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**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN  
PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL  
COMMITTEE AND THE COMMITTEE OF THE REGIONS**

**State of play on the implementation of the Pact on Migration and Asylum**

{SWD(2025) 162 final}

## 1. INTRODUCTION

The adoption of the Pact on Migration and Asylum (the Pact) in June 2024 marked an important milestone in the development of the Common European Asylum System (CEAS). The Pact reforms and further develops the current rules, on the basis of a comprehensive approach that strengthens and integrates EU policies on migration, asylum, border management and integration <sup>(1)</sup>. The Pact creates a legal framework that balances solidarity and responsibility between Member States, in a comprehensive approach to managing migration effectively and fairly. The legislative acts of the Pact entered into force on 11 June 2024 and will apply from mid-2026.

The implementation of the Pact is a complex process that involves multiple actors. Work is well underway to translate the large and complex set of legislative acts into operational reality. Getting the EU and national systems ready by June 2026 is a joint endeavour that requires the Member States, the Commission and EU agencies to work closely together.

In June 2024, the Commission adopted the Common Implementation Plan for the Pact on Migration and Asylum <sup>(2)</sup>, setting out the key tasks and milestones for this transition period. Since then, the Commission has steered the implementation of the Pact at EU level and has continuously supported Member States in their national efforts, together with EU agencies. The Commission is making available EUR 3 billion in additional funding to support Member States' efforts to implement the Pact and in hosting displaced persons from Ukraine. The Commission is currently working with Member States to finalise the necessary procedures by the end of the year to fund the objectives outlined in their national implementation plans.

Half-way through the transition period, considerable progress has been made at both national and EU level. Further efforts are however needed to ensure the full and timely application of the new rules. Some of these challenges are linked to current deficiencies. Other challenges are linked to preparing the ground for the application of the new rules introduced by the Pact, notably the operationalisation of the upgraded Eurodac, the implementation of screening and the mandatory border procedure, as well as the new fundamental rights safeguards. Remaining challenges will need to be addressed in time for a full implementation of the Pact.

The Commission calls on Member States to continue and intensify their efforts where needed to ensure that the implementation of the Pact will be a success. While progress is being made at technical level, sustained political engagement and ownership at national level remain essential to address the identified challenges effectively. It is necessary to make as much progress as possible in implementing the Pact ahead of the start of the annual solidarity cycle. In particular, it is key that there are no major deficiencies in applying the current rules because this may have an impact on the overall assessment of pressure and access to the Solidarity Pool. The Commission, together with the EU agencies, will continue working with and supporting Member States, including through funding, with a strong focus on action to overcome the challenges identified.

To adapt and respond to the dynamic nature of migration, the Pact also needs to be complemented by additional efforts in areas that are not covered by the new legislative framework. Enhancing global cooperation on migration is particularly important for a

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<sup>(1)</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Common Implementation Plan for the Pact on Migration and Asylum, COM (2024) 251 final, (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52024DC0251>).

successful and sustainable implementation of the Pact. The EU has invested in comprehensive partnerships with third countries, which have contributed to decreasing irregular arrivals to the EU. Based on Frontex data, in 2024 the number of irregular arrivals recorded at the EU external border was 240 000, a decrease of 37% compared to 2023 <sup>(3)</sup>. The Union must continue building and expanding such partnerships with third countries in a mutually beneficial way to reduce irregular arrivals, scaling up the Global Alliance to Counter Migrant Smuggling, to reinforce cooperation on return and readmission, to promote talent mobility through Talent Partnerships, and to provide protection to refugees displaced in non-EU countries, including through resettlement and humanitarian admission. The Team Europe <sup>(4)</sup> approach has proved to be a successful method when negotiating with relevant third countries to establish new or to recalibrate existing partnerships.

With this Communication, the Commission informs the European Parliament and the Council on the implementation of the Pact, in accordance with Article 84 of the Asylum and Migration Management Regulation <sup>(5)</sup>. Building on the key actions of the Common Implementation Plan of June 2024 and in anticipation of the launch of the first annual solidarity cycle in October 2025, this Communication presents a state of play of the progress made at EU and national level on the implementation of the Pact and provides an overview of the state of implementation in relation to each of the ten building blocks. As a next step, the Annual Report on Migration and Asylum of October 2025 will include an updated state of play of the implementation of the Pact. The Commission will then present a long-term European Asylum and Migration Management Strategy by the end of this year to support an integrated and coordinated approach to the implementation of the Pact, both at EU and national level.

Figure 1: Timeline of the transition period



<sup>(3)</sup> Frontex Monitoring and Risk Analysis: <https://www.frontex.europa.eu/what-we-do/monitoring-and-risk-analysis/migratory-map/>.

<sup>(4)</sup> Team Europe Initiatives: [https://international-partnerships.ec.europa.eu/policies/team-europe-initiatives\\_en](https://international-partnerships.ec.europa.eu/policies/team-europe-initiatives_en).

<sup>(5)</sup> Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013, COM (2020) 758 final <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1351>.

## 2. DELIVERING AT EU LEVEL

In line with the Common Implementation Plan, the Commission and the EU agencies, in coordination with Member States, have worked on ensuring that legal milestones are met and that the operational planning for implementation is continuously coordinated, updated where relevant, and translated into operational practice. In parallel, direct bilateral assistance to Member States has resulted in tailor-made support by the Commission and EU agencies to all Member States.

At EU level, the Commission also continues working to complete and complement the legislative framework of the Pact. In March 2025, the Commission put forward a new legislative proposal for a regulation establishing a common European system for return (6). Where appropriate, the Commission has also delivered early and proposed to frontload some of the new provisions of the Pact. It has proposed a European Union list of safe countries of origin (7), as well as a revision of the rules on the application of the “safe third country” concept (8), fulfilling the requirement under the Pact to review the application of the concept by June 2025. Lastly, the Commission has proposed to anticipate two key elements of the Asylum Procedure Regulation with the aim of supporting Member States to process asylum claims faster and more efficiently for applicants whose claims are likely to be unfounded. This includes the Pact provisions related to applicants coming from third countries with low recognition rates and the possibility to designate safe countries of origin and safe third countries with exceptions.

### 2.1 Steering, guidance and dialogue

The tasks and milestones outlined in the Common Implementation Plan for delivery at EU level by June 2025 have been fulfilled. The Commission has established a Pact Implementation Platform to provide steer, which met for the first time in January 2025 to discuss national-level planning and the strategic programming of dedicated EU financial support. The Strategic Committee on Immigration, Frontiers and Asylum (SCIFA) also provides steer through regular discussions on the implementation of the Pact.

Exchange with the European Parliament is recurrent in the framework of the Working Group on Asylum - Implementation of the Pact/Common European Asylum System of the Committee on Civil Liberties, Justice and Home Affairs.

The technical work proceeds apace, with the support of contact committees and expert group meetings to ensure a common interpretation and clarification of legal provisions. This has led to the timely preparation of required implementing acts (9) and the sharing of good practices across all components of the Pact. The agencies’ networks have also helped identifying common operational challenges and solutions, including through the development of templates and guidance documents. To avoid duplication, and promote simplification, and to ensure synergies, the Commission also organised various joint sessions of committees and

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(6) 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 of the European Parliament and the Council, Council Directive 2001/40/EC and Council Decision 2004/191/EC, COM(2025) 101 final [EUR-Lex - 52025PC0101 - EN - EUR-Lex](#).

(7) Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the establishment of a list of safe countries of origin at Union level COM(2025) 186 final [EUR-Lex - 52025PC0186 - EN - EUR-Lex](#).

(8) Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2024/1348 as regards the application of the ‘safe third country’ concept, COM(2025) 259 final [EUR-Lex - 52025PC0259 - EN - EUR-Lex](#).

(9) The different implementing acts for the Pact legislative acts are listed in Annex to the Common Implementation Plan: [EUR-Lex - 52024DC0251 - EN - EUR-Lex](#).

expert groups, covering different Pact elements back-to-back with the agencies' network meetings.

