000 on numerous occasions reaching a total penalty of almost € 2.5 million in early December 2025. Throughout 2025, the Dutch Council for Refugees reported several times that family members who arrived because of family reunion were denied reception. They often stayed for weeks or sometimes months in overcrowded situations with refugees in single or shared housing. They had to ask COA by mail for reception places before their arrival, and were sometimes put on a waiting list by COA. For several months, the Red Cross was asked by COA to arrange hotel places for the family members. However, this temporary measure ended in summer 2025. Since autumn, the waiting list for family members is again being used in practice although now they receive some pocket money and will be placed with urgency in a reception facility when there are medical problems.

(...) The costs for clothes and other expenses is covered by an additional fixed amount of € 14.87 per week per person. Unlike the other allowances, this allowance was only adjusted from 2023 onwards.

(...) In 2025, the allowance was adjusted again, to € 14.87. It is impossible to cook in almost all the (crisis) emergency locations, in which less than half of the asylum applicants were staying during 2025. Therefore, catering or microwave meals are provided. As of 1 January 2025, the social welfare allowance for Dutch citizens is set at € 1,401.50 for a single person who is at least 21 years old and not older than 67 years. Thus, an asylum applicant receives approximately less than 22% of the social welfare allowance provided to Dutch citizens.

(...) As of 15 December 2025, 79,497 people in the Netherlands were entitled to access reception conditions. Less than half of them are staying at one of the 103 'regular' reception centres by COA (38,693). The rest are hosted in one of the 212 emergency locations managed by COA (33,107) or other locations such as (crisis) management centres managed by a municipality (7,697). In 2025, almost 24% of the people entitled to receive reception by COA were beneficiaries of international protection (18,884). (...) In its report, the COA foresees a shortage of 48,500 places on 1 January 2026, using the official guiding that 96% of available spaces will be used for the required flexibility in resident placement policy.

(...) In 2024, the Law on the geographical distribution of reception places was implemented. The first deadline of the law was 1 July 2025, on which day municipalities were supposed to deliver 101,500 places. As of 1 July 2025, more than three quarters of 342 municipalities (partly) met the target or will do so soon, with 74,500 of the 101,500 places being realised. This means that not all municipalities were able to realise the required places under the law at that time. However, COA was positive that





since the implementation of the law, 43 new municipalities opened new reception centres and a better distribution of reception locations was achieved. Additionally, 120 largely sustainable locations with 27,000 places were in preparation. The former government (at the time of writing the report, in caretaker role until a new coalition is formed after new elections were held in October 2025) held the position that it wants to repeal the law on the geographical distribution of reception places. This is one of the reasons the required numbers have not been met yet. As explained by the provinces, the announcement of the intention to repeal the law, shortly after its implementation, caused confusion and delays. Local officials often found themselves in a difficult position when trying to justify the intended reception locations to local residents, and some municipalities refuse to continue the search for locations due to the uncertainty surrounding the law. The provinces have urged politicians to continue implementing the law in full, until sufficient residence capacity has been realised in the Netherlands.

(...) The total number of children in emergency locations and crisis emergency locations increased from approximately 6,600 in early 2025 to over 8,500 children in December 2025. The total number of children (age 0-17) staying at COA locations as of 1 December 2025 was 19,920.

(...) The 2025 report of the Inspection of Health Care and Youth concluded that there were improvements in relation to the medical screening, hygiene and the specific youth health care for asylum seekers, but reported still high risks for health damages of vulnerable groups like pregnant women and asylum seekers with chronic diseases and mental health care needs.

(...) Children's rights NGOs report that in 2024 there are 65% more children residing in (crisis) emergency locations compared to last year: 5,556 in July 2024 compared to 3,378 in July 2023. This has further increased to more than 8,500 in as of December 2025. (...) In July 2025, the Inspection for Justice and Security, the Inspection for Education, and the Inspection for Health and Youth Care observed insufficient improvements in the situation of children in emergency shelters.

(...) The COA had accommodated 5,054 unaccompanied children by the end of 2025. This represents a small decrease compared to the 5,212 unaccompanied children by the end of 2024 and 5,557 at the end of 2023.

Sweden: The first step in the Government's reform of the reception system entered into force on 1 March 2025 for individuals submitting a new asylum application, and on 1 September 2025 for those already registered in the reception system. Prior to this, applicants had generally been free to choose and arrange their own accommodation if they did not wish to reside in facilities operated by the Swedish Migration Agency. From the dates above, however, residence in a designated reception centre became a condition for receiving the daily allowance. This is the initial phase in realizing an aim that parties in Government and the Sweden Democrats expressed in the Tidö Agreement on 14 October 2022, which is to end asylum seekers' rights to arrange their own accommodation. The intention is forming a system where asylum seekers must stay in accommodation centres run by the Swedish Migration Agency and an increased monitoring of asylum seekers during the asylum process and in return procedures. There is, therefore, an ongoing process to shift from offering housing in shared flats to rooms in accommodation centres.

(...) The amendments provide, inter alia, that asylum seekers are entitled to a daily allowance only if they reside in the accommodation centre to which they have been assigned, and that an asylum application may be deemed withdrawn if the applicant fails to register their address or maintain contact with the Swedish Migration Agency. The legislation further grants the Swedish Migration Agency expanded powers to verify whether an asylum seeker is in fact residing in the designated accommodation and is therefore eligible for a daily allowance. In addition, asylum seekers are obliged to participate in classes regarding Swedish society.

(...) *Access to the labour market*

According to article 15 of the recast reception condition directive (2023/33) member states can postpone access to the labour market until nine months have passed, as long as the delay cannot be attributed to the applicant. There's no such time-related restriction in Sweden. Changes regarding in that regard are however suggested in the public inquiry SOU 2024:68, mottagandelagen. The inquiry suggests that entry to labour market should be allowed only after six months, according to the minimum conditions





prescribed in article 17 in the new recast reception condition directive (2024/1346). The inquiry on the implementation of the EU-pact, Ds 2025:30, suggested some minor changes compared to the ones of SOU 2024:68, which were related to the new three steps of the process of applying for international protection in articles 26-28 of APR. It's suggested that the six-month period in article 17 in the new recast reception condition directives should count from the registration of the application (article 27 APR) rather than from the "application", which was suggested in SOU 2024:68. In the public inquiry SOU 2024:68, it is noticed that the proposed changes will result in few applicants being granted access to the labour market, as decision are often made before six months have passed.

(...) *Access to education*

The public inquiry on the implementation of the EU-pact, Ds 2025:30, suggested changes regarding children's right to study, making the responsible municipality obliged to offer schooling within two months instead of one as before. The amendment, which is in line with the minimum requirements in article 16.2 of the new recast reception condition directive, is motivated by the view of the Swedish Migration Agency that such a timeframe would more in line with the asylum procedure regulation, according to which many applicants will be in special procedures like the asylum border procedure and therefore must be available during the process.

Slovenia: In 2025, the number of arrivals decreased, however due to lack of accommodation centres, the reception conditions in the Asylum Home did not improve significantly in comparison to previous years. Due to lack of capacity in the main buildings in the Asylum Home and its branch Logatec individuals were also accommodated in containers while waiting to lodge the application.

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)

Czechia: As part of the latest Schengen evaluations, the Czech Government was requested to take measures to ensure that the conditions in the Bálková detention centre correspond to the administrative nature of immigration detention. In 2020, the government was instructed to modify the design and layout of the detention facility as much as possible, to avoid restricting access to leisure activities, to improve the sanitary conditions in the detention centre and to repair the sanitary infrastructure. In 2025, it was instructed to improve the detention conditions in the Bálková detention centre by ensuring appropriate maintenance and good state of repair; ensuring that the regime applicable to the detention for foreigners is adjusted to reflect the nature of the administrative detention; providing sufficient possibilities to remain in a meaningful contact with the outside world; applying alternative arrangements for exercise in poor weather conditions.

In the last years, OPU has not registered from the detainees any complaints regarding insufficient cleaning, or insufficient number of showers and toilets for the detainees.

(...)

By the end of 2023, the funding structure for legal counselling changed again and the MoI reopened the calls for the provision of legal assistance to NGOs, when the budget for the new AMIF programming period was approved. From March 2024 to September 2025, the counselling was thus provided in parallel by the attorney at law and NGOs. In October 2025, there was a three-week gap in the provision of legal counselling in the detention facilities and at the Václav Havel airport due to administrative delays in approving the financing for a new contractual period. To summarize, while the law does guarantee entry, NGOs may face difficulties in accessing detention facilities in situations where they do not receive funding for the provision of legal counselling from the government, as the government connects the questions of funding with the question of access to these facilities.

Spain: In its 2025 annual report on the situation of CIEs, the Jesuit Migrants Service continued to denounce the lack of monitoring and supervision mechanisms to guarantee transparency and





accountability in these facilities. It also reported that several families were put in detention, as well as migrants who were very well rooted in Spain. In addition, the organisation continued to highlight the unnecessary suffering of inmates and the significant economic, social and, above all, human cost they entail.

(...) Throughout 2025, the following developments and incidents were registered regarding conditions in CIE:

- ❖ In March 2025, around 20 inmates at the CIE of Barcelona started a hunger strike to denounce the lack of guarantee of their rights, including mistreatments.
- ❖ In April, a fire spread at the CIE of Valencia, with no consequences for inmates but leaving three police officers injured.
- ❖ In June and July, at the CIE of Aluche (Madrid) experienced an infestation of bedbugs and rats. Another bedbugs infestation was reported to the Spanish Ombudsperson and the supervising judge in December.

(...) In November 2025, the Minister of Interior granted €1,125,000 to the Red Cross for providing assistance to inmates at CIEs.

Hungary: In 2025, the Mendék association re-obtained access to the asylum detention in Nyírbator. Their social worker is currently regularly visiting the facility.

(...) In 2025, the HHC received several complaints of ill-treatment in Nyírbator detention centre, especially from LGBTI people, but also others. Detainees complained of hostile and discriminatory treatment, verbal abuse, insults, and harassment, including manifestations of homophobia. There were several incidents involving physical attacks as well. Detainees feared for their safety and psychological well-being. They also complained of material conditions, such as no adequate access to drinking water, poor quality of the food and medical services and lack of information on their rights and the procedure.

(...) In 2025, the HHC is aware of a few cases in which asylum seekers applied for asylum immediately upon arriving at the airport and they were nevertheless detained, on the grounds of a risk of absconding, due to the fact that they refused to return to their country of origin and that they did not have any ties to Hungary. The Nyírbator court extended their detention, in one case despite very poor mental state of the applicant, who had been undergoing psychiatric treatment in his country of origin for several years prior to his escape and who reported suicidal thoughts several times in detention, but did not receive any medical or psychological help. However, the HHC is also aware of some positive examples. In one case, the applicant received a negative asylum decision, but the court did not extend detention, because the applicant had a partner where he could stay and he was ordered to report to the immigration office regularly. In another case, where the clients were represented by the HHC, the court refused to extend detention after 90 days, despite the grounds for detention being a threat to national security, because the applicants were in a very poor mental health state. However, in this case, the applicants were able to pay for an expert opinion from a psychiatrist (approx. 1000 EUR) and the court also conducted an on-line hearing of their psychiatrist from their country of origin (Nyírbátori District Court, 4.Beü.666/2025/11., 19 December 2025).

Malta: Throughout 2025, Malta continued a new detention practice implemented by the PIO in 2024. As observed by stakeholders, certain groups of applicants were detained immediately following the lodging of their asylum applications. According to NGOs, the PIO regularly liaises with the IPA, the latter sharing with the PIO lists of persons having appointments to lodge their asylum applications, in order for the PIO to be alerted as to specific groups of applicants and coordinate accordingly.

At IPA premises, the PIO would conduct Eurodac fingerprinting at the moment of lodging, and the PIO officials liaised with the duty Inspector once information has been obtained from the applicant lodging the asylum application. The Inspector would then decide whether to issue a Detention Order, in terms of the Reception Conditions Directive, often relying on the grounds listed in Article 4(a), (b) or (f).

