

## Contact details

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## 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?**

At EU level, the most significant developments affecting migrant women took place in the area of asylum and migration policy, particularly through the adoption of the EU Pact on Migration and Asylum. While presented as a harmonisation effort, the Pact raises serious concerns for migrant and asylum-seeking women due to accelerated procedures, expanded detention, and externalisation measures, which disproportionately affect survivors of violence, mothers, and women with disabilities.

Some progress was made in the recognition of the persecution on the basis of sex in asylum procedures, including violence against women and harmful practices as grounds for protection. However, access to sensitive procedures and protection remains inconsistent across Member States. Despite advances at EU level, asylum systems continue to prioritise control and deterrence, leaving a persistent gap between policy commitments and the lived realities of migrant women.

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

At EU level, limited or no progress was observed in several key areas affecting migrant and asylum-seeking women. Safe and regular migration pathways, including humanitarian visas and accessible family reunification, remain largely absent. Little progress was made in securing independent residence permits for women whose legal status depends on a partner, continuing to expose survivors of violence to risk.

In addition, reception conditions, access to legal aid, childcare, and long-term integration measures for asylum-seeking and refugee women showed minimal improvement. Despite increased consultation, meaningful participation of migrant women in policy-making remains weak, with few mechanisms translating inclusion into structural change.

**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?:**

From a pan-European feminist migrant women's perspective, early national-level implementation of the Pact on Migration and Asylum raises significant concerns. In several Member States, preparatory measures focus on expanding border procedures, screening, and detention capacity, with limited safeguards to identify and support women facing violence, trafficking, or other specific vulnerabilities.

There are persistent risks that accelerated procedures will undermine access to legal assistance, proper

interpretation, and trauma-informed asylum interviews, particularly for women and girls. National implementation plans rarely clarify how sex-sensitive assessments, child-care needs, pregnancy, or survivors' protection will be ensured in practice. Overall, implementation trends suggest a prioritisation of efficiency and control over protection, with insufficient attention to the specific rights and needs of migrant and asylum-seeking women.

## **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)**

In 2025, developments were largely shaped by preparatory measures for the implementation of the Pact on Migration and Asylum, including expanded screening and border procedures in several Member States.

While vulnerability assessments are formally included at first contact, they are largely not sex-sensitive, diluting the specific realities faced by migrant and asylum-seeking women, particularly survivors of violence, pregnant women, single mothers and women with disabilities.

Access to territory and asylum procedures remained uneven, with continued reports of pushbacks and restricted access at borders, raising serious concerns regarding compliance with the principle of non-refoulement. For many women, first arrival continued to involve inadequate access to information and healthcare, reflecting a broader prioritisation of border control over rights-based access to asylum.

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

In 2025, access to information and legal assistance for migrant and asylum-seeking women remained uneven and largely insufficient, particularly in border procedures and accelerated processes linked to the Pact on Migration and Asylum. While information provision is formally guaranteed, it is often delivered in ways that are not accessible, due to language barriers, lack of female interpreters, low literacy, and limited consideration of trauma.

Legal assistance and representation continued to be restricted in practice, with delays in access to lawyers, under-resourced legal aid systems, and limited availability of specialised counselling on sex-based asylum claims. These barriers disproportionately affect women, undermining their ability to understand procedures, disclose experiences of violence, and effectively exercise their right to asylum.

### **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)**

In 2025, provision of interpretation services for asylum-seeking women remained inconsistent across Member States. While some countries introduced remote or digital interpretation tools, coverage of relevant languages, particularly for minority or less common languages, remained limited. Qualifications and training for interpreters also varied, with few measures ensuring female interpreters for women survivors of violence,

which continues to restrict women's ability to communicate sensitive information and access asylum procedures effectively.

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

In 2025, Dublin procedures continued to face structural challenges for migrant and asylum-seeking women. While some Member States adjusted organisational frameworks to manage transfers more efficiently, practical implementation often lacked sex-sensitive safeguards, including during detention or medical screenings. Transfers under Dublin frequently expose women to risks of violence, inadequate healthcare, and family separation, and suspension of transfers to selected countries remained limited and inconsistent, leaving many women vulnerable within a system prioritising speed and control over protection.