Direct bilateral support of the Commission to Member States continues to be a strong focus of the common work across all elements of the Common Implementation Plan. This approach provides fit-for-purpose support, adapted to national circumstances and the different institutional arrangements of each Member State. The Commission set up dedicated country teams and liaison at senior officials' level to interact with each Member State.

The Commission services' country teams have engaged bilaterally with Member States' authorities and provided an underlying analysis of Member States' systems and related challenges, which fed into the national implementation plans (NIPs). Work is now focusing on the implementation and operationalisation of the NIPs. Member States are working with the Commission's support to ensure that sufficient funding under EU Funds and national budgets is allocated to the objectives under each Plan.

Furthermore, through a dedicated call in 2024, nine Member States made use of the support provided through the Technical Support Instrument (TSI) for the preparation of their NIPs<sup>(9)</sup>. Currently, the Commission supports ten Member States through the TSI on the implementation of the Pact. In addition, Member States are benefiting from peer learning and good practice exchanges set up in the context of the TSI. To promote a multi-stakeholder approach, the Commission held dedicated information and consultation meetings with stakeholders, such as social and economic partners, international and civil society organisations, in particular migrant-led organisations<sup>10</sup>.

## **2.2 The work of the EU agencies**

The work of the EU agencies to implement the Pact, notably the European Union Asylum Agency (EUAA), the European Border and Coast Guard Agency (Frontex) and eu-LISA, is advancing.

The EUAA has been facilitating Member States' transition to the new legal framework stemming from the Pact and supported the Commission in the development of the Common Implementation Plan. Within the framework of its national expert networks, the EUAA has updated its products and guidance and developed new ones where required by the Pact or where needed. The EUAA is currently updating the European Asylum Curriculum training modules and is reviewing the relevant operational standards and indicators (further details are provided in section 3 under each building block).

Additionally, two pilot monitoring exercises (in Estonia and the Netherlands) will take place in 2025 to prepare for the full roll-out of the EUAA multiannual monitoring programme from 2026 onwards. Under the programme, all Member States will be monitored in terms of their technical and operational implementation of the Pact in a 5-year cycle. The outcomes of the monitoring will also support the Commission's assessment of whether national asylum and reception systems are well prepared.

Frontex continues to provide support across those areas that fall under its mandate, providing practical guidance and tools, as well as operational support on demand, in particular in relation to the planning and implementation of new processes at the border. The various elements related to the implementation of the Pact are discussed in the Frontex working groups and networks, as well as in dedicated *ad hoc* meetings with Member States. Furthermore, Frontex provides support to Member States in all phases of the return process, in close cooperation with the EU Return Coordinator. Frontex also cooperates with the Member

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<sup>(10)</sup> [European Commission and NGOs discuss the implementation of the Migration Pact: \[https://home-affairs.ec.europa.eu/news/european-commission-and-ngos-discuss-implementation-migration-pact-2024-05-27\\\_en\]\(https://home-affairs.ec.europa.eu/news/european-commission-and-ngos-discuss-implementation-migration-pact-2024-05-27\_en\)](https://home-affairs.ec.europa.eu/news/european-commission-and-ngos-discuss-implementation-migration-pact-2024-05-27_en).

States on the development of risk assessments and plays a role in quality control of the borders. Frontex's annual vulnerability assessment, which evaluates the capacity and readiness of each EU Member State and Schengen Associated Countries to respond to challenges at its external borders, will facilitate the transition to the new legal framework.

eu-LISA plays a crucial role in the implementation of the Pact, particularly to further enhance the effective management of the Union's external borders, the establishment of uniform rules ensuring control, and the proper registration of irregular migrants and asylum seekers entering the EU. The good functioning of the new Pact rules depends on the effective availability and functioning of the new Eurodac by 12 June 2026. eu-LISA is continuously supporting Member States in this challenging task (further details are provided in section 3.1).

To ensure synergies between the work of the Commission and of the EU agencies, the former should develop the horizontal legal guidance, while the latter should primarily focus on developing targeted operational guidance and support. The Commission and the agencies will continue working together to achieve high-level efficiency and decrease the burden placed on the Member States, in line with the overall Commission's objective of simplification.

### **2.3 Financial support**

The EU is making an additional EUR 3 billion available to Member States to support the implementation of the Pact and hosting displaced persons from Ukraine. This represents a further increase of EUR 1 billion compared to the amounts announced in the Common Implementation Plan. In addition, qualifying Member States can also make use of the more than EUR 1.6 billion available under the mid-term review of the Home Affairs Funds<sup>11</sup>.

Member States should use these additional funds strategically to advance on their implementation efforts as much as possible, while giving priority to addressing the most important challenges identified in their National Implementation Plan and in dialogue with the Commission. The Commission has supported the Member States in identifying their priorities, and the programming of this additional funding should match Member States' National Implementation Plans. While the additional amounts are significant, the scale of reforms of the Pact will require Member States to identify other relevant funding sources at national and EU level (e.g. cohesion policy) to cater for all their needs. It is critical to ensure that the required amendments of Member States' programmes are finalised at the latest by the end of the year and that public procurement procedures are launched and completed on time. Most Member States are on track to reach this target, with further efforts needed in some Member States<sup>(12)</sup>, and are identifying other relevant funding sources at national level, as well as other funds at EU level, such as those under cohesion policy, while seeking more synergies and complementarities.

## **3. NATIONAL IMPLEMENTATION PLANS AND OPERATIONALISATION OF THE BUILDING BLOCKS**

### **3.1 Overview of National Implementation Plans and coordination**

The Common Implementation Plan set the common objective of having well-prepared systems in place by the end of the transition period. To ensure that systems are well prepared, Member States need to implement the new rules of the Pact and address existing challenges in relation to their national laws, practices and operational capacity.

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<sup>(11)</sup> Asylum, Migration and Integration Fund (AMIF) and Integrated Border Management Fund (BMVI).

<sup>(12)</sup> As of 6 June, there are concerning delays, if for different reasons, in: Belgium, Greece, Latvia, Malta, Poland, Spain.

All Member States were required to establish national implementation plans (NIPs) with clear actions and timelines, including on procurement, training, and recruitment needs. To date, 26 Member States have regularly engaged with the Commission on the implementation of the Pact, and 25 Member States submitted their national implementation plans <sup>(13)</sup>. The four Schengen Associated Countries also submitted their NIPs, covering elements of the Pact in which they take part.

All NIPs are based on the template that the Commission provided and thus reflect the building block structure of the Common Implementation Plan. About one third of the plans were also released as public documents <sup>(14)</sup>.

The Commission supported Member States in the assessment of their current systems to help establish baselines for planning, and provided some recommendations, which are reflected across a large majority of NIPs. In general terms, the level of detail of the NIPs varies across Member States and, within the NIP of a given Member State, by policy area or building block. Depending on the case, this can reflect the fact that either the assessments and reviews were still ongoing at the moment of submission, or that less work was needed in some areas or building blocks. Most Member States still need to define concrete milestones and targets to track and monitor implementation, which is useful in detecting and remedying critical delays.

The implementation of the Pact is not a one-off process but a dynamic one. Since the initial submission of the NIPs, some Member States have updated and reviewed elements of their NIPs <sup>(15)</sup>, reflecting the considerable work that is underway. Legislative elements are addressed in all NIPs, albeit to different degrees of detail. The work on the necessary legislative changes has started across Member States. At least three Member States have already finalised the drafting of the relevant national legislation and are preparing for adoption <sup>(16)</sup>. A good number of other Member States are expecting to finalise the process still this year. However, there is a need to accelerate this process in some others.

