Report on the Critical Factors for the Successful Implementation of the EU Asylum and Migration Pact and its Implications for Dutch Reception and Asylum Systems

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Executive Summary

The New Pact on Migration and Asylum has introduced the most significant reform of the Common European Asylum System (CEAS) in over a decade. The reformed rules, which will apply in full as of 12 June 2026, are intended to address long-standing weaknesses in the CEAS, including persistent secondary movements, limited execution of responsibility transfers, uneven reception conditions and tensions between responsibility and solidarity. The Pact does not fundamentally replace the previous system. Rather, it seeks to make it more balanced, coherent and enforceable. It introduces a mandatory screening, expands the role of border procedures, strengthens monitoring through the revised Eurodac system, facilitates the execution of responsibility transfers, establishes a mandatory but flexible solidarity mechanism and enhances convergence of reception systems.

At the same time, the Pact introduces a new governance system and strengthens interdependencies between different components of the reformed CEAS. Illustrating this, to benefit from solidarity provisions, member states will have to maintain well-prepared asylum and reception systems and fulfil their screening and border processing obligations. Due to these interdependencies, implementation in one country will affect asylum and reception systems elsewhere.

Against this background, this Report seeks to answer the central question of how implementation dynamics in other member states will shape the practical consequences of the Pact reforms for the Netherlands. The Report examines this question by comparing legal and administrative adaptations as well as operational developments in the Netherlands, Belgium, Italy and Spain. It identifies remaining gaps that could lead to uneven implementation and their potential spillover effects on the CEAS and the Dutch asylum and reception systems. The Report takes an issue-based approach. It focuses on four consequential issues: i) the fulfilment of obligations in relation to screening, the Eurodac system and border procedures; ii) the execution of responsibility transfers; iii) the functioning of the solidarity mechanism; and iv) reception conditions. It also addresses the horizontal issue of secondary movements. Due to contractual reasons, the data collection cut-off date for this Report is early May 2026. Although the assessment is therefore not based on stabilised practices, it provides a preliminary overview of potential implementation dynamics and their effects in the short- to medium-term. The Report also provides detailed answers to the following four sub-questions:

SQ1. Where is implementation proceeding smoothly, and where is it stalling?

The comparison does not reveal a simple divide between member states that are ‘ready’ and those where implementation is stalling. Preparedness varies significantly by policy area, with none of the four countries expected to be fully ready across all relevant components by mid-June 2026. Spain has invested in border processes but faces organisational and inter-institutional coordination challenges. Difficulties in Italy pertain to screening and border procedures, not least in terms of infrastructure. Both Belgium and the Netherlands may need to carry out on-territory screening, but the Netherlands appears comparatively better prepared. Conversely, Belgium has reportedly enhanced its capacity to process responsibility transfers, unlike the Netherlands that continue to face challenges in this area. All four countries have encountered difficulties in upgrading their Eurodac systems and strengthening the resilience of their reception systems. As to the latter, Belgium and the Netherlands will enter the implementation phase in June with limited reception capacity, while Italy’s and Spain’s territorial disparities may create their own set of challenges, including coordination challenges, especially in times of sudden arrivals.

SQ2. What are the underlying factors contributing to success and failure in each member state (legal, administrative, political, operational)?

The Report shows that differences in readiness originate in uneven progress achieved during the two years of preparations ahead of Pact implementation. However, these also depend on domestic dynamics and challenges that national asylum and reception systems experienced prior to the reforms.

Despite efforts made, it remains uncertain if member states will complete all necessary legal adaptations by mid-June 2026. Countries such as Belgium and Spain may face difficulties due to their decentralised institutional structures. Administrative capacity and operational preparedness will also be critical. Whereas Italy and Spain can draw on experience with the 'hotspot approach' to process irregular arrivals at the borders, and Belgium has invested into dedicated facilities for responsibility transfer, constraints related to infrastructure, staff recruitment and coordination between authorities could nevertheless hamper the application of the new procedures. Finally, political commitment to implement the reforms and close implementation gaps will also be key. Uncertainty persists, however, in relation to the determination to resume responsibility transfers by countries like Italy, for example.

SQ3. To what extent could implementation problems elsewhere affect the consistency and feasibility of the Pact at European level?

The comparison identifies several concrete dependencies and systemic risks, although their effects are hard to anticipate. The analysis shows, for instance, that responsibility determination and transfers depend on the timely and complete registration of data in Eurodac, on administrative capacity as well as on maintaining decent reception conditions. Shortcomings in one of these areas will affect the execution of transfers. Gaps in screening and border procedures can contribute to secondary movements, and so can variation in reception conditions, although the weight of each of these factors is hard to estimate. Where secondary movements occur without prior registration or screening, they shift responsibilities to countries like the Netherlands and Belgium, outside the EU external borders. This can place additional pressure on their asylum and reception systems. All this, combined with irregular movements, could affect member states' contributions to the solidarity mechanism and create tensions if a better and more effective balance between the fulfilment of new obligations and responsibility-sharing is not achieved. Systemic risks will be greater shortly after June 2026, when expectations will be higher but implementation dynamics and outcomes less clear. However, this Report does not suggest that persistent implementation gaps will make the Pact inherently unworkable. The reforms establish tools that could promote the convergence of common interests and practices, although this will not eliminate interdependencies.

SQ4. What risks and lessons are relevant for the Netherlands?

The main systemic risk is the potential accumulation of gaps across interdependent functions, also affecting mutual trust and the credibility of the CEAS. For the Netherlands, the risk lies in both the individual and cumulative effects of uneven implementation across the various elements of the Pact. The solidarity mechanism illustrates this interdependence: tensions could arise if benefitting states perceive support as unbalanced or if contributing states such as the Netherlands enter the implementation phase expecting greater compliance with responsibilities.

Despite the remaining uncertainty, the Report points to some important overarching lessons. First, it shows that 12 June 2026 should not be seen as a watershed moment at which the CEAS suddenly begins to function smoothly. It marks the start of a longer transition period. During this period, the Netherlands, like other states, will have to address the most pressing and consequential gaps while also not overlooking structural needs in its asylum and reception systems, including those existing prior to the preparation for implementation.

Connected to this, a key finding of the Report is that Dutch preparedness should be understood within the wider functioning of the CEAS. National investments in screening, responsibility procedures, reception and digital systems will have to address remaining shortcomings while also having to mitigate the possible immediate impact of uneven enforcement elsewhere. Dutch readiness to carry out responsibility transfers following secondary movements of asylum applicants, for example, may fall short in the immediate term due to insufficient readiness elsewhere, impacting the Dutch asylum and reception systems as a result. Dutch authorities, this Report finds, may be faced with heavier administrative workloads and complex case management. Targeted investments and flexibility as implementation practices elsewhere crystallise will therefore be of the essence.

Comparative findings at a glance

Issue	Netherlands	Belgium	Italy	Spain	Possible implications for the Netherlands
Eurodac	**Standalone WUI** (interim solution), with final preparations at an advanced stage.	**Standalone WUI** (interim solution). Timing uncertain for full integration.	**Outstanding operational issues**. Readiness timing uncertain.	**Standalone WUI** (interim solution). Timing uncertain for full integration.	Delays, uneven registration or incomplete data undermining responsibility determination and transfers.
Screening and border procedures	**Ready** - Adequate capacity reached; - Limited changes to existing asylum border procedure; - Independent Monitoring Mechanism (IMM) appointed.	**Not fully ready** - On-territory screening challenges; - Adequate capacity reached; - Limited changes to existing asylum border procedure; - IMM not in place.	**Not fully ready** - Screening authority not appointed; - On-territory screening challenges; - Adequate capacity not reached; - Operational uncertainties linked to infrastructure, sequencing of screening and border procedures, e.g., spatial organisation; - IMM not in place.	**Not fully ready** - Health-checks arrangements for screening pending; - Adequate capacity uncertain; - Legal, time limit and spatial organisation challenges; - IMM appointed.	- Shift of screening responsibility to NL with more on-territory screening workload following secondary movements; - Failure to process cases at the borders increases access to territory and onward movements; - IMM not in place may lead to more litigation and invalidation of detention/procedures.
Responsibility transfers	**No increase in capacity.**	- **Capacity improvements** (IT and case management, staff); - Dedicated facility for applicants subject to transfer.	- **Operational improvements** reported (IT, case-management, staff); - Uncertain capacity due to the suspension of transfers since 2022.	**No increase in capacity.**	- Ineffective transfers may incentivise secondary movements, increase the number of applicants under Dutch responsibility and the duration of stay in reception system; - Low transfer rates may impact solidarity pledges for the next cycle.
Solidarity mechanism	**Contributor**: financial contribution and interest in offsets.	**Contributor**: financial contribution and interest in offsets.	**Beneficiary**: interest in offsets, relocations and financial support.	**Beneficiary**: interest in financial support. No large-scale offsets available.	- Alternative forms of solidarity (offsets) can be subtracted from financial pledges in last-minute negotiations; - Difficulty to anticipate and organise the delivery of contributions.
Reception conditions	- Occupancy rate between 95-100%; - Reliance on emergency shelters; - **No structural expansion of capacity.**	- Occupancy rate over 90%; - **No structural expansion of capacity.**	- Occupancy rate unknown but system fragmented;[1] - **No structural expansion of capacity** but remodelling existing facilities.	- Occupancy rate unevenly distributed across the country (e.g., higher occupancy in Canary Islands); - **No structural expansion of capacity** but sufficient capacity reported.	- Shortcomings in reception conditions may be a factor incentivising secondary movements; - Deficiencies in reception can lead to judicial suspension of responsibility transfers.

1 Introduction

The New Pact on Migration and Asylum constitutes the most comprehensive attempt to reform the Common European Asylum System (CEAS) in recent years.[2] It seeks to address long-standing structural shortcomings in asylum and reception systems while also addressing the causes of tensions between member states of the European Union (EU). These include lack the balance between responsibility and solidarity, onward irregular movements (also referred to as 'secondary movements') within the Schengen area and uneven compliance with policies and laws. In the case of the Netherlands, the main reference point for this Report, next to exposure to secondary movements, some of the key persistent challenges include the management of reception capacities and the effective execution of transfers of asylum seekers to other member states.

Rather than fundamentally replacing the existing architecture, the Pact builds on it by introducing a more integrated and interdependent set of instruments to better govern mixed migration and irregular arrivals to Europe, also considering specific member state needs. These instruments include enhanced information-sharing systems and reinforced registration requirements, border procedures, and a mandatory but flexible solidarity mechanism embedded in an annual governance cycle. These elements are intended to create a more effective, predictable and balanced CEAS, while preserving a degree of flexibility to accommodate member states' specific situations and political constraints.

Following the reforms' adoption in May 2024, the Netherlands along with all other EU member states have had two years to prepare for their full application, with 12 June 2026 set as the starting date. While the European Commission has supported this process, with a comprehensive effort from national authorities and other stakeholders, questions remain about the capacity of member states to swiftly and consistently implement the reforms, due to various structural constraints.

At the operational level, key challenges that emerged during the preparatory phase include the readiness of IT systems, the availability of adequate reception and processing capacity, and the ability to comply with stricter procedural time limits. These challenges are further compounded by the need to manage the transition between the pre-existing system and the new rules, including parallel procedures and legacy caseloads. Some legal uncertainties persist, too, particularly where national legislation has not yet been fully adapted. Moreover, while dedicated financial resources have been made available for Pact preparation and implementation, questions remain around forward-planning at national level and the next EU budget as of 2028.

This Report, which has been drafted in the period leading to 12 June, and is based on data collected until early May 2026, provides a preliminary assessment of critical factors that could determine successful Pact implementation as well as specific challenges and negative spillover effects that could impact the Netherlands. The analysis considers the following research sub-questions:

- In which member states is the implementation of the Pact proceeding smoothly, and where is it stalling?
- What are the underlying factors contributing to success and failure in each member state (legal, administrative, political, operational)?
- To what extent do problems elsewhere threaten the consistency and feasibility of the Pact at the European level?
- What risks and lessons are relevant for the Dutch implementation strategy?

Answering these questions requires a preliminary assessment of the Pact rules against gaps in the pre-existing system as well as a careful examination of available data regarding preparedness and other enabling conditions and structural challenges that could influence Pact implementation. At the same time, the analysis faces limitations, including data collection, as the Report is drafted prior to the 12 June deadline. Methodological limitations and considerations are elaborated upon below.

This assessment builds on the broader framework and migration governance introduced by the Pact and its data-driven implementation cycle in particular. Already during the preparatory phase, the European Commission and member states coordinated their respective actions within this new structured governance system based on 'implementation plans'. The Commission also released three reports on the level of preparedness across the EU. This approach is intended to ensure accountability for remaining challenges and ownership over corrective measures.

Another central feature of the reforms on which this Report focuses is the degree of interdependence between the Pact's different components. To benefit from solidarity provisions, for instance, member states must comply with the responsibility rules and ensure the effective registration in Eurodac, the timely screening upon arrival, and the proper sequencing of the asylum procedure, including responsibility determination. Sufficient preparedness of national asylum and reception systems is thus a determining factor in the solidarity mechanism's functioning, and should incentivise member states to fulfil their obligations and close implementation gaps.

The flipside of this interdependence is that persistent implementation gaps in one part of the CEAS may generate effects across other stages of asylum and reception processes. Rather than reflecting isolated shortcomings, uneven implementation could generate unintended consequences elsewhere in the EU or even shift pressures between countries. This raises the stakes for poor or limited implementation for the Netherlands and the CEAS overall.

International migratory dynamics are also relevant for assessing the implementation of the Pact and potential spillover effects. Recently, the numbers of irregular arrivals and asylum applications have decreased, reducing pressure on asylum and reception systems while also freeing up resources and facilitating preparations ahead of 12 June, providing favourable implementation conditions.

Yet, lower arrival numbers are contingent on a range of factors, including cooperation with third countries and geopolitical developments in the EU's neighbourhood and beyond. As such, it is risky to assume that current trends will persist over time. In this view, the current situation does not show how the Pact reforms would function under conditions of increased migratory pressure, which have historically exposed structural weaknesses in the CEAS. This creates a degree of uncertainty as to whether the system would be able to absorb future fluctuations in arrivals without generating renewed imbalances and major operational bottlenecks, and if the application of the new rules is sufficient to withstand unprecedented systemic shocks.

Against this background, EU-wide and national political dynamics are also set to heavily influence future implementation. The degree of commitment to the Pact, the prioritisation and allocation of resources, and the willingness to cooperate with other member states under various migratory situations will play a key role in how quickly gaps are filled and the system is made to work. Examining the new rules and the prospects for implementation in the short and medium term thus requires moving beyond a black-letter legal analysis and examining how technical, operational and administrative factors as well as political dynamics could interact in practice.

The Report is organised chronologically. Section 2 outlines challenges affecting member states and the Netherlands prior to the Pact reforms, explaining how the new rules should remedy pre-existing systemic deficiencies in the CEAS' functioning. Section 3 follows with an analysis of the preparatory process for Pact implementation, looking at the period between the reforms' adoption in May 2024 and May 2026. Specifically, it provides an overview of key legal, operational and financial steps taken across the EU and in the four case study countries, and some relevant remaining gaps.

Section 4 moves on to analysing the implications for the CEAS and the Netherlands of possible implementation challenges based on this comparative assessment. The situation emerging in the four countries by May 2026 is used as a baseline to explore the possible spillover effects of uneven or partial implementation. The analysis focuses on the fulfilment of responsibility obligations and solidarity provisions, reception conditions and secondary movements.

Having identified potential shortcomings and consequences, Section 5 moves on to a preliminary overview of promising practices in response to some gaps that could inform strategic priorities in the Netherlands. Section 6 highlights the overarching policy implications for the Netherlands, as well as some insights concerning future funding needs under the Pact and external shocks.

Overall, the Report shows that the CEAS will not start to function smoothly, efficiently and effectively across all its components on 12 June. This date should not be viewed as a watershed moment, but as part of a gradual process that started with the adoption of the reforms and will continue during a longer transitional phase. Although such a phase is not unexpected considering the comprehensiveness and complexity of the reforms, its duration and the risk of frictions emerging during the longer transition period will depend on member states' capacity to address remaining gaps and progressively align their practices while also maintaining mutual trust. While not claiming to be exhaustive, this Report can thus be seen as a resource to anticipate such potential risks and help inform policymakers' thinking on future strategic priorities for Pact implementation.

1.1 Methodological Considerations

The Report takes an 'issue-based' and function-oriented approach. Rather than providing an exhaustive overview of all legislative instruments introduced by the Pact and comparing their how they are enacted at the national level, the analysis focuses on the issues, and corresponding reforms deemed most relevant for the Dutch context, and on pre-conditions for their effective implementation. These are i) the fulfilment of responsibility obligations, ii) solidarity provisions, iii) reception conditions and iv) addressing secondary movements.

The Report examines possible implementation dynamics regarding these four aspects, and possible implications of implementation gaps and shortcomings for the Netherlands and at European level. As the analysis shows, the Pact's interdependent nature means that a multiplicity of factors could have direct and indirect effects on the Netherlands. The Report examines, in particular, legal, operational, financial and political dynamics that could shape Pact implementation after 12 June. While the focus is on the Netherlands, the Report also draws attention to EU-wide and systemic effects where relevant for understanding country-level implementation dynamics.

Potential spillover effects are assessed by considering implementation gaps, the CEAS function affected and the mechanisms through which effects could extend beyond the member state concerned. Where relevant and supported by the available evidence, the analysis also considers pre-Pact dynamics as well as the conditions under which such effects could materialise, factors that may mitigate or reinforce them, and the possible implications for the Netherlands.

This Report adopts a comparative approach and uses Italy, Spain and Belgium – other than the Netherlands – as relevant case studies to assess the Pact implementation dynamics. The case country selection was made based on three criteria, considering geographic and political variation as well as distinct responsibilities under the reformed CEAS. The criteria consist of i) strategic relevance for the Netherlands, ii) legal, administrative and operational readiness, also aiming for variation, and iii) methodological considerations such as data access.

Shared structural challenges and similarities in policy priorities, next to the geographical proximity make Belgium a suitable reference point for comparison with the Netherlands. In addition, being part of the Benelux region, the two countries maintain close cooperation on migration and asylum, including regular exchanges between administrations, advanced information sharing and joint initiatives, thus offering common ground for comparing approaches and exchanging good practices.

Italy and Spain's geographical position, being entry points for irregular migration, renders both suitable case studies for this assessment: the reforms' effective implementation in these two countries could generate positive spillover effects. Instead, partial or insufficient implementation could likewise affect Dutch reception and asylum systems, not least due to concerns about the impact of secondary movements, while also influencing the overall balance of solidarity within the EU. Relatedly, both Italy

and Spain have been identified as “under pressure” during the first implementation cycle and, as such, eligible for support under the newly introduced solidarity mechanism.[3] By contrast, the Netherlands and Belgium have been declared at risk of migratory pressure.

While the governments of the four case studies have all remained committed to Pact implementation throughout the preparatory period leading to 12 June, their level of preparedness varies significantly. They have also taken different public positions: Italy, for example, has been less transparent about preparations. Spain’s supportive stance on the reforms provides a contrasting example.

Italy and Spain also provide relevant comparative examples in terms of operational preparedness and experience. Having introduced and experimented with some practices then adopted at EU level with the Pact reforms, as in the case of screening or border procedures, they can provide valuable operational experience on certain key elements of the Pact. At the same time, challenges that already emerged under the pre-Pact rules can point to potential implications for the Netherlands.

Considering that the research was conducted prior to the implementation deadline, a variety of sources were consulted to ensure timeliness and completeness. These include i) legislation at EU and national levels; ii) official reports (including three Commission reports on the progress in implementation preparation); iii) national implementation plans; iv) data and statistics relevant for the assessment of migratory situations, such as irregular border crossings, asylum applications and recognition rates; v) guidance and other practical resources, for example from the EU Asylum Agency (EUAA). In addition, the research team conducted 10 semi-structured interviews between January-April 2026 with EU and national representatives and other relevant stakeholders to address information gaps and validate preliminary research findings.

