



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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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, Sweden enacted a series of reforms affecting the asylum system as a whole, as well as the legal frameworks governing citizenship, the reception of asylum seekers, and work permits. Preparatory work on the implementation of the EU Asylum and Migration Pact was also initiated; however, during 2025 this work largely remained at the level of legislative analysis and inquiry. Throughout the year, Sweden maintained a consistently restrictive migration policy, with the reforms aimed at facilitating return procedures and reducing eligibility for residence permits to the minimum level required for continued compliance with EU minimum standards.

Several legislative proposals have been developed through governmental inquiries and are currently being prepared for parliamentary consideration in 2026, with the intention of adoption prior to the general election scheduled for September 2026. These proposals envisage further restrictions within migration law, including measures such as the abolition of permanent residence permits for persons holding asylum-related residence permits.

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

With regard to asylum, there are few areas that remain unaffected; the system as a whole is impacted by reforms that have either been implemented or are currently under review. Other areas, such as residence permits granted for the purpose of studies or visa regimes, are affected to a lesser extent.





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?

During 2025, the Swedish Government presented its inquiry concerning the implementation of the Pact on Migration and Asylum. As a consultation body, we submitted a detailed statement setting out our observations regarding the proposed legislative amendments. The submission is available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/remissvar/migrations-och-asylpakten/>

In brief, the Swedish Refugee Law Center considers that the inquiry lacks a comprehensive analysis of the consequences that may be expected to arise from the introduction of the extensive legislative changes proposed. In particular, there is an absence of a full impact assessment based on the perspective of the asylum seeker. We question whether the preparatory work meets fundamental requirements of adequacy and quality in relation to protection legislation, and identify a significant risk that Sweden may breach its international obligations should certain changes be implemented in accordance with the inquiry's proposals. Taken as a whole, the proposals entail a substantial restriction of asylum seekers' procedural rights and give rise to a tangible risk of violations of individual human rights.

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)

This is an area that is likely to be significantly affected in 2026, when the implementation of the EU Pact on Migration and Asylum is to take place.

As noted above, the Swedish Refugee Law Center, together with numerous other consultation bodies, has expressed criticism of the proposal to introduce extensive restrictions on asylum seekers' procedural safeguards in the absence of a comprehensive and substantiated impact assessment. The preparatory legislative process has been conducted at a rapid pace and exhibits significant deficiencies. The practical implications and scope of these shortcomings are expected to become clearer during 2026.





The consultation response and the associated criticism are available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/remissvar/migrations-och-asylpakten/>

With regard to the principle of non-refoulement, particular attention should be drawn to the legislative amendment that entered into force on 1 April 2025, which is described in further detail under point 13, Return of former applicants for international protection. Sweden amended the rules governing the limitation periods applicable to residence permits, with the effect that a return decision now remains legally enforceable for as long as the individual remains on Swedish territory.

As a consequence, a greater number of individuals are placed in procedures in which they must invoke impediments to enforcement in order to submit new grounds for international protection. Decisions taken within such procedures are not always subject to an effective right to appeal, thereby limiting access to review by a higher instance when new asylum claims are raised. This development reduces procedural guarantees and, in certain cases, makes it more difficult for individuals to be granted a residence permit.

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

In 2025, the Swedish Government presented an inquiry proposing restrictions on the right to legal assistance in the asylum procedure, entitled “Phasing out permanent residence permits and certain adjustments to the minimum level under the EU Pact on Migration and Asylum” (SOU 2025:31). Asylrättscentrum assesses that the proposals set out in the inquiry risk weakening asylum seekers’ legal certainty and their access to legal representation. In particular, the Swedish Refugee Law Center wishes to emphasise the following:

- The proposal to limit legal assistance before the Swedish Migration Agency to one hour is arbitrary and incompatible with the Asylum Procedures Regulation.
- The restrictions would disproportionately affect particularly vulnerable individuals with the greatest need for support, thereby entailing a risk of unlawful discrimination.
- The restrictions would also affect children, both children within families and unaccompanied minors, which would be contrary to children’s rights under the Convention on the Rights of the Child.
- The proposed limitations, such as the denial of remuneration to publicly appointed counsel for attendance at the asylum interview, risk undermining the role of public counsel in relation to their client.
- The restrictions risk shifting the focus of the asylum procedure to the appellate stage, resulting in increased costs due to longer processing times and a heightened risk of remittal. This would be neither appropriate, legally secure, nor efficient.