Member States have established planning and coordination mechanisms to deliver at the operational level and should now use them to implement the Pact effectively. Preparing the NIPs has helped identify national coordination issues. While many Member States are strengthening integrated policymaking through inter-ministerial arrangements, others need stronger coordination across policy areas and levels of government. Though migration or interior ministries will lead, involvement from other ministries, the judiciary, and local authorities is essential. The Commission welcomes and continues to call for good coordination with all stakeholders, and the involvement of local and regional authorities, as well as civil society, to achieve a high level of efficiency when implementing the Pact. To that end, building on the streamlined system put in place by the Pact (e.g. transfer procedures, closer links between asylum and return, better use of databases), the Commission will continue exploring ways to further streamline the related work and decrease the overall administrative burden in line with the Commission's objectives on simplification. The upcoming long-term European Asylum and Migration Management Strategy will be an opportunity to further address integrated and streamlined policymaking.

The Commission remains in close dialogue with and supports all Member States on planning and operational aspects. The Commission is also in close touch with the Member States that

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<sup>(13)</sup> Hungary communicated to the Commission that it does not intend to prepare a NIP. Poland submitted its position on the implementation of the Pact. Ireland also submitted a NIP because it notified its participation in the EU Pact on Migration and Asylum

<sup>(14)</sup> Austria; Bulgaria; Czechia; Germany; Lithuania; Luxemburg; the Netherlands; Slovakia; Slovenia; Sweden (on demand).

<sup>(15)</sup> For example, Greece, Spain and Belgium.

<sup>(16)</sup> Czechia, Estonia, the Netherlands.

did not submit a NIP and urges all Member States to complete this process as soon as possible.

### **3.2 Building Block 1 - Eurodac**

The swift development and entry into operation of the reformed Eurodac system is a critical precondition to properly implement all elements of the Pact. The reform of Eurodac is a shared responsibility between the Commission, eu-LISA and Member States, and significant progress has been made so far. The preparation of non-legislative instruments required for its implementation is on track as is eu-LISA's development of the new Eurodac, building in part on the Interoperability Framework components that Eurodac will use.

Given the challenging timeline for Eurodac's implementation, the Commission, eu-LISA and Member States have identified a set of measures to mitigate delays. These were mainly put into place by eu-LISA to support Member States. One such measure is that Eurodac functionalities are to be delivered in two phases (June and December 2026), prioritising the functionalities identified as critical for June 2026. Another measure is that eu-LISA developed a centralised solution, a Web-User Interface (WUI). The centralised solution should be used by Member States who, for various reasons such as a lack of resources, are not ready to achieve a full system-to-system integration by June 2026.

Moreover, eu-LISA opted to take a flexible approach for implementing the Eurodac system, allowing the Agency to share the various necessary technical documents in stages. This meant that key documentation could be shared early with the Member States facilitating the collection and use of the shared expertise existing in all Member States. This way, the first Interface Control Document (ICD) was delivered in October 2024, followed by the full ICD delivery in December 2024, as required by the Regulation. The same flexible approach was also adopted for the testing. The voluntary basic connectivity testing between Member States and eu-LISA has already started, with several Member States already successfully completing it.

At national level, when building their system, Member States may choose between using the centralised solution provided by eu-LISA, or building a national system that fully integrates Eurodac, or a combination of the two (i.e. first the centralised solution and then a system-to-system integration). Thanks to the above-mentioned flexible approach adopted by eu-LISA, Member States were able to start the development of the system at national level relatively early. Regular meetings organised by eu-LISA (Project Management Forum, Advisory Group) allow Member States to report periodically on the state of play of the national-level implementation and to flag any challenges that could have repercussions for the entire project at EU level. Until now, these exchanges have indicated that, despite good progress, some Member States face challenges. These include deciding which national authority is responsible for the implementation of the system or which authority hosts the national access point, difficulties in procurement procedures, scarce resources (human or financial), or continuous requests for the technical documentation <sup>(17)</sup>.

On its side, the Commission participates in all the meetings organised by eu-LISA where Member States report on the state of play of the implementation and the latest developments and potential challenges are monitored and discussed. In March 2025, the Commission sent a letter to all Member States underlining the progress reached until then and reiterating the importance of the timely implementation of Eurodac, both at the central and Member States' level. The Commission also organised bilateral meetings with those Member States facing

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<sup>(17)</sup> During the meeting of the Advisory Group on 15-16 May the following Member States reported themselves at risk or were considered as such due to lack of reporting: Denmark, Finland, Germany, Cyprus, Greece.

particular challenges. The preparation of the acts necessary for the functioning of the system (on the content of the cross-system statistics and on interoperability) is ongoing.

### **Key challenges and next steps**

eu-LISA should continue to work closely with the Member States and the Commission. The core ICD elements should at present be considered stable enough to allow Member States to launch procurement procedures where necessary. No other major changes should be included at this stage; any further changes in the document should only include minor adjustments stemming from Interoperability-related ICDs, typos or tweaks following testing. Stabilising the ICD now will however not prevent that over time further improvements are made to the system. Those Member States that would prefer a full system-to-system integration should not completely exclude the possibility of relying on the eu-LISA developed central solution as a backup, if there are delays in the integration process.

Over the next months, regular monthly reporting will be important to assess the overall status of implementation and allow the Commission and eu-LISA to provide additional support where necessary. Member States should make full use of the Eurodac Project Management Forum and proactively notify the Commission in case of major difficulties.

On the practical side, procurement processes need to be completed as soon as possible, training plans and recruitment processes put in place, and the necessary mandatory operational tests done. It is important that the agreed implementation timeline is respected, and all attention goes to national development, testing and operational readiness.

### **3.3 Building Block 2 – A new system to manage migration at the EU external borders**

Preparations for putting in place the new mandatory border procedure are underway. In August 2024, the Commission adopted the implementing act setting out the adequate capacity for each Member State and the maximum number of applications for international protection beyond which Member States will not be obliged to apply the border procedure ('annual cap')<sup>(18)</sup>.

The Commission is working on a guidance document on screening in order to provide a living document that addresses screening at the external borders and within the territory, including important considerations also for Member States concerned by secondary movements.

To help ensure policy coherence, screening was also included in the strategic guidelines of the multiannual strategic policy cycle for European integrated border management (EIBM)<sup>(19)</sup>. Frontex is on track in developing, in cooperation with EUAA and the Commission, its "screening toolbox", which includes practical tools for the conduct of the screening-related checks and verifications. Operational testing of these tools is scheduled to start in September 2025.

The Commission and the EUAA issued a series of tools directly relevant for setting up the new mandatory border procedure. These include hypothetical adequate capacity models, including the possibility of having 'multipurpose centres' that combine screening and the asylum and return border procedures. These models include indicative staffing and reception requirements for screening and the border procedures, to support national planning and the

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<sup>(18)</sup> Commission Implementing Decision (EU) 2024/2150 of 5 August 2024 laying down rules for the application of Regulation (EU) 2024/1348 of the European Parliament and of the Council, as regards the adequate capacity of Member States and the maximum number of applications to be examined by a Member State in the border procedure per year, OJ L, 2024/2150, 9.8.2024 [http://data.europa.eu/eli/dec\\_impl/2024/2150/oj](http://data.europa.eu/eli/dec_impl/2024/2150/oj).

<sup>(19)</sup> In November 2024, Frontex updated the Annex of Technical and Operational Strategy for European Integrated Border Management to include Screening.

setting up of targets for delivery. The EUAA has issued a blueprint for multipurpose centres, which provides for several steps of the process in one location (e.g. screening, registration, border procedures) to help Member States in the design of these centres. The EUAA, cooperating with Frontex, also issued the new Guidelines on alternatives for detention<sup>10</sup> that could be used in the context of the border procedure. The Commission is also developing a guidance document on the asylum and return border procedure.

At national level, some Member States already have the reception facilities and human resources needed to cater for their adequate capacity in place. Others have concrete plans on how to do so, including by allocating funds for the required infrastructure and personnel<sup>(20)</sup>, and plans for building, renovating or repurposing multi-purpose centres. The exercise to model the screening carried out by Romania in 2024 was useful to test screening operations and share experience with other Member States.