This policy was applied to persons spontaneously presenting themselves to apply for asylum – including some who were regularly staying in Malta – and who, in the PIO's assessment, submitted an asylum application 'too late' or with a view to frustrating a possible eventual return/removal. The assessment



primarily looked at the applicant's nationality and the date of the lodging of the application, targeting persons seeking asylum towards the end of their visa-free period. Although the groups mainly affected were South American applicants, aditus lawyers also reported the detention of Syrian nationals. As a result of this policy, applicants approached UNHCR and NGOs to accompany them to the lodging, hoping their presence would prevent detention. Indeed, it was reported that on some occasions NGO lawyers were able to prevent the applicant's detention, however the same NGOs also reported that they are unable to sustain this form of support. Some applicants also reported being threatened by Immigration Inspectors that if they failed to withdraw their asylum applications they would be immediately detained. (...) Data regarding the detention of persons with special reception needs is not available, but NGOs confirm that vulnerable persons were in fact detained throughout 2025. In particular, NGOs confirm the continuation of the practice observed throughout 2024 whereby AWAS' vulnerability assessments were not considered final or conclusive by the PIO in determining whether persons ought to remain in detention or be released, on the basis of their vulnerability. NGOs report that, whereas pre-2024 the PIO relied almost exclusively on AWAS' determinations of a person's vulnerability and released them almost automatically, in 2024 and 2025 the PIO requested or was provided with additional information by the DS, often stating that either the person was not in fact vulnerable or that, if vulnerable, adequate support services were being provided in detention by the enhanced medical services. The communicated application *M.S. v. Malta*, brought to the ECtHR by a person unequivocally determined to be highly vulnerable by AWAS yet kept in detention, focuses on this observation.

(...) In July 2025, the CPT published the report of its visit to Malta in 2023.

(...) Throughout 2024 and 2025, the Malta LGBTIQ+ Rights Movement (MGRM) repeatedly requested access to Safi Detention Centre to visit detainees who specifically asked for their services. These requests were consistently denied by the DS, stating that adequate support services are already being provided by the DS. This was flagged in the pending ECtHR application *M.S. vs. Malta*, brought by an LGBTIQ+ applicant confirmed as vulnerable yet denied MGRM services by DS.

(...) In 2024 and 2025, NGOs commented that their access to their clients was entirely dependent on the DS, including for situations of emergency. They reported being offered visit slots on weekends as the only available time. They also reported a number of incidents where the DS alleged that the persons listed on their authorisation request indicated a refusal to meet the NGO lawyer, without however providing evidence of this refusal. NGOs are also not alerted to the presence of people picked up from their workplaces, homes, buses or roadblocks. (...) NGOs also noted the impossibility of reaching new arrivals by phone for the first days or weeks following their arrivals. aditus noted that throughout 2024 and 2025 several documented attempts were made to reach newly-arrived people in China House, yet it was clear that the telephones in the blocks they were detained in had been either switched off or otherwise made unusable. Identical problems were flagged in relation to persons held in isolation in Safi. Despite these issues being repeatedly presented to the DS and to the Home Affairs Ministry, no response was provided. Furthermore, throughout 2025 NGOs repeatedly requested the DS to provide them with the telephone numbers of each of the zones within the centres, this being the only way they could communicate with detainees, including their clients. To date, these requests remain ignored by the DS. This lack of access to lawyers is particularly problematic due to the fact that deadlines stipulated in Maltese legislation for the filing of appeals against Detention Orders (three days), Removal Orders (three days), age assessment decisions (three days), and negative asylum decisions (15 days) are extremely stringent and template application forms are not regularly provided in detention. The actual deadlines often amount to the time needed to get the approval for a visit the following week.

Poland: As of September 2025, 1,099 third country nationals were currently placed in detention centres. The duration of the detention period varied. Depending on the place of deprivation of liberty, it ranged from on average 110 days to over 163 days. As of January 2026, there are 5 detention centres. Men were placed in Białystok, (Krosno Odrzańskie is closed for renovation since September 2024), Biała Podlaska, Przemyśl, Lesznowola and Kętrzyn. Lesznowola was for unaccompanied minors, families with children and single women. (...) in 2025, the capacity of the detention centres was increased. As of 26 September 2025, the number of places available in the detention centres was 1,167, compared to 805



as of 31 December 2024. The use of containers to host detained migrants was re-introduced. Despite this, all detention centres have been overcrowded since June 2025.

(...) In 2023 and in 2025, the National Prevention Mechanism (NPM) noticed improper documentation of the use of direct coercive measures in detention centre of Przemysl, both in terms of the application of the direct coercive measure itself, as well as the reasons, circumstances and effects of its use. The NMP also recommended to provide first medical aid, medical consultation to each person subject to isolation, immediately after being placed in the isolation room, and then at least once during each subsequent 24-hour period and preventive medical consultation to a person who was exposed to pepper gas, regardless of the officer's assessment of the health condition of that person and regardless of whether they require medical assistance or complain of any health problems in order to assess their state of health and document any injuries, and recording this fact in the documentation.

(...) In 2024, in the vast majority of cases, the percentage of granted Border Guard requests ranged between 96-100%. In 2025, the statistics on the acceptance of Border Guard's requests to place foreigners in guarded centres remained at the same level, while in the case of requests for extension of detention the acceptance rate ranged from 87% to 100%.

(...) In 96% of cases, courts took a detention order or a prolongation - up to 100% like before the Regional Court in Bialystok: in 2024, out of 159 detention requests before that court by foreigners or their representatives, only two lodged to that Court by a foreigner or their representative were upheld, while in all remaining cases the Border Guard's request was granted in whole or in part. Similarly, in 2025, none of the 104 complaints filed by detainees or their lawyers were successful. Alternatives to detention are either not considered, not properly justified or the reasons why they cannot be applied are not explained in detail. According to Polish NGOs, still in 2025 courts examine the possibility of using alternatives to detention only in a superficial way. Courts very often argue that it is not possible to impose an alternative to detention based on the risk of absconding and that asylum applicants had no money or no place to stay, ignoring the fact that asylum applicants have a right to live and receive financial assistance in open centres for foreigners managed by the Head of the Office for Foreigners. The courts generally consider that irregular entry is a sufficient element to determine the existence of a risk of absconding, without conducting an individual assessment if not to evaluate whether alternatives to detention can apply, contrary to the judgement of the Supreme Court.

(...) In 2024 and in 2025 access to the independent psychologist deteriorated, as none of the NGO provides the psychological assistance in detention centres. According to the Commissioner for Human Rights and NGOs, the authorities do not always release migrants who suffered the violence in their country of origin or, more recently, at the Polish-Belarusian border.

(...) On 4 November 2025, the Regional Court in Białystok (case no. III Ko 314/25) awarded compensation to a foreign national who had been unlawfully placed in detention for approximately one month despite being an unaccompanied minor. Although the individual possessed documents confirming his age, the authorities relied on a wrist X-ray examination, which classified him as an adult without indicating any margin of error in the results. In a separate case, on 9 December 2025, the District Court in Siedlce (case no. II Ko 160/25) ruled in favour of a minor who had spent two months in the detention centre in Biała Podlaska, being released by the Border Guard, after his identity and age were confirmed by the relevant embassy.

In a judgment of 27 November 2025, the ECtHR examined the case of detention of a Russian national and her infant child in a guarded centre for approximately nine months pending their expulsion from Poland. The Court found that, although the detention was based on domestic law, it was not a measure of last resort as required under Article 5 § 1 (f) of the Convention. The Court underlined that the detention centre in Biała Podlaska undoubtedly constituted a place of confinement similar, in many respects, to prisons or remand centres. The Court also stated that, as a matter of principle, the detention of young children in such facilities must be avoided and that only short-term placement in suitable conditions could be compatible with the Convention, provided, however, that the authorities establish that they took that measure as a last resort only after having ascertained that no other measure involving a lesser restriction of freedom could be implemented. Moreover, the Court was not persuaded that due consideration was given to the state of the applicants' mental health when assessing whether





there were any viable alternatives to detention in a guarded centre. The Court further held that the applicants' detention constituted a disproportionate interference with their right to respect for family life under Article 8 of the Convention, given its excessive duration, the applicants' vulnerability, and the lack of sufficient justification. Accordingly, the Court found violations of Articles 5 § 1 (f) and 8 of the Convention and awarded the applicants jointly EUR 15,000 in respect of non-pecuniary damage.

(...) According to the law, all detainees have access to regular health care. Generally, physicians and nurses are hired to work in detention centres. Unfortunately, in some detention centres access to the psychologists – especially if provided by NGOs – was significantly restricted in 2025. In 2025 there was no NGO providing psychological assistance in detention centres directly or online, inter alia due to funding issues, issues in accessing detention centres, etc. Difficulties in accessing female physicians, paediatricians and gynaecologists were also observed.

(...) Still in 2025, in Przemyśl, a foreigner or a Border Guard serve as interpreters between the foreigner and medical staff. Very often, a Border Guard officer is present during the medical consultations. The National Prevention Mechanism recommended that sworn translators be used for medical, psychological, and legal consultations with foreigners whenever there is a language barrier. The NPM also recommended ensuring that medical examinations of foreigners take place out of sight and earshot of persons who are not medical professionals, unless the healthcare professional performing the examination requests the presence of such a person.

Sweden: In 2024, the Migration Court of Appeal found that the appointment as a public counsel for a detained person not only includes the question of detention but also the action of appealing a decision regarding a body search. In 2025, there were two precedent rulings on detention. The first concerned whether the recast reception condition directive is applicable when a person made a subsequent application that was rejected. The second concerned whether the fact that a person had been detained according to the Dublin regulation had bearing on the applicability of article 8.3 of the recast reception condition directive. In January 2024, a commission of inquiry presented a report with proposals aimed at strengthening the safety and security in the detention facilities run by the Swedish Migration Agency. The commission was appointed as the Government saw a need to further align the rules regarding detention with the EU-law acquis, a review necessary also following critique from the Parliamentary Ombudsman (JO). According to its instruction, the commission should propose changes that would allow the time during which a person can be detained to be as long as is allowed according to the EU-acquis. It should also propose more alternatives to detention and changes that could improve the safety in detention facilities. The Commission's first report had proposals on, for example, the introduction of mandatory security screenings, room searches and supervising visits through introduction of glass partitions in the visiting rooms. The Commission of Inquiry proposed that legislative changes enter into force on 1 July 2025. The Government proposed a bill, based on the inquiry's report. The changes were proposed to enter into force on 1 August 2025. The bill was accepted by the parliament on 17 July 2025. On 17 February 2025, the commission of inquiry presented its final report. The report includes a wide range of proposals. New provisions are proposed in the chapter on detention in the Aliens act. They make a distinction between asylum seekers and others, a change that aims to a greater extent align the legislation on detention with the directives. Longer periods during which persons can be held in detention and alternatives to detention, as order of supervision in combination with electronic surveillance, are also proposed. The responsibilities of the Migration Agency and the border police should also be clearer due to the proposed changes. On 27 March 2026, the Government intends to present a bill based on the report.

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)





Czechia: In 2025, procedures have been frozen in case of Syrian applicants for international protection or prolongation of the subsidiary protection, due to the political changes in Syria. By the end of 2025 the procedures resumed. Before, all Syrian nationals were granted subsidiary protection or (less frequently) asylum. The recent information provided by the MoI suggests that this will no longer be the practice and every application will be considered individually.

Ireland: In December 2025, the IPO indicated that throughout 2024, it had delivered over 14,000 first decisions compared to over 8,500 in 2023. In 2025, to the end of November, there had been a 44% increase in the total number of first instance decisions made when compared to the same period in 2024.

(...) As of 8 October 2025, applications for international protection were processed at two separate locations. Families with one or more children under the age of 18 who were submitting a joint application on the same day, as well as nationals of Albania, Algeria, Bosnia and Herzegovina, Botswana, Brazil, Egypt, Georgia, India, Kosovo, Malawi, Montenegro, Morocco, North Macedonia, Serbia, and South Africa, were required to submit their applications at the Citywest Convention Centre, located in the south-west suburbs of Dublin. All other applicants, including single applicants and unaccompanied minors, were required to submit their applications at the International Protection Office (IPO) in Dublin city centre. Changes to the international protection application procedure were initially introduced in summer 2025, when the IPO first implemented the Pact Transition process in respect of applications from nationals of Georgia, India, and Brazil. This process was subsequently expanded to include nationals of the aforementioned countries. Applications from these nationalities were processed in a manner intended to mirror the border procedure that is scheduled to come into effect with the implementation of the Pact in June 2026. The transition is being carried out under the current legislative framework and therefore does not include certain elements envisaged under the Pact, such as restrictions on movement or the establishment of an independent rights monitoring mechanism. These measures will be introduced once the new legislation enters into force.

(...) From 13th January 2025, the responsibility for registering all applicants in the Republic of Ireland was transferred to the Immigration Service Delivery and will no longer be carried out by the Garda National Immigration Bureau, as was previously the case whereby an applicant resides outside of Dublin. In order to make an appointment for first time registration, an applicant is required to book an appointment online through the Immigration Service Delivery website. As of February 2025, applicants seeking to register were reporting significant delays of approximately 2-3 months in obtaining appointments. Delays continued throughout 2026 with appointment availability severely limited.