While a variety of sources was considered, it is important to stress that levels of information vary across the four selected countries as well as depending on the thematic issue considered, due to wide-ranging factors such as public sensitiveness and methodological obstacles. Political sensitivity thus not only shaped national authorities’ decision to make certain information public, but also the overall willingness to validate findings. Uncertainties, where they exist, are identified accordingly, while references to official reports are also systematic.

The data collection cut-off date for this Report is early May 2026. While this precedes the day when the rules come into full implementation, this is due to contractual and research considerations. The period for assessing progress and potential implications for the Netherlands, thus falls between the rules’ adoption in May 2024 and May 2026, with the May cut-off date contributing to methodological and analytical challenges. For example, some critical decisions on Pact implementation are only to be reached after this date. As such, some issues relevant for the Netherlands could only be evaluated based on the status quo ante. The Report thus provides a preliminary assessment, rather than a definitive or comprehensive forecasting of how implementation will occur in practice on 12 June and later.[4] Also relevant is that the analytical insights focus on the short-term transition period after 12 June 2026 and on medium-term risks where these follow directly from identified implementation dependencies, rather than on long-term evolution, which cannot be anticipated.

2 Key elements of the New Pact on Migration and Asylum

This section provides key information on the New Pact on Migration and Asylum reforms and their goals. It is structured around i) the new screening obligations, revision of Eurodac and border procedures; ii) responsibility-determination rules; iii) the solidarity mechanism, including the underlying pre-conditions to benefit from it; and iv) changes seeking to harmonise reception conditions and improve preparedness; v) further efforts to address secondary movements; vi) the new governance system introduced by the Pact, and its operational and political significance.

Rather than treating the reforms as self-standing, the Report highlights key interdependencies between the various measures. Where relevant, information on migration dynamics in the Netherlands, Italy, Spain and Belgium prior to the Pact reforms is integrated to point to structural challenges that the reforms aim to address, while also highlighting specific concerns that may inform member states' priorities and cooperation after 12 June, examined in subsequent sections.

2.1 Screening, Eurodac and border procedures

The Pact seeks to ensure a better functioning of the CEAS, starting from stronger compliance with states' obligations to register and process applications for asylum and irregular arrivals. The reforms update and expand states' responsibilities in several ways, including through the systematic registration of newly arrived persons under the Eurodac system,[5] their screening and the introduction of border procedures.

Under the rules pre-dating the Pact, several weaknesses affected the fulfilment of these responsibilities in practice. These included uneven approaches to registration, slow or haphazard identification of persons arriving irregularly as well as divergent practices and timeframes for processing applications at the border. These gaps have made it harder to establish which member state is responsible for an asylum application, while also allowing some movements across the EU to remain undetected. They also placed pressure on regular asylum and reception systems, particularly when cases with low prospects of recognition were not identified early enough or applicants could not be channelled swiftly into the appropriate procedure.

These challenges are visible in pre-Pact practices. Italy and Spain faced the practical challenge of managing arrivals by sea and land, including in locations such as Lampedusa, Sicily, the Canary Islands, Ceuta and Melilla. The Netherlands and Belgium have not been exposed to irregular arrivals from the EU's external borders but have been affected by them via secondary movements and repeated asylum applications. In the Netherlands, many applicants in 2025 did not have a traceable migratory history, either because they had not been registered upon arrival or because their movement through other member states had not been effectively recorded. In Italy, the persistent discrepancy between arrival numbers and final asylum decisions reinforced distrust around compliance with systematic registration.[6]

Against this background, the Pact strengthens responsibility compliance through three linked reforms: mandatory screening, a revised Eurodac system and expanded border procedures.

The mandatory screening

As a first element of this sequence, the Pact introduces a mandatory screening at or near the EU's external borders or in other locations within a member state's territory. This screening involves identity, security and basic health checks as well as an initial assessment of vulnerabilities, on top of the registration of biometric data that is to be transmitted to Eurodac.[7]

All the above tasks are to be completed in no more than seven days at the external borders, determining the type of procedure – asylum or return, regular or at the border – that a non-EU national should be channelled into. In the case of within-territory screening (for persons not screened at the external borders), this period is limited to three days.

Under the pre-Pact CEAS, there was no harmonised screening phase. Member states generally carried out identity and security checks upon arrival, primarily based on national procedures. Several but not all EU member states had some forms of initial screening in place under national law prior to the Pact reforms. Italy and Greece also gained experience through the 'hotspot approach'. This process – carried out on several Aegean islands as well as Lampedusa, among others – entailed initial reception, identification, and registration of asylum seekers and other migrants arriving by sea.[8]

Following the Pact reforms, the screening process is now standardised to facilitate quicker identification of individuals upon arrival and strengthen border control, while also preventing onward movement. Importantly, this step does not involve granting persons the right to enter the EU, with member states required to ensure persons remain at their disposal, a measure deemed necessary to prevent the risk of absconding other than to strengthen border management. Moreover, screening should lead to overall efficiency gains, as persons with low prospects of asylum would be identified early on, while those with genuine prospects would be channelled into the regular asylum procedure. This would allow resources to be more effectively focused on applicants likely to qualify for protection. Screening could also support the early identification of vulnerable individuals, provided health and vulnerability assessments are carried out effectively.

Seen from this viewpoint, member states at the EU's external borders – which will presumably conduct the greatest number of screenings – are set to become an 'operational gateway' into the Union. Yet, these measures require substantial investments into staffing and adequate facilities. Screening also requires administrative coordination and workflows, which may take time to develop unless member states already have some experience.[9]

While in absolute terms, pressure may be higher for first-entry countries, member states are also expected to carry out screening on their territory when there is no indication that an 'illegally staying' non-EU national was subject to controls at the EU's external borders. This obligation is relevant for countries facing secondary movements, such as the Netherlands and Belgium, which also have more limited experience with screening compared to countries further away from the EU's external borders.

The revised Eurodac system

The second component of this sequence is the reform of Eurodac. Under the pre-Pact framework, gaps in registrations in Eurodac limited authorities' ability to reconstruct individual migratory trajectories, identify multiple applications or determine the responsible country for asylum seekers consistently. These gaps impacted states experiencing onward movements, such as the Netherlands.

Following the Pact reforms, member states are required to collect a wider range of personal and biometric data, including identity documents, facial images and security risks, next to fingerprints. Notably, the personal scope of the database was also expanded. As such, it contains the above information for a wider range of non-EU nationals.[10] For example, member states must now record information on persons found to be irregularly present on their territory. Despite this expansion, registration must be completed within no more than 72 hours. National authorities must also update the collected information and data, for instance when the status of an applicant has changed. All the collected data is stored for periods lasting up to 10 years (e.g., in the case of asylum applicants).

Eurodac represents the operational backbone of the Pact system,[11] with the success of subsequent decision-making processes resting on its proper functioning. Beyond more effective responsibility determination, if effectively applied, this expanded system could contribute to more accurate data-sharing between authorities and improved tracking and anticipation of migratory trends. Illustrating this, a search can now yield an extensive readable file of the individual's migration-related records. Yet, for it to work, upgrading digital systems and recruitment and training personnel are necessary.

Experience shows that proper implementation is not just a matter of operational readiness, however. As in other areas of the reform, national authorities' willingness to apply the new rules, especially when dealing with large-scale arrivals, would impact the systematic registration under Eurodac.[12]

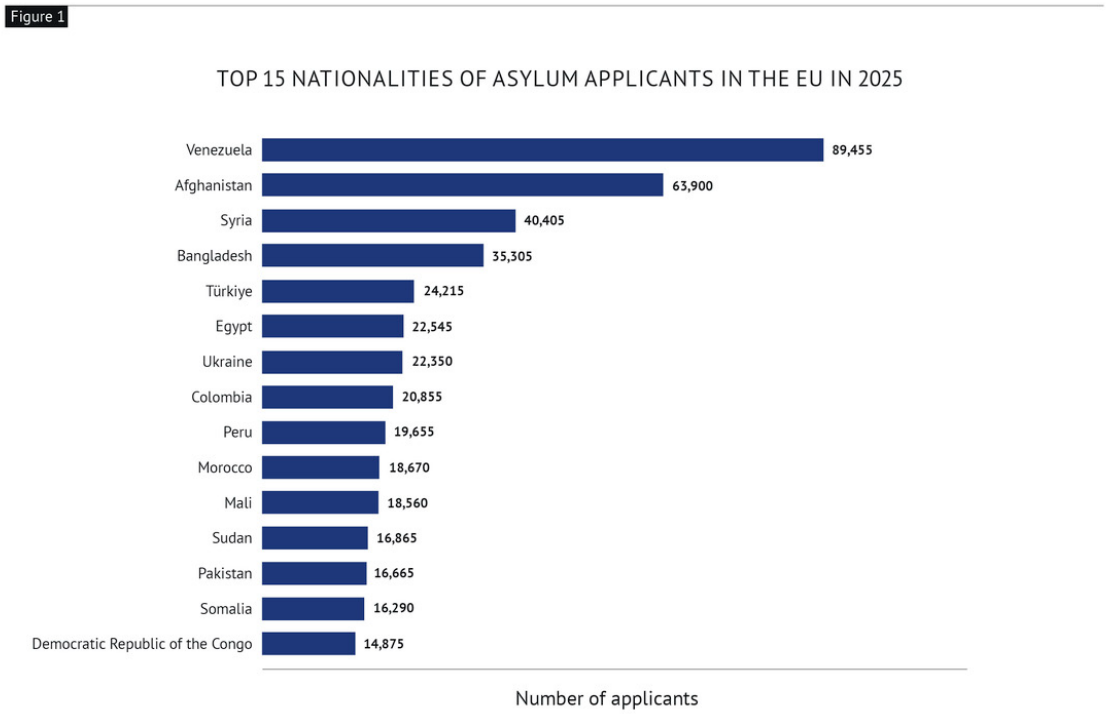
Border procedures

After data collection via Eurodac and completion of the screening, persons are channelled into different procedures: asylum applicants either into the regular or border procedure, while persons subject to the screening who do not apply for asylum are instead refused entry.

Notably, the border procedure is intended to allow for a quicker assessment of whether an application is unfounded or inadmissible in no more than 12 weeks, including appeals,[13] with the same period set for completing the return border procedure. If this duration is exceeded, the process continues under the regular framework, with persons granted access to the territory.[14]

Asylum border procedures are mandatory, among others, for individuals raising security concerns and asylum applicants from countries with a first-instance recognition rate of 20% or lower according to the Union-wide average based on Eurostat data. For context, 2025 saw close to half of all applications in the EU being lodged by citizens of countries with a recognition rate of 20% or less (see Figure 1).[15] Relevant nationalities include Bangladesh, Türkiye, Egypt, Colombia, and Morocco.[16]

Figure 1. Top 15 nationalities of asylum applicants in 2025



Source: EU Asylum Agency (2026), EU Asylum Agency, "Recognition Rates", *Latest Asylum Trends: Annual Analysis* (accessed 30 May 2026).

A further expanded use of border procedures stems from additional reforms adopted in 2026. National authorities can declare an application inadmissible if the applicant is considered to come from a 'safe third country' and, accordingly, could have sought international protection there.[17] Furthermore, the new rules provide for an accelerated procedure if the applicant is from one of the countries on the list of 'safe countries of origin'. The first EU-wide list includes Bangladesh, India, Kosovo, Egypt, Morocco and Tunisia and enlargement countries (subject to some exceptions).[18] Under this additional change, more inadmissibility assessments are expected to occur rapidly at the borders.

This differentiated system of processing asylum applications is meant to increase efficiency and alleviate potential pressure on the regular asylum process, especially but not only in times of higher arrivals. This prospect is particularly relevant for member states entering the Pact implementation phase with significant pending caseloads including the Netherlands (50,000 pending applications in 2025)[19], Italy (around 234,000 pending applications at the end of 2025)[20], Spain (248,740 pending applications at the end of 2025)[21], and Belgium (58,675 at the end of 2025).[22]

Border procedures could also support quicker return decisions for individuals with no right to remain in the EU, reinforcing the effectiveness of the broader migration policy. This is relevant given that, in many instances, the longer individuals remain on the territory, the less likely return becomes.

Overall, the Pact transforms border procedures from exceptional mechanisms into a core element of EU asylum governance, requiring further infrastructure and operational investments. Member states must also ensure high-quality first-instance decision-making, as this could otherwise have knock-on effects at the second instance. The judiciary's capacities also need to be strengthened for assessing the legal grounds for detention, handling appeals and meeting the tight time limits for decisions.

It is worth noting that some 18 member states already had border procedures in place prior to the Pact, the Netherlands included. However, practices and the extent and usefulness of the experience vary.[23] The Netherlands and Belgium will enter the Pact implementation phase with more limited practical exposure to large-scale external border processing, whereas Italy's and Spain's hotspot approach should help with executing border procedures. Yet, even for them, prior experience does not necessarily translate into readiness to apply the more demanding new framework.

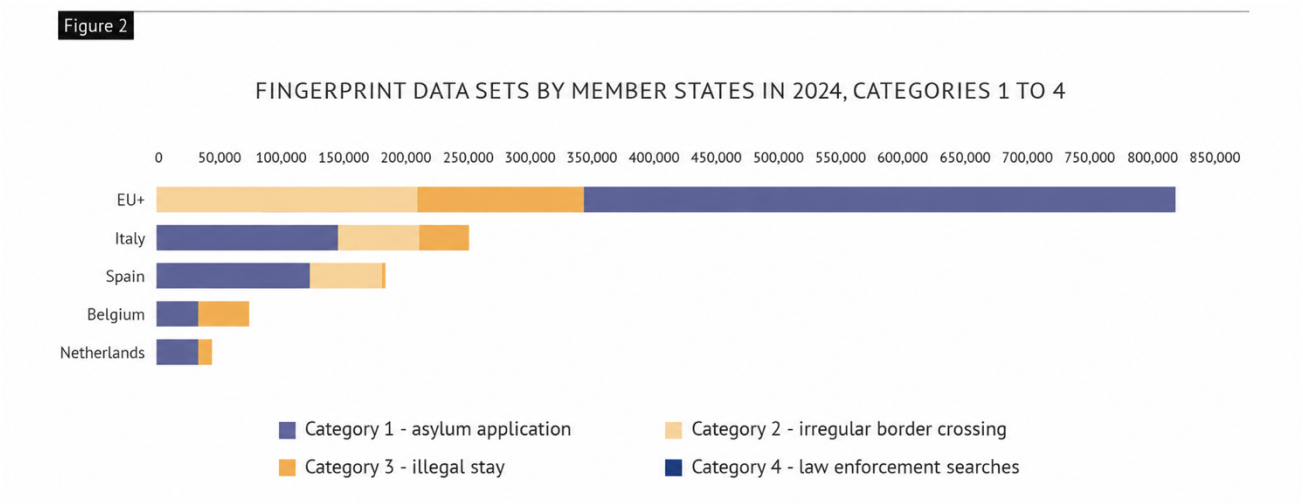
The functioning of the border procedure must also be understood in connection with member states' 'adequate capacity'. This concept entails that all member states must ensure sufficient human resources and reception infrastructure to process a specific number of asylum and return border procedures at all times. The total number of adequate capacity is set at 30,000 for the whole of the EU, with individual member states' yearly share calculated based on, among others, irregular border crossings and refusals of entry over a three-year period, with higher shares for border states. For the June 2026-June 2027 period, Italy must maintain an adequate capacity of 8,016 places, for instance, while for the Netherlands and Belgium, the figures are 211 and 106, respectively.[24] Meeting adequate capacity is a pre-condition to benefit from solidarity measures and, as such, it is considered in the assessment of member states' level of preparedness (see Section 2.3).

A further novelty is that both the screening and asylum border procedure are accompanied by an Independent Monitoring Mechanism of fundamental rights, with several member states also having introduced or tested similar mechanisms through pilots prior to the reforms' adoption.[25] The monitoring relates to access to the asylum procedure, the principle of non-refoulement, the best interests of the child and rules on detention although its limited scope has attracted criticism.[26]

2.2 The Pact's rules governing responsibility determination

Questions over which member state should be responsible for examining an asylum application have long been among the most contested issues in the CEAS. Under the pre-Pact Dublin system, responsibility was determined through a hierarchy of criteria, applied in cascading order. In practice, the first-country-of-irregular-entry criterion (also referred to as 'country of first entry') often played a decisive role, requiring member states where asylum applicants first entered without the right to stay to take responsibility. This placed pressure on member states at the EU's external borders. It also generated tensions between states of first entry, which argued that they faced a disproportionate burden, and destination states, which pointed to limited registrations under Eurodac and continued secondary movements, calling for more effective transfers of responsibility.[27]

Figure 2. Fingerprint datasets by select member states in 2024



Source: eu-LISA, Eurodac Statistics Report 2024, Statistical Annex, p. 32. eu-LISA (2025), Eurodac — 2024 Statistics Report, Tallinn: European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice, December 2025.

These tensions have dominated discussions for years. Italy, for example, received no fewer than 42,800 take-back requests in 2024, the highest number among the EU-27. Yet actual transfers numbered only 60, amounting to an implementation rate of less than 1%. In December 2022, the Italian government also invoked a state of emergency and formally requested other member states to suspend incoming transfers due to a lack of available reception capacity.[28] While the state of emergency no longer fully reflects the situation on the ground, transfers have not yet resumed.[29]

Persistent secondary movements, repeated applications and ineffective transfers of responsibility to other member states also affected the Netherlands, although in antithetical terms. While the available data do not allow individual asylum applications to be linked to subsequent Dublin procedures, the Netherlands' geographical position suggests that a large proportion of asylum applicants first entered through another member state. In 2025, for example, a total of 42,335 asylum applications were registered in the Netherlands.[30] Asylum applications were mainly from nationals from Syria, Eritrea and Somalia, typically associated with unauthorised movements from Greece and Italy. The Netherlands also issued 7,844 Dublin requests in 2024, the latest year from which data is available.[31] Nevertheless, only a minority of asylum applications ultimately gave rise to a Dublin procedure due to various reasons: absconding, lack of registration in other member states, and situations where pursuing a Dublin transfer may entail greater administrative costs than examining the application.

Similar dynamics affect Belgium. Around 34,500 applications were filed in the country in 2025.[32] Data from 2024 shows that Belgium issued 12,501 Dublin requests – more than the Netherlands – suggesting that in an even higher share of cases responsibility or the transfer procedure could not be established. Onward movements from Greece via Germany and France reportedly account for the main irregular routes to Belgium.[33]

This area of the CEAS is thus politically and operationally challenging. Yet, compared to rules governing Eurodac, screening and border procedures, those determining responsibility saw minimal change. The Pact preserves the principle of the hierarchy of criteria and their cascading order.[34] The only truly novel criterion in responsibility determination consists in having received a diploma in a member state less than six years before registration of the application. Yet, it is widely assumed that the first-country-of-irregular-entry criterion will continue being the most frequently applied.[35]

While responsibility determination criteria remain essentially the same, the Pact aims to streamline transfers, ensuring that an asylum application is examined by only one member state at a given time. More specifically, responsibility transfers follow a notification rather than a request, compared to the

rules predating the Pact.[36] Procedures are to be completed within shorter time limits: two weeks for notification and confirmation each. Notably, even if the limit for notification is exceeded, it does not affect a member state's obligation to ultimately take responsibility. Under the new rules, failure to respond can also lead to the suspension of solidarity contributions by the Commission. At the same time, absconding by applicants or failure to comply with the decisions lead to an extended timeline for the transfer.[37] This is intended to disincentivise applicants' onward movements and cooperation.