### **Key challenges and next steps**

Member States have until April 2026 to notify the locations designated for border procedure. So far, no Member State has done so. Member States risk facing delays in setting up their capability and capacity for screening and the mandatory border procedure if the final locations are not designated soon, and that the financial planning and related procurement processes are not initiated and concluded<sup>(21)</sup>. The ongoing programming of additional EU funding can support Member States in delivering on this important task. The Commission will be in contact with Member States to advance on these aspects, notably as it is not possible, at the moment, for the Commission to fully assess the progress made by Member States and the possible risks they may be facing.

The implementation of the mandatory border procedure will need to be accompanied by an independent fundamental rights monitoring mechanism (see section 3.10) and rely on effective cooperation with the judiciary to meet the deadlines and take account of procedural changes introduced by the Pact. Member States have identified cooperation with the judiciary as an important element of the implementation process. This requires taking into account the additional needs of the judiciary, ensuring the independence of the judiciary and meeting the requirements established by EU law for courts or tribunals.

Member States need to ensure the timely involvement of various stakeholders and the allocation of sufficient funds for all elements of the adequate capacity. As regards the phasing-in of the screening, there are some challenges related to designating sufficient facilities and human, material and technical resources to cope with peaks in migratory flows, as well as to provide effective mechanisms and legal tools to prevent absconding. Efforts must also be made to have in place sufficient trained staff and medical professionals to carry out screening, and the technical infrastructure to consult speedily the relevant EU and national databases, both at the designated borders and within the territory.

### **3.4 Building Block 3 - Rethinking reception**

Almost all Member States are implementing administrative and organisational reforms in response to the changes introduced by the Pact.

This process involves changes to their case management systems and IT infrastructure<sup>(22)</sup>, also using TSI support, as well as investment in infrastructure, whether in terms of renovating

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<sup>(20)</sup> Member States who either already reached their adequate capacity requirements or are progressing towards reaching it on time: Belgium, Finland, Luxembourg, Czechia, France, Malta, The Netherlands, Romania.

<sup>(21)</sup> Countries where there are concerns about reaching adequate capacity on time given the length of procurement procedures include: Italy, Germany. Stronger concerns: Estonia and Greece.

<sup>(22)</sup> Austria, Belgium, Estonia, Finland, France, Croatia, Ireland, Luxembourg and Portugal.

or establishing new structures. Almost half of all Member States plan for new reception centres of different types and for different groups of residents <sup>(23)</sup>. Furthermore, Member States are reviewing operational workflows and setting up new inter-agency cooperation arrangements with service providers and partners, for example relating to procurement procedures, healthcare, the assistance to be provided to unaccompanied minors or the labour market.

Member States are also exploring ways to strengthen self-reliance of and support to applicants who voluntarily forgo state-sponsored accommodation solutions <sup>(24)</sup>. Some Member States focus on early integration measures, including language classes in line with the new requirements of the Reception Conditions Directive <sup>(25)</sup>. Other Member States have identified actions to strengthen medical and psychosocial support <sup>(26)</sup>.

Additionally, Member States are in the process of transposing into their national legislation the Reception Conditions Directive and its new tools to manage reception. Member States' transposition efforts are supported by the Commission and the EUAA in the framework of the Commission Expert Group on the Reception Conditions Directive and the EUAA Network of National Contact Points on Reception. Furthermore, the Commission developed an explanatory document that was shared with Member States in December 2024 <sup>(27)</sup>. In parallel, Member States are developing methods to monitor the presence of applicants and on making available and applying alternatives to detention <sup>(28)</sup>.

### **Key challenges and next steps**

The timely transposition of the Reception Conditions Directive continues to require attention across all Member States. Ensuring sufficient capacity and adequate conditions is a key element for a Member State to be well prepared.

Challenges persist in a number of Member States <sup>(29)</sup> related to a suitable capacity in the national reception systems. In some cases, this has already been identified by the relevant courts. It is essential that Member States address the real reception needs of today, as required by the current *acquis*, and maintain sufficient capacity in their reception system that ensures an adequate standard of living, while having their contingency plans well developed and up to date (more information on contingency in section 3.9).

As the recast Reception Conditions Directive further harmonises the standards to be provided to applicants, Member States should refrain from decreasing or diverging from these standards or decreasing the overall capacity of their reception systems. Moreover, Member States' systems should enable a clear differentiation between 'adequate standards of living' and reduced material reception conditions in certain cases <sup>(30)</sup> linked to abuses by applicants, as provided for in the Reception Conditions Directive. In case of reduced material reception conditions, Member States should, as a minimum, continue to provide for basic needs, which need to be defined in national systems also in line with the case law of the Court of Justice of

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<sup>(23)</sup> Multipurpose centres: Czechia and Croatia; Housing for unaccompanied minors: Cyprus and Italy; Housing for vulnerable persons: Slovakia; Dublin centres: Belgium; (Multipurpose) centres at the border: Ireland, Portugal and Slovakia. Others focus on increasing general capacity: Luxembourg and Romania and detention centres: Italy.

<sup>(24)</sup> For example, Belgium and Estonia.

<sup>(25)</sup> This includes Czechia, Cyprus, Italy and France.

<sup>(26)</sup> For example, Czechia, Belgium, Slovenia, Lithuania and Latvia.

<sup>(27)</sup> The EUAA will also issue its practical guide on setting up and managing an arrival/reception centre in the coming months.

<sup>(28)</sup> Examples are Czechia, Portugal and Luxembourg.

<sup>(29)</sup> This includes Belgium, France, Greece, the Netherlands.

<sup>(30)</sup> For example, if the applicant moves without authorisation to another Member State or fails to comply with reporting duties or misleads the authorities.

the EU. Some Member States should also review their detention capacity and significantly improve the general conditions of their detention facilities.

Furthermore, convergence towards adequate standards of reception for international protection applicants is essential for the Pact to function properly, including to prevent secondary movements, for transfers under the responsibility rules, and to determine that a Member State is well prepared.

Remaining gaps related to the collection of the necessary reception data will need to be addressed swiftly. Moreover, especially related to early integration measures, Member States should focus on the timely establishment and review of adequate multistakeholder partnerships.

### **3.5 Building Block 4 - Fair, efficient and convergent asylum procedures**

Member States are focusing on reviewing their national legislation to adjust to the new legal framework. Some Member States face a significant backlog in asylum cases, due to structural issues, or limited staffing and infrastructure resulting in long processing times. Most Member States concerned have taken steps to address existing backlogs and reduce the duration of procedures, as well as avoid the need to run two parallel systems for too long after June 2026 - one governed by the current *acquis* and the Asylum Procedures Directive, and one based on the Asylum Procedure Regulation in relation to applications lodged as from 12 June 2026. A number of Member States have put plans in place to enhance their capacity by increasing the number of permanent staff <sup>(31)</sup> or by creating dedicated teams to tackle the backlog <sup>(32)</sup>. Some Member States have sought targeted additional support for this via the TSI or the EUAA <sup>(33)</sup>. Discussions held in expert committees serve to clarify legal provisions of the new legislation and help with the transition between the two systems.

Digitalisation, especially the use of integrated case management systems, and automated notifications for the efficient and secure transmission of information, is an important element for those Member States that are reviewing and streamlining their workflows and standard operating procedures, especially when different authorities are involved. Bulgaria for example is using TSI support to move forward on the digitalisation of asylum procedures.

#### **Key challenges and next steps**

The existing challenges regarding access to the asylum procedure, including delays in registration and appointments for lodging applications, need to be addressed. In building up their capacity, Member States should ensure that the necessary recruitments are done on time and adequate training is provided.