Hungary: In 2025, the HHC lawyers reported occasional poor quality of the videoconference. Another problematic issue is that when the interview is conducted on-line the legal representative can only be present at the location of the applicant or at the location of the case officer. If they are not in Budapest, then the legal representative also has to travel, it is not possible to join the on-line hearing from the NDGAP office in Budapest, or from the legal representative's office. The HHC also reported that in one case, the applicant was placed in a room at a regional NDGAP office where the local NDGAP staff continuously passed through the room throughout the interview.

Malta: In 2025 IPA engaged in a recruitment drive to strengthen its capacity by way of preparation for the implementation of the EU Pact.

The Netherlands: As of November 2025, the backlog is 52,360 cases. The IND has published an overview of the average waiting times for the interviews in the different tracks, which it updates regularly. As of 30 December 2025, for Dublin Procedures (Track 1), asylum applicants have to wait on average eight weeks before their first interview. In the Regular Procedure (Track 4) it takes on averages 17 weeks before the registration interview takes place (note that theoretically, this interview should happen on the third day after the asylum request). After this interview, another 86 weeks elapse on average before the detailed interview takes place. This means that on average, the detailed interview





takes place almost 24 months after the asylum request. However, after the detailed interview, the IND can also take several weeks or months to reach a decision, leading to a large amount of asylum applicants waiting for more than the maximum time-limit for deciding of 21 months before a decision is issued. As the statistics show, the number of cases that have not been decided upon after 15 months has grown from 1,610 in November 2022 to 5,490 in November 2023. In November 2024, this number reached 11,680. As of November 2025, this number has grown to 24,490.

(...) Due to the large number of asylum applications received and the arrival of a large number of asylum applicants from Afghanistan and people fleeing from Ukraine, paired with capacity problems, in September 2022 the IND decided to extend the time limit for deciding with 9 months in all cases where the 6-months time limit had not yet expired on 27 September 2022. In addition, for all asylum applications lodged after 27 September 2022, the time limit was pre-emptively extended by 9 months, meaning that the IND can take a maximum of 15 months to decide on asylum applications lodged after 27 September and before 1 January 2023. This measure was also announced for 2023, 2024 and 2025.

(...) On 8 May 2025, the CJEU issued its judgment (CJEU, Judgment of the Court, ECLI:EU:C:2025:326, *Zimir*, 8 May 2025, available at: <https://bit.ly/3YubS0X>), following the opinion of the Advocate General. The Court concluded that the difficulties with regard to taking timely decisions cannot stem from other circumstances than the large amount of asylum applications lodged at the same time, such as an existing backlog of undecided cases or the lack of the deciding authorities lacking adequate deciding capacity. In response to this judgment, the IND published Information Message 2025/28, in which it communicated its decision to withdraw the last two general extensions of 2024 and 2025, due to their incompatibility with the Court's judgment. However, because the Council of State still needs to issue its final judgment, the general extensions preceding 1 January 2025 still stand. As a result, in general, the time-limit for deciding is once again six months, although in practice this time limit is never upheld.

(...) There used to be an option to extend the Regular Procedure with a number of days, without referring an applicant to the Extended Procedure. This is called the Regular Procedure Plus, or AA+. In practice, this limited extension was not applied often. In an evaluation report of the IND published in March 2023, only 0.6% of 34,576 cases were found to have been referred to the AA+. On 1 September 2025, it was announced that the AA+ would be abolished. If slightly more time is needed, the IND would consult with the lawyer whether it was possible to extend the General Procedure according to the needs of the asylum seeker, without having to refer him to the Extended Procedure.

(...) In November 2024, the number of applicants in Track 4 (both AA and VA) that was still waiting for a decision after six months was 35,600, rising to 40,550 in 2025. The number of applicants still waiting for a decision after 15 months was 11,680. This number rose to 25,830 in 2025. In addition to the 9-month prolongation, the time limit can be extended by another 3 months according to Article 42(5) of the Aliens Act. In no case may the maximum time limit of 21 months be exceeded. (...) At the start of 2026, in the Regular Procedure (Track 4) it took on average 17 weeks before the registration interview takes place (note that theoretically, this interview should happen on the third day after the asylum request). After this interview, another 86 weeks elapsed on average before the detailed interview takes place. This means that on average, the detailed interview takes place nearly two years after the asylum request. Additionally, in practice, multiple months can elapse before a decision is taken.

(...) The Minister publishes country-specific policy for specific nationalities; these are usually based on an official country report from the ministry of Foreign Affairs. It is published in the Aliens Circular C7. As of 2025, there are country specific policies for 30 countries.

The country-specific policy first identifies groups that have well-founded fear of being persecuted under the Refugee Convention. A group can be identified as being at risk of group persecution. As a result, being a member of this groups is enough to qualify for refugee protection. In 2025 groups that have been identified as being at risk of group persecution are:

- Afghanistan: translators that have been working for international military or policy missions.
- China: Uyghurs and Tibetans subjected to repression.
- China: Active followers of religious and spiritual movements identified as xie jiao by the Chinese authorities.





- Iraq: LGBT persons.
- Iran: Christians who are active in 'new churches' or evangelize and/or members of house churches attending meetings.
- Russian Federation: LGBT individuals from Chechnya.
- Sudan: Masalit.

The Council of State ruled on 16 July 2025 that all relevant circumstances must be included in the Article 15c QD-assessment, including humanitarian circumstances that are the direct or indirect cause of the acting - or lack thereof - of a party to a conflict. As a result, the situations in Yemen and Syria had to be reassessed. However, which circumstances and more specifically, those caused by which specific parties to a (former) conflict have to be taken into account, is still unclear. In response, the Regional Court of Roermond referred preliminary questions to the CJEU regarding the 'actor requirement'.

At the time of writing, Cameroon (North-West and South-West), Congo DRC (North-Kivu, South-Kivu and Ituri), Gaza, Mali (Gao, Kidal, Mopti and Tombouctou), and Sudan (Khartoum, North-, South- and Central-Darfur, Kordofan and El Gezira), are designated as having a 'most exceptional situation' (severity level A).

Mali (Ménaka and Ségou), Yemen (provinces of Abyan, Aden, Al Bayda, Al Dhale, Al Hudayda, Al Jawf, Ibb, Lahj, Marib, Sa'da, Sana'a (city), Sana'a (province), Shabwa and Taiz), and Sudan (West-Darfur), are designated as having a 'higher level of indiscriminate violence' (severity level B).

Colombia (Antioquia, Arauca, Bolivar, Cauca, Choco, Magdalena Valle del Cauca, Nariño and Putumayo), Ethiopia (Amhara and Oromia), Iraq (Diyala, Dohuk, Erbil and Ninewa), Lebanon (South, Nabatiye and Baalbek-Hermel), Libya (North-West (including Tripoli and Sirte, and Benghazi), Mali (Koulikoro), and Pakistan (Balochistan and Khyber-Pakhtunkhwa (KP), Somalia (Benadir (including Mogadishu), Galgaduud, Hiraan, Mudug, Lower Juba, Lower Shabelle and Middle Shabelle), Sudan (Abyei, Blue Nile, Gedaref, Kassala, Northern, Nile, East-Darfur, Red Sea, Sennar and White Nile), Syria, Yemen (Al Mahwit, Amran, Dhamar, Hajjah and Raymah), and the West Bank are designated as having a (severity level C).

(...) A Postponement of Decision and Departure was active regarding Syria between 14 December 2024 and 14 June 2025, due to the fall of the Assad-regime in that country. Before 14 December 2024, almost all applicants from Syria were eligible for a subsidiary protection status. The Dutch authorities assumed that a foreign national from Syria ran a real risk of serious harm upon or after returning from abroad. Two exceptions were formulated: applicants that are active supporters of the regime and applicants that have already returned to Syria without experiencing problems. On 14 June 2025, the processing of applications of Syrian applicants resumed. The Minister published new country policy for Syria on 20 June 2025. Under the new policy, Alawites and members of the LGBTIQ+ community are considered 'risk profiles' (see above). Other groups in the country, such as Christians and other ethnic minorities, are not mentioned. In terms of Article 15(c) of the Qualification Directive, the country policy states that there is a relatively low level of indiscriminate violence in Syria. The Dutch Council for Refugees reports that Syrian applications in first instance are now rejected more often than before the fall of the Assad regime. Due to the recentness of the new country policy, most of these rejections have not been subject to judicial review at the moment of writing. In the scarce case-law available at the moment, courts are debating whether the Minister's qualification of the level of violence in the sense of Article 15 (c) is correct, with the Regional Court of Haarlem ruling, for example, that this has not been properly substantiated (Regional Court Haarlem, 11 December 2025, ECLI:NL:RBDHA:2025:23822, available in Dutch at: <https://bit.ly/4aICq5X>), while the Regional Court of Middelburg ruled that the Minister has not underestimated the level of violence (Regional Court Middelburg, 1 December 2025, ECLI:NL:RBDHA:2025:22984, available in Dutch at: <https://bit.ly/4qelRnk>). Just before the end of 2025, the Regional Court of Roermond made a request for a preliminary ruling from the CJEU regarding the relationship between Article 15 (c) of the Qualification Directive and humanitarian circumstances (Regional Court Roermond, 29 December 2025, ECLI:NL:RBDHA:2025:25445, available in Dutch at: <https://bit.ly/4bmxROU>). In short, the Dutch Court asked whether humanitarian circumstances, such as





a lack of food, shelter and medicine, that are the result of armed conflict, must be considered when determining the level of indiscriminate violence in the sense of Article 15 (c) and, if so, to what extent the conflict must have caused these humanitarian circumstances.

Portugal: Throughout the year 2025, CPR often contacted the determining authority, on behalf of asylum applicants, requesting information regarding the status of their application and the expected timeline for the issuance of a decision. In instances where a response was provided, CPR/the applicant was merely informed that the analysis of pending international protection cases was being carried out taking into account, among other factors, the date of application, the stage of the proceedings and any situations of particular vulnerability identified. No estimate was ever given for its completion. A study focusing on the situation of asylum-seeking unaccompanied children and ageing out in Portugal published in 2021 revealed that among those questioned, the majority waited for more than 12 months for a decision on their application for international protection. In the context of the provision of legal assistance to asylum applicants in 2024 and 2025, CPR has also at times observed significant delays in the execution of judicial decisions by AIMA, even when a deadline is set by the court. According to CPR's observation, this mostly concerned the execution of judicial decisions ruling that an application should not be processed under an accelerated procedure and consequently ordering the Administration to reanalyse the case under the regular procedure, or Dublin cases that should be reprocessed. It was mostly thanks to the proactiveness of the applicant that the judicial decision was acted upon by AIMA. (...) In 2025, the asylum applications of several Afghan women were rejected because the IND considered that they could conform to the Taliban rules. There is not much national case law regarding the legality of this practice at the moment of writing this report. The Regional Court of Middelburg ruled on 26 November 2025 that the Minister was wrong in rejecting asylum application of an Afghan woman (Regional Court of Middelburg, 26 November 2025, ECLI:NL:RBDHA:2025:22308, available in Dutch at: <https://bit.ly/3Yt2ydk>). It relied on the CJEU ruling of 4 October 2024 (see above) to find that Afghan women automatically qualify for refugee status and that a further individual assessment is not permitted.

Sweden: According to the Agency's Instructions, the Swedish Migration Agency shall ensure predictable and consistent decision-making of high legal quality. According to the Agency's definition of high legal quality, this requires that decisions are formally and substantively correct, that the application of the law is consistent, and that case processing is carried out in accordance with applicable legislation and based on the individual circumstances of the applicant. In 2025, the Swedish Migration Agency introduced a new method for systematic national quality monitoring to assess the legal quality and consistency of asylum decision-making. Responsibility for national quality monitoring is now centralized, with the Legal Affairs Department coordinating the work and ensuring that monitoring is conducted on a regular basis, in collaboration with the Planning Department and the regional offices. The new method combines quantitative and qualitative analyses and compares outcomes across regions and applicant groups to identify differences in consistency. The first review, conducted in autumn 2025, covered approximately 800 first-time asylum decisions on protection grounds from 2024–2025, including both positive and negative decisions.

(...) As a consequence of a report issued by the Swedish Agency for Public Management (Statskontoret), the Swedish Migration Agency was, through its appropriation directions for 2025, instructed by the Government to take measures to ensure that the Swedish Migration Agency's case processing is uniform and legally secure. On 23 September 2025, the Swedish Migration Agency submitted the report "Increased Uniformity and Legal Quality in Case Processing" to the Government.