The changes thus seek to ensure greater compliance with responsibility. For destination states such as the Netherlands, this may reduce the accumulation of cases that are formally linked to another member state but are, in practice, handled within their own asylum and reception systems.[38]

Whether transfers will happen at scale not only depends on the simplified procedures or inter-state cooperation, but also judicial considerations and broader fulfilment of responsibilities. More specifically, prior to the Pact reforms, deficiencies in asylum and reception systems of member states of first entry prompted judicial interventions at EU and national levels. Courts suspended transfers from northern to southern countries due to, among others, lack of effective access to dignified accommodation, although the latter were in principle responsible. The Pact retains applicants' right to appeal the transfer decision based on the risk of inhuman or degrading treatment. Decent reception conditions will thus remain a pre-condition for transfers.

2.3 The Pact's solidarity mechanism

The Pact's solidarity mechanism was adopted against this background of longstanding disagreement over the balance between responsibility and solidarity in the CEAS: first-entry states argued that responsibility rules placed disproportionate pressure on them and demanded more predictable support, while other member states insisted that solidarity should be tied to compliance with responsibility. The experience of the four countries examined in this Report partly illustrates these different positions. The Netherlands and Belgium experienced incomplete registration, low transfer rates and secondary movements. Despite a considerable decrease in arrivals, Italy and Spain accounted for 81% of all disembarkations to the EU between 2024-25.[39] While Italy saw around 60,000 persons disembarked,[40] Spain recorded 34,251 irregular arrivals, mainly via sea.[41] Meanwhile, other countries, mostly belonging to the 'Visegrád Group', refused to take part in relocation efforts altogether (on Hungary and its position on migration policy, see Section 3.4).

The Pact's solidarity mechanism is designed to respond to states' differing interests while also trying to pre-empt political tensions. First, the mechanism gives member states some discretion in choosing between three types of solidarity contributions: i) relocations; ii) financial transfers from member states to a dedicated Union budget, to be managed by the Commission; or iii) material contributions focused on operational support. The minimum annual number of relocations is set at 30,000, while the minimum level of financial contributions is set at €600 million.[42] The idea behind this set-up is to maintain states' obligation to participate and contribute, but with greater flexibility to avoid blockages.

Among the key novelties of the Pact, the new system foresees an annual assessment by the Commission of the migratory situation in the EU. Member states are placed into three categories: i) under migratory pressure, ii) at risk of migratory pressure and iii) facing a significant migratory situation. Migratory pressure is defined as a situation brought about by arrivals by land, sea or air or asylum applications that create disproportionate obligations on a member state, considering the overall situation in the Union, and require immediate action. The second category relates to countries approximating such conditions, and serves as a preventive category. A migratory situation refers to a situation where the cumulative effect of current and previous arrivals leads a well-prepared asylum, reception and migration system to reach its capacity limits.

The Commission's assessment is based on a range of factual indicators and information gathered thanks to the more systematic collection of migration and asylum statistics, including via Eurodac. These include irregular border crossings, reception and asylum capacity, and secondary movements, next to others, and should provide an accurate picture of which countries are in need of support.

Countries under pressure benefit from an annual 'Solidarity Pool' of contributions. Member states falling into the second category can obtain EU funding and operational assistance under the so-called EU Migration Support Toolbox. Member states in the third category must pledge contributions but can request a full or partial reduction in their annual solidarity contribution. All member states that do not fall within these three categories must effectively contribute to the annual Solidarity Pool.

The mechanism therefore does not simply separate between countries of first entry and destination. It creates a more complex framework in which different forms of pressure, responsibility and contribution are more objectively and comprehensively assessed, with emphasis on needs-based solutions. This is meant to avoid tensions while ensuring contributions reach countries in need.

At the same time, member states cannot benefit from solidarity in all cases. Instead, compliance with responsibilities and preparedness of asylum and reception systems are pre-conditions to be eligible. This requires sufficient resourcing and infrastructure to implement asylum and migration management policies.[43] They must also fulfil their obligations, notably in terms of the processing and completion of responsibility transfers. These pre-conditions are seen as essential for continued buy-in to the system.

This novel approach does not eliminate the risk of political tensions entirely.[44] For example, the flexibility of the mechanism may come at the expense of timely and predictable support. Should relocations be insufficient, the Pact foresees complementary 'second-tier' solidarity, referred to as 'responsibility offsets'. These involve a shift – rather than a physical transfer – from the country formally responsible to a second one where the asylum applicant is already present following irregular movement. In this sense, offsets act as an additional layer of support. At the same time, they can also be understood as acknowledging the reality of unauthorised onward movements.

Practically, it is worth noting that member states can enter bilateral agreements to facilitate offsets, linking them to the effective execution of responsibility transfers. While such arrangements align with the reforms' overarching goals, they could skew the rules' effectiveness towards member states concerned by secondary movements. They may also arguably normalise the consequences of such movements. For countries like the Netherlands and Belgium, this could carry significant implications.

2.4 Convergence of reception conditions and preparedness of reception systems

The EU also reformed the framework governing reception conditions for asylum seekers. This can be connected to longstanding differences between national reception systems, uneven standards, persistent capacity pressure and recurring reliance on emergency accommodation. These have systemic consequences in the CEAS. For example, where access is uneven or reception systems are saturated, resilience is weaker, and applicants have stronger incentives to move onwards.

The situation at the end of 2025 illustrates how these structural problems persisted ahead of Pact implementation. In the Netherlands, 79,826 people were staying in reception centres managed by the Central Agency for the Reception of Asylum Seekers (COA), divided between regular and emergency locations. This represented a 118% increase since 2022.[45] Around 20% of residents in reception had a residence permit but could not move out of the system because of a combination of backlogs and housing shortages, creating additional pressure on reception capacity.[46]

In 2025, Belgium's reception system also was under structural pressure, with around 20,000 people hosted in the reception network, an average stay of almost 15 months and an occupancy rate of 94%.[47] The decision to refuse accommodation to certain asylum seekers who already enjoyed protection in another member state led to more people sleeping rough, including children.[48]

Italy and Spain faced different but related challenges. Italy's reception capacity had been central to the suspension of incoming transfers. Spain's reception system grew considerably after previous emergencies in the Canary Islands[49] and the enclaves of Ceuta and Melilla,[50] reaching 34,000 regular

places in 2025.[51] Capacity reserved for persons seeking protection has been complemented by places reserved for vulnerable individuals, reported at 27,000 at the end of 2024.[52] Yet, reception capacity remains unevenly distributed across regions,[53] with previous emergencies exposing overcrowding, registration delays, inadequate infrastructure and lack of specialised personnel.[54]

These country-specific dynamics show the need for greater minimum standards, and how they can also affect responsibilities, systemic resilience and preparedness.

Against this background, the Pact further harmonises minimum reception standards. Changes relate to the precise definition of 'material reception conditions', which include personal hygiene products, next to housing, food, clothing and a daily expenses allowance. The revision also reinforces integration measures. At the same time, it maintains some flexibility for member states to shape reception practices at different stages of the asylum procedure according to national preferences.

Other than providing greater clarity on the scope of material reception conditions, the reformed framework also places emphasis on the "conditional character" of reception.[55]

First, access to reception conditions is contingent on applicants' compliance, for example, with reporting requirements and residence rules, to discourage absconding.[56] Accordingly, member states can limit applicants' presence to certain areas for the duration of the asylum procedure, considering available capacities. This is also relevant for member states like the Netherlands that aim to more evenly distribute asylum seekers across the territory due to, among others, housing shortages. For countries like Spain, it connects to specific pressures affecting border and island contexts.

Where applicants are considered a security threat or when it is deemed necessary to reduce the risk of absconding, member states can also impose further restrictions on movement and, in some cases, detention. However, alternatives to detention should be used effectively. These include the obligation to stay in a certain location, reporting rules, or the deposit of financial guarantees.[57] It remains to be seen if the use of alternatives to detention, as encouraged by the EU Asylum Agency among others,[58] will lead to their effective use, or if stricter restrictions will be more frequently imposed.

Second, the new rules aim to disincentivise unauthorised onward movements by circumscribing entitlement to the full material reception conditions in the responsible member state. In cases where persons are found to be in a state other than the one responsible for their application, this second state can either reduce or withdraw the daily expenses allowance and, if justified, other material conditions. This decision is based on several considerations, such as the risk of absconding or lack of cooperation with authorities. Authorities in the second state must nevertheless ensure a dignified standard of living and access to healthcare until the transfer takes place.

The reform thus reflects the goal of ensuring more harmonised reception conditions while also introducing measures to reduce secondary movements. In practice, however, it remains open if reducing reception entitlements for applicants subject to transfer procedures may not itself increase the risk of absconding, particularly where applicants are excluded from the regular reception system.

A third goal of the reform is to address longstanding issues around insufficient capacity and readiness for increased arrivals. To respond to possible pressure on reception systems, member states must submit a national contingency plan at least every three years, with the first due by April 2025.[59] They must also ensure sufficient capacities and infrastructure. Highlighting the Pact rules' interdependence, maintaining a well-prepared reception system is also considered a pre-condition for a country under pressure to benefit from solidarity contributions. Achieving greater preparedness is particularly important for countries like Italy and Spain, where reception resilience is closely connected to the ability to manage fluctuating irregular arrivals. But it is so also for Belgium and the Netherlands, as both face persistently high occupancy rates. The contingency planning exercise can thus be seen as part of an expanding architecture for crisis management within the reformed CEAS.

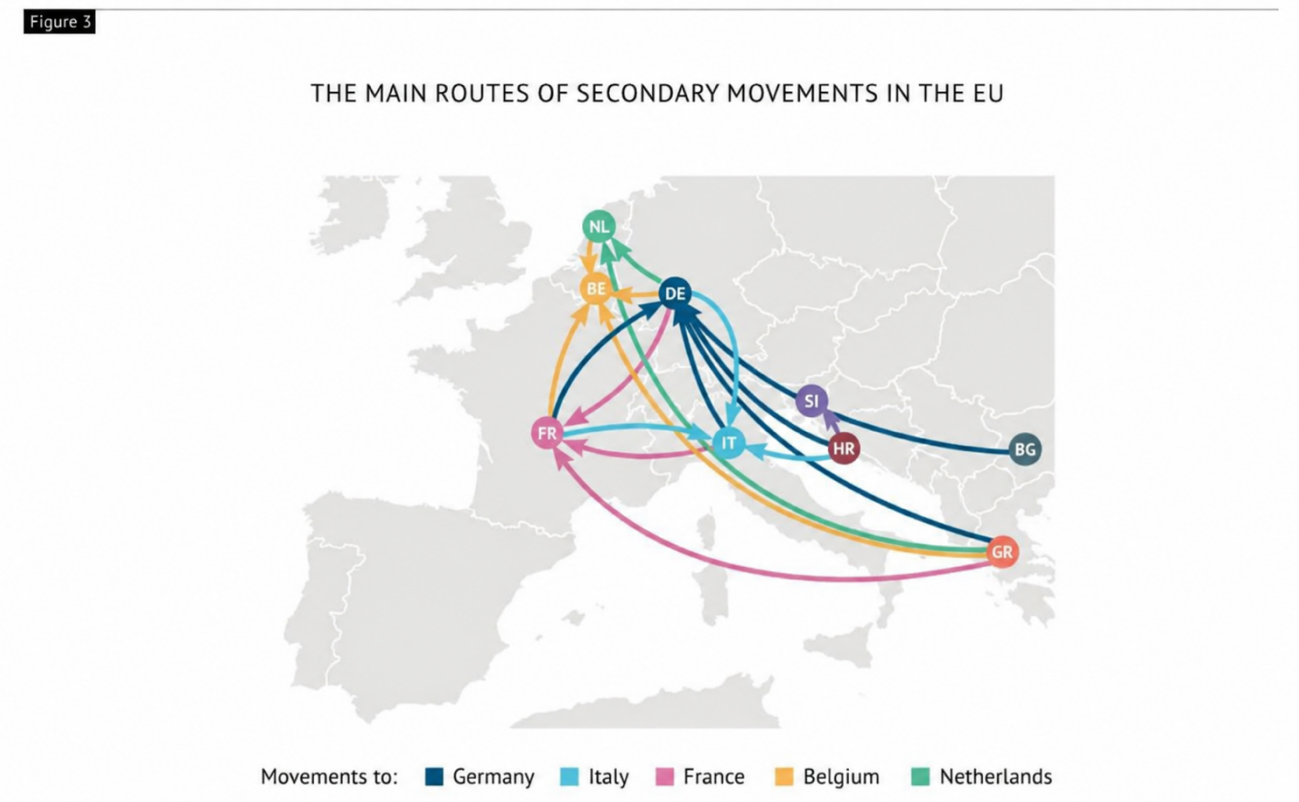
Despite the importance of translating such standards and goals in practical reality, unlike other Pact legislative measures which came in the form of 'regulations', the reform to reception conditions is a directive and, as such, does not have the same harmonising potential, also affecting its application.[60] One possible source of variation (further examined in Sections 3 and 4.4) concerns the governance arrangements of reception systems. Member states retain discretion on important matters, such as outsourcing to NGOs and profit-oriented firms the coordination of reception systems and the running of facilities. This discretion matters because the Netherlands, Belgium, Italy and Spain rely on different governance models, levels of decentralisation and mixes of public, private and civil society actors.

This could generate fragmentation across national systems. It also means that the updated measures may not work effectively across all member states, which could also have implications for secondary movements. But these differences in reception governance could also affect the speed with which capacity is expanded and the consistency of reception standards in a situation of higher arrivals.

2.5 Further efforts to address secondary movements

Secondary movements are central to assessing the Pact reforms. While recent years have seen a reduction, this can be explained with overall lower numbers of irregular arrivals, with some countries remaining more affected than others (see Figure 2).[61] Countries like the Netherlands and Belgium have been especially concerned by onward movements and the resulting pressure on asylum and reception systems, including due to movements from countries at the Southern external borders of the EU. Addressing unauthorised movements is also long considered key for the Schengen area.[62]

Figure 3. The main routes of secondary movements in the EU



Source: European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, JRC elaboration based on eu-LISA data, p. 14.

Secondary movements are shaped by a multiplicity of factors, such as registration gaps, uneven reception conditions, asylum backlogs, differences in recognition prospects and the limited execution of responsibility transfers. Accordingly, the full impact of the different revisions brought about by the Pact remains to be seen. Other than the above-mentioned changes to the Eurodac system that enable

better tracking of onward movements, earlier identification through screening, border procedures limiting where people can remain and greater convergence in reception standards, the Pact reforms also seek to reduce disparities in asylum rates through further procedural harmonisation, although member states retain discretion over the substantive assessment of protection needs.[63]

The reforms do not, overall, appear to address all possible drivers and multidimensional causes.[64] Additional factors identified by expert literature include cultural and language affinity, employment prospects or the presence family members or the wider diaspora, among others.[65] Illustrating the potential limits, cultural or linguistic ties are marginally considered in responsibility determination. The reforms also did not systematically review positive incentives – measures encouraging asylum seekers to voluntarily remain in the responsible country – such as rules on long-term residence.[66]

As such, it remains to be seen if the reforms will halt or significantly reduce secondary movements. Because trends can fluctuate over time and may be uneven, some states may find it harder to prepare for their impact on reception and asylum systems. Lower volumes of secondary movements may also not immediately result in reduced pressure, especially where a backlog has formed over time.

Against this background, alongside the Pact, the EU also reformed the Schengen rules governing the introduction and lifting of border controls in the event of serious threats to public policy or internal security, including exceptional situations characterised by large-scale unauthorised movements.[67] Under the reformed rules, member states can now extend internal border controls for up to 3 years as opposed to 18 months, provided they are duly justified.[68] While never intended as a measure of first response, this could lead to the extension of controls in the future if secondary movements persist. The Netherlands' reintroduction of internal border controls before the Pact entered into application – for reasons related to, inter alia, an overburdening of its asylum and reception systems[69] – illustrates how pressures linked to migration management, reception capacity and secondary movements can also affect the functioning of Schengen.

Table 1. Select challenges under the pre-Pact rules and the reforms' intended remedy

Pre-Pact challenge	Evidence from the compared countries	Pact response	Limits and unresolved questions
Incomplete registration and fragmented information via Eurodac	- Secondary movements to NL and BE without fully traceable migratory history - Harder responsibility determination and responsibility transfers - Registration pressure for IT and ES due to irregular arrivals and asylum applications	- Wider personal and biometric data collection - Registration of more categories of TCNs	- Pressure for countries at external borders to increase - Effectiveness continues to depend on systematic registration, national IT readiness, interoperability, staff training and compliance by national authorities, especially under pressure
Limited differentiation between categories of asylum applicants and pressure on regular procedures	- NL, BE, IT and ES faced backlogs or procedural pressure - IT and ES faced specific pressures linked to external-border arrivals - Delays and uneven deadlines in conducting border procedures - Risk of absconding and secondary movements	- Mandatory screening and border procedures, with tight-uniform deadlines - Screening and channelling of applicants from countries with low recognition into border procedures - Closer links between screening, asylum examination and return border procedures	- Ensuring adequate capacity, including via facilities and human resources - The ability to respect strict time limits - Effectiveness of reception or detention arrangements to prevent absconding
Responsibility disputes, low transfer implementation	- Low execution of responsibility transfers from the NL - Sustained secondary movements - Limited trust between member states	- Simplified transfer procedures; shorter notification and confirmation deadlines - Extended duration of responsibility - Link between responsibility compliance and access to solidarity	- Transfers remain dependent on cooperation between member states, reception conditions in the responsible state, judicial review and practical execution capacity
Unresolved responsibility-solidarity imbalance	- IT and ES are exposed to external-border pressure - Voluntary solidarity arrangements do not lead to sufficient pledges/support - Mandatory solidarity arrangements (relocation) are divisive and are not executed	- Mandatory but flexible solidarity mechanism; - Relocations, financial contributions, material support and responsibility offsets are all contemplated contributions - Annual assessment of migratory pressure to determine which countries ought to contribute, and which ones ought to receive support	- Mismatch between contribution and needs - Short duration of first solidarity cycle makes execution of contributions harder, with challenges in observing positive effects of the mechanism

Pre-Pact challenge	Evidence from the compared countries	Pact response	Limits and unresolved questions
	- NL and ES have an interest in responsibility compliance where secondary movements persist - Different perceptions of what counts as pressure and which countries should receive support		
Uneven reception standards	- Different practices result in uneven access and discrepancies in reception standards - NL and BE face high reception pressure, long stays - Unclear resilience of countries at EU's external borders to deal with rises in arrivals - Secondary movements	- Alignment of material reception conditions - Restrictions and conditional access to reception conditions for those engaging in secondary movements - National contingency planning to strengthen preparedness	- Recast directive allows persistent national variation. Reception capacity, governance models, cooperation may continue to differ significantly across member states - Secondary movements have multiple drivers, including family, language, diaspora, employment prospects and living conditions. The Pact addresses some but not all of these drivers
Fragmented implementation	- Lack of compliance with EU law and policy - Political disputes often reflected divergent perceptions of compliance	- New migration governance and implementation cycle - Annual Migration and Asylum Report - Fact-based pressure assessments - Stronger data reporting and monitoring	- The system depends on consistent reporting by member states - Uneven implementation of Pact reforms could make it harder to sanction countries failing to comply with their obligations

2.6 The new migration governance and implementation cycle

The Pact reforms were adopted against a background of uneven compliance and limited predictability. The pre-Pact framework made it harder to assess pressure objectively, anticipate capacity needs and ensure that negotiations and debates on solidarity and responsibility were grounded in a shared factual basis. This situation weakened mutual trust. To address these shortcomings, the Pact also introduces a new governance system, including an implementation cycle. This cycle includes milestones to support the reforms' operationalisation while also ensuring greater transparency, buy-in and accountability for member states. These milestones include:

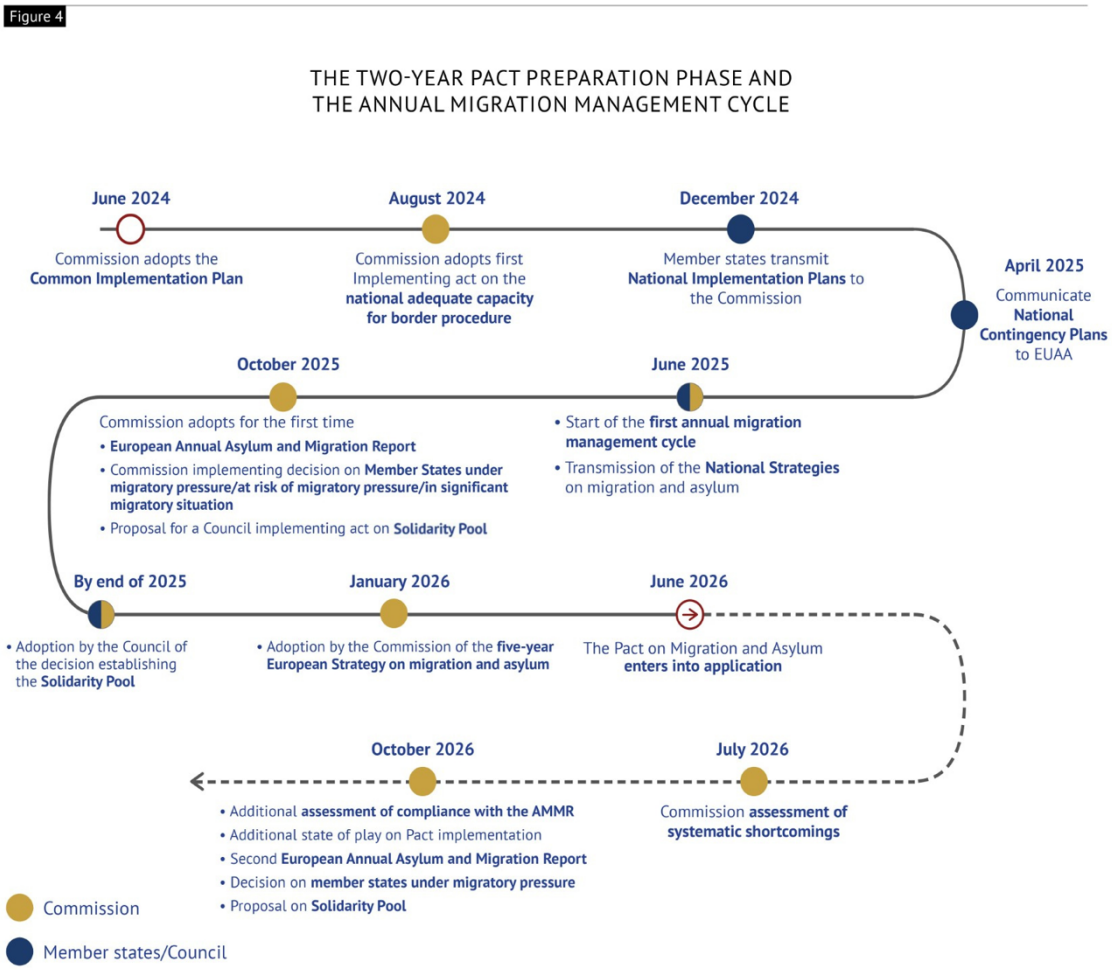
- The European Annual Migration and Asylum Report, released yearly by the Commission in October. It takes stock of the migratory, asylum and reception situation in the EU and its member states, covering a 12-month period until July of the year of publication. It also presents a projection of future migratory trends. The first Report was issued in autumn 2025.[70]
- In parallel to the Report, the Commission releases a decision establishing which member states face migratory pressure or fall in the other categories examined in Section 2.3.
- At the same time as the Report and decision, the Commission also makes a proposal for the 'Annual Solidarity Pool'. This sets out the recommended number of relocations and financial contributions and where applicable, material contributions, based on the above assessment. It also makes a proposal for the shares for contributing and benefitting member states.
- Following the Commission's proposal, member states negotiate how solidarity contributions are to be implemented in the upcoming solidarity cycle. This process involves both technical and political meetings. By the end of each calendar year, member states are expected to adopt a decision on the size of the Solidarity Pool, establishing each specific country's contributions.
- Every five years, the Commission publishes a Migration and Asylum Strategy, outlining the EU's political priorities for that period. The first Strategy was presented in January 2026.[71]

While the first annual cycle formally began in autumn 2025, the two-year phase that preceded 12 June – the day when all Pact reforms come into full application – can be understood as feeding into this new cycle and governance system. Illustrating this, in 2024, soon after the reforms' adoption, the Commission launched a Common Implementation Plan (CIP). In it, it outlined a framework for preparing for implementation based on a set of 10 building blocks comprising the Pact's main components. Member states then delivered National Implementation Plans at the end of 2024. Based on the plans and the goals set by the Commission, the EU executive has provided regular updates (June 2025, November 2025, and May 2026) outlining member states' advancements and remaining challenges across legal, financial and operational dimensions of Pact preparation (see Section 3).

Additional milestones that will affect future implementation dynamics are also foreseen (see Figure 4). These include the Commission's assessment of compliance with responsibility rules, focusing on member states identified as being under pressure, including Italy and Greece - expected for July 2026 - as well as an additional communication on the 'state of play' of implementation in October 2026.[72]

A further notable change concerns the information and assessment informing these milestones. Under the Pact rules, member states are required to more systematically and regularly report on their situation, via Eurodac and other frameworks, thereby contributing to a more objective assessment of the EU and member states' migratory situation.[73] This regular monitoring of Pact implementation as well as migratory trends should lead to greater situational awareness and improve the common identification of capacities and risks, provided member states collect the information systematically.

Figure 4. The Two-Year Pact Preparation Phase and the Annual Migration Management Cycle



Source: Adapted from: European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final.

The new governance system also entails new roles and responsibilities. Among them, the Commission oversees the assessment of the migratory situation, the assessment and decision establishing which member states fall under migratory pressure and other categories, as well as the proposal for the Solidarity Pool. The Council also acquires new powers, ultimately deciding upon the size of the Solidarity Pool and the type of solidarity contributions, based on member state pledges. Alongside expanded responsibilities for EU agencies (on the EU Asylum Agency, see Box 1), new, specific roles to support the implementation of the cycle and solidarity mechanism were also established. Illustrating this, the Pact introduced the role of an 'EU Solidarity Coordinator' who is responsible for overseeing the negotiation and execution of member states' solidarity contributions.

Taken together, these steps are meant to ensure states' accountability and buy-in, also minimising the risks of political tensions. As this system will need time to consolidate, however, it may be harder to avoid tensions during the first implementation cycle (autumn 2025 - autumn 2026). This is unique in several ways. Among others, the assessment of the migratory situation in the EU is based on less comprehensive data. The implementation of solidarity contributions is also only foreseen for half a year, between June and December 2026, instead of the usual calendar year. This will add pressure to execute solidarity pledges within half the usual time, while contributions will have to happen before a clear understanding of whether all countries are fulfilling their obligations.

For the four countries examined in this Report, these milestones and remaining uncertainties will likely determine future implementation dynamics. The Netherlands and Belgium will be attentive to whether solidarity is matched by effective responsibility compliance and transfer cooperation, following the July 2026 report. Italy and Spain will be attentive to whether the Pact delivers effective solidarity.

3 Member states' preparation for Pact implementation

Pact implementation requires substantial adaptations and investments. These range from staffing, infrastructure (e.g., screening facilities), and IT upgrades. Further attention must also be placed on reception places, monitoring, and processing capacity. While timelines for making decisions are shorter and stricter under the Pact reforms, national authorities must ensure high-quality decision-making, as this could otherwise have negative knock-on effects. Relatedly, given the importance of the judiciary, for example in handling appeals, additional resources for courts are also expected.

Against this background, preparation for implementation in the two years leading to 12 June can be understood as a 'triptych' determined by i) national legislation, ii) operational preparedness as well as iii) the availability of financial resources and capacity, pointing to the Pact's multi-layered nature.[74]

This section examines these three dimensions, assessing how member states have prepared in the two years since the Pact's adoption.[75] It provides an EU-wide picture while also comparing the Netherlands, Italy, Spain and Belgium's specific efforts, as well as remaining gaps (see Table 8).

The evidence examined in this Report shows that Pact implementation has not been pursued in isolation, but alongside existing national priorities and structural challenges. For the Netherlands, preparatory work has been linked to longstanding concerns about the speed and efficiency of asylum processing, increasing reception capacity and ensuring more even territorial distribution of asylum-seekers, addressing secondary movements, and achieving the resumption of responsibility transfers.

Belgium's priorities include adaptation to the Pact, and in particular the application of responsibility rules to counter secondary movements and faster asylum procedures, next to addressing reception capacity issues.[76] Despite changes in government since the Pact's adoption, both Belgium and the Netherlands have remained committed to implementation politically and technically.

Like other states, Spain sees the Pact as an opportunity to achieve its strategic priorities, including better organisation of its asylum system, tighter border controls, quicker handling of unfounded and fraudulent cases, and continued digitalisation of procedures, other than meaningful solidarity.

The Italian government, too, has remained committed to implementing the Pact reforms while also aiming to achieve its own set of national priorities. These include updating pre-existing screening and border procedures based on the new rules, including safe third country concepts, and the effective implementation of solidarity. Yet, less official information is publicly available on Italy's level of preparedness, with the evidence collected suggesting that readiness is more uneven.

3.1 The process of legislative and institutional adaptation to the Pact rules

While most Pact reforms come in the form of directly applicable regulations, effective implementation requires deeper processes of institutional adaptation and coordination. As such, it also depends on a range of further legal enactments at the national level. Among others, these will govern the organisation of procedures and the establishment of procedural safeguards such as appeals and the suspensive effect of remedies as well as detention and/or alternatives to detention, and the Independent Monitoring Mechanism for the screening and asylum border procedure.

This process of legislative adaptation has progressed across the EU, although gaps remain prior to 12 June (see Table 2). In most countries, including the Netherlands, Italy, Spain and Belgium, a decision was made to adapt existing legal frameworks rather than establish entirely new ones. This reflects a preference for the less resource-intensive avenues, considering an already densely packed two-year preparatory phase. Yet, despite this choice and early preparations, only five member states within the EU had adopted all relevant legislation for Pact implementation as of early May 2026.[77] In

some states, the legislation is either in the final drafting stages or awaiting parliamentary approval. In others, the process appears less advanced.

Table 2. Progress on legislative and institutional adaptation

Legislative/institutional aspects	June 2025	November 2025	May 2026
National Implementation Plans submitted	25 member states	Unchanged since June 2025	Unchanged since June 2025
Legislative adaptation	At least 3 member states finalised drafting and prepared adoption	A small number adopted relevant legislation, fully or partly	5 member states adopted most relevant national legislation
Member states in final stages of drafting/finalised draft measures	Not specified	Not specified	BE, LV, LT, ES and SE

Similar to other countries, in the Netherlands, the process of legislative adaptation accelerated in the weeks leading to June 2026, with rather positive chances of successful on-time completion due to the legislation already being in the parliamentary procedure at the time of the writing.[78]

In Spain, legal adaptation is also being finalised, with the lack of a parliamentary majority being seen as a potential hindrance to timely adoption of the legal provisions, however.[79] Administratively, the implementation of Pact rules could also encounter broader structural challenges, such as the division competences between regions, and could later lead to further inter-institutional coordination needs.

In Belgium, legislative adaptation is also advanced.[80] A draft law has received a positive opinion from the Council of State and is expected to be submitted to Parliament prior to June 2026, although authorities have acknowledged that not all legislative measures will be in place by the deadline. Belgium's federal structure and system of governance add a layer of complexity in the process of administrative adaptation and re-organisation. This could complicate implementation in certain areas, as in the case of reception, where competences are allocated to different regional authorities.

In Italy, by contrast, legislative preparation faces uncertainties, with the draft legislation pending parliamentary approval in May 2026. As a result, elements such as the Independent Monitoring Mechanism, detention provisions and practical aspects like the appointment of responsible bodies are not yet fully defined. Delays could have a bearing on both the asylum and judicial systems.[81] Practical issues may arise with respect to Pact-regulated time limits and appeals, among others.[82] To ensure that the legislative process is completed on time, the government could adopt a law decree.[83]

Looking at specific measures, progress appears inconsistent, although some areas of the reforms face more systemic delays. Screening, for example, requires the designation of authorities. By May 2026, approximately two-thirds of all member states had notified their screening authorities. At the same time, more than half of them had engaged with the judiciary to align themselves with the new procedural requirements, also ensuring sufficient resources, for example, for effectively handling asylum appeals. By 12 June, member states are also required to notify the Commission of all authorities involved in receiving and registering asylum applications, and designate a National Contact Point to facilitate information exchange with the Commission and other member states on the implementation of asylum procedures and adjudication. This step remains instead a work in progress.

As to procedural safeguards, most member states are close to finalising arrangements for the provision of free legal counselling at the administrative stage of the asylum procedure. However, approximately a third is yet to make the needed legal changes. With respect to May 2026, most member states have also finalised arrangements for the Independent Monitoring Mechanism, oftentimes involving national ombudspersons. While the exact share of member states was not made available in the Commission's reports, the Netherlands and Belgium were among those confirmed.

When it comes to reception, the determination of authorities responsible for fulfilling obligations under the reformed framework also remains an outstanding task. Member states should also ensure that provisions for detention and alternatives to detention are laid down in national law. But most member

states are still in the process of transposing the recast directive (see Table 7), with none of the four countries examined in this Report having completed the transposition. Delays in this process could generate legal and judicial complexities, other than operational challenges.

Not all elements of the CEAS are, however, equally sensitive to gaps in national legal implementation. Some activities may still be carried out in practice, even without completion of the required legislative adaptations at the national level. That said, components like the designation of competent authorities and locations for screening and border procedures do require legislative decisions.

Broader delays in the finalisation of legislation and institutional adaptation could hinder certain decision-making processes or the operational implementation of Pact rules, other than potentially carrying judicial consequences. Legal uncertainty may also translate into reduced cooperation between member states. Officials in a less prepared system may simply lack a mandate to act, whether due to the absence of delegated powers, unclear competences or lack of appropriate workflows. This could have tangible consequences: periods for transfers may elapse, case processing may slow down, or responsibility may de facto shift to the member state where the applicant is located.

National administrations will also have to deal with the backlogs of asylum applications that fall within the scope of the pre-Pact rules. Several member states will likely have to process a considerable number of applications filed prior to 12 June and cases brought in front of courts in accordance with pre-existing rules. Some national authorities have undertaken efforts to tackle systemic pressures that could arise from this. In the immediate term, all member states could still face additional pressure, as they will have to address remaining gaps while operating two parallel systems.

3.2 Member states' operational preparedness for Pact implementation

Operational preparations have involved various decisions, with member states expected to establish and prepare facilities, recruit or train staff, adapt administrative workflows, update IT systems and create coordination arrangements for responsible authorities.

While monitoring and reporting on progress, the Commission also supported the rollout of such measures through the involvement of EU agencies and targeted technical assistance. The EU Asylum Agency (EUAA) in particular has already contributed to preparedness in various ways, becoming more embedded in the new system and its implementation as a result of this process (see Box 1).

Box 1. The role of the EU Asylum Agency in Pact implementation and monitoring

The EUAA plays a key role in ensuring the uniform application of the asylum acquis as well as the functioning of the CEAS through monitoring, technical and operational assistance.[84] Among others, it provides guidance and training, planning and operational support in alignment with national needs. Its work also entails assistance during asylum procedures, in the handling of responsibility transfers, reception and with implementing procedural safeguards.[85] At present, it is active in 11 member states, with past numbers fluctuating in line with member states' requests.[86]

The EUAA will also play a key role in the operational and technical application of Pact rules after their entry into application. As of June, the Agency will be responsible for monitoring the functioning of the CEAS via a dedicated mechanism (separate from the monitoring mechanism for fundamental rights in border processes). This exercise is intended to help detect the incorrect or partial application of the new rules with a view to enabling prompt remedial action.[87] It will occur on the basis of a five-year cycle, with each member state falling under the scope of the mechanism, to be monitored at least once in that time period. Following pilots in Estonia and the Netherlands prior to 12 June, Slovakia, Bulgaria and Malta will be the first three states to be subject to monitoring in the second half of 2026.[88] Country-level monitoring can be complemented by thematic monitoring or

ad hoc monitoring in cases of serious concerns relating to the functioning of the asylum and/or reception conditions, thus potentially increasing its frequency for a given member state.

The mechanism will thus provide insights into the rules' application, including the asylum process, reception system, and contingency planning. This could prove a useful additional tool to promote alignment. However, the monitoring does not guarantee a continued and real-time depiction of the reformed rules in all member states. It also remains open how effective it will be in closing gaps. Potentially, the final stage of the monitoring involves targeted recommendations by the Agency and Commission. Member states are required to respond to the recommendations and report on their implementation. That said, the mechanism does not in itself require immediate corrective action. If the follow-up is considered insufficient, further recourse would require the member state in question to cooperate with the Agency based on a Commission proposal and Council decision.[89] As such, the effects of the monitoring may remain largely indirect.[90]

Other than via agencies, during the preparatory period, member states were also able to request assistance from the European Commission under the Technical Support Instrument (TSI), both for the development of their National Implementation Plans and their operationalisation. A total of nine member states, including Belgium and Italy, have benefitted from such technical support since 2024.[91]

The four countries examined in this Report all strove to be sufficiently prepared on 12 June, although gaps remain as of the beginning of May. Early on, the Netherlands for example set up an internal monitoring structure that facilitates regular exchange on implementation between key stakeholders.[92] It also made considerable progress in the months leading to the deadline, including on Eurodac readiness, asylum and transfer procedures, and adaptations in its reception system.[93]

Italian authorities, for their part, started laying the foundations for Pact implementation as early as the summer of 2024, including the establishment of an inter-institutional coordination mechanism under the auspices of the Ministry of the Interior and the hiring of additional temporary staff, among others. Italy also received support from the EUAA, focusing on increasing authorities' capacity to process asylum applications and address reception needs. Further support was provided via the TSI, focusing on improving the capacity of public administrations and strengthening the Italian reception system.

Belgium also received dedicated support via the TSI, with a focus on guardianship and age assessment. Further work concentrated on digitalisation, notably to make asylum procedures more efficient.[94] Belgium also sought staff increases, including for responsibility transfers.

Like the other member states, Spain's preparatory efforts entailed extensive coordination between relevant ministries, with Pact coordination falling under the responsibility of the Ministry of the Interior.[95] Support from the EUAA pre-dated the two-year preparatory phase, although some of the reception-related objectives, especially on expanding capacity, can be considered part of system-level investments accompanying legal and practical changes under the Pact.[96]

Despite such efforts, the level of operational readiness appears mixed across the different elements of the Pact reforms, and across countries. Variations emerged already during the preparatory phase with respect to the functioning of Eurodac, screening and border procedures, responsibility rules, and the readiness of national reception systems. The following subsections examine these areas in turn, to show potential gaps in the lead-up to June 2026. While focusing on efforts made in the four countries compared in this Report, contextual reference is made to EU-wide preparedness levels.

3.2.1 Preparing operationally for screening

Screening requires the creation of suitable facilities and the operational integration of its various elements, from identity to health checks, as well as coordination mechanisms and appropriate workflows between responsible authorities. By May 2026, 20 member states were reportedly on track. Despite overall progress, variations across member states remain (see Table 3).