As part of their programming exercise, Member States should actively liaise with the judiciary to verify and, where necessary, expand capacity for processing appeals. This is needed to reduce the processing time of applications for international protection and ensure the overall efficiency of the system, reducing the existing backlogs and avoiding the emergence of new ones. Similarly to the situation of administrative authorities, it is of crucial importance to ensure, where needed, a timely and adequate training of judges.

Member States need to ensure that pushback allegations are investigated swiftly to guarantee the respect of fundamental rights, including the right to access asylum procedures and the principle of *non-refoulement*. As indicated in the Commission Communication on countering

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<sup>(31)</sup> As done in Bulgaria.

<sup>(32)</sup> As done in Portugal.

<sup>(33)</sup> Belgium and Germany.

hybrid threats from the weaponisation of migration<sup>(34)</sup>, any measures taken to address the weaponisation of migration affecting the borders with Belarus and Russia and restricting fundamental rights (e.g. the right to asylum), have to be temporary, proportional and limited to what is strictly necessary, and ensure that the essence of those rights is respected.

### **3.6 Building Block 5 - More efficient and fair return procedures**

The Commission has worked closely with Member States, in the context of the development of the National Implementation Plans, to bring asylum and return authorities closer together. To date, 19 Member States already issue negative asylum decisions and return decisions at the same time, which will be a requirement under the Pact, aiming at further simplifying and streamlining administrative processes. Within the framework of the High-Level Network for Returns, dedicated workshops were organised to share experiences and identify best practices<sup>(35)</sup>. Similar workshops were also organised on last-minute asylum applications and on ways to accelerate the return process, improving coordination and reducing the time between the rejection of asylum applications and return procedures.

Meanwhile, several Member States are upgrading their national return case management systems to enable more efficient monitoring of return, establish automated integration with the broader migration management IT systems, and ensure more complete and effective use of the Schengen Information System.

As presented in the 2025 State of Schengen report<sup>(36)</sup>, the thematic Schengen evaluation on the effectiveness of the return system, carried out in 2024, highlighted both developments on the ground and persistent internal obstacles hampering returns. Some Member States have established or strengthened integrated planning for all authorities involved in the return process, enabling regular coordination and more effective resource allocation. However, there is still a need for better risk analysis and forward planning for return, which would support strengthening preparedness and resource allocation, including for defining the necessary support from Frontex. Two Member States<sup>(37)</sup> have reassessed existing return capacities, including their ability to address the risk of absconding, and are in the process of increasing those capacities. In some Member States<sup>(38)</sup>, voluntary return programmes have been reinforced, which can significantly enhance the overall effectiveness of return.

Frontex actively supports Member States in their efforts to implement the key novelties of the Pact on return. This includes ongoing technical work to map Member States' needs to be able to plan the Agency's support. Frontex EU Reintegration Programme is playing an increasingly important role in promoting more voluntary returns from the EU and is now actively being used by almost all Member States

The Commission's proposal of 11 March 2025 for a Regulation establishing a common system for return of third-country nationals staying illegally in the Union constitutes a key piece to complement the other Pact proposals, with a view to putting in place swifter, simpler and more effective returns, in full respect of fundamental rights.

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<sup>(34)</sup> Communication from the Commission to the European Parliament and the Council on countering hybrid threats from the weaponisation of migration and strengthening security at the EU's external borders, COM(2024) 570 final, [EUR-Lex - 52024DC0570 - EN - EUR-Lex](#).

<sup>(35)</sup> The Netherlands and Norway.

<sup>(36)</sup> Commission reports on the State of Schengen, celebrating 40 years: [https://home-affairs.ec.europa.eu/news/commission-reports-state-schengen-celebrating-40-years-2025-04-23\\_en](https://home-affairs.ec.europa.eu/news/commission-reports-state-schengen-celebrating-40-years-2025-04-23_en).

<sup>(37)</sup> Belgium and France.

<sup>(38)</sup> Austria, Bulgaria, the Netherlands and Norway.

Based on relevant exchanges with Member States, at the end of 2024 the Commission published a staff working document listing the ways to prioritise and streamline the return of third country nationals considered as a threat to public security <sup>(39)</sup>.

In the context of the annual assessment of third countries' cooperation on readmission under Article 25a of the Visa Code, the Commission is paying particular attention to the relevance of readmission cooperation of third countries whose nationals are likely to be subject to the border procedure.

### **Key challenges and next steps**

The Commission considers it a priority to advance in the negotiations on the abovementioned proposal for a Regulation on return and calls on the European Parliament and the Council to conclude the negotiations as soon as possible, and in any event before the Pact starts applying in June 2026.

Member States will need to address existing internal inefficiencies, such as limited coordination between authorities and overly complex procedures, to ensure the most effective implementation of the new obligations under the Pact, particularly those related to the return border procedure. The overall effectiveness of the return system depends on adequate resources, seamless processes for continuous follow-up on the return of third-country nationals, and treating return as a planned and predictable process <sup>(40)</sup>.

The EU Return Coordinator continues to support Member States to address these challenges. The Return Coordinator is developing a manual on efficient workflows to guide actors involved in the return border procedure in Member States and continues to encourage the use of the return alert in the Schengen Information System.

A targeted return action on preparedness and contingency planning for returns, launched by the EU Return Coordinator in March 2025, aims at promoting good practices that some Member States have already in place and helping identify the key and shared elements of contingency planning for return, to foster a coherent common approach across the EU. Frontex will play an important role in the implementation of this targeted return action.

Frontex will share with Member States a comprehensive survey on the needs for possible Frontex support on return in 2026. The Agency is following up on the introductory meeting held in November 2024 with dedicated bilateral meetings with all interested Member States to better plan and explore how the individual needs of the Member States can be addressed.

### **3.7 Building Block 6 - Making responsibility work**

The good functioning of the existing Dublin rules and of the new rules, as provided for by the Asylum and Migration Management Regulation (AMMR), on the fair sharing of responsibility is of fundamental importance for the overall functioning of the Pact.

In recent years, the rate of Dublin transfers across the Union has been very low, significantly hampering the effectiveness of the system. The technical work by the Commission and at national level is focused on making transfers work.

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<sup>(39)</sup> [Commission Staff Working Document on the return of illegally staying third-country nationals posing a security threat, 17.12.2024: https://home-affairs.ec.europa.eu/document/1a5b1f9c-af3b-4dc7-a01f-55d64c43b926\\_en.](https://home-affairs.ec.europa.eu/document/1a5b1f9c-af3b-4dc7-a01f-55d64c43b926_en)

<sup>(40)</sup> Communication from the Commission to the European parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions 2025 State of Schengen report, , COM(2025) 185 final [EUR-Lex - 52025DC0185 - EN - EUR-Lex.](#)

The Commission is finalising the implementing act that will repeal the current implementing rules with a view to adoption in July 2025 <sup>(41)</sup>. In operational terms, this will facilitate the cooperation and exchange of information among Member States, and thus make transfers quicker and easier. In addition, this will include standard forms for take-charge requests and take-back notifications, for transfers, as well as for the relocation procedure and exchanging information. The new implementing rules have been drafted in close cooperation with the Member States. Once they are adopted, eu-LISA will implement technical adaptations for the introduction of these procedures in each Member State's system.

During a dialogue with Member States on the assessment of their needs for the Pact's implementation, the Commission paid particular attention to the need to improve the system of responsibility and the functioning of national Dublin units. The Commission's recommendations to Member States focused on having a well-functioning responsibility system and ensuring the effective implementation of transfers among Member States. Most Member States have put in place plans to increase staff, review workflows and/or upgrade the existing infrastructure for effective case management.

In April 2025, the EUAA published two templates for family tracing forms to facilitate determination of responsibility: one for adult applicants, and another one for unaccompanied minors <sup>(42)</sup>. Both forms are accompanied by a Practical Guide on family tracing, both in the EU Member States and Schengen Associated Countries, and in third countries <sup>(43)</sup>.

