

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

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Name and title of contact person

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

General observations

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

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

- Bulgaria was in the process of adapting its legal and administrative framework with regard to the new EU Pact on Migration and Asylum.
- The adoption of new legislation aligned with the Pact was still pending.
- The restructuring of migration and asylum facilities was underway in preparation for the implementation of the Pact.

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

- Challenges remain with regard to prosecuting pushbacks.
- Challenges remain with regard to developing state policies or programs to facilitate the integration and access to basic services of applicants for international protection and beneficiaries of international protection.
- Challenges remain with regard to introducing community-based alternatives to immigration detention or in establishing legal pathways for the regularization of long-term undocumented migrants.

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 preparation for the implementation of the EU Pact on Migration and Asylum in Bulgaria was characterised by a degree of uncertainty and a lack of transparency, particularly for administrative bodies and civil society actors working on the ground. The preparatory process largely did not include meaningful engagement with civil society organizations. National legislation related to the implementation of the Pact had not yet been finalised or adopted.

At the same time, a trend toward the externalization of migration and asylum processes was observed, with activities increasingly shifted to border regions outside major urban centres. However, these border areas continue to lack sufficient capacity to provide legal aid and social services to migrants and asylum seekers.

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)

Since April 2024, the Bulgarian Ministry of Interior has been publishing monthly statistics on third-country nationals who, after being apprehended at the border, are reported to have “independently returned” to neighboring countries. According to these statistics, between January and November 2025, a total of 14,745 third-country nationals attempted to irregularly cross the Bulgarian border, of whom 13,029 were recorded as having “independently” gone back, predominantly to Turkey, following their apprehension by Bulgarian border police. No independent monitoring mechanism has been able to verify whether this practice complies with human rights standards. Alleged pushback practices have not been subject to judicial scrutiny by Bulgarian courts, as related cases have been dismissed at the level of the national prosecution offices. In December 2024, three unaccompanied minors died of hypothermia after their irregular crossing of the Turkish-Bulgarian border. In July 2025, Frontex Fundamental Rights Office (FRO) issued a report on their case investigation. FRO concludes that the Bulgarian authorities were under the obligation to assist and rescue the unaccompanied minors, as they had sufficient information to reasonably infer there was a life-threatening situation, they were aware of the migrants’ location and while having the capacity to act, failed to implement adequate measures in time that resulted in loss of lives. FRO further concluded that considering that the deceased migrants were underage, the Bulgarian authorities also failed to fulfil specific child protection obligations. Tightened border policies highlights the growing need for a coordinated institutional mechanism capable of delivering search and rescue operations, providing life-saving assistance, and assisting the recovery, identification, and repatriation of deceased individuals.

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

There is a discernible trend toward increasingly restricted access to information and legal assistance for third-country nationals classified as national security threats. Legal representatives and interpreters were required to obtain security clearance in order to access the case files of individuals designated as security concerns. Asylum seekers considered a national security threat have insufficient remedies to challenge the evidence and the grounds on which their threat to national security is based. They are also exposed to an increasing risk of prolonged and indefinite administrative detention as illustrated by the case of a Saudi Arabian national - Abdulrahman Al-Khalidi - who continues to be held in administrative detention since 23 November 2021

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)

Interpretation services for rare languages are limited, particularly in immigration detention centers. This shortcoming is further exacerbated by some new requirements for interpreters to obtain security clearance in order to access the case files of third-country nationals designated as security concerns, compounding existing barriers to adequate interpretation support.

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

According to the 2025 statistics of the Bulgarian State Agency for Refugees, there was a decrease in the number of requests for the return of third-country nationals under the Dublin procedure compared to 2023 and 2024. Dublin returnees may be detained only where they have not been granted international protection in Bulgaria and have no ongoing asylum procedure at the time of their return. Challenges remain for Dublin returnees in accessing information and legal assistance necessary to understand the status of their asylum application or procedure in Bulgaria.

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

With the new EU Pact on Migration and Asylum, Bulgaria was in the process of introducing and implementing screening and border procedures as new elements to its migration and asylum system.

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)

Third-country nationals may be placed in immigration detention for an initial period of up to six months, with the possibility of extension to a maximum of eighteen months. Detention during the asylum procedure may be applied to third-country nationals primarily when they are classified as posing a national security threat. In 2025, a trend was observed of increased application of asylum detention on national security considerations.

Immigration detention continues to be applied not as a measure of last resort but as a default practice. No policies have been introduced to establish community-based placement as an alternative to detention centers.

Systemic deficiencies in the conditions of the Bulgarian detention centers continue to be observed. Detention facilities do not have medical staff on site on a daily basis; instead, a nurse and/or a doctor visits on a weekly basis. These visits are largely ineffective due to language barriers and the lack of appropriate medication, rendering them of limited practical benefit to detainees. In practice, no meaningful vulnerability assessments are conducted, exposing detained individuals to a heightened risk of deteriorating mental health. Detention centers also lack regular access to specialized psychological assistance.

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)

Under the current legal framework, unaccompanied minors must always have access to the regular asylum procedure. The new EU Pact on Migration and Asylum allows for unaccompanied children to be subjected to accelerated or border procedures in certain circumstances, including where they are classified as posing a national security threat. In this context, a case was recorded of an unaccompanied minor who was classified as a national security threat and placed in asylum detention near Sofia.

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)

National policies of “zero integration” persist. The systematic lack of national integration programs exposes even people with granted international protection to a risk of homelessness and hinders their access to healthcare and basic social services. Cases have been documented of people with asylum, who ended up on the streets and were left without state support to meet their basic needs. In July 2025, the ECHR, app. No 22952/2025, issued interim measures against Bulgaria on the grave humanitarian situation of a single mother and her children, having lived in a legal limbo for two years. National legislation and state practice still lack mechanisms for regularizing long-term undocumented migrants. The national Strategy for Migration Management 2025–2030, published in 2025, likewise does not provide for such mechanisms.

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)

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

PART B: Publications

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

Migrant Children and the EU Pact on Migration and Asylum: A Case from Kafka's Trial?,
<https://centerforlegalaid.com/en/migrant-children-and-the-eu-pact-on-migration-and-asylum-a-case-from-kafkas-trial/>.

The Anatomy of the EU Pact on Migration and Asylum – Kangaroo Asylum – The new regulation on the international protection procedure: the case of Bulgaria as an external EU border, <https://centerforlegalaid.com/wp-content/uploads/2025/01/AnatomyOfThePact-1.25-EN.pdf>.

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				
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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](#)