

Input by civil society organisations to the Asylum Report 2026

Fields marked with * are mandatory.

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

* Name of organisation

FARR, Flyktinggruppernas Riksråd (The Swedish Network of Refugee Support Groups)

Name and title of contact person

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

General observations

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

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

The Impact of the Tidö Declaration on Migration Legislation

The rapid implementation of the Tidö Declaration laid the foundation for cooperation between the Moderate Party, the Liberal Party, the Christian Democrats, and the Sweden Democrats. Although the Sweden Democrats were the largest individual party within this coalition, they are not formally part of the government. Nevertheless, the government relied on their support to pass legislation in the Swedish Riksdag. This dependency enabled them to exert significant influence, particularly in the areas of migration and criminal law. Through these negotiations, the Sweden Democrats secured the right to representation in all government departments, granting them a say in the formation and execution of policies across various sectors. Crucially, the remits for legal investigations were crafted in such a way that investigators were not allowed to dismiss proposed changes. Instead, they were mandated to produce concrete legislative proposals, regardless of their professional assessments.

One example involved an investigation into enhancing incentives for voluntary return among individuals holding

residence permits. The investigator found no objective evidence supporting the idea that increasing financial support from 10,000 SEK to 350,000 SEK per adult would increase voluntary departures. SD responded negatively pressuring the government to present a proposal aligned with their stance. Therefore, such a measure became law as of 01/01/2026. [Legal position on interpreting this new ordinance <https://lifos.migrationsverket.se/dokument?documentSummaryId=49682>]

Accelerated Legislative Processes and Limited Consultation

Another significant aspect of the legislative process has been the reduced timeframe given to stakeholders to respond to proposed changes. Previously, stakeholders had more time to provide considered feedback, but recent practices have drastically shortened these periods, increasing the risk that the full implications of new laws are not thoroughly scrutinised.

The volume of proposals—spurred by the Tidö agreement's aim to ensure Swedish legislation is as restrictive as possible within the bounds of EU regulations—has overwhelmed both authorities and non-governmental organisations. Notably, some proposals have already been enacted, reflecting a marked shift towards more restrictive policies.

It has become increasingly difficult to assess and predict the impact of the proposed legislative changes, due to multiple overlapping proposals being introduced and implemented concurrently, often in the same area of migration law. One example where overlapping changes in the migration law had serious consequences is so-called "teenage expulsions" in Sweden. An increasing number of teenagers with permits face expulsion after turning eighteen, when they are legally regarded as adults. This development followed a general transition from permanent to temporary residence permits. Taken together with new stricter criteria for residence permits on humanitarian grounds and existing rules which denied family reunification for individuals over eighteen, these parallel changes led to a growing number of young people facing expulsion.

Changes to Labour Migration Pathways

Sweden has also rescinded the law that allowed failed asylum seekers, who were employed during their asylum process, to switch to the labour migration route if their employer could guarantee their job for at least a year. Previously, this provided a two-year renewable permit, with the possibility of permanent residence after four years if certain criteria were met. The removal of this provision, with no transitional arrangements, led to situations where individuals in stable employment lost the ability to renew their permits, even with employer support. They have been compelled to leave Sweden, with re-employment only possible if Sweden recognises passports from their home countries—a significant barrier for nationals of countries such as Afghanistan and Somalia. This policy has faced much public criticism, particularly in relation to the treatment of well-integrated individuals. Further complicating matters, income requirements for migrant workers have been steadily increased, often beyond what many existing jobs pay.

Shift from Permanent to Temporary Residence Permits

After decades of granting permanent residence to successful asylum seekers, Sweden has shifted towards issuing temporary permits of varying lengths. There are even proposals to revoke already granted permanent residency, potentially affecting around 160,000 people who now face the prospect of expulsion after extended periods of residence. FARR along with other NGOs has submitted an opinion criticising this proposal.

Yttrande över utmönstring av permanent uppehållstillstånd och vissa anpassningar till miniminivån enligt EUs migrations- och asylpakt (SOU 2025:31) available at www.farr.se remisser

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

Statelessness

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?