### **Key challenges and next steps**

All Member States will need to ensure that they apply the new rules, including on take-charge requests, take-back notifications and transfers. An increase of the overall number of implemented transfers will contribute to the effective functioning of the system, reducing incentives for unauthorised movement and ensuring that the balance between responsibility and solidarity of the Pact is maintained. Since conditions are in place for transfers to function to and from all EU Member States, and in view of applicable rules, transfers should take place towards all Member States already now. This is essential for the effective transition to the new responsibility rules, and for the proper functioning of the annual solidarity cycle.

Moreover, the implementation of the new responsibility rules is closely linked to the effective implementation of the new Eurodac Regulation. In addition to the technical readiness, Member States must ensure that their national authorities have access to all information relevant to the determination of the Member State responsible and are able to access the system to update the data with relevant information, such as indicating the Member State responsible, in accordance with both the AMMR and the Eurodac Regulation.

Once the new implementing rules are adopted, eu-LISA will take technical measures to make it easier and faster for Member States to communicate via DubliNet.

## **3.8 Building Block 7 – Making solidarity work**

Preparatory work continues to start operationalising the annual solidarity cycle in October 2025, and to establish the permanent solidarity mechanism and the Technical-Level EU

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<sup>(41)</sup> Commission Implementing Regulation (EU) No 118/2014 of 30 January 2014 amending Regulation (EC) No 1560/2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, OJ L 39, 8.2.2014, p. 1-43, ELI: [http://data.europa.eu/eli/reg\\_impl/2014/118/oj](http://data.europa.eu/eli/reg_impl/2014/118/oj).

<sup>(42)</sup> Art. 22(1) AMMR.

<sup>(43)</sup> Practical Guide on Family Tracing Part I: <https://euaa.europa.eu/publications/practical-guide-family-tracing-part-i-principles-practices>; Practical Guide on Family Tracing Part II: <https://euaa.europa.eu/publications/practical-guide-family-tracing-part-ii-tracing-AMMR>.

Solidarity Forum by June 2026. The solidarity mechanism of the Pact allows Member States to choose between relocations, financial contributions, and in-kind support when it comes to their contributions.

Work so far has centred around the Solidarity Platform ‘Pact’, bringing together Member States, the Commission and the EUAA. A Solidarity Platform ‘Pact’ meeting took place in April 2025 to discuss key aspects of operationalising the solidarity mechanism and to advance preparations for the establishment of the Technical-Level EU Solidarity Forum. The Commission presented draft terms of reference and rules of procedure for the Technical-Level EU Solidarity Forum to Member States and announced the appointment of the EU Solidarity Coordinator <sup>(44)</sup>. A meeting of the Commission Expert Group on the AMMR was dedicated to discussing the solidarity mechanism and the various modalities for the provision of different solidarity measures available <sup>(45)</sup>. A mechanism has been developed for the financial contributions, to be set out in the related AMMR implementing act.

The implementation of the solidarity mechanism requires timely exchange of quality data from the Member States. The Commission is therefore working closely with the EU agencies and Member States in the framework of the Migration Preparedness and Crisis Blueprint Network to identify and address the needs and challenges of gathering and/or transmitting data for the purpose of the annual solidarity cycle. From April to November 2024, the Commission carried out a test run to gather data and ensure consolidation and analysis-sharing for the European Annual Asylum and Migration Report. On this basis, an efficient information-sharing process has been designed. The Commission has also concluded relevant working arrangements with EUAA and Frontex, and one with Europol is in preparation. A common evidence base and data sharing are essential for the successful implementation of the Pact.

### **Key challenges and next steps**

The preparatory work for the first Annual Asylum and Migration Report is ongoing. Member States and EU agencies submitted the requested information to the Commission by 1 June. Close cooperation with the EU agencies resulted in significantly simplified and streamlined processes of data and information gathering. The Commission, the European External Action Service, Member States and EU agencies will exchange on the first draft Report in a dedicated meeting of the Migration Preparedness and Crisis Blueprint Network in July, in view of its adoption by 15 October. It remains crucial that Member States continue reporting the data and information required in a timely, accurate and complete manner, covering also return and reception.

The analysis in the Annual Report will underpin the Commission’s implementing decision identifying Member States under migratory pressure, at risk of migratory pressure or facing a significant migratory situation. That analysis will also serve to prepare the Commission’s proposal for a Council implementing act establishing the Annual Solidarity Pool necessary to address the migratory situation. Both proposals are due latest by 15 October 2025.

The designation by the Commission of Member States under migratory pressure, at risk thereof or facing a significant migratory situation will include the assessment of whether national systems are well prepared. Such an assessment will have a direct impact on the possibility for those Member States to be able to access the Solidarity Pool and/or request a full or partial deduction of their solidarity pledge.

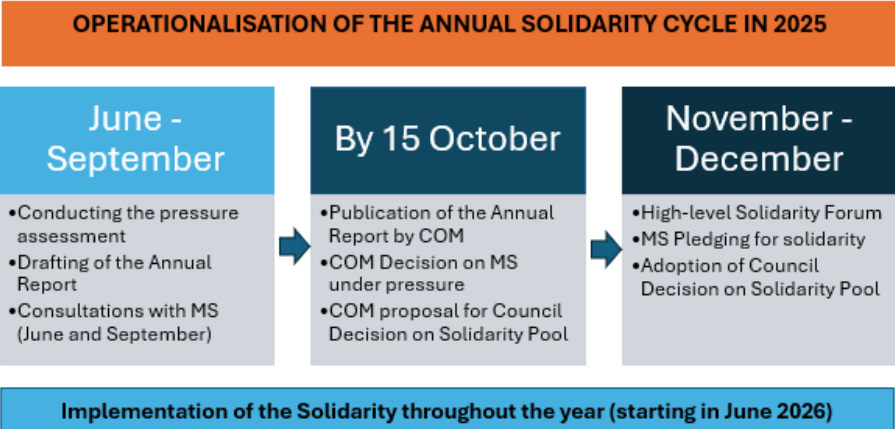
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<sup>(44)</sup> An EU solidarity coordinator, established by the Asylum and Migration Management Regulation, will coordinate the implementation of the solidarity mechanism, notably through the Technical-level Solidarity Forum.

<sup>(45)</sup> Article 46 (2) AMMR.

The assessment of the Commission will also consider the possible existence of systemic shortcomings with regard to the implementation of the responsibility (Dublin) rules in Member States benefitting from solidarity measures, in particular deficiencies that could result in serious negative consequences for the functioning of the Dublin system. Where such a situation is identified by the Commission, the contributing Member States are not required to implement their solidarity pledges or to apply responsibility offsets.

The first meeting of the Technical-Level EU Solidarity Forum will take place early in 2026. The finalisation of the terms of reference and of the rules of procedure is ongoing. The EUAA is in the process of developing a practical guide on the implementation of the solidarity mechanism in relation to relocations and responsibility offsets.



**3.9 Building Block 8 - Preparedness and contingency planning**

Contingency planning is an instrumental part of the Pact, guaranteeing that the asylum and reception systems can continue to function properly and adapt quickly to sudden changes in the migratory situation.

To support Member States during the preparations of their contingency plans, as required by the Reception Conditions Directive, in November 2024 the EUAA developed the template that Member States must use. It also issued a manual of examples and good practices and organised a series of training webinars. In March 2025, the European Migration Network (EMN) organised a capacity building workshop on scenario modelling and contingency planning for Member States. More broadly, to intensify the technical exchanges on different aspects of contingency planning on migration, the Commission reactivated a dedicated sub-group on contingency planning within the framework of the Migration Preparedness and Crisis Blueprint Network.

The legal deadline for submitting the national contingency plans to the EUAA was 12 April 2025. To date, 22 Member States have adopted and notified their contingency plans <sup>(46)</sup>.

**Key challenges and next steps**

Member States that have not yet done so should notify their contingency plans to the EUAA as a matter of urgency.