In its report, the Swedish Migration Agency concludes that, based on the findings of the Swedish Agency for Public Management, it will implement a large number of planned, ongoing, and already completed measures within the authority in order to address the deficiencies identified across various areas. The proposed measures include, inter alia, competence-enhancing initiatives, the establishment of a new operational management and coordination structure, specific measures aimed at ensuring uniform and legally secure handling of cases where LGBTIQ-related grounds and claims of religious persecution are invoked, as well as the implementation of methods and guidelines in accordance with guiding documents





for EU Member States. During 2026, the Agency intends to examine the possibility of conducting a thematic quality review of asylum cases in which LGBTIQ-related grounds are invoked, with the aim of analysing the effects of the implementation measures undertaken.

(...) In 2025, 6 735 applications for international protection were lodged in Sweden. This marks a decrease of 30 % compared to 2024, when 9,645 applications were lodged (which in turn was a 23% decrease from 2023, when 12,498 applications were lodged). Applications have declined steadily since 2022, and the total decrease between 2022 and 2025 amounts to 60%. The majority of the 9,645 applications lodged were in Stockholm (3,381), in Gothenburg (1,276) and in Malmö (1,223).

(...) The Swedish Migration Agency decided on 8,339 applications of international protection in 2025 and 57,539 prolongation decisions (including decision in accordance with the Temporary Protection Directive). The huge difference in applications is likely due to people from Ukraine having had to renew their resident permits in accordance with the Temporary Protection Directive. At the end of January 2025 there was a backlog of 4,169 first time applications and at the end of 2025 this number had decreased to 2,511.

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

Ireland: In October 2025, it was announced that up to 30 staff from the European Union Asylum Agency would be seconded to the International Protection Appeals Tribunal in order to assist with the Tribunal's increasing caseload. At the end of September 2025, there were 15, 929 cases pending before the Tribunal. EUAA staff will assist with preparing appeal files, conducting research on country-of-origin information and international protection jurisprudence, while also providing interpretation in difficult-to-source languages. The agreement between the Irish government and the EUAA will be valid until the 31st of December 2026. The agreement was announced after the release of figures in July 2025, 87 individuals were employed with IPAT and there were 25 unfilled vacancies.

Slovenia: *Legal assistance on appeal*

In its decision, issued in 2025, the Constitutional Court noted that the principle of confidentiality enshrined in Art. 35 of the Constitution applies to refugee counsellors as the relationship of trust is essential between the refugee counsellor and the applicant in order for the refugee counsellor to perform the tasks effectively. The Court however decided that the swift and efficient implementation of asylum procedures and measures to prevent abuse of the asylum procedure are constitutionally permissible objectives that allow the interference with the right to privacy. The Court therefore concluded that the obligation to disclose the information, although it undermines to some extent the confidentiality of the relationship between the applicant and the refugee counsellor, it does not constitute an excessive interference with the right to privacy under Art. 35 of the Constitution (Constitutional Court decision, U-I-52/22, 19. June 2025, available [here](#)). A refugee counsellor lodged an application against the decision of the Constitutional Court before the ECtHR arguing that the provision of the IPA is in breach of Art. 8 of the ECHR (ECtHR, *Regvar v. Slovenia*, communicated on 11. December 2025, available [here](#)).

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

N/A

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)





Germany: The Federal Association for Unaccompanied Minor Refugees, highlighted in a 2025 report based on a survey of 2024, that youth welfare services in Germany have been under enormous pressure due to the dismantling of structures for unaccompanied minors and the rising number of arrivals between 2021 and 2023. The report documents a significant deterioration in the care and support situation, with high demand for appropriate services often unmet, leading to delays, long waiting times, and burdens on the young people that also affect their participation. Staff shortages and overwork further exacerbate the situation, while access to education and health care for young refugees has worsened substantially. Despite the high educational motivation of newly arrived minors, the association strongly disagrees with the Federal Government's conclusion that "adequate accommodation, care, and support in line with the UN Convention on the Rights of the Child is still ensured." The association emphasizes that standard reductions in accommodation and support quality, which were permitted at the state level, have left many young refugees in inadequate or emergency structures and poorly prepared for adult life, underscoring the urgent need for improved coordination between federal, state, and municipal authorities.

Spain: In March 2025, the State-Secretary for Security at the Ministry of Interior issued an instruction providing indications on different aspects related to international protection procedures. Among other elements, the instruction provides for the adoption of measures to allow applicants with special needs or in a vulnerable situation (i.e. persons with disabilities, elderly people, pregnant women, single parents, victims of trafficking, LGTBIQ+ persons, mental health issues, victims of torture or of sexual assault) to be interviewed with particular attention to adapting their individual circumstance. Similarly, it contains details on interpretation and legal support, on the adequacy of spaces to carry out interviews, and it allows the applicant to be assisted in the formalisation by a cultural mediator or psychological support during the interview.

(...) In the 2025 Trafficking in Persons (TIP) report, the US Department of State referred to the gaps remaining in Spain regarding victim identification, and that the government did not report identifying any victims among the asylum-seeker population, despite civil society identifying such victims.

(...) In the Canary Islands, where high numbers of unaccompanied children in need of international protection arrived, many coming from Mali, UNHCR continued to work closely with the child protection authorities to strengthen their capacity for identification and referrals of children in need of international protection. After intense efforts by the Canary Islands government, in 2025 an agreement for the mandatory relocation of the estimated 5,400 foreign unaccompanied children under the guardianship of child protection authorities was reached.

(...) In March 2025, the government adopted the Royal-Decree 2/2025 which provides for urgent measures to guarantee the best interests of children and adolescents in situations of extraordinary migratory contingencies. It introduced modifications to different dispositions related to migrant children, for example by introducing the mechanism for the distribution of UAMs among Autonomous Communities, by establishing the criteria for the plan for solidarity sharing among Communities. In the same month, the Supreme Court (*Tribunal Supremo*) issued a landmark ruling affirming that unaccompanied minors (UAMs) who apply for asylum are entitled to access and remain within the asylum reception system. This means they should not be placed in the general facilities for UAMs or in shelters for abandoned children. The case stemmed from the situation of approximately 1,000 UAMs who had applied for asylum in the Canary Islands. The ruling compelled the central government - responsible for the reception conditions of asylum applicants - to take responsibility for these minors and provide a solution within 10 days. The UNHCR warned that that 55% of the UAMs arriving to the Canary Islands are in need of international protection, and it asked the government to prioritise their asylum applications in the decision-making process. The Minister of Youth and Childhood informed that the Government is working with the EUAA to train professionals of the child protection system also on asylum issues. During the following months, negotiations continued between the central government and the government of the Canary Islands on how and where to transfer and accommodate the unaccompanied migrant children asylum applicants, as well as to which facilities.





Considering the delay in assuming the reception and assistance of the UAMs asylum applicants by the central government, the Supreme Court convened the central government to a hearing at the end of May to explain the measures adopted so far to accommodate UAMs asylum applicants from the Canary Islands. At the beginning of June, the central government and the government of the Canary Islands started to organise the reception and assistance of those UAMs asylum applicants in the Canary Islands. The Government planned to open 800 reception places – all of them in the archipelago - specifically for UAMs asylum seekers, thus it agreed with the government of the Canary Islands to assume their reception within the asylum reception system. In addition, it offered 400 reception places in the Autonomous Community of Madrid. Between the end of July and beginning of August, a group of 250 UAMs asylum applicants started to be accommodated within the asylum reception system at the facility *Canarias 50* located in the Canary Islands, while other 10 were transferred to a facility in mainland. After the transfer of the first group of 10 UAMs to mainland, the government of the Canary Islands complained about the lack of additional transfers during the same week, despite the central government's commitment to transfer groups of 15-20 UAMs each week. This was justified due to the lack of appropriate additional facilities for UAMs asylum applicants in mainland. At the same time, the government of the Canary Islands announced to have reached an agreement with the central government to immediately transfer to mainland unaccompanied migrant girls – 90 in August - with the aim of avoiding assessing their asylum application while accommodated in the facility *Canarias 50*. A second group of 5 Malian UAMs were transferred to mainland in mid-August. By this date, the central government reported to have transferred a total of 240 UAMs (including those who aged out in the meantime) to facilities within the asylum reception system. (...) Close to the end of November, the central government informed to have complied with the Supreme Court's decision, with a total of 679 UAMs transferred to mainland after an additional 817 new places were created within the asylum reception system. The government of the Canary Islands urged the central government to transfer 2,700 UAMs before the 18 March 2026.

(...) On 22 July, the Council of Ministers adopted Royal Decree 658/2025 establishing the rules, procedure and measures to relocate UAMs from places declared to be in a state of extraordinary migratory contingency (currently, Ceuta, Melilla and the Canary Islands) to other Autonomous Communities. At the end of August, the government adopted the Royal Decree foreseeing the compulsory relocation of UAMs from border territories (such as the Canary Islands, Ceuta and Melilla) to other Autonomous Communities. Andalucía was the region expected to accommodate the majority of relocated UAMs. The transfer will be activated maximum 15 days after the arrival of each child. Some Autonomous Communities -especially those governed by the Popular Party - announced the intention to challenge the compulsory distribution of UAMs. The Government of the Balearic Islands lodged an urgent precautionary measure at the Supreme Court asking for the suspension of the transfer of UAMs asylum seekers from the Canary Islands to the archipelago, alleging the decision taken by the Supreme Court was invalid due to having been adopted without the mandatory opinion of the Council of State. Similarly, the government of Cantabria lodged other two appeals in November against the decisions taken by the Government Delegate in Ceuta to transfer and relocate two UAMs there, and an additional one in December against the transfer of a UAM from the Canary Islands. The first transfer was carried out from Ceuta at the end of September 2025.

Ireland: In April 2024, it was reported that Ireland has experienced a 500% increase in the number of unaccompanied children seeking international protection. According to figures released by Tusla's Separated Children Seeking International Protection Team in April 2024, in the previous 15 months, 607 unaccompanied children were referred to the service. Of those, 243 minors arrived within the first 3 months of 2024. While definitive statistics regarding unaccompanied children for 2025 are not publicly available, according to media reports, Tusla expected to care for approximately 1,200 unaccompanied children by the end of 2025, a 33% increase on the previous year. Separately, concerns were raised throughout 2024 regarding the use of unregulated Special Emergency Accommodation for unaccompanied minors in the care of the State. In February 2024, reports emerged that a care home utilised by Tusla had fabricated pre-employment checks of staff, including Garda vetting, therefore





posing a significant risk to vulnerable children in its care. An internal report conducted by Tusla determined that Garda vetting files providing clearance for staff to work for the company running the care home had been altered, while pre-employment checks carried out in respect of prospective staff were reportedly falsified. Concerns continued to be raised throughout 2025. In January 2025, it was reported that Tusla had placed children in the care of a firm that had been blacklisted due to concerns over lack of Garda vetting and child protection training. Concerns continued to be raised regarding the number of unaccompanied children seeking international protection missing from state care. In July 2024, it was reported that there were 39 children missing from State care. 22 of these children were unaccompanied minors seeking international protection. As of October 2025, 69 unaccompanied children had gone missing from State care. Of these, 48 had been accounted for subsequently, two had aged out and 19 remained missing at the time of reporting.

Malta: AWAS is responsible for implementing government policy regarding persons with special reception needs and oversees these assessments that are now mainly conducted in detention. Despite positive improvements in the last 3 years including in 2024 and 2025, NGOs report ongoing difficulties for vulnerable people to receive appropriate care and support. The increasing reliance on detention as the primary reception model and its further entrenchment through the establishment of support services within the centres, has often led to persons identified as vulnerable being left in detention since it was deemed – by AWAS and/or the Immigration authorities – appropriate for them to receive support in the detention centres. By way of example, in 2025 the ECtHR communicated to Malta an application submitted in 2024 regarding a vulnerable person held in detention, despite several official reports confirming their vulnerability (M.S. v. Malta, 30737/24, communicated on 19 March 2025, available at: <https://tinyurl.com/mrx26tda>). In their application, the applicant, an LGBTIQ+ person, laments treatment in Malta’s detention centre including incidents of bullying and harassment, as also the ineffectiveness of the system in place to verify legality of detention. The application indicates that, in 2024, practice shifted towards one where AWAS is no longer the sole entity responsible for vulnerability assessments for the PIO’s determination of the detention or otherwise of an applicant. With increased resources provided to the Detention Services to enhance its health services, the PIO increasingly relies on information and reports from these health services in its detention decision-making procedures. The application remained pending by January 2026.