Table 3. Screening implementation progress

Screening implementation elements	June 2025	November 2025	May 2026
Member states considered on track for screening	Not specified	14 member states	20 member states, plus IT for sea arrivals
Member states that notified competent screening authorities	Not specified	Not specified	Around two thirds, including NL
Independent monitoring mechanism established	EUAA guidance issued, initial plans integrated in NIPs and some initial contacts with national bodies	Most identified partners/institutional arrangements, notably ombudspersons	NL and BE on track, not yet appointed in ES and IT[97]
Screening pilots reported	Romania screening modelling mentioned	Not specified	Lampedusa, Sicily, Lisbon airport and Romanian land border
Gaps reported	Facilities, human resources, technical resources, trained staff, medical professionals, absconding prevention	Task distribution, SOPs, staffing, procurement, IT/database integration, health checks	Absconding prevention, health checks, IT infrastructure, forms, guardianship of unaccompanied minors, location designation

The four countries examined in this Report will begin implementation with different screening-related outstanding priorities. The Netherlands made significant progress, also achieving a high level of integration and preparedness on border processing, compared to the EU-wide average, also appointing the entities in charge of fundamental rights monitoring.

Despite prior experience with screening-like practices, Italy faces challenges. These include the spatial separation of the different stages of the process, including with following border procedures, and other related logistical elements, though these are expected to be promptly resolved, if not on time by 12 June, then soon after.[98] On-territory screening appears more problematic, as it requires the establishment of dedicated workflows and practical arrangements for apprehended persons, with its experience being more limited.

Spain has adapted operational practices for both screening and border procedures but expects practical and legal challenges. These include compliance with tight time limits, the spatial organisation of the various elements of the screening, and possible litigation.[99] Belgium is expected to be ready to implement the new rules. Yet, possible challenges could also arise with the screening on the territory, notably with respect to coordination and information exchange between relevant authorities.[100]

This indicates that Italy and Spain could face operational pressures linked to external border screening, while the Netherlands and Belgium are more likely to face difficulties connected to the organisation of on-territory screening, and that most will persist well after June 2026.

3.2.2 Progress on updating the Eurodac system

Eurodac likewise constitutes a critical element in the preparatory phase, requiring access for all competent authorities, procurement and staffing, updates to the IT infrastructure, and testing. While an increasing number of member states look to be ready to operate the new Eurodac system, in early May, more than half are still facing some remaining challenges.[101] Achieving full system integration by the deadline appears especially unlikely, with consequences for future workloads.

While the Eurodac reform foresees rigid responsibilities for member states in data collection and sharing, some flexibility was provided to them in how to ensure operational and technical readiness. Also reflecting different levels of digitalisation within the EU, member states were given the choice to either opt for integration of their national system with the central Eurodac system or, alternatively, to use a standalone Web-Use Interface (WUI). The former allows for automated system-to-system

interaction. The latter offers an interim approach and enables authorities to perform Eurodac operations from the WUI, without full integration. This flexibility should help member states meet the inevitable technical and operational challenges arising from the upgrading of the Eurodac system.

Several member states opted for the solution offered by eu-LISA, allowing national authorities to perform Eurodac operations through the WUI. While affording more time for full integration, this interim approach could initially increase the workload, and require additional human resources, when the rules start applying, as it entails double recording, in national and central systems.

Preparations in the four countries examined in this Report reflect different ways of managing this transition. In line with its digitalisation goals, the Netherlands is set to pursue automated system-to-system integration of national and Eurodac systems,[102] although it will temporarily use the WUI for at least half a year until system-to-system integration is completed.[103] Spain shifted from the initially preferred full interoperability towards the WUI as an interim solution, although it reportedly achieved broader progress in preparations.[104] Belgium opted for the WUI standalone interface, too, with current preparations at an advanced stage. Italy faces instead greater needs as part of its broader operational adaptation, including IT testing, and its readiness ahead of the June deadline appears less certain.

Taken together, this shows that the four countries will face different transition pathways and timelines, and related challenges, while at a wider EU-level, delays are to be expected (see Table 4).

Table 4. Eurodac implementation progress

Eurodac implementation elements	June 2025	November 2025	May 2026
Member states reportedly on track for Eurodac	Not specified	8 member states and Europol	11 member states, including BE and ES
Member states reporting challenges but expecting to resolve them on time	Not specified	18 member states	16 member states, including IT and NL
Operational testing	Voluntary basic connectivity testing started; several member states completed it	5 member states initiated actual operational testing	19 member states completed compliance testing, including BE, ES, IT and NL
Gaps reported	Procurement delays, resources, nomination of responsible authority/national access point, technical documentation	Connectivity issues, procurement delays, testing targets, national access point	Procurement delays, testing, training, business process testing

3.2.3 Preparing operationally for border procedures and adequate capacity

Several of the preparatory steps for the border procedure are akin to those of the screening, including the scaling up of infrastructure as well as staffing and training. While efforts have been recorded on all relevant fronts, several member states face challenges (see Table 5). The infrastructure for border processing appears a significant obstacle in particular, forcing the adoption of interim solutions.

Table 5. Progress on border procedures and adequate capacity

Border procedure implementation elements	June 2025	November 2025	May 2026
Interim or provisional facilities reported	Not specified	HR, IE, EE, IT, LV and RO may need bridging measures; EL and BG expected to reach adequate capacity, but facility quality needed to be ensured	EE and LV mentioned as examples of interim solutions
Gaps reported	Locations, financial planning, procurement	Staffing, SOPs, procurement, IT integration, adequate capacity	Location notifications, interim facilities, absconding prevention, adequate staffing, return border procedure link

Member states had to inform the Commission of the location for border procedures by 11 April 2026. This information has only been made available by a total of 17 member states. While the latest Commission communication did not specify this, it may be the case that different facilities will be used until so-called 'multi-purpose facilities' are finalised, bringing the various steps under one roof.

On this account, the Commission reported that only around 15 member states may be able to sustain border processing in line with their adequate capacity with a view to June 2026.[105] Other than the building of multipurpose centres, the links with other procedures, staffing and the care of vulnerable groups appear as significant challenges, as also exemplified by the four case countries.

The Netherlands has achieved substantial progress in its readiness to implement border procedures. With a national border procedure already in place prior to the Pact, alignment with the reformed rules has been achieved thanks to minor adaptations. The Netherlands will also enter the implementation phase with a comparatively lower adequate capacity requirement (see Section 2.1).

Belgium also benefits from pre-existing experience with border procedures, but still faces challenges connected to IT, case management and the operationalisation of new safeguards, which may not be completed by June 2026.[106] Italy could also build on its national border procedure, in place since 2023.[107] However, questions remain on its readiness to meet the adequate capacity threshold. This could be especially consequential given Italy's exposure to arrivals by sea. By contrast, Spain appears confident it will meet its annual adequate capacity.[108] Yet, Spanish authorities opted not to build additional infrastructure and expand detention centres but rather to more strictly monitor occupants' activities in reception facilities and invest in effective alternatives to detention.[109]

In comparative terms, Italy and Spain thus appear to face larger external border and infrastructure-related challenges. By contrast, the Netherlands and Belgium are less confronted by high-capacity requirements as such. Their main priorities appear less connected to the creation of a large processing systems but, rather, readiness to process border procedures – alongside screening – in case of sudden secondary movements and, in this respect, alignment with the overall Pact requirements, including procedural safeguards, stricter time limits, and reception conditions.

3.2.4 Preparing operationally for compliance with responsibility rules and implementation of solidarity

As seen in Section 2, the Pact reinforces responsibility rules and seeks to make transfers more effective, while also creating a structured solidarity mechanism. The mechanism depends on member states' willingness to pledge and deliver contributions and on trust that beneficiary countries will comply with their own obligations. Operational preparedness to implement responsibility transfers should therefore be assessed alongside the functioning of the Solidarity Pool.

Also based on national-level decisions made during the transition period, member states appear to have approached the revision of responsibility rules as an occasion to both make the necessary practical changes and address pre-existing deficiencies.[110] Among others, this has involved investments in staffing, IT systems, and physical infrastructure for executing responsibility transfers.

Yet, only a handful of member states appear fully ready to implement responsibility transfers, as per the Commission's monitoring (see Table 6). This can be measured in terms of investments into AMMR Unit staffing and case management systems, as well as infrastructure. Several pre-conditions, such as the administrative ability to ensure swift handling of requests and the availability of judicial resources, may only be met after the 12 June deadline in some cases.

The four countries at the centre of the analysis face specific challenges on top. At a technical level, Italy is not seen as facing insurmountable obstacles in relaunching transfers.[111] On the other hand, the practical execution of the transfers after several years of limited cooperation remains a point of uncertainty both at an administrative and political level, with the Commission's report due in July 2026 expected to provide a first comprehensive assessment.[112] While bilateral arrangements to facilitate

offsets in the context of the solidarity mechanism could also strengthen cooperation, this would be limited to specific member states with which agreements are signed. It thus remains to be seen if Italian authorities will be able to resume transfers promptly and at scale.

By contrast, Spain shows clear will to fulfil its responsibilities,[113] and has a generally positive track record on transfer cooperation in the past. And yet, it may not receive as many requests.

For transfers between states to happen systematically, the Netherlands, alongside other destination countries like Belgium, will also have to be administratively ready. Specifically, this involves establishing dedicated facilities for accommodating and processing persons subject to the transfer procedure (see also Sections 4.2 and 5.2), among others. While Belgium has pre-existing experience with this, the Netherlands is still in the process of implementing differentiated reception conditions based on the status of an applicant.[114] This said, along with other member states, they may still face challenges on other fronts (see Table 6).

Table 6. Progress on responsibility transfers and related operational preparation

Key elements of responsibility enforcement	June 2025	November 2025	May 2026
Member states with strengthened 'Dublin'/responsibility units	Not specified	Not specified	AT, BE, HR, EE, EL, MT, PT and SI
Member states with reported IT/case-management improvements for responsibility	Digitalisation identified as relevant	Not specified	BE, BG, CY, CZ, DK, FR, FI, IE and IT
Member states with dedicated facilities for transfer cases	Not specified	Not specified	Established in several member states, including BE
Gaps reported	Existing transfer difficulties; cooperation and judiciary relevant	Responsibility cooperation still to be operationalised	Staffing shortages in some member states; need to facilitate transfers and cooperate on logistics

When it comes to the solidarity mechanism, member states went beyond operational preparations, as both pledges and negotiations of the Pool were completed prior to June 2026. Public information about the agreed Solidarity Pool is limited, and uncertainty remains about its effective implementation. In the context of the first solidarity cycle, financial contributions of €420 million were agreed, while 21,000 relocations – less than the 30,000 annual allocation, due to the shorter implementation window during the first cycle (see Section 2.6) – could in principle be executed.[115]

The comparative view of the four case studies indicates remaining uncertainty about the mechanism's functioning. For example, Italy has expressed a strong preference for benefitting from relocations or offsetting under the solidarity mechanism. To also make the most of responsibility offsets, it prioritised concluding bilateral agreements with other member states.[116] Yet, persistent challenges in executing transfers could lead to political tensions, also making it harder to benefit from the Solidarity Pool.

Spain's clearer willingness to fulfil its responsibilities under the reformed rules on the other hand, including responsibility transfers, comes with an expectation that other member states will effectively contribute with solidarity in return. Yet, it is not clear if the agreed pool in the first cycle with meet political expectations as well as practical needs. Relatedly, the Spanish government has publicly called for an equitable distribution of responsibilities.[117] The government also expressed dissatisfaction with the first Solidarity Pool, criticising its size and composition and raising concerns about precedents being set for future solidarity cycles.[118] Spain has also expressed concerns about the types of contributions it would be able to benefit from, stating that offsetting would not be possible at large scale, as it proactively reduced secondary movements from its territory in past years.[119]

Seen from the viewpoint of contributing countries, the mechanism's functioning also raises questions. The Netherlands and Belgium's respective exposure to secondary movements and heavy asylum backlogs under previous rules means that their willingness to contribute should be read together with

the interest in the effective operationalisation of responsibility rules. Yet, pre-existing relations and secondary movements trends may also limit the leverage to enter into bilateral agreements.

In addition, contributing countries mostly expressed a preference for financial contributions over other forms of solidarity, especially relocations. Belgium, for example, pledged €12.9 million in the first cycle.[120] According to the first agreed Solidarity Pool, neither Belgium nor the Netherlands will have to conduct relocations. Yet, it remains to be seen if there will be a sufficient number of pledged relocations, and overall solidarity support, or the situation will need to be rectified, also considering that countries like Hungary and Slovakia made no pledges at all (on Hungary, see Box 2 below).

Showing the complex interaction between technical, practical and political considerations under the new rules, Belgium and the Netherlands have also been declared at risk of migratory pressure and, as such, eligible for support. Their respective governments have, accordingly, signalled their intention to make use of funding under the EU Migration Support Toolbox.[121] How the solidarity mechanism will function in practice, and whether it will meet practical and political expectations is thus to be seen.

3.2.5 Ensuring reception conditions and preparedness

As to reception conditions, asymmetries in operational preparedness in the preparatory phase combined with slow legislative adaptation (see Section 3.1) point to the possibility of fragmented practices. Most member states have pursued partial adjustments to their reception systems, with only a few undertaking larger-scale systemic reform.[122] Yet, practical and operational challenges remain (see Table 7). Among the main ones are the provision of sufficient capacity in terms of both facilities and staffing as well as the adjustment of reception to the needs of specific groups of beneficiaries. These partly reflect problems national reception systems faced under pre-existing rules.

Table 7. Progress on adapting reception conditions

Key elements of reception conditions	June 2025	November 2025	May 2026
Member states planning new reception centres	Almost half of member states	Not specified	Several member states constructing, refurbishing or remodelling facilities
Member states indicating sufficient reception capacity	Not specified	Not specified	CZ, LT, FR, FI, ES, MT, SK and EL mainland
Reception Conditions Directive fully transposed	Not specified	A small number had adopted legislation fully or partly	CZ
Reception-related IT or case management work	Many member states changing case management systems and IT infrastructure	Several member states advanced case management/digitalisation	Ongoing in BE, BG, HR, LT, FI, FR, IT, MT, SK, SI, ES and others
Factual gaps reported	Capacity, reception standards, detention conditions, reception data	Capacity, vulnerable groups, data granularity, reduction of capacity	Transposition, reception data, capacity, quality conditions, vulnerable groups, unaccompanied minors

In the Netherlands, reception preparedness has been pursued against the background of high occupancy (over 90%), extensive reliance on emergency accommodation and long stays, even by protection holders. This is due to systemic housing and accommodation shortages.[123]

Belgium also faces high occupancy rates.[124] Despite this, the current Belgian government further reduced reception capacity, in line with an older trend.[125] The reception system currently consists of 35,000 places in different facilities.[126] These reductions have been justified by a decrease in arrivals.[127] At the same time, the Belgian reception system will remain exposed to pressures.

While also considering pre-existing problems, Spain and Italy are pursuing adaptation in a context of greater uncertainty regarding possible irregular arrivals and resulting pressure on their reception

systems. As of May 2026, the Italian reception system provides high accommodation numbers. However, it remains fragmented.[128] Past experience has also shown the importance of coordination between relevant authorities during periods of heightened arrivals and reception needs.[129] Particular attention has been paid in this context to the levelling of reception conditions for sea versus land arrivals, the geographic location of reception centres, the improvement of reception for vulnerable groups/persons with special needs, and the application of provisions related to restrictions on freedom of movement.[130] Despite efforts by Italian authorities, it remains uncertain if a level playing field, and appropriate coordination between authorities, will be in place by June 2026.

Spain is considered among the member states having sufficient reception capacity.[131] During the preparatory phase, Spanish authorities focused on further increasing reception places, including for vulnerable groups such as unaccompanied minors.[132] At the same time, Spain's reception capacity is regionally uneven, with its needs remaining potentially vulnerable to rising pressures due to irregular arrivals in specific locations (e.g., Ceuta or Canary Islands).[133]

Relatedly, variation is also visible with respect to contingency planning and preparedness of reception systems. Despite efforts to ensure some consistency, the process remains politically sensitive, with member states appearing to have approached the drafting of national contingency plans differently, with varying levels of comprehensiveness.[134] Beyond this, it appears they made varied use of scenarios, projections or dashboards to plan forward. The four case studies illustrate all this.

Given ongoing reception challenges and reliance on emergency shelters, Dutch authorities sought to strengthen contingency planning. This entailed ensuring stable and predictable funding for reception, despite possible decreases in onward movements that would relieve the national reception system.[135] Yet, the Dutch plan also varied in completeness and is in the process of being revised.

Spain and Belgium likewise submitted their plan, although limited information is publicly available on the contents. Little information is also available about Italy's efforts to improve its contingency planning, and how it could address coordination and emergency needs in different future scenarios. As a result, uneven reception preparedness is likely to remain. Considering that the EU remains exposed to large-scale arrivals in a more unpredictable geopolitical context, this could lead to both practical and political challenges, especially in places like Lampedusa, Ceuta or the Spanish islands.

3.3 Financial support for Pact implementation

Operational preparations during the transition period and closing remaining gaps point to a cross-cutting issue: funding needs. Early in the process, the Commission acknowledged that member states would require additional resources during both the two-year preparatory phase and post-June 2026 to ensure full Pact implementation.[136] At the EU level, resources have been allocated under the current budget, with further funding subject to the ongoing negotiations on the Multiannual Financial Framework (MFF) for 2028-34 (see Section 6).

During the preparatory phase, national budgets have been essential for recruiting personnel, the construction of facilities, the provision of legal counselling, and the independent mechanism for the monitoring of fundamental rights, among others. To support preparation, the Commission also freed up a total of €3 billion from the Asylum, Migration and Integration Fund (AMIF) and Border Management and Visa Instrument (BMVI) in 2024 to address member state needs identified in their National Implementation Plans. Next to these, member states were also able to make use of cohesion funds to improve synergies between post-arrival measures and longer-term inclusion strategies. As such, most states have so far relied on a combination of national and EU funds.

Yet, some member states appear to have under-allocated resources in their national budgets, creating the risk of a future disproportionate reliance on EU funds.[137] In Italy's case, for example, the national budget for 2026 only foresees limited funding for Pact implementation, with uncertainty concerning future available funding. The four countries examined in this Report also illustrate different configurations of national and EU funding. Dutch authorities intend to combine EU and multiannual

national funds. The possibility of making use of the EU Migration Support Toolbox to obtain further financial support is being explored in this context.[138] As part of their effort to strengthen systemic resilience, Dutch authorities have also prioritised funding for areas such as reception.[139]

EU financial support is likewise a priority for Spain and Belgium. Considering the expected impact on national resources, Spain has signalled the desire to benefit from EU funding where possible, including through the solidarity mechanism. Ultimately, it remains open how the various funding streams will work in practice, and whether needs will be met.

A further challenge concerns countries where EU funding cannot cover certain needs due to legal provisions and restrictions.[140] Italy, for example, can only benefit from EU money for certain aspects of implementation, such as temporary staffing needs, not the salaries of national authorities as such.

One issue further complicating member states' preparations, and possible later use of EU funding has been the delayed disbursement, even if already programmed, with Belgium being one of the countries affected.[141] This challenge may become more acute closer to the implementation deadline, and in the period immediately after.[142] A related challenge concerns the insufficient capacity of administrations to absorb EU funds or the underestimation of the time required for recruitment, procurement, and infrastructure development. This could also limit the positive impact of EU funds.

3.4 Expectations towards the 12 June deadline and the longer transition period

While significant progress has been made in terms of legal and operational preparation across member states, evidence from the case studies and other member states indicates that implementation is likely to remain uneven and partial in the period following mid-June 2026, with some gaps persisting beyond the formal application deadline (see Table 8). In this context, evidence points to a realignment of priorities. For example, the Commission signalled that the final weeks prior to 12 June should focus on putting into place the most crucial elements of the Pact, with leeway to address remaining challenges after this point in time.[143] The June deadline can therefore be understood as a milestone in a broader and longer process to ensure progressive operational – other than legal and administrative – alignment between national systems. This raises key questions concerning potential spillover effects on the Netherlands and on the CEAS, examined in the next section.