Most of the plans notified to the EUAA include the core elements of the template, albeit with different levels of completeness. Member States are invited to ensure that concrete measures

<sup>(46)</sup> 26 Member States are required to submit national contingency plans to the EUAA. Czechia, Poland and the Netherlands informed the EUAA of delays. Hungary provided no information.

are outlined for all elements of the template (e.g. asylum, reception and unaccompanied minors), underpinned by well-defined scenarios and indicators, as well as preparedness measures.

All Member States also need to maintain the plans fit for purpose, update and revise them and test them when possible. It is also important to ensure coherence with other contingency plans relevant for migration (e.g. on borders or return). Moreover, practical preparedness measures (e.g. logistics and procurement preparation, stockpiling, training or buffer reception capacity) should be taken to ensure capacities can be mobilised in a flexible and efficient manner. The Commission will provide information on the level of preparedness in the Union and in the Member States in the Annual Report in October, based on input from the EU agencies, in particular Frontex and the EUAA. From 2026 onward, contingency planning on reception and asylum will be assessed as part of the EUAA multiannual monitoring programme.

### **3.10 Building Block 9 - New safeguards for applicants for international protection and vulnerable persons, and increased monitoring of fundamental rights**

The Pact strikes an important balance not just between solidarity and responsibility, but also between the obligations and rights of people seeking protection in the EU. It introduces new elements related to the independent monitoring of fundamental rights during screening and the asylum border procedures, reinforced procedural safeguards and protection measures, such as free legal counselling and information provision, and includes clear and reinforced provisions for people with vulnerabilities or special reception needs, notably children, including unaccompanied minors. While some gaps remain, Member States' Nationals Implementation Plans generally reflect the overall balance between rights and obligations and incorporate these new elements. It is important that this continues to be the case throughout the full implementation process, in legislation and during operationalisation and resource allocation.

In support of Member State's implementation, clarification and guidance on the relevant legal provisions were provided in the expert committee meetings. In September 2024, the Commission organised a dedicated meeting with Member States that focused specifically on the implementation of the provisions and specific safeguards relating to children, including unaccompanied minors, across all the new legislative instruments.

As required by the Screening Regulation<sup>(47)</sup>, the EU Fundamental Rights Agency issued guidelines on the Independent Fundamental Rights Mechanism to Member States in September 2024<sup>(48)</sup>. Those guidelines focus on the different elements of the mechanism in helping to prevent rights violations, protect victims and support investigations into allegations of wrongdoing by public authorities.

The EUAA is drafting the relevant information provision material, and the Practical Guide on Information Provision in the Asylum Procedure will be finalised in 2026. In relation to vulnerability, the EUAA has issued relevant practical guides regarding the assessment of the mental health of applicants for international protection, applicants with diverse sexual

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<sup>(47)</sup> Regulation (EU) 2024/1356 of the European Parliament and of the Council of 14 May 2024 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, OJ L, 2024/1356, 22.5.2024, ELI: <https://eur-lex.europa.eu/eli/reg/2024/1356/oj/eng>.

<sup>(48)</sup> [Monitoring fundamental rights during screening and the asylum border procedure – A guide on national independent mechanisms: https://fra.europa.eu/sites/default/files/fra\\_uploads/fra-2024-independent-border-monitoring-mechanisms\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-independent-border-monitoring-mechanisms_en.pdf).

orientations, gender identities, gender expressions and sex characteristics <sup>(49)</sup>. Still this year, the EUAA is expected to publish an update of the 2019 Practical Guide on the Best Interest of the Child in Asylum Procedures, the Best Interests Assessment tool and a package of child-friendly information about the asylum procedures and specific safeguards available to children. The EUAA is also working on the revision of various training modules related to vulnerable applicants, such as the module on children in the asylum process, the module on victims of Gender-Based Violence and the module on reception of vulnerable persons. The work on the revision of the EUAA Guidance on vulnerability in asylum and reception is underway and is expected to be concluded before mid-2026. The EUAA will publish and update of the 2018 guidance on age assessment still this year.

Most Member States provide for the establishment of the independent Fundamental Rights Monitoring Mechanism in their NIPs, and some are already in contact with existing national bodies and potential providers <sup>(50)</sup>. Similarly, most Member States either already have free legal counselling during the administrative stage or have included it in their plans <sup>(51)</sup>.

Member States are also preparing adaptations to the assessment and dedicated support for people with vulnerabilities or special procedural needs. This may include revising the Standard Operating Procedures care manuals or the active establishment of new partnerships for related tasks, as for example is foreseen in Ireland, as well as increased staffing. Several Member States are also anticipating the creation of more dedicated reception spaces for vulnerable people, including families <sup>(52)</sup>.

A number of Member States have taken steps to prepare for the implementation of the new multi-disciplinary age assessment process and put in place the necessary reforms of their system for providing guardians or legal representatives to unaccompanied minors in line with the new requirements. In some Member States this means reviewing procedures for the designation of representatives for unaccompanied minors, while other are now developing or strengthening procedures and guidance for the assessment of the best interests of the child and the related follow-up.

### **Key challenges and next steps**

A general challenge across this building block relates to the need to coordinate with different partners and entities, be it for legal aid, education, social welfare or health, to put in place the operational arrangements required. Various Member States have also flagged challenges related to the reforms relating to minors <sup>(53)</sup> and to the requirements relating to vulnerability assessment and subsequent support. Other Member States continue to face a lack of suitable

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<sup>(49)</sup> [Practical guide on applicants with diverse sexual orientations, gender identities, gender expressions and sex characteristics – Cross-cutting elements: https://euaa.europa.eu/publications/practical-guide-SOGIESC-cross-cutting-elements](https://euaa.europa.eu/publications/practical-guide-SOGIESC-cross-cutting-elements); [Mental Health and Well-being of Applicants for International Protection Part I: https://euaa.europa.eu/sites/default/files/publications/2024-11/Practical-guide-mental-health-well-being-applicants-part-i-senior-management.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-11/Practical-guide-mental-health-well-being-applicants-part-i-senior-management.pdf); [Mental Health and Well-being of Applicants for International Protection Part II: https://euaa.europa.eu/sites/default/files/publications/2024-11/Practical-guide-mental-health-well-being-applicants-part-ii-first-line-officers.pdf](https://euaa.europa.eu/sites/default/files/publications/2024-11/Practical-guide-mental-health-well-being-applicants-part-ii-first-line-officers.pdf).

<sup>(50)</sup> Some 23 Member States provide relevant information in their NIPs, although details are lacking for some of them. Issues have already been flagged, including for Bulgaria, Italy and Malta. Austria and Greece make no reference to it.

<sup>(51)</sup> Some Member States already have free legal counselling in place: Germany, Belgium, Croatia, France, Portugal, though adaptations are needed. Some 18 Member States foresee it in their NIPs. It is not yet in place in Greece, Hungary, Poland.

<sup>(52)</sup> These include for example Cyprus, Latvia, Malta and Slovenia.

<sup>(53)</sup> For example, relating to the process of appointing representatives for unaccompanied minors and ensuring sufficient legal guardians: Estonia, France, Latvia, Lithuania.

reception places for people with special needs, including children and/or lack of reception places in general <sup>(54)</sup>.

Over the next months, Member States should work to ensure that the national entities for monitoring fundamental rights are defined and designated, that their independence is guaranteed, and that the relevant cooperation arrangements are set up <sup>(55)</sup>. Member States should also ensure adequate resources for the fundamental rights monitoring mechanism and free legal counselling ensuring, through recruitment and training, the necessary capacity and that a quality control mechanism is in place if such services are outsourced. Member States should also ensure a sufficient number of well-trained representatives for unaccompanied minors, in accordance with the Asylum Procedure Regulation. In many cases, this may require reaching out to the other relevant national authorities and ministries. Member States where plans still need to be established or confirmed must urgently do so to avoid further delays in the operationalisation <sup>(56)</sup>.