The Swedish Refugee Law Centers consultation response is available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/remissvar/utmonstring-av-permanent-uppehallstillstand-och-miniminivan/>





- 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)

The Ministry of Justice has circulated for consultation the legislative memorandum entitled “Stricter requirements for publicly appointed counsel and enhanced competence requirements for interpreters in migration cases”, which proposes tightened eligibility requirements as well as the regulation of the processing of personal data relating to interpreters.

The Swedish Refugee Law Centers consultation response is available in Swedish (with the option to translate the summary page into English) at the following link, and states, inter alia, that the Swedish Refugee Law Center welcomes the introduction of competence requirements for interpreters and translators in migration cases and supports the principle that interpreters and translators should, as a general rule, be authorised:

<https://asylrattscentrum.se/remissvar/skarpta-krav-for-offentliga-bitraden-och-hojda-kompetenskrav-for-tolkar-i-migrationsarenden/>

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

No major changes during 2025.

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

Significant changes are expected in 2026; see the other sections concerning the implementation of the EU Pact on Migration and Asylum.

- 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 January 2025, the Swedish Parliament adopted new legislation tightening the conditions for asylum seekers’ reception. As of 1 March 2025, entitlement to accommodation and financial assistance is, as a rule, conditional upon residing in the accommodation assigned by the Swedish Migration Agency. The Agency has been granted expanded powers to verify residence and to withdraw accommodation and financial support from asylum seekers who fail to maintain contact with the authorities. The legislation also introduces a statutory obligation for asylum seekers to participate in a societal introduction program.





In addition, an official inquiry presented proposals in October 2024 that would further strengthen obligations for asylum seekers, including attendance checks, geographical restrictions, reporting requirements, and sanctions in the form of reduced allowances. The inquiry also proposes aligning Swedish law with EU minimum standards by introducing a six-month waiting period before access to the labor market, revising the calculation of daily allowances, and reinstating the right to accommodation and allowances for individuals subject to deportation orders. These proposed changes are intended to enter into force on 1 October 2026.

The Swedish Refugee Law Centers consultation response is available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/sverige/mottagandelagen-en-ny-lag-for-ordnat-asylmottagande-och-effektivt-atervandande/>

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)

The Government commissioned an inquiry with the purpose of reviewing the rules on detention under the Aliens Act. The inquiry has put forward a number of proposals concerning the use of electronic monitoring, time limits for detention, the placement of detainees, and the use of prisons.

The inquiry also proposes expanded possibilities for the detention of children.

The Swedish Refugee Law Center has provided comments on the proposals in the form of a consultation response. We, inter alia, oppose the proposal to expand the possibilities for detaining children, longer detention periods for children, extended maximum time limits for adult detention, and the granting of authority to the Swedish Migration Agency to use prisons in cases of violent behavior.

The Swedish Refugee Law Centers consultation response is available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/remissvar/ett-nytt-regelverk-for-uppsikt-och-forvar/>

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)





No major changes are expected, other than the ways in which the Swedish Migration Agency's work may be affected by the various legislative proposals put forward during 2025. Of particular note are the changes concerning publicly appointed counsel and the implementation of the EU Pact, where the Migration Agency itself highlights issues in its consultation responses.

https://www.migrationsverket.se/om-migrationsverket/styrning-och-uppfoljning/remisser-och-skrivelser.html#svid12_2cd2e409193b84c506a2f890

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

No major changes are expected, other than the ways in which the courts may be affected by the various legislative proposals put forward during 2025. Of particular note are the changes concerning publicly appointed counsel and the implementation of the EU Pact.

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

No significant changes.

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)

In our consultation response to the inquiry on how the Swedish asylum procedure should be adapted to the EU's new Pact on Migration and Asylum (Ds 2025:30), the Swedish Refugee Law Center emphasises that we are deeply concerned about the risks posed by the system as a whole. Of particular concern are the proposals under which Sweden goes beyond what is necessary under EU law with respect to border controls, restrictions on freedom of movement, and expanded possibilities for deprivation of liberty, including in relation to children.