NGO Involvement and Consultation on the EU Pact on Migration and Asylum

Initial Engagement with NGOs

Non-governmental organisations (NGOs) were invited to attend a meeting at the Department of Justice following the issuance of guidelines from the Commission concerning the implementation of the Pact on Migration and Asylum. Representatives from both the Migration Agency and the Police participated in this meeting, where they outlined their ongoing work as well as some of the difficulties they were encountering. During the session, the Secretary of State assured attendees that the processing would be conducted transparently and that there would be further opportunities for NGOs to participate in dialogue. However, these further opportunities did not materialise. Ultimately, most NGOs were only provided with the contents of the submissions to the Commission once these had been finalised.

Ongoing Dialogue and Information Sessions

NGOs active in the field of migration are regularly invited to meetings with the leadership and experts of the Migration Agency. One notable session, which also included the police, offered valuable updates on preparations for the implementation of the Pact. Topics discussed included the introduction of a new screening procedure, and how access to legal support and representation at the initial stage will be significantly reduced compared with the current involvement of legal counsel. There was also detailed discussion about the new rules relating to the reception of asylum seekers, as well as the roles and degree of access NGOs will be permitted under the new framework.

Sweden's Adaptation and Civil Society Consultation

Recently, a proposal was put forward regarding Sweden's adaptation to the legal instruments introduced by the Pact on Migration and Asylum. This proposal has drawn considerable criticism. As one experienced migration expert observed, the government has been so occupied with managing a series of new regulations and proposals in line with the Tidö Agreement that it has not adequately prepared for the implementation of the EU Migration Pact. The expert further emphasised that civil society organisations should have been consulted at an earlier stage in the process.

The Chancellor of Justice provided the following succinct and pointed comment on the proposal:

"Memorandum on the Migration and Asylum Pact (Ds 2025:30)"

(Ministry's file number Ju2025/02509)

The Chancellor of Justice notes that the memorandum is substantial and contains, in places, proposals for far-reaching measures affecting individual rights. Despite this, the consultation period has been set uncommonly short, restricting the authority's ability to review the large number of proposals and considerations in the memorandum with the thoroughness that would have been desirable.

Against this background, the Chancellor of Justice has no views on the proposals that are presented in the memorandum and the considerations made therein."

On behalf of the Chancellor of Justice
Anna Falk "

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)

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

Update of Quality requirements for public counsel and representatives
 Applies to: Swedish Migration Board
 Applies from: 2026-01-01
 Decision
 That RS/021/2020 legal position on quality requirements for public counsel and representatives be updated
 Reasons for decision
 Changes in the Aliens Data Act (2016:27) and the Aliens Act (2005:716) mean that the legal position needs to be updated. Updates have been made to sections 1, 1.2, 1.2.2, 2.1, 2.4.5, all of 3.
 Enters into force from 1 January 2026.
 Anchoring
 RC preparation, 19 December 2025 Version 3.0 is published on the Swedish Migration Board's website and Lifos
 LEGAL STATEMENT <https://lifos.migrationsverket.se/dokument?documentSummaryId=49683>
 RS/021/2020
 Decision reference
 2026-01-01
 3.0

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)

Legal position. Suitability assessment of interpreters and translators - RS/001/2021 (version 2.0)

DECISION RA/095/2025

Suitability assessment of interpreters and translators

Decision date: 2025-12-19

Applies to: Swedish Migration Board

Applies from: 2026-01-01

Decision

That RS/001/2021 legal position on suitability assessment of interpreters and translators be updated

Reasons for decision

Changes in the Aliens Data Act (2016:27) and the Aliens Act (2005:716) mean that the legal position needs to be updated. Updates have been made to sections 1, 1.1, 2.1.3, 2.1.4, 2.1.5, 2.1.6, 3.3.1, 3.2, 3.3.4.

Enters into force from 1 January 2026

<https://lifos.migrationsverket.se/dokument?documentSummaryId=49684>

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

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

Sweden has introduced new laws allowing the authorities to weigh in any history of suspected criminal activity into admissibility criteria either at the beginning of an asylum procedure or when temporary permits have to be renewed. FARR says no to stricter and clearer requirements for good conduct for residence permits

FARR has, on its own initiative, submitted a response to the government's inquiry SOU 2025:33, on stricter and clearer requirements for good conduct for residence permits. FARR rejects the inquiry's proposal, and is critical of the fact that even behaviours that are neither criminalised nor tried in court should be able to form the basis for interventions.