The extent and duration of these gaps will depend on countervailing factors, including the effectiveness of monitoring, EUAA and other operational support, the speed of national corrective measures, the availability and absorption of EU funding as well as broader considerations, such the level of irregular arrivals after 12 June. These factors may reduce the scale of spillover effects, delay their emergence, or confine them to specific locations or systemic aspects.

The transition period, and efforts to close gaps, point to another variable that will shape the reforms' application: how to deal with countries refusing to take part in implementation efforts. While so far, politically, most member states, including the four case countries, have remained committed to implementing the Pact reforms, uneven implementation could also make it complicated for the Commission to exercise its enforcement functions in the case of persistent non-compliance (see Box 3).

Box 3. Persistent non-compliance with the asylum acquis: lessons from Hungary

Contrary to most other member states, Hungary openly refused to partake in efforts to prepare for Pact implementation. The Hungarian government, ruled by the Fidesz party at the time of the reforms' adoption, did not submit a National Implementation Plan. It is also unclear to what extent there has been engagement between EU and Hungarian officials during the preparatory phase. Open refusal to implement the Pact reforms could have wide-ranging implications for the credibility of the CEAS and mutual trust between member states, and deep practical consequences. While

elections held in April ended Orbán's rule, the threat of persistent non-implementation and echoes of his government's positions in other states raise the question of how to handle future situations of deliberate non-compliance.

Soft enforcement through cooperation and dialogue (see Section 2.5) would unlikely generate the desired change in the case of open confrontation. Considering this, the Commission stated during the preparatory phase that it would take all necessary measures to enforce the new rules, including infringement procedures.[144] However, the prospect of a longer transition period and uneven implementation limits the margin for future actions by the Commission, as possible sanctioning measures would logically have to be applied to not just countries openly refusing to comply, but all those that do not implement their obligations. Yet, the Commission would face a trade-off in immediately opening infringements procedures after years of negotiations and preparatory work. In addition, infringement procedures may only work if the concerned state has a fundamental interest in reaching a compromise. If that is not the case, this step may even backfire, as the long-protracted confrontation with Hungarian authorities itself shows.[145] Another option involves the imposition of financial sanctions or freezing EU funds. These roads were already pursued in the case of Hungary.[146] Even so, budget conditionality may only lead to shifts in the longer term, without an immediate impact on compliance.

Looking ahead, there appears to be no clear-cut way to deal with cases of persistent refusal to comply. Given the extended transition period and related uncertainties, a case-by-case approach would likely be pursued, with both soft and hard enforcement measures being explored.

Table 8. Comparative overview of preparedness across case study countries prior to 12 June and implications for the Netherlands

Issue	Netherlands	Belgium	Italy	Spain	Key comparative points	Possible Implications for the Netherlands
Screening	- Ready for on-territory screening - Independent Monitoring Mechanism (IMM) appointed	- Outstanding issues for screening capacity - IMM not appointed	- Not fully ready: screening locations and organisation - Capacity challenges for on-territory screening - IMM not appointed	- Not fully ready: screening spatial organisation challenges - IMM appointed	- IT and ES will face larger screening pressure at the borders - NL and BE could face pressure regarding on-territory screening due to onward movements	Screening workload could shift to the Netherlands in case of screening gaps at the external borders
Eurodac/IT readiness	- Automated integration with national databases pursued - Temporary WUI. At least 6 months needed for full integration	- Automated integration with national databases pursued - Temporary WUI. Timing uncertain for full integration	- Automated integration with national databases pursued - Outstanding issues, timing uncertain	- Automated integration with national databases pursued - Temporary WUI. Timing uncertain for full integration	- Uncertain timing for interim solutions for BE and ES - Larger volume of data to be recorded for IT and ES	- Delays, uneven registration or incomplete data undermines responsibility determination and transfers
Border procedures	- Adequate capacity reached - Limited changes to existing asylum border procedure	- Adequate capacity reached - Limited changes to existing asylum border procedure	- Adequate capacity not fully reached - Experienced with asylum border procedure - Facility and inter-authority coordination challenges	- Adequate capacity uncertain - Experienced with asylum border procedure for sea arrivals - Legal, time-limit and spatial organisation challenges	- External border states face larger operational and infrastructure pressure than NL and BE	- Failure to process cases at the borders increases access to territory and onward movements - IMM not in place may lead to more litigation and invalidation of detention/procedures and access to territory
Responsibility transfers	- No improvement or increase in capacity mentioned	- Capacity improvements: IT and case management and the recruitment of staff - Dedicated facility for asylum applicants subject to transfers	- Operational improvements reported: IT and case management - Capacity uncertain after responsibility transfers were suspended in 2022	- No improvement or increase in capacity mentioned	- NL and BE issue more outgoing requests than incoming ones, with uncertain transfer capacity - IT and ES capacity and determination to follow up on notifications uncertain	- Ineffective transfers incentivise secondary movements and increase pressure on NL asylum and reception systems
Solidarity mechanism	- Financial contributions and interest in offsets	- Financial contributions and interest in offsets	- Interest in financial support and offsets	- Interest in financial support - No large-scale offsets available	- NL and BE have similar interests as contributors. - IT and ES both interested in financial contributions, but offsets are not as meaningful for ES	- Alternative forms of solidarity such as offsets and their deduction from financial pledges can make it difficult to anticipate and organise

						the delivery of contributions
Reception conditions	- Occupancy rate between 95 and 100% - Reliance on emergency shelters - No structural expansion of capacity reported - Directive not yet transposed	- Occupancy rate at 94% - Share of emergency shelters unknown - No structural expansion of capacity reported - Directive not yet transposed	- Construction of new facilities or remodelling existing ones prioritised, but progress unclear - Reliance on emergency shelters - Occupancy rate uneven across facilities (fragmented reception system) - No structural expansion of capacity reported - Directive not yet transposed	- Reported sufficient capacity - Occupancy rate: around 90% (uneven across territory) - No structural expansion of capacity reported - Directive not yet transposed	- High occupancy rates for BE and NL - No major investment in expansion of capacity - Uneven reception conditions more likely considering different governance models	- Uneven or inadequate reception conditions may incentivise secondary movements - Shortcomings in reception systems lead to judicial suspension of responsibility transfers

4 Implementation challenges, potential risks and Implications for the CEAS and the Netherlands

Based on the previous examination of legal, political, financial and operational constraints facing the case countries, this section provides a preliminary and conditional assessment of potential spillover effects for the Netherlands and the CEAS during the initial implementation phase and the longer transition period after 12 June. It does not treat these effects as inevitable post-implementation outcomes. Rather, it uses the May 2026 baseline to identify plausible pathways through which remaining preparedness gaps could affect registration, screening, transfers, solidarity and reception, specifying where the evidence is stronger and where the analysis remains prospective.

The analysis is organised around four issues: i) the fulfilment of responsibilities through screening, Eurodac, border procedures; ii) transfers of responsibility; iii) the functioning of solidarity provisions; iv) the strengthening of reception systems. The solidarity dimension is approached through questions of system balance, mutual trust and the predictability of contributions, which are central to its future functioning in practice. Reception, in turn, is analysed through the lens of capacity, the ability to scale up in response to fluctuations in arrivals, and its interaction with other components of the system, in particular responsibility transfers. While secondary movements are treated in Section 6 as a horizontal implementation issue, they also cut across this Section.

Across all thematic issues, the analysis emphasises dependencies, the mechanisms through which gaps may generate spillover effects elsewhere, and, where relevant, past experience of dynamics that may persist under the Pact. The focus is on short-term implications. As the analysis is prospective, it treats wider implications as conditional, acknowledging uncertainties. For each issue, this section starts by briefly considering the position of the Netherlands, Belgium, Italy and Spain, alongside relevant EU-wide observations, and then examines in turn how implementation gaps may affect the functioning of the CEAS and the Netherlands. While this organisation is reflected in specific subsections, due to the interlinked nature of the elements examined, Section 4.1 includes instead a separate assessment of the potential implications of screening, Eurodac and border procedures, before examining systemic implications for the CEAS and then for the Netherlands.

4.1 Operationalising Screening, Eurodac and Border Procedures

4.1.1 Screening as an Operational Filter

Table 9. Screening – Spillover effects

Implementation gap	MS concerned	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Incomplete screening	BE, IT, ES	- Incorrect or incomplete identification - Inadequate procedural channelling - Delays in processing - Increased backlogs	- Onward movements before screening is completed - Identification issues, with potential security concerns	- Increased on-territory screening - Greater administrative and operational workload

Screening constitutes the physical entry point into the reformed CEAS. As examined in Section 3, the execution of screening responsibilities after 12 June will raise capacity challenges. While the most sensitive pressure points for Italy and Spain are at their external borders, Belgium and the Netherlands are more likely to encounter challenges in relation to on-territory screening.

Infrastructural resources must also be considered alongside the ability of member states to comply with new administrative requirements, in this context. Adequate facilities may remain unavailable well after June 2026. While Italy and Spain have developed significant operational experience in some

locations such as Lampedusa or the Canary Islands, this is not evenly distributed across their territory. The extension of screening could thus expose differences between sea and land arrival processes.

In addition, capacity may have to be increased with the use of multiple locations, particularly where the full screening process cannot be carried out in a single place. Illustrating this, Italy faced questions about the suitability of existing infrastructure, with authorities considering partial relocation of screening activities to other locations.[147] Challenges could be amplified by increased coordination needs between stakeholders. Screening typically involves multiple actors, which may operate under different mandates and timelines.

All this has direct implications for the organisation of screening in practice. Where coordination mechanisms are weak or underdeveloped, the likely result will be a disjointed process in which key steps are not appropriately synchronised. This, in turn, could put into question the reliability of the chain, with delays at the screening stage also affecting subsequent data registration, procedural channelling, access to reception conditions and procedural safeguards.

The consequences should also be understood considering the inherent difficulty of managing fluctuating volumes of irregular arrivals. Even in the absence of major implementation gaps, screening remains structurally difficult to ensure in response to sudden peaks in cross-border movements, particularly but not only those linked to search and rescue operations.

4.1.2 Eurodac: Operational and Technical Challenges

Table 10. Eurodac – Spillover effects

Implementation gap	MS	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Uneven or delayed Eurodac registration	BE, IT, ES	- Incomplete identification and registration - Reduced traceability and reliability of responsibility evidence	- Untraceable secondary movements - Reduced ability to establish responsibility	- Fewer responsibility transfers - More cases processed to be processed - Greater administrative burden

The expanded Eurodac system is expected to strengthen identification and monitoring through the collection of more extensive data and its integration within the broader interoperable European IT architecture. Eurodac's positive impact is, however, contingent on high registration rates, high-quality data recording, compliance with procedural deadlines, and timely updates.[148] Conversely, differences in digital capacity and system integration across member states could reinforce asymmetric outputs.

Illustrating this, the four countries compared enter the implementation phase facing similar challenges, having also opted to use the WUI interim solution until integration is completed. On top of such common challenges, Spain will have to overcome persistent underinvestment in IT infrastructure. Italy also faces outstanding issues, although its level of preparedness is less clear.[149]

As Eurodac only captures individuals effectively apprehended at a given stage of the migratory route, its functioning remains inherently dependent on operational readiness, effective detection and registration practices at the external borders and within the territory in different possible scenarios. The main comparative takeaway is that these differences in operational and interim arrangements could produce delays in registration, lack of timely updates, issues with data quality or administrative reliability. Where registration is delayed, incomplete or not updated, Eurodac may provide a weaker evidentiary basis for establishing previous presence in another member state. This would matter most during the early transition period, when manual workarounds and staff adaptation are more likely to affect data quality. Conversely, the risk would diminish if system-to-system integration is completed, staff are trained and lower arrival levels give administrations time to stabilise procedures.

In the short-term, countries using the WUI as a bridging solution could face greater administrative workloads. The non-integrated option indeed implies increased reliance on manual processes and greater human resources as multiple systems recording will be necessary. This points to the need for additional staff, equipment, and training, rather than efficiency gains. Moreover, manual processes and double entries imply higher risks of delays in data transmission and inconsistencies.

Various technical and operational challenges will therefore have to be dealt with in a context where the EU system of interoperability remains underdeveloped and only partially tested in the longer transition period foreseen after 12 June.[150] Considering that some administrations are better equipped to comply with the new requirements, Eurodac could thus become a source of operational bottlenecks.

To be able to assess the consequences in the period after 12 June, the different geographical positions of member states as well as distinct roles within the reformed CEAS must also be considered. Italy and Spain are more directly exposed to registration pressures linked to external border arrivals. The Netherlands and Belgium are not exposed to comparable registration levels as at the EU's external borders, but nevertheless depend on Eurodac data generated elsewhere, among others, for responsibility to be established.

4.1.3 Border Procedures and Adequate Capacity: Implementation Challenges and Implications

Table 11. Border procedures – Spillover effects

Implementation gap	MS concerned	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Limited border procedure capacity	IT, ES	- More applicants channelled into regular procedures for asylum and return - Limited containment at the external borders - Increased duration of stay and backlogs	- Reduced containment effect of border procedures - Continued secondary movements	- More asylum and return cases to be processed - Weaker basis for responsibility determination - Greater need to conduct responsibility transfers

Border procedures are designed to enable the rapid processing of asylum applications and, where applicable, return decisions at the external borders. Yet, the effective implementation of border procedures depends on appropriate infrastructure and trained staff. The latter includes, among others, case officers, interpreters, security personnel, counsellors and social workers. Managing parallel procedures simultaneously under strict timelines will also require appropriate workflows for such staff.

Despite the need to ensure overall readiness, the situation across the four countries examined, and in the rest of the EU, differs significantly. Among others, bottlenecks remain in different member states in many respects, including the designation of locations as well as IT infrastructure and processes for unaccompanied minors. This is also the case in the four countries compared in this Report.[151]

At the same time, countries with a higher adequate capacity level, such as Italy and Spain, will need to step up efforts in setting up and running facilities, operating under clear chains of responsibilities across different levels of authorities as well as execute procedures and logistical arrangements at pace to comply with the set capacity levels.

For readiness to be achieved, weeks if not months will be needed after June 2026. This has been implicitly acknowledged in the Commission's latest update from May 2026, which called on 11 member states, including Italy, to step up their efforts to ensure adequate capacity.[152]

The inability to ensure adequate implementation for a longer period after 12 June could be especially consequential in the case of member states where responsibilities are distributed across different

authorities or regions. Even where infrastructure and staffing are present, the successful completion of the process will depend on effective coordination and continuity across all its stages.

In addition, member states may make choices that could also lead to fragmentation and differentiated implications, with certain preferences being especially consequential. Illustrating this, member states will need to ensure that individuals remain available to the authorities throughout the border procedure, either through detention or effective alternatives to detention. Yet, different practices will likely emerge. Italy for example appears to be moving towards a more systematic use of detention.[153] In Spain, by contrast, alternatives to detention are seen as a more flexible way of managing absconding risks together with the completion of border procedures, while recognising the operational challenges as well as procedural risks associated with large-scale alternatives to detention.[154]

Such choices could have significant implications for countries concerned. For example, member states relying more on detention would need greater resources for infrastructure and staff.[155] As such, they may be less adaptable to fluctuations in arrivals. Alternatives to detention would lead to reduced risks of tensions with fundamental rights protections and appear to offer greater flexibility. However, countries opting for alternatives to detention such as Spain will also depend on the availability of appropriate facilities and effective reporting mechanisms to ensure compliance and avoid absconding.

Border procedures and their application are also subject to judicial scrutiny, which increases the need for appropriate resources and pressures to complete the process on time. Judicial oversight will likely focus on detention conditions, procedural safeguards, and the application of safe country concepts. The inability to adopt the necessary legislative changes – as for example in Spain – and the potential absence of an established independent monitoring mechanism in some countries – a concrete prospect in Italy – could also intensify judicial oversight.[156]

4.1.4 Systemic effects of Screening, Eurodac and Border Procedures

While effective fulfilment of responsibilities in relation to registration, screening and border procedures could strengthen the functioning of the CEAS, insufficient or uneven compliance could affect subsequent procedures and generate disruptive systemic effects.

First, uneven implementation of screening could result in incomplete identification, insufficient security checks, or inefficient or inappropriate procedural channelling. Such divergences could undermine convergence within asylum procedures, as similar cases may be channelled differently or relevant vulnerabilities and procedural needs identified inconsistently depending on the member state in which screening takes place. It could also result in disparities in the effective protection of fundamental rights, particularly where safeguards concerning vulnerability identification, access to legal advice or restrictions on movement are applied differently across member states.[157]

Second, in case of persistent gaps in member states at the EU's external borders, the risk of absconding could also increase, potentially leading to onward movements of individuals. Relatedly, onward movements could also occur before persons have been fully screened, registered and channelled into the appropriate procedure, including persons constituting security risks or with low prospects for asylum. Individuals who have not been screened at the external borders would need to be screened later on the territory of another member state. This implies an administrative shift to countries affected by secondary movements.

Gaps in Eurodac registrations would amplify the challenges. Member states affected by onward movements would have to take responsibility for asylum applications where the information available in Eurodac cannot support the responsibility determination. Such gaps could result from a range of factors, including non-detection at external borders, delayed or incomplete registration, inconsistencies as well as technical constraints. While some of these challenges could be solved once the system is stabilised, it is possible that, after 12 June, some individuals will continue to move within the EU without being correctly registered, affecting responsibility determination.

Further challenges would derive from other rules in combination with implementation gaps. For example, if screening cannot be completed within the required timeframe, the screening phase ends automatically.[158] Similarly, if border procedures are not correctly implemented, individuals may gain access to the territory, potentially shifting cases towards regular asylum procedures. This could also lead to additional onward movements and shifts in reception and asylum pressure.

Similarly in the case of returns, when the procedure is not completed within the timeframe provided by the Pact, the consequence will be access to the territory. While this does not mean that return could not be pursued under the 'regular' procedure, a significant shift of applicants from the border return procedure towards the regular return system could generate additional procedural pressure. It could also affect detention and capacity practices. In addition, where individuals authorised to enter the territory are no longer effectively at the disposal of the authorities, this could also increase the risk of absconding and secondary movements, particularly in situations of delays or where return prospects remain limited.

Taken together, these elements could reproduce, at least in the short to medium term, some of the dynamics that characterised the CEAS prior to the Pact reforms. Where persistent secondary movements combine with pressure on national asylum and reception systems, member states have historically been more willing to rely on internal border controls as a migration management response. Reliance on internal border controls by the Netherlands in recent years, including for irregular migration and secondary movements, illustrates this pathway.[159] The consequences on internal border controls would not be automatic and any decision would still depend on national threat assessments, proportionality requirements, available alternatives and the broader Schengen legal framework. However, to the extent that uneven implementation continues, and underlying dynamics concerning secondary movements do not change, persistent practical challenges and political pressure could make the extension or reintroduction of controls more likely.

The spillover effects identified would also depend on broader circumstances, especially the overall migratory pressure. Low irregular arrivals could facilitate compliance with new responsibilities and reduce the likelihood of significant spillovers, while high or unexpected arrivals would place greater pressure on systems that remain under construction. While scaling up capacity in the face of increased arrivals would be particularly hard in practice, maintaining resilience in a situation of reduced arrivals could also raise challenges. Paradoxically, periods of lower arrivals may lead to a reduction in processing – and reception – capacity, making it harder to maintain responsive systems.

4.1.5 Implications of Screening, Eurodac and Border Procedures for the Netherlands

The uneven implementation of Eurodac, screening and border procedures in other member states could have direct operational consequences for the Netherlands. These consequences can be grouped around three concrete dependencies: the completion of screening before onward movements, the capacity of external border member states to complete procedures within the time limits and the availability of reliable Eurodac evidence.

In case of unauthorised onward movements, individuals who have not been detected or whose prior screening cannot be confirmed would have to be screened in the Netherlands within three days.[160] Persistent gaps elsewhere could therefore increase the workload of Dutch authorities and require sufficient screening capacity, including suitable facilities and arrangements to ensure identification, security checks, vulnerability assessment and availability of individuals throughout the procedure. The scale of this effect would depend on the volume of onward movements and on whether external border member states manage to stabilise screening practices.