The Netherlands: As of 1 January 2025, the medical examinations that were done for the last couple of years by MediFirst were taken over by the company called MedTadvies. After one year of reviewing the medical examination done by MedTadvies, VWN (Dutch Council for Refugees | VluchtelingenWerk Nederland) can conclude that MedTadvies is a continuation of the MediFirst examinations. The examinations are as limited as the previous ones with the same scope and function. The same complaints VWN had about them still exist today. The authors of this report also have noticed in 2025 a further decline in the total number of examinations, without having the specific data, because they are not provided publicly. The IND has been hesitant to provide specific information, but it is VWN’s belief that certain nationalities are still ruled out from having a medical examination due to lack of capacity and given priorities.

(...) The Council of State ruled on 20 August 2025 that the age inspection (*leeftijdsschouw*) is a viable method for age determination (Council of State, 20 August 2025, ECLI:NL:RVS:2025:3801, available in Dutch at: <https://bit.ly/4pwcnTc>). However, the conclusions of the age inspection have to be properly substantiated based on the findings of the inspection. For example, if certain behaviours or physical attributes of the applicant are determined to be fitting to those of an adult person, it has to be substantiated why those behaviours or attributes make the applicant an adult as opposed to a minor.

(...) As of 1 January 1st 2025, the IND terminated its contract with the NFI/NIFP. That meant that, to the knowledge of VWN, in 2025 no Forensic Medical assessments have taken place on the request of the government, therefore undermining the obligations under Article 18(1) of the APD. Given the low numbers of issued medical legal reports for the last couple of years, and the termination of the contract





with NFI/NIFP in 2025, VWN fears that the use of medico-legal reports as a form of supportive medical evidence is and will be given a low priority by the Dutch government.

Sweden: The Swedish Migration Agency has guidelines and legal positions that apply to asylum investigations involving children, LGBTQI cases, persecution on the basis of gender, and suspected human trafficking. The Swedish Migration Agency has guidelines for handling children's cases, such as how interviews with parents and asylum investigations with children are to be conducted. The latter guideline provides guidance on what the Swedish Migration Agency needs to take into account when investigating children. Among other things, it addresses issues about the interpreter and the interview environment, how children's ability to recount can vary depending on age, what information should be given to the child, and appropriate ways to initiate the investigative conversation. There are also routines for handling cases of suspicion that a child is being harmed and for detecting whether a child is married or living in marriage-like conditions. The Swedish Migration Agency has published a legal position regarding the investigation and assessment of persecution based on gender related to women. The legal position provides guidance for the investigation and assessment of the risk of women who invoke persecution on the basis of gender. The position addresses gender as a basis for refugee status and. Factors to be taken into account in the asylum investigation, such as confidentiality and the significance of trauma. The Swedish Migration Agency also has a procedure that provides support in how the Swedish Migration Agency should detect and handle cases where the applicant is subjected to gender-based violence. On 20 October 2025, the Swedish Migration Agency published a legal comment to clarify how the judgment of the Court of Justice of the European Union in case C-646/21 should be interpreted. The legal comment provides guidance in the handling of cases concerning issues related to the assessment of membership of a particular social group and the examination of the best interests of the child. The Swedish Migration Agency has published a legal position intended to provide guidance for the investigation and assessment of the forward-looking risk for individuals who invoke grounds for protection based on their actual or imputed sexual orientation, transgender identity, or gender expression.

(...) A report by the Swedish Ombudsman for children, published in October 2025, highlights the legal developments that have taken place and the existing case law concerning the application of the Convention on the Rights of the Child. In the report it is stated that following the incorporation of the CRC into Swedish law, the Swedish Ombudsman for children is aware of nine decisions by the Migration Court of Appeal addressing various aspects of migration law in which the Convention is mentioned. The report highlights the rulings mentioned above, and a ruling from 2018 - i.e, before the CRC was incorporated. The Convention is referred to in different ways in these decisions, in some cases only in the context of summarising the arguments of a party. The Ombudsman has not observed any more developed or substantive engagement with the Convention in decisions other than the three cases mentioned above (MIG 2018:20, MIG 2020:24 and MIG 2021:18). The Children's Ombudsman states that these rulings are important and can provide guidance in other cases and matters. They concern decisions that are clear and methodical in determining what constitutes the best interests of the individual child and how those interests should be weighed against other considerations. In addition, the court has identified deficiencies in the handling of cases, linked to children's rights, which have led the court to remit cases to the lower instance for renewed processing. The Children's Ombudsman looks forward to further rulings that clearly emphasize the importance of ensuring that children's rights are upheld and decisions that demonstrate how additional rights under the Convention can be applied in the migration law context. Although not elaborating on the rights under the CRC, two of the decisions made by the Migration Court of Appeal are mentioned below. In September 2024, the Migration Court of Appeal ruled in a case concerning the significance of a child not holding permanent residence when determining whether the child should acquire Swedish citizenship in connection with a parent's naturalisation. The Court found that there was no circumstance in the case that would justify imposing a requirement of permanent residence on the child. According to the Court, the decisive factor is the child's actual connection to the applicant and that the assessment must be carried out from the child's perspective. In December 2025, the Migration Court of Appeal held that an unaccompanied refugee





child's unconditional right to family reunification with their parents entails that minor siblings must also be granted residence permits when the parents are granted residence permits, unless there are specific circumstances showing that the siblings are not dependent on their parents. Denying residence permits to the siblings would effectively deprive the unaccompanied child of the right to family reunification. The Court referred to the EU Charter and the best interest of the child. The case was remitted to the Swedish Migration Agency for further examination of identity requirements and possible evidentiary relief.

(...) A civil society review by 25 organizations regarding the development and the government's work since the Committees recommendations, published in June 2025, reveals that while some progress has been made over the past two years on a number of recommendations, too little progress can be noted. Sweden is largely stagnating or moving in the wrong direction regarding children's rights. The most severe criticism is directed at the government for presenting proposals that directly contradict 14 specific recommendations from the UN Committee on the Rights of the Child, particularly concerning children in migration, socio-economic vulnerability and the justice system. In a general overview, a regression of rights is identified, as the principle of "progressive implementation" is being violated. Civil society is concerned that political rhetoric linking migration to criminality fosters racism, polarization, and stigmatization. The area of migration is described as having the most significant negative development for children's rights. Key points of criticism include restricted conditions for family reunification, proposals to abolish permanent residency and for introducing stricter requirements for citizenship, which creates instability for children. There is strong opposition to inquiries proposing expanded possibilities to place children in detention for longer periods. While the number of medical age assessments has decreased, the government's decision to discontinue a review of the system is criticized for maintaining legal uncertainty for asylum-seeking children.

(...) ECRE and some of its partner organisations carried out a study visit to Stockholm, Sweden in June 2025. The specific aim of the visit was to assess how Sweden's legal framework, asylum procedures, reception systems and civil society structures respond to the specific needs of self-identified women and girls. ECRE has published a [report](#) on the study visit which highlights several strengths in Sweden's approach, including the legal recognition of gender and sexual orientation within the refugee definition, individualised and gender-sensitive asylum interviews, and the possibility to request the gender of interviewers, interpreters or legal counsel. It also documents the central role played by civil society organisations in providing legal assistance, psychosocial support, anti-trafficking and female genital mutilation-related services, and inclusion programmes. At the same time, the report also identifies a number of significant challenges. For example, recent and planned reforms under the Tidö Agreement, including proposed reductions in first instance legal aid, stricter reception rules tied to assigned housing, expanded control measures, limitations on repeat applications and moves toward temporary residence permits, risk weakening gender-sensitive safeguards. The report also reveals gaps in interpretation quality, consistent gender-based violence-informed training, safe accommodation for single women, access to documentation and the sustainability of NGO services amid shrinking funding and limited engagement in the implementation of the EU Pact on Migration and Asylum. The report underscores that even though Sweden continues to host a strong ecosystem of actors committed to supporting asylum-seeking and refugee women and girls, the restrictive policy climate is increasingly shaping the extent to which these protections can be upheld in practice. Challenges that were identified during the study visit concerned, *inter alia*, that the purpose of the right to request a female or male interviewer, interpreter, and public counsel is not always explained. Another challenge affecting gender-sensitive asylum procedures involve the quality of interpretation services. The Swedish Migration Agency requires parental consent for children's interviews, which can create barriers to disclosure in sensitive cases such as FGM. See also above concerning children. The impact of trauma on communication and testimony can significantly affect the applicant's ability to navigate the asylum procedure as well as their capacity to give a coherent or detailed account of their experiences during the interview. Language barriers, trauma-related stress, and cultural factors may hinder their expressiveness, potentially affecting the outcome of their claims. Access to specialized health and psychosocial support is not uniformly guaranteed. Another challenge that was identified was the inconsistent training on gender-based





violence (GBV). Although the Swedish Migration Agency offers training opportunities on GBV, civil society representatives highlighted that the level and consistency of such training varies. There are no formal requirements for all legal representatives or the Swedish Migration Agency staff to have specialized knowledge in gender-related asylum claims. Legal professionals are not required to demonstrate specific expertise in GBV or related protection needs, even in cases where such issues are central to the applicant's claim. Another challenge that was identified concerns the significant evidentiary burden on applicants in GBV cases. Even when presenting credible claims, some applicants are denied protection without support from external institutions. Legal professionals and civil society representatives highlighted that the perceived credibility of claims frequently depends on language proficiency, emotional expression during interviews, and external corroboration. Applicants who struggle to clearly communicate their experiences - due to trauma, language barriers, or cultural norms - may be disadvantaged. Moreover, intersectional vulnerabilities are often overlooked. Lawyers noted that cumulative factors are rarely recognized, and intersectional approaches are not systematically applied in case assessments. Legal professionals highlighted that the new restriction on repeat asylum applications is seen as particularly harmful to survivors of gender-based violence, who often need considerable time before disclosing their experiences and may now lose the chance to seek protection after an initial rejection.

(...) Based on the findings and recommendations in the report from Statskontoret, the Swedish government gave the Migration Agency the task in its appropriation directive for 2025 to improve the uniformity and legal quality in decision-making and assessing LGBTQI asylum claims. On the 23rd of September 2025 the Swedish Migration Agency reported back to the government what measures have been taken during 2025 and are planned to fulfil the task in the government's appropriation directive. In its report, the Swedish Migration Agency briefly described that they have adopted a plan to implement the EUAA Practical Guide on applicants with diverse sexual orientations, gender identities, gender expressions and sex characteristics (SOGIESC). They describe that this plan includes measures that will be taken to address the conclusions made by Statskontoret as well as the external criticism against the legal assessments of SOGIESC asylum claims. The Swedish Migration Agency also reported that they will investigate the possibility of doing a thematic follow-up of the quality of decision-making in SOGIESC asylum cases, including examining whether a method can be developed to keep statistics in these cases. Both RFSL and RFSL Ungdom welcome that the Swedish Migration Agency has chosen to implement the EUAA's Practical Guide in SOGIESC/LGBTQI asylum cases and that they have developed an implementation plan to improve legal certainty and address the criticism that RFSL, RFSL Ungdom, Statskontoret and others have expressed. RFSL Ungdom highlights that a thematic quality follow-up that also concerns children and young people and includes children's rights and youth perspectives is necessary, as RFSL Ungdoms audits have shown that children and young LGBTQI people are particularly exposed to unjustified assessments and discrimination within the framework of the asylum process. The organisations note at the same time that no improvement has yet taken place. RFSL is currently conducting new research on SOGIESC asylum law, examining decisions and judgements in 2025, showing that no change or improvement has happened compared to what the previous legal investigations showed. RFSL's experience from SOGIESC case law 2025 is that discretion-reasoning has been found in cases concerning applicants from countries that have various forms of criminalising laws that are applied to arrest LGBTQI+ people. The credibility assessments still rely on stereotyped notions of LGBTQI+ people. RFSL concludes that the Swedish migration authorities' assessments of SOGIESC asylum cases are still contrary to national and international law. There are no official statistics over the Swedish Migration Agency's SOGIESC asylum decisions. From the 1st of January to the 31st of December 2025, RFSL has gathered altogether 448 judgements from the Swedish Migration Courts in asylum cases where SOGIESC claims were assessed by the courts. In 418 of the cases (93,3%) the court rejected the SOGIESC asylum claims. Out of the 418 denied SOGIESC asylum claims, 313 of them were based on the credibility assessment, where the applicant's sexual orientation, gender identity, gender expression and/or sex characteristics were not assessed as credible. The remaining 105 judgements were rejected based on sufficiency; most often when the country of origin was assessed as a so-called "safe country of origin" for LGBTQI+ people. RFSL has furthermore observed a significant increase in cases where





refugee status and residence permits are revoked for individuals who were granted protection on SOGIESC-related asylum grounds. RFSL considers this development to be a consequence of the Government's 2025 appropriation directive, which instructed the Swedish Migration Agency to prioritise revocation cases. A frequent basis for revocation is that the Swedish Migration Agency receives anonymous tips or discovers that individuals granted refugee status due to their sexual orientation have had children or are cohabiting with a person of a different legal gender, regardless of the other person's gender identity or the nature of their relationship. RFSL, Civil Rights Defenders and other civil society organisations report an increase in revocation cases affecting LGBTQI+ persons and warn that investigations increasingly involve intrusive and privacy-violating questioning about SOGIESC, contrary to UNHCR Guidelines No. 9, CJEU case law and the Swedish Migration Agency's own legal position (RS015/2021).