The inquiry also proposes that acquittals and statements should also be taken into account when examining good conduct. This is particularly problematic in light of the punitive populist rhetoric that has increasingly characterized migration law. It is also in conflict with fundamental constitutional principles such as legality (Chapter 1, Section 1, third paragraph of the Instrument of Government) and predictability, and risks leading to legally uncertain and arbitrary decisions. The proposed system would also open up for subjective assessments rather than assessments on objective and legally certain grounds.

The proposals for withdrawal and expulsion involve a limitation of the possibility of individual assessment and reduced consideration of ties, family life and establishment in Sweden. This limited protection may lead to decisions that, among other things, violate the right to private and family life under Article 8 of the European Convention, where a careful and balanced assessment is crucial. The principle of equal treatment and protection against arbitrary interference is also challenged by the introduction of mandatory withdrawals without the possibility of flexible exceptions.

See the fukk submission

Yttrande över skärpta och tydligare krav på vandel för uppehållstillstånd (SOU 2025:33)

2024 see www.farr.se remissvar

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)

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

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

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

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

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

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

Yttrande över förslaget om kvalificering till socialförsäkring och ekonomiskt bistånd för vissa grupper (SOU 2025:53) see www.farr.se remissvar

Summary

FARR rejects the inquiry's main proposals for new models for qualifying for social insurance and financial assistance. The proposals risk restricting the principle of equal rights and opportunities and leading to structural

discrimination against already vulnerable groups, such as people with disabilities, ethnic minorities, women, children and the elderly.

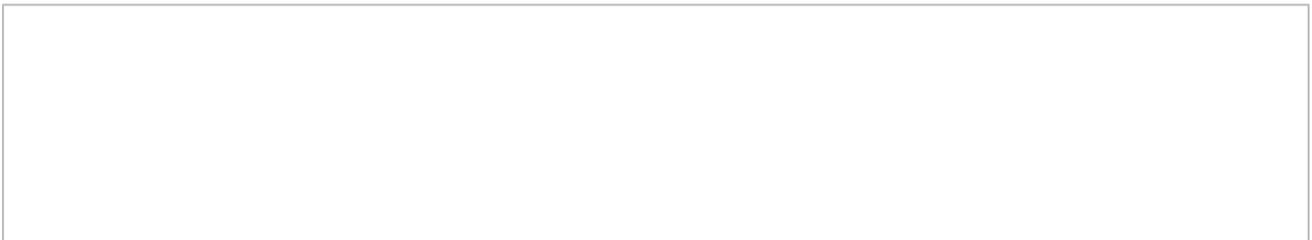
The inquiry's own review shows several serious risks of deteriorating living conditions, increased economic vulnerability and deepening gaps in society. Despite this, the inquiry concludes that the proposals are compatible with Sweden's international law commitments, which FARR strongly questions. FARR notes that the inquiry's proposals raise serious questions in relation to Sweden's international obligations and human rights. FARR agrees with the criticisms made by both the Discrimination Ombudsman and the Church of Sweden in this regard.

In light of the above, FARR rejects the two main proposals for models for qualifying for social insurance and financial assistance, respectively.

Migration more complex than theories of pull effect

FARR opposes the inquiry's use of the so-called pull effect as an analytical framework for migration, as this type of simplified reasoning risks reducing the complex, long-term and often coercive processes that characterize human mobility. The pull effect theory is based on assumptions about voluntariness and calculated benefit, notions that rarely reflect the reality for people who are deeply vulnerable. In addition, there is a lack of clear scientific support for the claim that more generous welfare benefits would constitute a decisive incentive for migration. The Swedish Social Insurance Inspectorate (ISF) also states in its response to the consultation that it is not clear whether qualification conditions for residence-based benefits have any significant effect on migration, and that the extent of any impact is unknown. Furthermore, the research results to which the inquiry refers are characterized by high uncertainty both in terms of the effect on migration and on employment.