The implementation of border procedures could also impact the Netherlands through onward movements. The capacity to contain and process cases at the external borders depends on sufficient infrastructure, staffing and logistical capacity, as well as the ability to complete asylum and return procedures within the prescribed timeframes. Gaps or uneven implementation of border procedures

would not automatically produce secondary movements towards the Netherlands. But where these conditions are not met and individuals gain access to the territory, onward movements may persist, particularly but not only where return and asylum prospects are limited. For the Netherlands, the relevant practical consequence would not be the failure of a border procedure as such, but the arrival of persons whose case should have been processed earlier in another member state. This could add to the number of cases requiring reception, case management or return follow-up in the Dutch system.

Gaps in registrations and updates in Eurodac would generate further spillover effects in this context. As a member state affected by onward movements, the Netherlands will rely on Eurodac data to establish prior presence in another member state and support responsibility determination. Where registration is missing, incomplete, delayed or inconsistently updated, Dutch authorities may have a weaker evidentiary basis for issuing or defending responsibility notifications. Practically, this would affect responsibility determination procedures, possible litigation as well as reception capacity and planning: more cases may remain in the Netherlands, stay longer in reception or require processing under the regular Dutch asylum system. The prospect may be more likely to be strongest during the early transition period, when member states still rely on interim Eurodac solutions and parallel workflows.

Importantly, these possible challenges and 'external' spillover effects will interact with other requirements and internal dynamics during the longer transition period. If spillover effects from uneven implementation elsewhere materialise at the same time, Dutch authorities may face combined pressure across screening, responsibility determination, reception allocation and return follow-up. The Netherlands will also need to manage legacy caseloads under the pre-Pact framework while applying the new rules to new cases.

4.2. Responsibility Determination Under the Pact

Table 12. Responsibility procedures – Spillover effects

Implementation gap	MS concerned	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Low execution of responsibility transfers	BE, IT, ES	- Greater probability of absconding - Increase in secondary movements - Impact on solidarity pledges and execution of contributions	- Onward movements - Shift of responsibility	- Additional capacity need to proceed responsibility procedures - More cases under Dutch responsibility - Pressure on reception system - Administrative burden due to withdrawal or reduction of reception conditions - Potential consequences on solidarity contributions

While responsibility determination rules have undergone minimal change, the reform seeks to make responsibility transfers more effective and systematic. This calls for an examination of the rules' potential impact, also considering interdependencies with other Pact elements, including reception conditions and the solidarity mechanism. Dutch authorities can issue responsibility (take-back) notifications, but the new procedures does not guarantee that those notifications lead to actual transfers.

For this reason, the analysis below distinguishes between three separate but connected conditions for effective transfers: political willingness to cooperate, administrative capacity to process and execute transfers, and material and judicial considerations for the feasibility of transfers, including reception conditions in the responsible member state. While each of these conditions may affect the Netherlands differently, they are all consequential.

The Netherlands and Belgium are particularly concerned with the implications of secondary movements and the practical execution of transfers. The main uncertainty concerns whether simplified rules will translate into actual transfers. The observed starting point is that transfer execution under the pre-Pact framework was persistently low and affected by several constraints: limited cooperation between member states, administrative capacity, absconding, reception conditions and judicial review. These constraints are a useful benchmark for assessing the Pact rules as the reform adapts the procedure more than the underlying operational and political conditions. The short-term implication is that transfers may become easier to initiate, but not necessarily easier to execute unless EU states have the capacity and political willingness to accept applicants back.

A first uncertainty in this context, more political in nature, stems from the possible reluctance to restore transfers following years of slow execution, illustrated by unilateral suspensions in Italy since 2022. While such reluctance cannot be excluded under the Pact, its occurrence may be mitigated by the new governance framework which increases monitoring and links responsibility to solidarity. This would raise the potential costs of lack of implementation compared to under the previous framework. The level of uncertainty remains significant, however, because the new rules cannot change pollical conditions or domestic priorities.

As a second element, administrative capacity is also a pre-condition for transfers to take place. Even if responsibility can be established, transfers require staff to identify the case, issue or process the notification, respond within the applicable time limits, organise reception on arrival, coordinate the physical transfer and manage appeals or absconding risks. For the four countries examined in this Report, rebuilding responsibility systems after several years of limited implementation will likely require time, especially to absorb a significantly higher volume of incoming and outgoing transfer requests. This priority does not only concern countries at the EU's external borders. It also concerns Belgium and the Netherlands, which will need to strengthen resources to enable a rapid return to sustained transfers, while balancing it against other implementation priorities and operational gaps.

A third consequential challenge relates to judicial interventions. Already under the rules applicable prior to the Pact, national courts scrutinised the so-called Dublin transfers, often leading to their suspensions on either a case-by-case or a more generalised basis due to the risk of degrading treatment where inadequate reception conditions are provided.[161] Yet, this Report cannot point with certainty to major short-term improvements of reception systems in the EU or case studies examined.

This does not only concern external border countries. The Belgian experience illustrates how persistent shortcomings in the reception system of countries may continue to affect the functioning of responsibility transfers across the board. Prolonged reception capacity shortages have resulted in the suspension of transfers of specific categories of applicants to Belgium under the pre-Pact rules, including from the Netherlands.[162] The risks of persistent reception challenges in Belgium as elsewhere in the Union identified in Section 3 do not rule out the continuation of this situation.

This shows that, beyond legal and procedural reforms, and political will, sustained investments in administrative and reception capacity across the EU remain prerequisites for the effective functioning of responsibility rules. This Report also shows that meeting these pre-conditions will remain sensitive to external factors, particularly the volumes and profile of irregular arrivals. These can deteriorate reception conditions and increase the risk of transfers being challenged or suspended on judicial grounds, affecting the number of transfers.

Lower arrival numbers could support a more positive implementation dynamic, at least in the short term.[163] However, this would not amount to a structural solution: if pressure on reception systems increases again, the same obstacles to transfers would likely reappear.

4.2.1. Systemic Effects of Responsibility Determination Rules

Taken together, the Pact is unlikely to produce a rapid evolution of responsibility transfers, and systemic risks would therefore persist, especially in its early implementation phase.

First, weakness in rebuilding administrative capacity across the EU, or lack of trust and cooperation, could mean that, instead of seeing responsibility transfers at scale, cases will remain in practice with the member state where applicants are present following secondary movements. Lack of administrative capacity, adequate staffing or infrastructure is a more likely scenario compared to one where member states altogether refuse to execute transfers. This is a short-term concern rather than a conclusion about the long-term functioning of the Pact. If member states close gaps, build case management systems and administrative capacity, transfer execution could improve progressively.

Second, ineffective or limited transfers may sustain current patterns of secondary movements, as lack of consequences could be perceived as an incentive for individuals to abscond or move in the EU.[164] The exact weight of lack of transfers on secondary movements could not be forecast, and onward movements could still fluctuate due to, for example, shifts in irregular arrivals to the EU. This could make it harder to anticipate procedural and reception needs.

The persistence of secondary movements could generate further multilayered consequences. A broad effect on solidarity could arise if contributing states conclude that the responsibility side of the Pact is not being implemented consistently. In this scenario, they may become more cautious about future pledges, or more inclined to favour contribution types that directly reduce their own caseload, such as offsets.

Furthermore, if the new system does not produce visible improvements, member states may also continue to rely on unilateral responses if there is evidence of lack of compliance with responsibility rules. The combination of persistent gaps in border processes and transfers could sustain the dynamic that contributed to the reintroduction of border controls within the Schengen area in the recent past. Where limited transfers coincide with continued secondary movements and pressure on national asylum and reception systems, member states may be more likely to justify internal border controls or other unilateral measures. This should not be understood as an automatic consequence of weak transfer execution, however. Such measures would still depend on national assessments and formal requirements under the Schengen Borders Code.

4.2.2 Implications of Responsibility Rules for the Netherlands

For the Netherlands, responsibility transfers create three concrete operational dependencies. First, Dutch authorities rely on evidence, including that collected through Eurodac, to establish that another member state is responsible. Second, they depend on the administrative and political cooperation of the responsible member state to accept and execute the transfer. Third, they depend on reception and procedural conditions in that member state being sufficient for the transfer to withstand judicial scrutiny. Where one of these dependencies fails, the practical consequence could be that the applicant will remain in the Dutch asylum and reception system for longer, or ultimately that the application will have to be processed in the Netherlands. Where transfers are not implemented, three consequences could arise.

First, reception capacity would be exposed: applicants remaining longer in the Dutch reception system will contribute to higher occupancy rates and limit the absorption of new arrivals. While the reforms provide grounds for reducing material reception conditions for applicants who have moved onwards from the responsible member state, pressure on the reception system would remain, especially if the number of applicants subject to responsibility procedures and pending their transfer is high.[165]

The consequences would also be significant considering that the new rules imply a differentiation of reception between applicants whose responsibility falls on other states and those undergoing regular asylum procedures. This would require Dutch authorities to organise reception systems with varying levels of material conditions and support while still ensuring a dignified standard for all. In turn, this would create the need for guidance, consistent case management and safeguards to ensure that differentiated reception conditions do not generate further litigation and organisational challenges.

Considering the prospects of near-term shortcomings, some member states have developed more targeted reception structures for applicants subject to the take-back procedure, which may provide useful operational experience in this area. For the Netherlands, such examples point to the potential of dedicated arrangements for dealing with persons awaiting responsibility determination or transfer (see Section 5.2), without assuming that these would themselves resolve responsibility-related gaps.

Second, while the Pact may incentivise a more systematic initiation of take-back notifications, the effectiveness of such efforts will remain dependent on sufficient administrative capacity to execute take-backs and, relatedly, cooperation with other member states. This involves a redirection of strategic investments towards case management, reception planning and transfer logistics. The practical challenge is not only whether the Netherlands can submit more notifications, in this context, but whether these requests lead to effective transfers. If receiving member states do not execute transfers, Dutch investments may mainly increase administrative capacity without producing a corresponding reduction in the overall number of asylum cases processed in the Netherlands.

Investing further in the administrative, operational and control capacities will not always lead to the expected results. This does not mean that such investment would be unnecessary, but it will limit the extent to which it could resolve Dutch reception and asylum pressure on its own.

Moreover, the limited predictability of the outcomes to take-back requests would increase the need for measures to prevent absconding of applicants subject to transfer procedures. This may require greater use of reporting obligations, restrictions on movement, or even detention, all of which have implications in terms of resources, administrative workload, and judicial oversight.

Third, judicial considerations will also remain relevant. As this Report cannot confidently predict systemic improvements across reception systems, the consequence could be that the basis for judicial suspensions could remain, at least in the short to medium term. If reception conditions in the responsible member state are considered insufficient, applicants may challenge transfers, courts may suspend them, and Dutch authorities may have to continue accommodating or processing the applicant. This prospect must also be considered, with judicial interventions becoming more likely where reception pressure rises.

These dynamics may also affect Dutch choices within the Solidarity Pool. Although the exact effects are difficult to anticipate, for the Netherlands, offsets may become more politically and practically attractive if responsibility transfers remain difficult to execute.

4.3 Solidarity Mechanism and Operational Balance under the Pact

Table 13. Solidarity – Spillover effects

Implementation gap	MS concerned	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Contributions do not match the needs	BE, IT, ES	- Weakened trust in solidarity mechanism - Fewer incentives to comply with responsibility obligations for benefitting MS - Two-tiered solidarity patterns	- Unbalanced system between responsibility and solidarity - Lack of mutual trust	- Potential predominance of responsibility offsets - Difficulty to anticipate contributions

The solidarity mechanism responds to a long-standing structural tension linked to the application of the first-entry criteria and responsibility rules. By making solidarity mandatory and giving some discretion in the choice of contributions, the Pact seeks to redistribute part of the pressure on first-entry countries while also pursuing a more sustainable overall functioning of the reformed CEAS. Yet, this institutionalisation does not remove national priorities or distributional tensions, nor does it

eliminate uncertainty altogether. Rather, it channels them into a more institutionalised decision-making process and organised delivery of solidarity. The fact that national priorities differ means that countries will have different expectations about the mechanism's benefits, however.

Illustrating this, Italy has shown interest in relocations and offsets, while Spain has expressed interest in benefitting from financial support. At the same time, Spain raised concerns about the size and composition of the Pool, due to pledges being lower than the Commission's proposal and the risk of responsibility 'offsets' becoming a primary, rather than a second-tier form of solidarity.[166] Meanwhile, Belgium and the Netherlands pledged financial contributions.

In this context, it is possible that the types of solidarity most attractive to contributing states will not fully match the needs of benefitting states, especially where the latter needs relocations or operational support while contributing states prefer financial contributions or offsets. Also relevant in this sense is that the distribution of the Solidarity Pool is described as a difficult balancing exercise between needs and contributions and where politics also play an important role.[167]

A second important aspect of the mechanism's functioning in this context is the operational and administrative capacity to process solidarity contributions, particularly relocations, at a national level.[168] Should this not be in place, national authorities may lean towards less complex contribution types such as responsibility offsets, which allow member states to count responsibility for individuals already on their territory, rather than organising a full transfer.

Connected to this, the first cycle will likely amplify challenges and uncertainty. The six-month period – which runs from 12 June to 31 December 2026 – limits the time during which solidarity contributions can be effectively organised and executed before the next cycle begins. The time horizon also means delays or mismatches may be difficult to interpret.

A third source of uncertainty concerns the risk that the interdependent nature of the Pact will disincentivise certain types of pledges, at least in the early stages. Reciprocity means that contributing states may be more willing to provide visible support if they perceive benefitting states as complying with responsibility obligations, while benefitting states may be more willing to invest in compliance if they perceive solidarity as meaningful and predictable. Where either side doubts this reciprocity, the mechanism may function less predictably than intended.

This raises uncertainty as to whether offsets will operate as a transitional tool to manage legacy cases and cushion ineffective responsibility transfers or will become a substitute for relocations and the harder to execute – or less politically appealing – contributions.

A further relevant challenge is the governance and transparency in the allocation of the different types of solidarity contributions, especially in the first cycle. Limited transparency or experience could reduce predictability. Also relevant in this sense is that, although overall contributions to the first Pool have been established in late 2025, the final operationalisation details of the Pool are still under discussion, with the Commission exchanging with member in the Solidarity Platform and bilaterally.[169]

4.2.2 Systemic Effects for the Reformed CEAS from the First Solidarity Cycle

These dynamics and the remaining degree of uncertainty about how the Pool will operate in practice could have several systemic implications. The first is practical: while member states may opt for a more pragmatic stance, contributing countries may not be able to opt for their preferred solidarity types while benefitting countries may also find it harder to receive the contribution type most relevant to their situation. The second is systemic and more conditional: if the Pool is perceived as not matching needs or not supporting responsibility compliance, it could weaken trust, especially if similar patterns persist into subsequent cycles. These systemic consequences are examined in turn.

As to the former, while the mechanism could potentially help to stimulate convergence of national interests over time, its actual functioning in the earlier period of implementation will likely be driven by

constructive pragmatism, with member states trying to maximise the benefits of participating in the mechanism, while minimising risks.

To this end, member states may favour contribution types that are easier to organise administratively or defend politically, even if they do not fully correspond to solidarity needs. This may reinforce a preference for offsets rather than relocations, especially for countries where 'legacy' caseloads could be deducted from solidarity contributions. Offsets would also make it possible to avoid take-back procedures, which can be time-consuming and burdensome.

In the short to medium term, there is also a risk that a two-tier system of solidarity will emerge, with some member states focussing on and benefitting from offsets, while others are more reliant on the Solidarity Pool. Due to their nature, offsets also have an important bilateral dimension.[170] The availability of offsets is structurally dependent on migratory routes and existing caseload distributions, meaning that not all member states are equally able to make use of them. This may leave better off certain countries of arrival and others subject to secondary movements who are in a position to enter into arrangements to facilitate their execution, and worse off other contributing or solidarity-eligible states.

This could solidify a system in which member states with pre-existing agreements are better positioned than others to shape solidarity beyond needs and based on migratory patterns. At a systemic level, this could leave certain countries eligible for solidarity contributions worse off. Spain, for instance, found it harder to identify offsets at scale in the first cycle.

The mechanism should also lead to more predictable solidarity arrangements. Yet, the above-mentioned lack of clarity in how the Commission distributes resources within the Pool and accounts for legacy contributions is highlighted as a key concern by different stakeholders.[171] Extensive reliance on offsets would also make it harder for eligible states to anticipate what support they will be able to rely on in practice.[172] It could also complicate planning for contributing member states, as they would not be in a position to form clear expectations regarding the resources they have to mobilise.

These dynamics are in part already visible within the first solidarity cycle.[173] For example, final distribution and practical modalities of contributions remain unclear. In this context, both benefitting and contributing member states already face difficulties anticipating the operational resources, financial commitments or case management adjustments they need to make available. At the same time, the distributional impact of the contributions has already attracted criticism. Amid keen interest by several member states in making use of offsets, Spain expressed concerns about the first cycle setting a negative precedent and normalising a reduction in the level or type of contributions most relevant to the needs identified prior to the Pool's negotiation.[174]

If these challenges are not addressed, they could weaken the mechanism's credibility and stabilising function. While not immediate, this risk could already become evident in the shorter first cycle. This not only limits the period during which solidarity contributions can be effectively executed. It also reduces the time for assessing positive change. Contributing countries may not be able to observe evidence that their participation in the Pool produces improvements in fulfilment of responsibilities. Conversely, if contributions do not materialise, member states eligible for solidarity, such as Italy and Spain may in turn consider their responsibility as unfair and unsustainable. For this reason, while the evidentiary basis for judging success or failure will be limited, this could still affect political perceptions.

4.2.3 Implications of the Solidarity Mechanism for the Netherlands

The precise implications of the first solidarity cycle for the Netherlands are hard to assess because, at the time of writing, the operational details of the Solidarity Pool are yet to be finalised. The analysis is therefore necessarily preliminary. For the Netherlands, the most concrete dependencies concern three issues: i) the types of solidarity contributions that it can pledge and deliver; ii) the extent to which responsibility offsets can be used to manage legacy and future secondary movement-related caseloads; and iii) whether solidarity contributes to better responsibility compliance by member states

under pressure. These dependencies will influence the number of cases that remain in the Netherlands, resources needed for procedures and the political assessment of the mechanism.

As to the first, like other countries, the Netherlands expressed a preference for financial contributions while also pursuing arrangements allowing legacy Dublin cases to be counted as responsibility offsets. The final scale of these offsets has not yet been determined, however, as the definition of the exact contributions depends on a technical assessment as well as higher-level political negotiations of the Solidarity Pool. Relatedly, the specific contributions for the Netherlands as well as the number of offsets available will also depend on any bilateral arrangements it signs with other countries and on whether other member states enter into agreements with one other to facilitate offsets.

If offsets are available at scale, some cases already present in the Netherlands may be absorbed within the solidarity framework rather than pursued through transfer. If offsets are limited, contested or allocated elsewhere, the Netherlands may instead need not only to fulfil its responsibility-sharing obligations, but also rely more heavily on transfer procedures or process more cases domestically.

The effect cannot be quantified at this stage. Yet, this unpredictability would itself have significant implications. While the number of asylum applications ultimately remaining under Dutch responsibility will be hard to anticipate, investments would be needed to create processing and reception capacity.

Overall, the limited predictability will make it harder to anticipate whether such contributions will take the form of financial support, offsets, operational support or a combination of these, and how this will interact with its own responsibility and reception caseload.

Third, solidarity is expected to support member states under pressure, thereby strengthening their ability and incentives to comply with registration, screening, reception and responsibility obligations. Uncertainty regarding the contributions, and extensive reliance on offsets could contribute to a mismatch between the composition of the solidarity available and the needs of benefitting member states. This could also weaken incentives for benefitting member states to fulfil their obligations, with potential consequences on cooperation with the Netherlands on, for example, responsibility transfers.

