



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**.*





Contact details

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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?

One of our main areas of work is providing advice on asylum procedures. One format we offer is information at the initial reception centre. Our experience here has been that, since the beginning of 2025, hearings/interviews have been scheduled very quickly after asylum applications have been submitted (not always, but often). However, this seemingly positive development has the glaring problem that it leaves people with little or no opportunity to prepare adequately.

At the same time, we see an enormously restrictive tendency within the asylum procedures not only at the Federal Office, but also at the Courts.

In addition, people are also becoming increasingly restricted and marginalised in terms of social law (just one example, the so called “social card” or the failure to hand over identity documents such as temporary residence permits during Dublin proceedings).

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

In general: anti-racism campaigns or at least a greater effort to educate people about prejudices against asylum seekers; a more restrictive implication within the area of “integration”, although the German policy wants to strengthen the ways into the labour





market, but by establishing more possibilities for sanctions and, at the same time, by giving the illusion most of the refugees seeking protection are not willing to work.

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?

Following the collapse of the last government coalition (SPD/die Grünen/FDP), a new legislative proposal has been introduced by the CDU/CSU/SPD coalition. We are currently preparing to analyse this proposal. At this stage, it is not yet possible to make concrete observations regarding the implementation of the Pact on Migration and Asylum.

However, a number of accompanying national measures and reform initiatives are already underway, indicating that the legislator is not waiting for the formal implementation of the new Pact. These include, inter alia:

the abolition of mandatory legal counsel in detention pending deportation, the designation of "safe countries of origin" by means of secondary legislation (regulation), rejections (Zurückweisungen) of asylum seekers at the German border, the non-issuance of visas for particularly vulnerable persons (e.g. from Afghanistan) despite existing admission commitments, further restrictions in social benefits law, including the introduction of payment cards and the exclusion of benefits in Dublin procedures.

Overall, there is a high density of reforms at the national level. In addition, there has been a tightening of the enforcement of the obligation to leave the country. In practice, toleration permits (Duldungen) are no longer granted where a deportation is foreseeable within the next six months, following a decree of the Hessian Ministry of the Interior.

Taken together, these developments suggest a significant shift towards more restrictive migration and asylum policies at the national level, preceding and potentially shaping the context in which the Pact on Migration and Asylum will be implemented.

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)

We do not engage at the border, but we get more information about people complaining about disrespectful behaviour at the registration centre. They report more often problems about getting into medical treatment soon and they have a lack of information provided by the authorities. Due to the already mentioned accelerated asylum procedures, they lack enormously to adequate consultations for their asylum cases and mostly they don't have any chance to get an appointment for preparation of the interview due to the short time given between the invitation and the hearing's appointment.

In addition, there are serious concerns regarding refusals of entry at the German border. There are reports of repeated attempts by individuals to enter Germany, particularly via Poland, being denied. The Administrative Court of Berlin has already ruled that such refusals of entry are unlawful, explicitly referring to EU law. Although the decision formally has effect only inter partes, it is nevertheless generalisable and strongly indicates that the current practice is incompatible with Union law. Furthermore, there are reports of pushbacks involving returns towards Belarus, raising serious concerns with regard to the principle of non-refoulement.

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

Although in theory the access to information and legal assistance is given, practically there are many burdens. First, the lack of time as described above. Second, the financial aspect got worse due to the implementation of the "social card". Many asylum seekers are not able to pay at least a smaller amount for lawyers as they -especially in Dublin procedures- don't have access to (physical) money. The NGOs who are engaged in legal assistance get more and more in financial troubles since the German prior government did decrease the financial support. Many consultation offices had to reduce their staff.

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)

Nothing changed noticeably.

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

Asylum seekers on Dublin procedures face especially the following problems: confiscated ID documents (they don't even get a physical Duldung), which have an enormous negative impact on daily life; no or limited access to money. When they are already living in districts,





they usually get goods receipt notes (“Warenbezugscheine”) instead of money, as long as they stay here.

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

No information can be provided here.

- 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)

In the current national context, there is a clear trend towards longer stays in initial reception centres. At the same time, fewer applicants are being transferred to collective accommodation facilities or decentralised housing. This prolongation of residence in initial reception facilities has significant negative effects on living conditions, access to services, and prospects for integration.

Material reception conditions are increasingly restricted through changes in social benefits law, in particular through the introduction of payment cards, which limit access to cash benefits and significantly restrict autonomy in everyday life.