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

In 2025, special procedures, including border, accelerated, and admissibility procedures, were increasingly applied across several Member States as part of Pact-related reforms. While intended to expedite processing, these procedures often lack sex-sensitive safeguards, limiting women's ability to disclose experiences of violence or other vulnerabilities. For migrant and asylum-seeking women, the fast-tracked nature of these processes heightens the risk of inadequate assessment, detention, and separation from dependents, reflecting a continued tension between efficiency and rights-based protection.

#### **6. Reception of applicants for international protection (including information on reception capacities – increase/decrease/stable, material reception conditions - housing, food, clothing and financial support, contingency planning in reception, access to the labour market and vocational training, medical care, schooling and education, residence and freedom of movement)**

In 2025, reception capacities across the EU remained uneven, with some countries increasing temporary spaces while others continued to face overcrowding and delays. Material conditions, such as housing, food, clothing, and financial support, varied widely, and contingency planning for surges was often insufficient.

Access to the labour market, vocational training, education, and healthcare, including sex-sensitive services, remained limited, particularly for women in border or transit facilities. Restrictions on residence and freedom of movement persisted in several Member States, exacerbating dependency and limiting opportunities for social integration.

#### **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)**

In 2025, detention capacities for asylum seekers remained stable or slightly increased in several Member States, often linked to border or Dublin procedures. Grounds for detention continued to include irregular entry or pending transfer, with limited use of alternatives to detention. Time limits were formally set but frequently extended in practice, and detention conditions rarely accounted for sex-specific needs. For migrant women, detention increases vulnerability to violence, limited healthcare access, and restricted family contact, highlighting persistent gaps in protection.

## **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)**

In 2025, procedures at first instance saw incremental organisational adjustments in several Member States, including minor changes to authorities in charge and case management practices. Interviews and evidence assessments often remain insufficiently sex-sensitive, limiting the recognition of sex-based persecution.

Timeframes and backlog management were formally improved in some countries, but delays persist, and decision-making rarely accounts for the specific vulnerabilities of women, including survivors of violence, pregnant women, single mothers, or women with disabilities.

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

In 2025, procedures at second instance remained largely unchanged, with some Member States introducing minor organisational adjustments or improvements in case management to address backlogs. Hearings and written procedures continued to lack consistent sex-sensitive safeguards, limiting recognition of women's specific vulnerabilities and experiences of violence. Timeframes remain variable, and delays in appeals disproportionately affect migrant women, particularly those whose first-instance claims were expedited or processed under special procedures.

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

In 2025, identification and registration of stateless individuals within asylum procedures remained limited and inconsistent across Member States. There are few systematic measures to detect statelessness at first contact, and processes rarely consider sex-specific vulnerabilities, leaving women and children at particular risk of being overlooked. As a result, stateless asylum-seekers often face delays in protection, restricted access to services, and heightened legal insecurity.

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

In 2025, reception and procedural standards for children and applicants with special needs saw limited improvements, including some expansion of specialised facilities and referral mechanisms. Age assessment, legal guardianship, and foster care for unaccompanied and separated children remain uneven across Member States. A major concern is that children are often treated as neutral categories, without disaggregation by sex, which obscures the specific risks and violence faced by girls. As a result, sex-specific vulnerabilities, including early marriage, sexual violence, and exploitation, are frequently overlooked in both reception and procedural measures.

## **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)**

In 2025, access to social security, healthcare, housing, and other basic services for asylum-seeking and refugee women remained uneven across Member States. Integration measures, including access to the labour market, language courses, and education or vocational training, were limited and often short-term,

with insufficient attention to the specific barriers faced by women, such as childcare responsibilities, sex-based violence, and informal work dependency. Overall, while legal entitlements exist, practical access to protection and integration support remains inconsistent and insufficiently sex-sensitive.