### **3.11 Building Block 10 - Integration and legal pathways to protection**

Effective integration and inclusion policies are important for a well-managed migration and asylum policy, helping to ensure social cohesion. In this way, migrants can support themselves and contribute to society and the economy as well as the EU's competitiveness.

Several Member States addressed the need to invest more or continue their efforts to support the integration of beneficiaries of international protection in their National Implementation Plans. This includes developing early integration measures and a more efficient process for the recognition of qualifications and the validation of skills. Effective access to housing remains a challenging issue <sup>(57)</sup>.

The EU supports Member States in their integration efforts through funding, developing guidance and fostering multi-level partnerships involving migrants, host communities, social and economic partners, civil society and the private sector <sup>(58)</sup>.

In November 2020, the Commission adopted an Action Plan on Integration and Inclusion 2021-2027 <sup>(59)</sup>, as one of the first actions when putting forward the Pact. Alongside this Communication, the Commission is presenting a staff working document reviewing the implementation of the Action Plan at mid-term and identifying good practices, remaining challenges and areas where further work remains to be done. The review also provides insights and tools on the integration of persons in need of protection with a view to assisting Member States with the operationalisation and implementation of the Qualification Regulation <sup>(60)</sup> and of the Reception Conditions Directive, including measures for early integration of international protection applicants and beneficiaries.

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<sup>(54)</sup> For example, Belgium, Greece, Latvia, Lithuania, the Netherlands and Cyprus.

<sup>(55)</sup> See also: [https://fra.europa.eu/sites/default/files/fra\\_uploads/fra-2024-independent-border-monitoring-mechanisms\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra-2024-independent-border-monitoring-mechanisms_en.pdf).

<sup>(56)</sup> For example, Austria, Belgium, Denmark, Greece, Poland and Hungary.

<sup>(57)</sup> This was also a key topic for deliberation at the last bi-annual meeting of the EUAA Network of Contact Points on Reception (May 2025).

<sup>(58)</sup> Examples include the European Integration Network, which unites representatives from national public authorities responsible for migrant integration in all 27 Member States, as well as Iceland and Norway; the Expert Group on the views of migrants; the Committee of the Regions partnership on the Integration of Migrants; the Urban Agenda Partnership on Inclusion, which brings together partners from different governance levels.

<sup>(59)</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Action plan on Integration and Inclusion 2021-2027, COM(2020) 758 final, [EUR-Lex - 52020DC0758 - EN - EUR-Lex](#).

<sup>(60)</sup> Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted,

On legal pathways to protection, the work on the implementation of the Union Resettlement and Humanitarian Admission Framework Regulation<sup>(61)</sup> is advancing. In line with the voluntary nature of the instrument, Member States have assessed their needs to amend existing programmes and workflows to align with the novelties brought by the Regulation. The Commission convened three meetings of the Resettlement Expert Group to exchange on specific provisions of the Regulation and their implementation. The EUAA Resettlement and Humanitarian Admission Network meetings also discussed the operational support that Member States may require when carrying out their programmes under the new rules. To prepare the first Union Resettlement and Humanitarian Admission Plan, the Commission convened two meetings of the High-Level Resettlement and Humanitarian Admission Committee, where participants exchanged on priorities.

### **Key challenges and next steps**

The mid-term review of the Action Plan on Integration and Inclusion shows that migrant integration outcomes have overall improved since 2021. At the same time, challenges persist in all the four main areas of intervention: education, employment, health and housing<sup>(62)</sup>. Maintaining targeted interventions towards beneficiaries of international protection remains necessary, particularly for women, children and persons with specific needs. The mid-term review also highlights the importance of a more integrated approach and closer coordination between the different levels of governance of the Member States, notably regarding financial planning and support. Finally, the mid-term review also acknowledges the challenges faced by the Member States to strike the right balance between migrants' integration and the welfare of their own populations. Going forward, the Commission will take on board the lessons learnt from the mid-term review of the Action Plan.

More generally, in already stressed housing markets, lack of access to housing for beneficiaries has consequences on reception capacity because it makes it more difficult to free up reception places. In addition, simplification and reducing delays in providing residence permits and other necessary documentation to beneficiaries is also a target for a few Member States.

Resettlement and humanitarian admission are an important contribution to a sustainable and comprehensive approach to migration management. Following the indications at the High-Level Committee and the preliminary contributions set forth by the Member States, the Commission will present its proposal for the Union Resettlement and Humanitarian Admission Plan by the autumn. The Union Plan aims to serve as a strategic tool to further embed the Union's resettlement and humanitarian admission efforts within comprehensive partnerships and dialogues with key third countries. Following the Commission proposal, the Council and the Member States will finalise the Union Plan and work towards its adoption by the Council before the end of 2025, for a timely implementation in 2026 - 2027.

## **4. CONCLUSION AND NEXT STEPS**

Half-way through the transition period, important progress has been made both at Union and national level. However, a steady pace must be maintained and, in several instances, accelerated to address the challenges that remain across all building blocks.

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amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council, OJ L, 2024/1347, 22.5.2024 [Regulation - EU - 2024/1347 - EN - EUR-Lex](#).

<sup>(61)</sup> Regulation (EU) 2024/1350 of the European Parliament and of the Council of 14 May 2024 establishing a Union Resettlement and Humanitarian Admission Framework, and amending Regulation (EU) 2021/1147, OJ L, 2024/1350, 22.5.2024 [Regulation - EU - 2024/1350 - EN - EUR-Lex](#).

<sup>(62)</sup> For more details, see Commission Staff Working Document on the mid-term review of the Commission Action Plan on Integration and Inclusion 2021-2027 accompanying this communication.

Maintaining this positive momentum and continuing to work together will ensure a streamlined and coordinated process, while enabling critical interdependencies across the various workstreams to be monitored effectively. Keeping track of the implementation will require continuous exchange of information, promoting mutual learning and sharing of good practices. To facilitate this, the Commission will promote a more structured and transparent exchange of information and provide targeted support to Member States facing challenges. In parallel, attention will be given to simplifying processes and mitigating administrative burdens where possible, to ensure that efforts remain focused, efficient and result oriented. The Commission will also continue its engagement with Member States on a bilateral basis to provide tailored support for the implementation of the Pact.

The first annual solidarity cycle starting in October 2025 makes it even more important to address existing challenges, to ensure that there are no significant shortcomings in the application of the current rules, including in the Dublin system and on reception, and that continuous progress is made in the implementation of the Pact. Being well prepared underpins the obligations under the Pact, also serving as a baseline for Member States to be considered under migratory pressure, facing a significant migratory situation or facing a crisis, and for having access to the Solidarity Pool.

An important deliverable will be the adoption of a five-year European Asylum and Migration Management Strategy by December 2025. This Strategy will build on the national strategies that Member States need to adopt and transmit to the Commission by 12 June 2025, covering both the internal and external dimensions of migration in a comprehensive and integrated approach.

To complement and support the sustainable implementation of the Pact, the Commission will continue its work on the external dimension of migration policy, notably on comprehensive partnerships with third countries, in a Team Europe spirit and following a whole-of-route approach. Focus will be put, among others, on decreasing irregular arrivals to the EU, on fighting migrant smuggling and on increasing the efficiency of our return efforts.

The success of the system will rely on the commitment and readiness of all Member States across all building blocks, as actions in one area can have wider implications for all. The Commission and the EU agencies will continue supporting Member States in their efforts and count on their constructive and sustained engagement. At the same time, recalling that any legal framework is only as effective as its implementation, the Commission will carefully monitor progress and stands prepared to use the appropriate procedures in line with the Treaties to ensure compliance. This underscores the shared political responsibility of all to fully commit to the Pact's objectives.

The Commission will present the next state of play on the implementation of the Pact to the European Parliament and the Council as part of the Annual Report on Migration and Asylum in October.