The system also fails to provide sufficient protective mechanisms and safeguards for legal certainty. We identify a serious risk that the needs and protection grounds of particularly vulnerable groups will not be adequately identified in the proposed fast-track and standardised procedures.

The consultation response is available in Swedish at the following link, and the summary page can also be translated into English:

<https://asylrattscentrum.se/remissvar/migrations-och-asylpakten/>

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)





On 12 March 2025, the Swedish Parliament adopted a bill introducing changes regarding the removal of the possibility to switch from an asylum application to a work permit application. Individuals who have changed from an asylum application to a work permit will no longer be able to extend their permits. The Swedish Migration Agency estimates that approximately 4,700 persons may face difficulties renewing their work permits as a result of this legislative change. The bill entered into force on 1 April 2025 and contains no transitional provisions, meaning that the amendment also applies to work permit applications issued prior to that date.

The Swedish Refugee Law Centers consultation response is available in Swedish at the following link, and the summary page can also be translated into English:
<https://asylrattscentrum.se/sverige/nya-regler-for-arbetskraftsinvandring/>

13. Return of former applicants for international protection

Since 2022, the Swedish Government has maintained a strong focus on return operations and has reallocated substantial resources to ensure that the Swedish Migration Agency and the Police Authority prioritize the issue. This focus has also been reflected in numerous legislative proposals and inquiries since then. This remains one of the key priorities in 2025.

A governmental inquiry has proposed measures to strengthen return operations and the enforcement of immigration controls in Sweden. The proposals include, inter alia, a requirement for state authorities to inform the Police Authority about individuals suspected of residing in the country without authorization, as well as measures to facilitate internal immigration controls and the seizure of electronic communication equipment.

The Swedish Refugee Law Center opposes the proposal regarding mandatory reporting by authorities, in particular because it may lead already vulnerable individuals to refrain from contacting public services—an outcome that would pose a particular risk to the safety and rights of children.

The Swedish Refugee Law Centers consultation response is available in Swedish at the following link, and the summary page can also be translated into English:
<https://asylrattscentrum.se/remissvar/vissa-atgarder-for-starkt-atervandandeverksamhet-och-utlanningskontroll/>

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)

Sweden lowered the number of resettled refugees accepted from 5,000 in 2022 to 900 the per year the consecutive years. No changes during 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](#))

MIG 2025:3

A serious weapons offence has been assessed as such an exceptionally grave crime that a refugee status declaration may be revoked.

<https://rattspraxis.etjanst.domstol.se/sok/publicering/34b4aaad-397f-4ed0-aeca-d1e2dc5f4002>

MIG 2025:14

The unconditional right of an unaccompanied refugee child to family reunification with their parents entails that, when the parents are granted a residence permit, minor siblings must also be granted residence permits, unless particular circumstances indicate that they do not have a dependent relationship with their parents.

<https://rattspraxis.etjanst.domstol.se/sok/publicering/4cc09252-757c-4628-824a-465cd0d8c994>

Internationally, it is noteworthy to mention the judgment of the Court of Justice of the European Union in case C-195/25, Framholm, where the Swedish Refugee Law Center represents the appellants—and the Court ruled in favor of our clients. The Court endorsed our interpretation of EU law, confirming the position earlier advocated by the Advocate General this past autumn.

The Court held that individuals granted temporary protection under the Temporary Protection Directive have the right to have their application for subsidiary protection examined on the merits. The CJEU further noted that the EU law provisions conferring this right have direct effect, and that where a national court considers it impossible to interpret national legislation in conformity with the requirements arising from those provisions, the national legislation must be set aside.

<https://curia.europa.eu/juris/documents.jsf?nat=or&mat=or&pcs=Oor&jur=C%2CT%2CF&num=C-195%252F25&for=&jge=&dates=&language=en&pro=&cit=none%252CC%252CCJ%252CR%252C2008E%252C%252C%252C%252C%252C%252C%252C%252C%252Ctrue%252Cfalse%252Cfalse&oqp=&td=%3BALL&avg=&lgrc=en&page=1&lg=&cid=8579057>

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:





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				
2				
3				
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