13. Return of former applicants for international protection



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

Annual resettlement numbers are fixed to 900 per year. Applications for resettled refugees for family members in the nuclear family to join them could be made earlier from the point in time they entered Sweden and within three months of that date in order to avoid the rules regarding economic support. The Sweden Democrat party disliked this and had the rules changed by the government so that the three month period is counted from the day the decision is made in Sweden. Since departure is often delayed these three months frequently elapse by the time they arrive thus leading to long term or permanent separation. The previous more generous practice

was determined by the Migration Court of Appeal in 2021 https://www.domstol.se/globalassets/filer/domstol/kammarratten_stockholm/ovrigt-innehall/mig-2021-5.pdf but has now been overridden by political decisions.

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](#))

16. Other important developments in 2025

The Swedish government has stated that their vision for the future is zero asylum seekers and has chosen as a solidarity mechanism to pay money to other member states or to external international migration-prevention projects. Sweden has also supported the MSS note to the Council of Europe requesting that the European Court of Human Rights modifies its stand regarding Article 8 of the convention to facilitate the removal of persons who have committed serious crimes or are considered to be a security threat. Labour migration will be geared to attracting talented professionals mainly. By raising the salary level it will be impossible to immigrate to lower salary jobs. This elitist and restrictive attitude is totally blind to the long term demographic challenge facing Sweden. Currently we have the lowest birth rate (1.45) for more than a century and an aging population. A recent report from a government-ordered investigation states

"Sweden's population development is currently not in a stable balance and is likely to face a historic break in the trend given current levels of childbearing and migration. The development is heading towards a future with an aging and shrinking population. This will have significant real economic effects and require extensive adaptation of both politics and society." <https://www.regeringen.se/globalassets/regeringen/dokument/socialdepartementet/fokhalsa-och-sjukvard/presentationbilder-vid-presstraff-den-17-december-2025.pdf> page 45

At the same time qualified law-abiding immigrants holding jobs in the care and health sector and residing in Sweden for many years are being prevented by new legislation from continuing to work here and will be expelled. They are required to reapply for their jobs from abroad and have to be offered an even higher salary which is often not possible. Furthermore, the rules for family reunification for those in need of protection will become stricter thus leading to permanently split families, especially those that include many children, because it will be impossible to live up to the economic requirements the law requires. Moreover families of those granted subsidiary protection will no longer have income requirements waived if they apply within three months of receiving their permit but have to wait for two years before being allowed even to apply, in a processing system that is often very drawn out.

PART B: Publications

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

Overview of developments: Tidösidan <https://dok.farr.se/tido>
A detailed presentation and analysis of proposals for new legislation emanating from the Tidö agreement as

well as critical articles and reports from manifestations concerning some specific proposals. Charts illustrating which legislation has been enacted, which is still in process and which legislation has not been presented so far.

<https://dok.farr.se/utsatt-insatt> (In Swedish and English) <https://dok.farr.se/utsatt-insatt>

"Utsatt/Insatt" (Vulnerable/Informed) is a resource guide by FARR (Flyktinggruppernas riksråd, the Swedish Network of Refugee Support Groups), aimed at LGBTQI+ asylum seekers in Sweden, helping them understand the asylum process and feel empowered from being vulnerable to being informed and included, bridging the gap between feeling exposed and gaining knowledge.

<https://artikel14.se/> FARR has published this periodical since 1990 with four issues per year. During 2025 a wide variety of articles have appeared written by asylum-seekers, refugees, activists, migration experts, health-care workers and academics within and outside Europe covering current issues as well as updates on recent guideline decisions in asylum cases. Artikel 14 has so far only been available in printed form but we are looking into transforming it into a digital publication in 2026

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

Please upload your file

The maximum file size is 1 MB

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

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

[EUAA Asylum Report 2025 \(https://euaa.europa.eu/asylum-report-2025\)](https://euaa.europa.eu/asylum-report-2025)

[Executive Summary -Asylum Report 2025 \(https://euaa.europa.eu/asylum-report-2025-executive-summary\)](https://euaa.europa.eu/asylum-report-2025-executive-summary)

[Sources on Asylum 2025 \(https://euaa.europa.eu/publications/sources-asylum-2025\)](https://euaa.europa.eu/publications/sources-asylum-2025)

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

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

Background Documents

[Word template to submit input to the 2026 Asylum Report.docx](#)

Contact

[Contact Form](#)