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)

Belgium: On 18 August 2025, a new law on family reunification entered into force, affecting procedures and conditions for family reunification for all types of family reunification (protections statuses, EU citizens, etc.). The law also creates also separate regimes for family reunification with subsidiary protection beneficiaries on the one hand, and recognized refugees on the other. The main changes can however be summarized as follows.

Specifically for persons having subsidiary protection:

- Persons with subsidiary protection will in principle have to wait two years after obtaining their status before a family member can apply for family reunification. An exception is made when the person is joined only by minor children and/or handicapped children above 18.
- It is no longer possible for minor children with subsidiary protection to be joined by their parents through family reunification. These parents will have to refer to the (much more insecure) procedure of a humanitarian visa.
- Abolishment of the (previously) 1 year grace period during which persons with subsidiary protection can be joined by their family members under more favourable conditions (no condition of sufficient means, housing, healthcare insurance, etc.). If the person is only joined by their minor children and/or handicapped child above 18 and under the condition that the relation already existed before their arrival in Belgium, there is still the exception under which they will not have to provide proof of sufficient means of income.
- There is no longer a right to family reunification if the family was not existing before their arrival in Belgium.

Specifically for persons having international protection:

- The grace period is shortened from 1 year to 6 months. The grace period depicts the period after a positive decision in the application for international protection, during which the persons are exempted from providing proof of:
 - o Sufficient housing
 - o Sufficient financial means
 - o Sufficient healthcare insurance
- Within 6 months after the positive decision, a 'beginning of proof' needs to be provided of:
 - o The identity of the applicant
 - o Family ties with the sponsor family member in Belgium.
- An additional four months is granted to complete the file, meaning the application needs to be complete within 10 months in total.

Applicable to both persons with subsidiary protection and refugee status:





- Family members accompanying the person to Belgium can apply for family reunification from the Belgian authority and no longer have to prove exceptional circumstances as to why they are not able to apply at the competent embassy abroad. This is the case for both family reunification with persons having obtained subsidiary protection and international protection. The condition is however that the relationship existed before their arrival in Belgium, and the family member themselves is on the territory for the purpose of applying for protection (he or she will thus have to provide a negative decision in the asylum application in order to be able to apply for family reunification from within Belgium).
- The age requirement for family reunification is lifted: instead of 18, both partners have to be at least 21 years old. However, if the partner has accompanied the person in Belgium, the age remains 18.
- Elevation of the reference for 'sufficient means'. This is currently set at 2,232.079 euro net, a 10% extra is added per family member. This is not applicable in so far the application is done within the grace period or the family member is exempted from this condition (i.e., if the person is joined only by minor children and/or handicapped child above 18 years of age). This counts as reference: under this amount, the immigration office may not automatically refuse but must, as was also the case under the old law, conduct a "needs analysis".

The new law provides for transitory measures. The above changes are thus not applicable to persons having received asylum or subsidiary protection before 18 August 2025 and under the condition the family reunification is applied for within two years after the coming into force of the law. This also means that persons having received subsidiary protection before 18 August 2025 may still be joined by eligible family members without the 2 years waiting period being applied.

Spain: The lack of social housing alternatives, the insufficient financial support allocated for rent expenses, high requirements (i.e. payslips, high quantities for deposit, etc.) and criteria in rental contracts and discrimination exposes many beneficiaries of protection to economic vulnerability and in some cases leads to destitution. Although many NGOs who work with refugees and asylum seekers during the first phase try to mediate between refugees and house holders at the time they start looking for private housing, there is no specialised agency or intermediate service helping beneficiaries to find a home. Even in cases in which NGOs act as intermediaries, asylum seekers face serious discrimination in renting apartments. Some of them face homelessness and are accommodated in homeless shelters. *CEAR Euskadi* denounced the discrimination that asylum seekers face in renting flats, and that 7 out of 10 real estate-agencies admit implementing explicit forms of discrimination, while the other 3 apply more subtle forms of it. Such challenges continued in 2025 and the beginning of 2026. The lack of houses for rent and high prices in certain cities are an impediment to the integration of refugees. Similarly, the lack of sufficient public housing for persons at risk of exclusion has been described as another barrier that asylum seekers and refugees face in Spain. In addition, discrimination by landlords and neighbours continued to represent the main obstacle for accessing housing. In April 2025, the organisation *CEAR* joined the claims for the right to decent and free from discrimination access to housing of migrants and refugees and prepared a set of proposals to the new national plan for accessing housing for 2026-2029. In May, different organisations called the Government to act against the discrimination that migrants and refugees face in the real-estate sector, by registering a law proposal on the topic at the Congress. In July, the organisation *Provivienda* denounced that the 99% of real-estate companies are discriminating migrants in accessing housing for rent. It also underlined that it obtained a compensation of 4,000 euros by a real-estate company in the Canary Islands for a Moroccan woman that could not access housing for rent due to her migrant background. A report published by the Economic and Social Council of Spain (*Consejo Económico y Social de España*) in December 2025 highlighted that migrants in Spain continue to face systemic exclusion from access to accommodation.

Ireland: Naturalisation

An exact breakdown of the number of individuals with refugee and subsidiary protection status who became naturalised was not available at the time of updating in January 2026. Throughout 2025, there





were a total of 40,479 applications for citizenship received. There were 26,400 grants of citizenship, while 377 applications were refused.

(...) Significant changes to the legal frameworks governing citizenship were announced in November 2025. Under these reforms, the qualifying residence period for refugees to be eligible for citizenship will be extended from three to five years. The criteria for naturalisation will also be revised through the introduction of a requirement that applicants demonstrate self-sufficiency. Applicants for citizenship must not have been in receipt of certain social protection payments during the two-year period immediately preceding the submission of an application. While the majority of the proposed changes will require legislative amendments in order to become operational, the qualifying residence condition with respect to citizenship became operational on the 8th of December 2025 and apply retrospectively to existing applications. The Irish Refugee Council has expressed significant concern with respect to the proposed changes, warning that they will significantly weaken refugee integration by limiting pathways to citizenship. Additionally, in April 2025, the Minister for Justice signed an order reinstating the State's powers to revoke naturalised Irish citizenship in serious cases. This followed a 2021 Supreme Court judgment which held that the previous revocation regime lacked adequate procedural safeguards and was therefore unconstitutional. As a result of that decision, no citizenship revocations have taken place since 2021. Under the revised legislative framework, an individual who is the subject of a proposed revocation is afforded 28 days to make submissions to the Minister for Justice setting out why their citizenship should not be revoked. Following the Minister's decision, the individual has a further 14 days to request an independent inquiry. Where such a request is made, an inquiry committee will be established, chaired by a retired judge drawn from the Circuit Court, High Court, Court of Appeal, or Supreme Court. The committee will also include two ordinary members appointed by the Minister for Justice.

(...) *Family reunification*

Throughout 2025, there were extreme and persistent delays in the processing of family reunification applications. These delays occurred primarily with respect to the processing of applications, meaning that in many cases, applicants were required to wait lengthy periods for a decision to be issued in respect of their application, with some applicants waiting in excess of 2 years. In the experience of the Irish Refugee Council, such delays have a detrimental impact on the enjoyment of family life for both applicants and their family members, who continue to face separation for prolonged periods. This is particularly concerning in cases whereby family members were vulnerable or facing persecution in their country of origin. (...) Significant changes to the legal frameworks governing family reunification were announced in November 2025. Under these reforms, individuals granted international protection are now subject to more stringent family reunification requirements, including the obligation to demonstrate adequate financial resources and access to suitable accommodation to support family members. Applicants will also be required to wait 3 years after being granted international protection in order to apply for family reunification. The majority of the proposed changes will require legislative amendments in order to become operational and according to the Minister of State, at the time of updating in January 2025, work was underway with the Attorney General to developing provisions for inclusion in the International Protection Bill to give effect to the proposals. The Irish Refugee Council has expressed significant concern with respect to the proposed changes, warning that they will significantly weaken refugee integration by limiting pathways to family reunification.

(...) *Health care*

Throughout 2025, beneficiaries of international protection, along with Irish citizens, faced difficulties in accessing medical care on the basis of a shortage of available places for medical card holders in GP practices. Whereby a medical card applicant approaches three different GPs and is notified that the GP is unable to accept them on their patient list, the applicant can request that the HSE assign them to a GP who does have capacity. However, in the experience of the Irish Refugee Council, applicants may be left waiting for several months until capacity becomes available and a GP is assigned.

The Netherlands: *Family reunification*





On 7 November 2025, the Council of State ruled that the right to family reunification remains intact if the sponsor obtains the Dutch nationality during the family reunification procedure (Council of State, ECLI:NL:RVS:2025:5376, 7 November 2025, available in Dutch at: <https://bit.ly/3LuEx2V>). The relevant reference point for the sponsor's residence status for the purpose of the right to family reunification is the date of the (subsequent) application. On 12 March 2025, a legislative proposal titled "*Asylum Emergency Measures Act*" was submitted. One of the measures proposed is to narrow the category of eligible family members who may qualify for family reunification with the sponsor in the Netherlands. If the proposal enters into force, unmarried partners will no longer qualify. Children who were already adults at the time the sponsor entered the Netherlands will also no longer be eligible for family reunification, nor will foster children and adopted children. A positive development, however, is that minor siblings of an unaccompanied minor holding an asylum residence permit will henceforth fall under the more favourable framework for family reunification. For them, currently, the regular framework applies (see below). Unlike the current situation, they will then also be eligible for an asylum residence permit. In the legislative proposal 'Implementation and Enforcement Act for the 2026 Asylum and Migration Pact 2026', this restriction of the category of eligible family members is also included.

There is no waiting period before a beneficiary of international protection can apply for family reunification. Although Dutch legislation applies different assessment frameworks for refugee status and subsidiary protection status, the rights attached to these asylum residence permits are equal, including the right to family reunification. For this reason, the current practice refers to a single-status system. However, on 12 March 2025, a new legislative proposal entitled "Introduction of a Two-Status System" was submitted, which, upon entry into force, does aim to introduce a distinction in the right to family reunification. The waiting period proposed in the legislative proposal for holders of an asylum permit that is based on subsidiary protection status, is would be two years. In the legislative proposal 'Implementation and Enforcement Act for the 2026 Asylum and Migration Pact 2026', this waiting period is also included.

(...) As of November 2025, there are 53,550 outstanding applications for family reunification filed by beneficiaries of international protection under the favourable framework, 32,820 of which have exceeded the maximum decision period of 6 months. The IND provides an estimate of the expected waiting period before the start of the procedure: On the webpage 'When will the IND start with my application for family reunification?', the IND gives an estimate of the month in which the application is expected to be taken into consideration. Currently it shows that IND will start processing applications that were filed in November 2023, in January 2026. Applications that were filed in November 2025, are expected to be processed starting August 2028. The backlog is nearly three years.

(...) Between March 2024 and March 2025, the Netherlands was not able to help evacuate any more family members of beneficiaries of international protection out of Gaza, because the border between Gaza and Egypt was closed. Since March 2025, the Ministry of Foreign Affairs successfully helped facilitate several more evacuations via Israel and Jordan. The IND has therefore resumed the processing of these applications with priority.

(...) *Housing*

In 2025 there is still a backlog in housing for beneficiaries of international protection waiting in COA facilities to be housed by a municipality. In May 2025, the backlog of status holders still to be housed amounted to 12,500. In January 2026, there were 18,420 refugees with a permit residing in COA reception centres.