Access to the labour market and to German language courses has become more limited. Accelerated asylum procedures often prevent applicants from meeting the practical and legal requirements for taking up employment or participating in vocational training and language learning at an early stage. In addition, there is a risk that, in the future, work permits will be denied to a larger number of applicants. This is linked to the legislator’s intention to designate more “safe countries of origin”, as applicants from these countries are generally excluded from access to employment.

- 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)

No information can be provided here.

- 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)





At first instance, decision-making is clearly structured along countries of origin. Women from Afghanistan are, in the majority of cases, granted refugee status. For other groups, however, the situation is currently very difficult.

For applicants from Syria, decisions and interviews had been suspended for a prolonged period; more recently, procedures have resumed, with an increasing number of negative decisions being issued. Men from Afghanistan are predominantly rejected, and applicants from Türkiye also face very low recognition rates.

We have had positive experiences with the involvement of special officers for gender-specific persecution in cases concerning women, for example from Ethiopia. These specialised officers can contribute to a more adequate assessment of gender-based asylum claims.

Hearings before the Federal Office for Migration and Refugees (BAMF) are often scheduled very shortly after registration, leaving little time for adequate preparation of the interview. Our organisation does not represent applicants in court proceedings; therefore, our observations regarding judicial review are based on reports from lawyers we cooperate with. According to their experience, the courts largely uphold the decisions taken by the BAMF.

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

Due to the fast asylum procedures and more restrictive decision-making practices, including at the court level, the need for alternative right of residence regulations is much greater than in the past. In addition, there are significantly more petitions and hardship cases.

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

We did not have seen any problematic developments. We did not have much contacts with stateless persons, though.

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)

As mentioned above, people with physical handicaps still suffer from a lack of information and often an adequate therapy at the registration camp. We heard from many people in cancer therapy whose therapy paused just because the authorities waited for their transfer to other Bundesländer or the return in another EU-country regarding the Dublin procedure.

Regarding unaccompanied minors, we did not see any worse developments.





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)

A huge problem are deportations within an ongoing, successful vocational training. Many companies are therefore unsure whether they should still offer training places to refugees with uncertain status. At the same time, there is a growing need for training permits, which the immigration authorities often refuse to grant. This is causing increasing discontent among civil society, and several new alliances have already been formed, such as „Bildung statt Abschiebung“ (Education instead of deportation).

13. Return of former applicants for international protection

No specific information can be provided here. Currently, we see a worrying tendency withdrawing protection regarding Syrian people, members of minorities included.

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)

No information can be provided here, as we are not working in this area.

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](#))

An overview of relevant national case law can be found here:

<https://www.asyl.net/recht/rechtsprechungskategorien/asylverfahrens-und-prozessrecht/asylverfahrensrecht-allgemein>

In particular, reference should be made to the judgment of the Federal Administrative Court concerning the situation of beneficiaries of international protection in Greece: BVerwG, Case No. 1 C 19.24, judgment of 16 April 2025 (Federal Administrative Court of Germany), <https://www.bverwg.de/de/160425U1C19.24.0>

16. Other important developments in 2025





Part B: Publications

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

Maik Paap, Natalie Maurer, Bernd Hanewald, Saskia Ebert, Louisa Bäckermann, Markus Stingel und Michael Knipper: Traumafolgestörungen und Kriterien zur Glaubwürdigkeit und Glaubhaftigkeit im Asylverfahren: Eine interdisziplinäre Analyse medizinischer und rechtlicher Grundlagen, ZAR 2025, 436–443.

Jürgen Bast, Natalie Maurer: Rechtswissenschaftliche Literatur zum Migrationsrecht im Jahr 2024, in: Berlit, Uwe/Hoppe, Michael/Kluth, Winfried (Hrsg.), Jahrbuch des Migrationsrechts für die Bundesrepublik Deutschland 2024/25, S. 307–332.

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
1	Traumafolgestörungen und Kriterien zur Glaubwürdigkeit und Glaubhaftigkeit im Asylverfahren: Eine interdisziplinäre Analyse medizinischer und rechtlicher Grundlagen	Maik Paap, Natalie Maurer, Bernd Hanewald, Saskia Ebert, Louisa Bäckermann, Markus Stingel und Michael Knipper	ZAR	12.2025
2	Rechtswissenschaftliche Literatur zum Migrationsrecht im Jahr 2024	Jürgen Bast, Natalie Maurer	Berlit, Uwe/Hoppe, Michael/Kluth, Winfried (Hrsg.), Jahrbuch des Migrationsrechts für die Bundesrepublik Deutschland 2024/25	9.2025
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