### **13. Return of former applicants for international protection**

In 2025, returns of former asylum applicants continued to be implemented inconsistently across Member States, with limited safeguards for vulnerable groups. Procedures rarely include sex-sensitive assessments, leaving women, particularly survivors of violence, single mothers, women with disabilities and pregnant women, at risk of exploitation, abuse, or family separation. Monitoring and access to legal remedies remain insufficient, meaning that returns often prioritize efficiency over 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)**

In 2025, EU and national resettlement and humanitarian admission programmes continued to provide limited but targeted pathways for vulnerable groups. While some progress was observed in prioritising women and children, programmes remain small-scale, fragmented, and inconsistently applied across Member States.

Access to tailored support, including safe housing, healthcare, and integration services, often depends on the capacity of implementing authorities, and sex-specific needs are not systematically addressed, leaving women at risk of violence, exploitation, or social isolation.

### **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)**

A key jurisprudential development relevant to women in 2025 is the *continued application at national level* of the CJEU's sex-based persecution case law (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62021CJ0621>) established in 2024, which national authorities and courts have applied in their 2025 decisions. The European Union Agency for Asylum (EUAA) reports that national courts in several Member States (including Finland, Greece, the Netherlands, Ireland and Portugal) overturned negative asylum decisions where authorities failed to conduct sex-sensitive procedural guarantees, such as moving vulnerable women from accelerated or border procedures to regular procedures with appropriate safeguards. These cases reflect how 2024's CJEU guidance on recognising sex-based violence and systematic discrimination as persecution has been *practically applied* in 2025 asylum appeals and decisions.

### **16. Other important developments in 2025**

In 2025, significant gaps persisted for migrant and asylum-seeking women. Vulnerability assessments remain largely neutral, failing to capture the specific risks faced by women and girls, including survivors of violence. Reception, integration, and protection measures continue to be uneven across Member States, with limited access to healthcare, childcare, housing, legal aid, and labour market opportunities. Procedural safeguards, particularly in accelerated, border, or Dublin procedures, often neglect women's specific needs. Overall, while awareness of women's vulnerabilities increased at policy level, implementation continues to lag, leaving structural gaps unaddressed.

## PART B: Publications

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

<https://www.migrantwomennetwork.org/2025/12/30/briefing-for-french-high-council/> - France's High Council on Equality between Women and Men

<https://www.migrantwomennetwork.org/2025/12/16/addendum-to-general-recommendation-n-30/> - Submission to General Recommendation No. 30, submission to CEDAW Committee

<https://www.migrantwomennetwork.org/2025/12/08/enomw-shadow-report-to-the-grevio/> - Shadow report to the GREVIO committee on the EU's implementation of the Istanbul Convention

<https://www.migrantwomennetwork.org/2025/12/01/submisson-to-european-border-and-coast-guard/> - Submission to the Consultation on European Border and Coast Guard: Update on EU rules

<https://www.migrantwomennetwork.org/2025/07/30/submission-to-the-public-consultation-on-the-gender-equality-strategy-2026-2030/> - Submission to the Public Consultation on the Gender Equality Strategy 2026-2030

<https://www.migrantwomennetwork.org/2025/01/31/submission-to-the-unsrva-wg-consultation-on-consent-in-violence-against-women-legislation/> - Submission to the UNSRVAWG's consultation on consent in violence against women legislation

<https://www.migrantwomennetwork.org/2025/01/31/submission-to-the-unsrva-wg-consultation-on-sex-based-violence-against-women-and-girls/> - Submission to the CEDAW Committee on General Recommendation No. 41, Gender Stereotypes

<https://www.migrantwomennetwork.org/2025/03/28/womens-rights-roadmap-statement/> - Expert Statement on EU Commission's Roadmap for Women's Rights and Calls for Strong Implementation

<https://www.migrantwomennetwork.org/2025/07/08/statement-on-the-report-sex-based-violence-against-women-and-girls/> Statement on the Report "Sex-based rights against women and girls"

<https://www.migrantwomennetwork.org/2025/11/03/statement-on-the-attack-on-refugee-accommodation-in-ireland/> Statement on the Attack on Refugee Accommodation in Ireland

<https://www.womensrightsdatabase.eu/> European Women's Rights Case Law Database

<https://www.migrantwomennetwork.org/2024/11/15/fulfil-report-in-spanish-italian-and-french/> - Women's Rights Perspective on the EU Charter of Fundamental Right