(...) In August 2025, the Scheme to Encourage the Exit of Permit Holders from Asylum Reception 2025 ('Regeling stimuleren uitstroom vergunninghouders uit de asielopvang 2025') was published. This scheme retroactively extends the existing Hotel and Accommodation Arrangement, which was in effect until 1 January 1 2025. The scheme was also expanded and will run until 1 January 1 2026. It is already known that HAR+ will be extended until 1 July 2026, but, at the time of writing this report, the regulation for that extension has not yet been published. The scheme extends the existing HAR, with the purpose of relieving the reception facilities by allowing status holders, while waiting for regular housing, to be accommodated in their future place of residence. The municipality to which the status holder is assigned for housing by the COA can temporarily (for a maximum of twelve months) provide shelter in





(recreational) locations not intended for permanent residence, such as a hotel, guesthouse, holiday home, or Bed & Breakfast, and immediately count this towards fulfilling the housing allocation target. The principle is that the municipality ensures regular housing within twelve months. Under the previous HAR, the period was six months. The target group remains the same. The COA provisions continue for a maximum of 12 months. After that, the municipality takes over the costs if regular housing has not yet been arranged. In addition to the COA provisions, the permit holders also receive an extra allowance similar to the "Logeerregeling" the Hosting Scheme.

Portugal: While CPR is not aware of systematic instances of homelessness among beneficiaries of international protection, still in 2025, access to adequate housing is consistently identified as a major issue within the national context by asylum applicants, refugees and NGOs. Factors such as high prices, and contractual demands including high deposits, need of guarantors and proof of income hinder the capacity of asylum applicants and refugees to access the market directly, and that of frontline service providers to increase reception capacity. Consequently, asylum applicants and refugees often have to resort to overcrowded or sub-standard housing options when accessing the private housing market.

Sweden: *Residence permits*

On 9 April 2025, an official inquiry presented its first report on the discard of permanent residence permit and certain adjustments to the EU minimum level set by the Pact. The Inquiry proposes establishing an arrangement with only temporary residence permits for refugees or persons eligible for subsidiary protection, resettlement (quota refugees), long-term residents and aliens who were granted residence permits based on exceptionally distressing circumstances and in cases of certain impediments to enforcement. The Inquiry proposed that those covered by the proposals on phasing out the possibility of being granted a permanent residence permit should be able to obtain Swedish citizenship if they have reasonable prospects of obtaining the right of permanent residence. The Inquiry proposed introducing provisions that make it possible to reject an asylum application in all situations where this is allowed under the Asylum Procedure Regulation. The Inquiry proposed introducing provisions that make it possible for the Swedish Migration Agency to declare an asylum application manifestly unfounded in all situations permitted under the Asylum Procedure Regulation.

On 26 September 2025 the same official inquiry as mentioned above presented its final report "Changing of permanent residence permit for certain Aliens (SOU 2025:99)"

The Inquiry proposed introducing a special act on the revocation of permanent residence permits. The act would cover all aliens who have been granted permanent residence permits based on their refugee status, are eligible for subsidiary protection, have resettled in Sweden (as quota refugees), are long-term residents of Sweden or have been granted permanent residence permits on the grounds of exceptionally distressing circumstances or in cases of certain impediments to enforcement.

The main rule according to the proposed act is that a permanent residence permit covered by the act should be revoked and replaced by a temporary residence permit, if the relevant conditions are met. The Inquiry proposed introducing an exemption according to which permanent residence permits would not be revoked for aliens who have initiated the process to obtain Swedish citizenship within a certain period of time and have not been denied citizenship through a decision that has become final and non-appealable.

(...) *Family reunification*

In December 2025, the Migration Court of Appeal found that the unconditional right of an unaccompanied refugee child to reunification with their parents means that, when the parents are granted a residence permit, minor siblings must also be granted a residence permit, unless special circumstances indicate that they do not have a dependent relationship with their parents. Parents with a residence permit based on family ties will not be considered as sponsors according to the Aliens Act and there is no special provision on the right for siblings to be granted residence permit. The Migration Court of Appeal referred to EU law and the CJEU case EU:C:2024:96 as a ground for residence permit for the siblings. The Swedish Government instructed an official report of the Government to review the Swedish regulatory framework for family member immigration with the aim of achieving restrictive and





effective regulation. On 5 September 2025, the Inquiry presented its report “Stricter conditions for immigration based on family ties”. The Inquiry proposed that, as a rule, for an application for a residence permit based on family ties to a person with a temporary residence permit to be granted, the sponsor must have lived in Sweden with a residence permit for at least two years at the time the application is submitted. Certain cases should be exempt from the waiting period, including cases relating to unaccompanied minors and certain cases involving refugees. It should also be possible to make exceptions to the waiting period if there are special grounds to do so. The Inquiry also proposed that the regulation on family member immigration for situations not covered by EU law should be entirely optional in its design, even in cases involving the immediate family. Furthermore, the Inquiry proposes that the maintenance requirement should, as a general rule, also apply when assessing an application for an extension of a residence permit based on family ties.

13. Return of former applicants for international protection

Germany: By the end of 2025, Germany resumed deportations to Syria and Afghanistan after many years of largely suspended returns to these countries. Among these deportations, the Federal Government reported that 83 convicted offenders were returned to Afghanistan, and for the first time since the start of the Syrian civil war, a convicted Syrian criminal was deported after the fall of the Assad regime—marking only the third such return under the stricter enforcement approach. These measures have been pursued following political decisions and negotiations with the respective governments, with a particular focus on the removal of convicted criminals and persons considered security risks, even as debates continue about the security situation in Syria and Afghanistan and overall asylum numbers decline. The government’s resumption of deportations to Afghanistan—including charter flights carrying Afghan nationals, some convicted of crimes—drew sharp criticism from human rights organisations, advocacy groups and legal experts concerned about the pervasive human rights violations under Taliban rule. Pro Asyl condemned Germany’s first flight of 81 deportees to Kabul as occurring “despite known human rights abuses and deterioration of conditions on the ground,” arguing that forced returns violate international law and urging a halt to all deportations to Afghanistan given the risks of torture, persecution and abuse faced by returnees. The German Institute for Human Rights similarly called for an end to forced returns as long as the security and humanitarian situation remains dire. Critics emphasised that cooperation with the Taliban—an internationally non-recognised de facto authority implicated in systematic rights violations—risks legitimising a regime guilty of widespread abuses, and that Germany should instead prioritise protection and alternatives to deportation for people at risk. In response to questions about arrangements with the Taliban regarding deportations to Afghanistan, Parliamentary State Secretary Daniela Ludwig stated in early January 2026 that the German government had reached agreements with the Afghan de facto government on technical-level discussions, below the political level, to resume regular readmission procedures. She clarified that responsibility for implementing deportation measures lies primarily with the federal states, while the Federal Police provides support such as security escorts in accordance with their residence law responsibilities. The government emphasized that as of January 2026, only persons who had committed criminal offenses had been deported to Afghanistan. Regarding monitoring to ensure respect for human rights of deported persons, the response noted that the National Agency for the Prevention of Torture regularly observes Federal Police operations as part of its mandate and based on its own priority-setting.

Ireland: In September 2025, it was announced that for a limited period, persons in the international protection process prior to 28th September 2025 would be offered increased reintegration assistance if they chose to withdraw their international protection application and avail of voluntary return at an earlier stage in the process. Prior to September 2025, the level of reintegration assistance offered was up to €1,200 per person and €2,000 per family unit. Under the changes, whereby an applicant chooses to withdraw their application for international protection before receiving a first instance decision or prior to appealing a negative first instance decision, the reintegration assistance offered would be





increased to €2,500 per person to a maximum of €10,000 per family unit. Whereby an applicant is in the appeals process and decides to voluntarily return prior to an appeal decision being issued, their assistance will increase, but to the lower amount of €1,500 per person and to a maximum of €6,000 per family unit. If they receive a final decision on their application assistance will only increase for families to a maximum of €3,000 per family unit. The Irish Refugee Council raised significant concerns regarding the revised policy, noting that it targets specifically persons in the protection process and that it is unethical and inappropriate to pay applicants in need of safety to abandon their claims. 1,496 persons had left Ireland by way of voluntary return as of 5 December 2025, an increase of 78% compared with the same period in 2024. Throughout 2025, there was an increase in the number of Deportation Orders signed. As of the 10th of December, 4,454 deportation orders have been signed throughout the year, compared to 2,403 deportation orders signed in 2024. The increase in deportation orders is attributable to the new government's decision to strengthen immigration enforcement. 2025 also saw the renewed use of chartered deportation flights. A contract was signed in November 2024 for the provision of charter aircraft for deportation operation purposes. The first flight, bound for Georgia, departed Dublin airport in February 2025. Passengers on board the flight were accompanied by Garda personnel, medical staff, an interpreter and a human rights observer. As of December 2025, six charter flights operations had removed 205 people from the State. Of these, five operations were to non-EU destinations, including Georgia and Nigeria, removing 182 persons subject to deportation orders. The remaining operation removed 23 EU citizens on grounds of criminality.

Poland: According to the Rule of Law Institute, in November 2025 Frontex halted an operation to return Pakistani nationals due to Poland's failure to ensure their right to apply for asylum, after being informed by an NGO of a possible violation of the principle of non-refoulement. The migrants were to be transported to Frankfurt am Main and from there to Pakistan, together with foreign nationals deported from Germany. The operation was to be carried out in cooperation with Frontex.

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)

Belgium: For 2025, Belgium pledged to resettle 1,000 persons. However, due to the ongoing reception crisis the resettlement programme is severely impacted. During 2022, only 71 out of 1,250 resettlements (6%) were effectively carried out. In 2024, 487 persons were resettled to Belgium, mainly Congolese refugees from Rwanda and Syrian refugees from Türkiye. In 2025, the Minister for Asylum and Migration announced that she would discontinue the resettlement programme. The Minister declared that she would only resume the programme as soon as there is a decrease of migrants arriving in Belgium irregularly.

Germany: In early January 2026, the German government provided statistics on arrivals through various protection pathways for 2025 in response to a parliamentary question. According to the Foreign Nationals Central Register, between 1 January and 30 November 2025, 51,075 persons who arrived during that period received their first residence permit under family reunification provisions. Under the Federal Reception Programme for Afghanistan, 1,137 persons arrived in Germany during the full year 2025, while 1,093 persons were admitted through the resettlement procedure over the same period. In April 2025, Germany suspended its participation in the United Nations refugee resettlement programme, temporarily halting new commitments and admissions for particularly vulnerable refugees while ongoing coalition negotiations continued between the former government parties CDU/CSU and SPD. During the pause, the Federal Ministry of the Interior and UNHCR agreed that only cases already far advanced would still be processed, but no new resettlement applications were accepted until a new government decides on the programme's future. According to the NGO ProAsyl, in May 2025, a





scheduled resettlement flight from Kenya to Germany carrying refugees from African conflict zones was cancelled at the last minute shortly before the new German government took office, despite passengers having already been taken to Nairobi to prepare for departure. Two South Sudanese families affected by the cancellation challenged the decision in court; in late October 2025 the Higher Administrative Court of Berlin-Brandenburg ruled that the German government must allow one family to enter. In response to a parliamentary question in early January 2026, Parliamentary State Secretary Daniela Ludwig stated that following the court's decision, the resettlement procedure for the 183 resettlement refugees affected by the suspension of the flight scheduled for May 2025 from Kenya had been resumed, with the majority of affected persons having already entered Germany or expected to arrive in early 2026. She reported that during the 2024 to 2025 federal resettlement admissions, a total of 5,099 particularly vulnerable persons had arrived in Germany, comprising 2,664 persons through the resettlement procedure, 2,277 persons under the Humanitarian Admission Programme Turkey, and 158 persons under a state reception programme of the state of Brandenburg. Ludwig emphasized that the governing coalition parties had agreed in their coalition agreement to end voluntary federal reception programmes as far as possible, and that the court ruling on the specific situation had no impact on this decision, with voluntary admission programmes being or to be ended as far as possible. Parliamentary State Secretary Daniela Ludwig further confirmed that Germany had not submitted any contribution to the European Union Resettlement and Humanitarian Admission Plan due to the ongoing suspension of resettlement, and noted that the governing coalition parties had agreed in their coalition agreement to end voluntary federal reception programmes "as far as possible". Besides that, in 2025, the German government had revoked nearly every second admission commitment made under the Federal Reception Programme for Afghanistan. According to a parliamentary response from Parliamentary State Secretary Daniela Ludwig, as of 22 December 2025, revocation proceedings had been initiated in 49 cases, with revocation decisions issued in 33 cases. In 27 cases, lawsuits had been filed before the Administrative Court of Ansbach challenging the respective revocation decisions, with applications made to restore suspensive effect. The Administrative Court of Ansbach had decided on 19 of these interim relief applications by ruling: in 13 cases the court granted the application in whole or in part, while in six cases the application was rejected.

Spain: In 2025, a total of 860 refugees were resettled in Spain, being 364 Syrian refugees displaced in Lebanon and 496 Nicaraguan refugees from Costa Rica. UNHCR supported the resettlement programme through its participation in the national resettlement coordination group and the community sponsorship initiative through a specific consultancy, which informed discussions on the way forward for these programmes in the future.

(...) In December 2025, the IOM and the Ministry of Inclusion, Social Security and Migration signed an agreement for the implementation of projects in the areas of resettlement, assisted voluntary return and reintegration, labour mobility and social inclusion during 2026 with a total budget of €4 million. In January 2026, the Ministry of Inclusion, Social Security and Migration launched an informative video on resettlement, which explains in detail how the resettlement programme works and outlines the work carried out in each of its phases. In March 2025, UNHCR called for more labour migration channels to Spain to curb the dangerous route to the Canary Islands. After the shipwreck of a boat in El Hierro (Canary Islands) in May 2025, *Accem* and *CEAR* called for legal and safe pathways to Spain.

Ireland: By May 2025, 83 Syrian nationals and 6 Afghan nationals had been resettled under the Irish Refugee Protection Programme for 2025. Applicants arriving under resettlement receive programme refugee status. Ireland's pledge for resettlement and humanitarian admissions, along with forecasted resettlement numbers for 2024-2025 was submitted to the European Commission on the 7th of October 2023. Ireland has pledged to support the arrival of 1,200 refugees under the UNHCR resettlement process from Lebanon and Jordan, with a further 100 humanitarian admissions from Afghanistan. Under the Union Resettlement and Humanitarian Admission Plan (2026-2027), Ireland pledged to resettle 1,200 people and grant humanitarian admission to a further 100 people.





(...) For 2025, a designated partner organisation, was appointed by the Department to support the admission of 50 Afghan individuals under the Humanitarian Admissions programme, using a community sponsorship framework. The 2025 Humanitarian Admissions Programme was divided into two phases and Phase 1 has been completed. It is planned to complete the balance of the 50 pledged arrivals before the end of 2025. It is envisaged that the 50 pledged arrivals will arrive in Ireland throughout 2026.

The Netherlands: From January to November 2025, 346 refugees were resettled to the Netherlands, of which 27% were from the Democratic Republic Congo.

(...) After the Dutch elections, a new parliament was installed and, in December 2025, a parliamentary motion was accepted in which the government was asked to evacuate certain categories of military and embassy guards from Afghanistan.

Sweden: The Swedish Migration Agency resettled 861 refugees in 2025.

15. National jurisprudence on international protection in 2025 (please include a link to the relevant case law and/or submit cases to the [EUAA Case Law Database](#))

See above, Dublin procedures.

16. Other important developments in 2025

Sweden: The Government appointed an inquiry on 21 November 2024 to review the need to adapt Swedish legislation in line with the Pact instruments concerning asylum procedures and screening, including mechanisms for monitoring fundamental rights. The inquiry submitted its report to the Government on 24 November 2025, and consultation bodies were given until 7 January 2026 to analyse and comment on its contents. This represented an unusually short consultation period for legislation of such scope and was criticised, among others, by the Swedish Human Rights Institute, which in its response stated that it considered several of the proposals presented in the inquiry to constitute general and serious restrictions on the rule of law and on human rights. Overall, the general response from the consultation bodies indicates that the proposed legislative changes could have significant consequences for asylum seekers. In particular, there appears to be limited analysis of the potential impact from the perspective of the applicants themselves. Certain changes may substantially restrict procedural rights and create challenges in ensuring full compliance with Sweden's international obligations. While the proposals aim to implement the Pact efficiently, they raise concerns regarding the protection of individual human rights and the adequacy of safeguards within the proposed legislative framework. The Government has indicated that the final bill is expected to be submitted on 26 March 2026.

(...) The possibility to switch from the asylum procedure to accessing a labour permit after rejection of the asylum application, which was introduced in 2008, was abolished 1 April 2025. It was done by adopting changes proposed by the public inquiry SOU 2024:15. The change was adopted without any transitional provisions, meaning that after 1 April 2025 no new permits were granted to asylum seekers according to this rule. This is reflected in the number of granted permits on this ground during 2025, which was 73. By contrast, 309 asylum seekers were granted work permits according to the rule in 2024. The change also affected persons who already were holding permits according to the rule that were no longer able to extend them. This effect, making many holders of work permits unable to extend them and often leaving them with no other option than to apply for work permit from abroad, has been covered by media.

Slovenia: *National forms of protection/regularisation*

In September 2025, the new amendments of the Foreigners Act came to force. Article 34(11) allows asylum seekers and rejected asylum seekers to apply for a work residence permit.

Asylum seekers can apply for a residence permit if:





- they have not been convicted for a criminal offense for which a prison sentence of more than 3 years can be imposed
- they are included in social insurance system on the basis of employment when lodging the application for the residence permit
- have been included in the social insurance system for at least three months in the past four months.

If during the residence permit procedure, the asylum seeker's application is dismissed or they are granted international protection their procedure to obtain the residence permit is stopped. If the asylum seeker's application is rejected and the decision becomes final the procedure is continued however under the conditions that apply for rejected asylum seekers (regulated in Art. 37(9) of the Foreigners Act. In case the work residence permit is granted the applicant's asylum procedure is stopped. Rejected asylum seekers whose decision became final can apply for a work residence under the conditions set in Art. 37(9) of the Foreigners Act. After their decision on asylum became final they have to lodge the application for a work residence permit in the timeframe for the voluntary return. If the application is lodged in time they are issued a confirmation that allows them to stay in Slovenia until the decision on the permit is made. During the procedure they can continue their employment.

The work residence permit is issued to rejected asylum seekers if:

- they were included in social insurance system based on employment when their decision on asylum became final
- if, at the time the decision became final, they were included in the above-mentioned system at least 6 months.

In addition, both asylum seekers and rejected asylum seekers have to meet other conditions for obtaining the residence permit on this ground, meaning that they needed to provide a valid passport from their country of origin. Since asylum applicants obtain free access to the labour market 3 months after lodging the application, this means that only asylum applicants that were staying in Slovenia for more than 6 or 9 months can be potentially eligible for the residence permit. In addition, their application should not be dismissed meaning that asylum applicants processed in the Dublin procedure cannot access the permits.

Part B: Publications

1. If available online, please provide links to relevant publications produced by your organisation in 2025:

ECRE Policy Notes

- ECRE Policy Note 50: [Towards a point of no return for fundamental rights? The EC's proposal for a Return Regulation](#), October 2025
- ECRE Policy Note 49: [All Packed-up and Ready? Assessment of the State of Play on Pact Implementation](#), October 2025
- ECRE Policy Note 48: [A Gender-sensitive Approach to Combating Human Trafficking and Support Asylum-seeking Survivors in the EU](#), July 2025
- ECRE Policy Note 47: [Reception Conditions: Protecting Women and Girls in EU Asylum Systems](#), May 2025
- ECRE Policy Note 46: [Maintaining International Protection in Europe During Syria's Transition](#), March 2025





ECRE Policy Papers

- ECRE Policy Paper 15: [Creating More “Safe” Countries and Frontloading the Pact: ECRE’s analysis of the proposed amendments to the Asylum Procedures Regulation covering safe countries of origin, frontloading the Pact and safe third countries, and the politics behind the measures](#), July 2025

ECRE Comments Papers

- [ECRE Comments on the Qualification Regulation \(EU\) 2024/1347](#), December 2025
- [ECRE Comments on the Proposal for a Regulation of the European Parliament and of the Council establishing a Common System for the Return of Third-country Nationals staying illegally in the Union and repealing Directive 2008/115/EC, Council Directive 2001/40/EC and Council Decision 2004/191/EC](#), June 2025
- [ECRE Comments on the Regulation of the European Parliament and of the Council amending Regulation \(EU\) 2016/399 on a Union Code on the rules governing the movement of persons across borders](#), March 2025
- [ECRE Comments on the Regulation of the European Parliament and of the Council introducing the screening of third-country nationals at the external borders and amending Regulations \(EC\) No 767/2008, \(EU\) 2017/2226, \(EU\) 2018/1240 and \(EU\) 2019/817](#), February 2025

ECRE Working Papers

- [ECRE Working Paper 24: Transitioning to What? Legal Statuses Available After Temporary Protection for People Displaced from Ukraine – Paper 3: Poland and Italy](#), February 2026
- [ECRE Working Paper 23: Transitioning to What? Legal Statuses Available After Temporary Protection for People Displaced from Ukraine – Paper 2: Belgium, France and Spain](#), February 2026
- [ECRE Working Paper 22: Transitioning to What? Legal Statuses Available After Temporary Protection for People Displaced from Ukraine – Paper 1: Germany, Austria, Czechia, Estonia, Latvia, Lithuania and Republic of Moldova](#), February 2026

ECRE Legal Notes and interventions

- [ECRE Legal Note 17: The Cessation of International Protection and Review of Protection Statuses in Europe](#), April 2025

ECRE intervened in the following cases:

- *LB v France* (App. No. 11013/24) – intervention of November 2025 (not published)
- *DH v Hungary* (App. No. 42008/23) – intervention of October 2025 (not published)
- *TF v Switzerland* (App. No. 17088/23) - intervention of October 2025 (not published)
- *MA v Sweden* (App. No. 6559/25) – intervention of September 2025 (not published)





- *Al Khalidi v Bulgaria* (App. No. 26364/24) – intervention of September 2025 (not published)
- [MS v Malta](#) (App. No. 30737/24) – intervention of July 2025
- [ABA and Others v the Netherlands](#) (App. Nos. 27637/23 and 1954/24) – intervention of March 2025
- [AAN and Others v Greece](#) (App. No. 38203/20 and 7 others) – intervention of March 2025
- [MAE v Poland](#) (App. No. 7463/23) – intervention of March 2025

ECRE statements

- [Joint Statement: Council's position on the Return Regulation proposal](#), December 2025
- [Open Letter: Upholding Not Undermining International Law](#), September 2025
- [Open Letter: Call for donors to support civil society to prevent a crisis of asylum reception and inclusion in Europe](#), April 2025

Other ECRE publications

- [Joint Shadow Report on GREVIO Baseline Evaluation procedure for the EU](#), December 2025
- [AIDA Country report on Egypt](#), July 2025

AIDA Country reports

- Austria: 2024 [Update](#) and [Annex](#), July 2025
- Belgium: 2024 [Update](#) and [Annex](#), June 2025
- Bulgaria: 2024 [Update](#) and [Annex](#), March 2025
- Croatia: 2024 [Update](#) and [Annex](#), August 2025
- Cyprus: 2024 [Update](#) and [Annex](#), April 2025
- France: 2024 [Update](#) and [Annex](#), June 2025
- Germany: 2024 [Update](#) and [Annex](#), June 2025
- Greece: 2024 [Update](#), [right of reply](#) and [Annex](#), September 2025
- Hungary: 2024 [Update](#), [right of reply](#) and [Annex](#), May 2025
- Ireland: 2024 [Update](#) and [Annex](#), May 2025
- Italy: 2024 [Update](#), [right of reply](#) and [Annex](#), July 2025
- Malta: 2024 [Update](#), [right of reply](#) and [Annex](#), August 2025
- Netherlands: 2024 [Update](#) and [Annex](#), May 2025
- Poland: 2024 [Update](#) and [Annex](#), July 2025
- Portugal: 2024 [Update](#), [right of reply](#) and [Annex](#), September 2025
- Romania: 2024 [Update](#) and [Annex](#), August 2025
- Serbia: 2024 [Update](#) and [Annex](#), July 2025
- Slovenia: 2024 [Update](#) and [Annex](#), July 2025
- Spain: 2024 [Update](#) and [Annex](#), April 2025
- Sweden: 2024 [Update](#) and [Annex](#), May 2025
- Switzerland: 2024 [Update](#) and [Annex](#), May 2025





- Türkiye: 2024 [Update](#), July 2025
- Ukraine: 2024 [Update](#), June 2025
- United Kingdom: 2024 [Update](#) and [Annex](#), April 2025

AIDA Reports

- [The implementation of the Dublin III Regulation in 2024](#), November 2025
- [Asylum in Europe: The situation of applicants for international protection in 2024](#), September 2025
- [Preparing for reform: Romania’s asylum system ahead of the EU Pact](#), August 2025
- [Access to socio-economic rights for beneficiaries of temporary protection: 2023 update](#), January 2025
- [The implementation of the Dublin III Regulation in 2023](#), January 2025

2.If not available online, please share your publications with us at:
Asylum.Report@euaa.europa.eu

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	Date
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