4.4 Reception Systems: Capacity, Preparedness and Convergence

Table 14. Reception systems – Spillover effects

Implementation gap	MS concerned	CEAS effect	Channel of effects for the Netherlands	Impact on the Dutch system
Shortcomings in reception systems	BE, IT, ES	- Absconding and secondary movements - Uneven convergence and safeguards - Limited responsibility transfers	- Secondary movements - Low transfer rate	- Judicial suspension of transfers - Additional pressure on judicial, reception and asylum systems

The revised rules governing reception seek to create a more coherent and harmonised framework for member states. Yet, across the countries examined, differences are expected to remain regarding reception capacity, infrastructure, occupancy rates and reliance on emergency accommodation, governance arrangements and contingency planning.[175] All these elements are likely to influence the resilience of national reception systems and their capacity to absorb fluctuations in arrivals.

Illustrating this, the Netherlands and Belgium will enter the implementation phase with high occupancy rates and limited flexibility. In this sense, they will also have to deal with the 'dual pressure' of having to implement the Pact reforms while also dealing with pre-existing constraints in their reception systems. By contrast, Spain appears comparatively better placed in overall capacity terms but will

remains vulnerable to territorial unevenness in the event of sudden pressure. Italy will also benefit from high accommodation numbers, although also being affected by fragmentation and uneven capacity across the country.

Against this background, several questions and uncertainties emerge. First, it is to be seen if member states will be able to effectively absorb new arrivals considering structural constraints. Reception capacity and resilience determine whether applicants can be effectively accommodated and remain available for procedures, whether transfers can be carried out without judicial interruption, and whether national systems can continue to function without resorting to emergency accommodation.

A further related question concerns the consequences of administrative and infrastructural pressure. Under the Pact rules, member states may need to accommodate different categories of applicants under different procedures, including border procedures, regular asylum procedures and 'responsibility-determination' procedures. This requires the creation of suitable facilities, trained staff and coordination between relevant authorities. Relatedly, while the new legal framework allows for differentiated conditions for regular asylum applicants and applicants subject to a take-back procedure,[176] it also maintains the obligation to ensure a dignified standard of living for all.

This will require continued investments and adaptations. Italy and Spain are adapting reception infrastructure and workflows to distinguish between applicants channelled into border procedures, regular asylum procedures and vulnerable groups. Yet it is not clear which countries will be ready on 12 June, and how long others will need to be able to provide for differentiated reception conditions.

A third overarching point, with potential consequences on the CEAS and the Netherlands, is that the current framework leaves member states with a significant margin of discretion for implementing the reformed rules in their national system. Some countries, for example, rely more on public actors, while others resort to non-state partners for managing their reception system. This discretion is also visible in the flexibility on the treatment of applicants who are subject to a take-back procedure. The current framework allows national authorities to limit or withdraw access to material reception conditions outside the responsible state while also providing alternatives involving some restriction of movement. While some member states may systematically rely on restrictions of movement or allocation to specific reception structures, others may opt to reduce access to material reception conditions, also leaving applicants outside the regular reception system.

The four countries examined in this Report represent different preferences on these matters, with Italy relying more on detention while Spain prefers alternatives to detention. Meanwhile, Belgium has set up reception centres for asylum-seekers waiting to be transferred to other responsible countries.

A further source of variation, with potential consequences for both the EU and the Netherlands, concerns contingency planning. The revised rules require member states to anticipate urgent capacity needs. This reflects a strategic interest under the reformed CEAS to move towards more predictable and forward-looking reception management, addressing one of the key weaknesses observed in past emergencies when national administrations did not manage to put in place effective responses as soon as arrivals rose. By June 2026, however, the level of preparedness appears uneven across the EU, including in the four countries at the centre of this Report's analysis.

4.4.1 Systemic Effects of Reception Capacity for the CEAS

Considering these challenges and remaining variation in capacity and governance, the Pact may have a somewhat limited effect on harmonising reception systems, also beyond the transition period. As a result, reception conditions are likely to remain a driver of uneven implementation, with systemic consequences for the CEAS. Whether these differences translate into sustained secondary movements, transfer suspensions or wider systemic consequences will depend on arrival levels, contingency planning, the extent of judicial scrutiny and, more broadly, on the effectiveness of national decisions and the availability of EU support. While evidence does not point to definitive conclusions, potential systemic implications are significant.

A first systemic consequence is that the partial convergence of reception standards may contribute to limiting but not prevent continued secondary movements if significant differences will persist in the accessibility and capacity of national reception systems. While reception conditions do not alone determine onward movements, they can be confidently seen as a contributing factor.

Variation could be generated by access to specific reception conditions, but also national preferences as to implementation, including on which specific restrictions for asylum seekers engaged in or at risk of secondary movements. These choices will have consequences for applicants' incentives to remain in or move between member states, and transfers. Yet, such implications are not linear and are consequently harder to predict and assess. For example, the objective of discouraging secondary movements through the exclusion from parts of the reception system may also make applicants less available for transfer procedures in practice. Instead, differentiated conditions and reporting obligations may support transfer execution, provided they remain lawful, proportionate and sufficiently resourced.

As a second element, the current framework could also lead to fragmentation in response to sudden and large-scale arrivals.[177] Relatedly, systems relying on complex governance structures and multistakeholder partnerships could be more agile in increasing capacity in such scenarios. But they could also raise coordination challenges, including in adapting to new procedural requirements.[178]

Persistent shortcomings in reception standards, especially in periods of increased arrivals, could overwhelm reception systems. In the meantime, if member states are unable to maintain sufficiently high reception standards, judicial interventions may once again become a decisive obstacle in the execution of responsibility transfers. This effect is conditional on both the severity of reception shortcomings and the extent to which courts consider them relevant to transfers. It is nevertheless an important dependency because responsibility transfers cannot function sustainably if reception conditions in the responsible member state fall below acceptable standards.

The implementation of reception rules will likely continue to be shaped by national decisions and domestic considerations. Reception capacity tends to expand and contract in response to fluctuations in arrivals. Yet, capacity reductions tend to occur more quickly than capacity expansion. Rebuilding capacity in the presence of renewed pressure, especially if it manifests in rapid manner, is often operationally complex and politically contentious. This will have consequences in the first phase after 12 June, in the presence of lower arrivals that reduce incentives to maintain contingency capacity. Policy decisions in Belgium and the Netherlands themselves illustrate that pressure on reception systems has not resulted from migratory flows alone, but also from policy choices to reduce capacity.

Uncertainty in how member states would respond to large-scale arrivals is also due to contingency planning. Despite a higher degree of convergence, this remains a national responsibility and, as such, is closely linked to domestic preferences and sensitivities. The effect of contingency planning under the Pact is therefore uncertain. Plans could reduce negative spillovers if they enable rapid mobilisation of reception and processing capacity. However, if they remain untested or insufficiently resourced, they may not prevent the use of emergency accommodation or ad hoc responses under pressure. Although the revised framework introduces more structured planning tools, resilience will continue to depend on national preparedness and decisions, especially at the EU's external borders.

4.4.2 Implications of Reception Challenges for the Netherlands

For the Netherlands, reception-related spillovers mirror EU-wide dynamics closely, and concern three concrete dependencies. First, reception conditions in other member states may influence whether applicants remain there or move onwards. Second, the adequacy of reception conditions elsewhere affects whether transfers can withstand judicial scrutiny. Third, Dutch reception capacity will be affected by the number and duration of cases that remain in the Netherlands when transfers are delayed, challenged or not executed. These effects are not automatic: they depend on the scale of onward movements, the quality of reception in the responsible member state and the effectiveness of transfer procedures. Yet, fragmentation and uncertainty could generate negative spillover effects.

First, if reception arrangements in other countries do not support continued stay throughout duration of procedures, including during border processes, onward movements would become more likely. The implication is not that countries like Italy and Spain will necessarily generate reception-related spillovers for the Netherlands. Rather, reception resilience in states at the EU's external borders remain conditional on the ability to ensure sufficient administrative capacity and infrastructure. Where this does not happen, reception pressure may affect incentives for onward movement, not just procedural efficiency.

Onward movements could also generate further administrative workload for the Netherlands to determine and apply the appropriate reception regime to applicants who are on the Dutch territory but are under the responsibility of another state. This determination would affect reception allocation and entitlements, other than legal safeguards. All this would happen while responsibility procedures are ongoing, adding a layer of complexity to reception management. The scale of this burden would depend on the number of applicants subject to take-back procedures and dedicated reception arrangements. But even limited additional inflows could have a disproportionate effect in an overstretched system.

For the Netherlands, the centrality of reception conditions in other countries for the functioning of responsibility transfers also derives from judicial considerations. Transfers could be suspended again under the new rules, depending on whether the Pact reforms result in well-run reception systems in other countries, including during times of increased arrivals, or shortcomings lead to litigation. Instead, if reception conditions in the responsible member state are considered insufficient, applicants may challenge the transfer, courts may suspend it, and the applicant may remain in the Dutch reception system while the case is resolved or processed domestically.

All this would not only affect capacity to execute transfers, but also, when it comes to the reception system itself, turnover and the duration of stays, occupancy rates, and flexibility in managing new arrivals. In situations where pressure increases, this could require the use of emergency accommodation and short-term solutions, with impacts on cost, service quality, and safeguards. The resilience of the Dutch reception system will thus be shaped by both internal and external factors.

5 Emerging Approaches and Potentially Relevant Practices

As this Report was drafted during the weeks immediately preceding 12 June, it cannot rely on an extensive set of potentially relevant practices. In fact, evidence of good practices directly linked to the preparatory phase and future implementation of the Pact has not yet emerged at this stage.

Considering this, the examples identified in this Section cannot generally be considered as established good practices (summarised in Table 15). They instead include ongoing projects, existing national approaches and pilot initiatives that could help to address implementation challenges identified in previous sections. The examples below are distinguished according to their evidence status – indicating whether they constitute established practices, promising approaches or pilot projects – and are assessed in terms of the problem addressed, transferability constraints and potential relevance for the Netherlands.

5.1 Promising Approach: Digitalisation and Case Management

The level of digitalisation and integration of case management systems with respect to asylum, reception and return is set to play a key role in Pact implementation. Integrated systems contribute to more coherent and efficient case management by ensuring continuity between procedures and reducing fragmentation between responsible authorities. Digitalisation can reduce reliance on staff to perform resource-heavy tasks by automating data processing, limiting duplication of tasks and facilitating the circulation of information across authorities. These potential efficiency gains are

particularly relevant where staffing and administrative capacity could give rise to implementation bottlenecks.

Illustrating this, Belgium has received support in the context of the TSI aiming to further digitalise migration management through new technologies and integrated data solutions. Belgium's TSI project also seeks to strengthen coordination between different authorities involved in the asylum process, reduce manual processing and identify solutions that can be implemented within the existing administrative framework. The problem addressed is both technical and organisational: reducing fragmented and resource-intensive case management across authorities involved in interconnected procedures.

Although the project is still ongoing, and its effectiveness cannot be assessed yet, its approach illustrates how digitalisation could potentially enable more effective and integrated Pact implementation. This will become increasingly relevant after 12 June, given the expected administrative pressures and interconnection between various procedures, including screening, asylum and reception. In this context, digitalisation is already presented as a structural component of Pact implementation. The EUAA emphasises that the effective functioning of the reformed CEAS will rely on integrated and interoperable information systems capable of ensuring continuity throughout procedures.[179]

Accordingly, member states with more advanced digital systems will be better positioned to absorb the additional operational requirements associated with the Pact.[180] EUAA guidance highlights, for example, the importance of real-time data management systems capable of providing authorities with an overview of reception capacity and occupancy.[181] This can facilitate the distribution of applicants according to available places, in line with geographical criteria or specific reception needs.

While the Netherlands is generally considered among the most advanced countries in terms of digitalisation, further efforts on this front could lead to greater administrative capacity, while also reducing duplication and allowing reinvestments where needed. In addition, pursuing digitalisation with the context of Pact implementation could lead to a level playing field and systemic benefits.

Next to the above, digital tools could allow applicants to access information, monitor the state of their procedure, receive notifications, or communicate remotely with authorities for interviews or even judicial hearings.[182] In the Netherlands, this could also contribute to reducing pressure on asylum systems and backlogs. It may also mitigate the risk of fragmented information, redundant communication and administrative interactions, also alleviating workload for staff.

At the same time, the digital transformation of asylum and reception systems also raises important operational and fundamental rights considerations. Fragmented digital infrastructure, limited interoperability, artificial intelligence or unequal access to digital tools may create additional barriers for applicants and further deepen implementation asymmetries between member states.[183] Continued guidance will therefore be needed as systems become more consolidated.

5.2 Promising Approach: Group-Based Differentiated Approach to Reception

Another promising practice concerns the establishment of dedicated reception structures for applicants subject to responsibility transfers. Some member states have already developed such facilities prior to June 2026. Some also introduced complementary counselling measures intended to reduce the risk of absconding.[184]

The creation of a dedicated 'Dublin centre' In Belgium in 2022 illustrates this approach. The centre was designed to accelerate the processing of applicants who had previously registered in another member state by concentrating accommodation, counselling and procedural follow-up within a single structure. According to the Belgian authorities, the objective was both to facilitate transfers and to relieve pressure on the wider reception network by shortening the stay of the concerned persons.[185]

Available evidence on the effectiveness of this approach remains partial. While Belgian authorities presented the 'Dublin centre' as a tool to accelerate procedures and free up reception places, there is currently little publicly available data demonstrating measurable effects on transfer rates and duration of stay in reception facilities. As a result, its operational impact remains difficult to assess.

Despite this, and although this approach predates the Pact, it illustrates a broader operational principle that is set to become important under the new framework. Dedicated reception structures for different categories of applicants could facilitate case management, improve coordination between reception and asylum authorities and support the availability of applicants for transfer procedures. In some cases, they may also allow member states to rely on alternatives to detention while still maintaining a degree of procedural control and monitoring. Moreover, by concentrating applicants subject to transfer procedures in dedicated structures, member states may also be better positioned to apply different levels of reception conditions provided for under the revised framework.

This approach also presents potential benefits for the Netherlands, given its position as a destination country affected by secondary movements, as Belgium. At the same time, the transferability of the approach to the Dutch context would depend on broader features of the asylum and reception system, including capacity, procedural timelines and the effectiveness of responsibility transfers, while also raising questions about funding and investments.

5.3 Pilot: Stress-Testing Resilience through Preparedness Exercises

The current migratory context, characterised by lower levels of irregular arrivals and asylum applications, provides a comparatively manageable environment for the initial implementation of the Pact. It does not, however, demonstrate the capacity of national systems to operate under substantially higher or different forms of pressure. This points to a persistent need to test whether national asylum and reception systems, including newly developed procedures, capacities and coordination arrangements, can remain operational and effective under alternative scenarios.

Scenario-based planning would enable responses to variations in the volume of arrivals, but also to their composition. Different flows would have significantly different implications for reception systems, procedural pathways and resource allocation. For instance, large-scale arrivals of persons with a high likelihood of protection may require rapid expansion of reception capacity but follow relatively streamlined procedures, whereas flows composed primarily of applicants with low recognition rates or specific profiles (e.g., unaccompanied minors) may lead to more complex demands on the system.

The EUAA places significant emphasis on the development of preparedness and has encouraged member states to define realistic pressure scenarios. This would involve identifying early warning triggers and thresholds, operational responses, responsibilities and coordination mechanisms. It has also highlighted the value of testing preparedness through exercises involving all relevant actors, particularly in decentralised systems requiring additional coordination.[186]

The possibility to put to test resilience of the reformed rules acquires particular importance, given the many uncertainties that this Report identified, and are set to persist.

In April 2026, Romania organised the first live simulation aimed at testing operational preparedness for the Pact implementation under a TSI project. The exercise involved more than 200 participants from national authorities, EU agencies and international organisations. It simulated a situation where reception and processing capacities were exceeded. This allowed the testing of screening procedures, inter-institutional coordination, contingency planning, data and biometric processing, transfer procedures and operational responses under such crisis conditions.[187] The exercise provided an opportunity to test national contingency arrangements and identify potential operational and coordination bottlenecks ahead of the Pact's entry into application.

Italy also organised a pilot implementation of the new screening phase in Lampedusa with the support of the EUAA, Frontex and Europol.[188] The exercise aimed to test how the different actors, procedures and information flows would function together under different conditions.

Such pilot exercises provide an opportunity to clarify responsibilities and adjust workflows before they have to be rolled out at scale. For the Netherlands, such exercises may be particularly relevant given the potential pressure on the reception and asylum system and the reliance on emergency accommodation. They could contribute to assessing operational readiness under different scenarios, testing surge capacity, familiarising staff with the new procedural framework and identifying bottlenecks. More broadly, they would facilitate coordination between authorities involved in asylum, reception and border management while supporting the transition to the new CEAS.

Scenario-based approaches can be considered transferable to the Netherlands as a methodology, although the specific scenarios tested would need to reflect national migration patterns, institutional structures, existing capacities and identified uncertainties that are pertinent to the Dutch asylum and reception systems specifically. Its value also depends on the participation of the authorities and other implementation partners that would be involved in an actual pressure situation and on mechanisms allowing lessons learnt to be incorporated into existing procedures and contingency planning.

Table 15 - Approaches at a glance

Practice area	Example	Problem addressed	Evidence base	Relevance for the Netherlands	Transferability constraints	Possible Dutch use
Digitalisation and case management	- Digitalisation TSI project in Belgium for migration and asylum authorities - Use of technologies to strengthen management and use of data	- Administrative pressure - Data fragmentation - Streamlined communication across authorities	Evidence of effectiveness expected with Pact implementation	Belgium and the Netherlands face similar migration management challenges and operate within similar administrative environments The Netherlands is also moving forward with digitalisation and integrated case management	- National system architecture - Interoperability - Data safeguards	Could support the management of higher caseload, end-to-end case tracking and reduce duplication and manual work
Differentiated reception conditions	Dublin centre in Belgium	- Ineffective transfers - Reception pressure linked to responsibility	Evidence of effectiveness expected with Pact implementation	Dutch exposure to responsibility transfers and reception pressure due to secondary movements	- The availability of dedicated capacity and case-routing system - Sufficient reception places	Could inform dedicated reception models for applicants subject to transfer procedures
Scenario-based exercise	Pilot projects testing contingency arrangements in Romania and in Italy	- Uncertainty regarding resilience of asylum, border and reception systems in the face of future migratory pressures - Effectiveness of administrative processes in different conditions	Detailed evaluations not publicly available but promoted by EU institutions and agencies	Relevant for the Netherlands due to asylum pressures and uncertainty regarding future arrivals, including secondary movements	- Resources and involvement of relevant actors for conducting scenario-based exercises - Commitment to follow-up and regular updating	Could help anticipate administrative and procedural bottlenecks Could strengthen preparedness and resource planning

6 Overall policy implications for the Netherlands

The preparation for the implementation of the Pact reforms constitutes a considerable undertaking for EU member states, including the Netherlands. Changes to the overall migration governance structure and the CEAS architecture as well as to national legislative frameworks, the establishment of new authorities, structures, coordination mechanisms and workflows, and novel elements such as the solidarity system bring to the fore the complexity and interdependent nature of the Pact instruments.

This Report identifies several implementation dependencies through which uneven application of the Pact could affect the Netherlands. This section thus focuses on the short to medium-term implications that follow most directly from the preceding analysis. These are i) the continued transition after 12 June; ii) the remaining influence of pre-Pact national priorities; iii) operational consequences of secondary movements, including for planning and investment choices on infrastructure and staffing; iv) access to EU funding; the functioning of the v) solidarity mechanism and vi) Schengen area.

The first general policy implication emerging from this Report concerns how the post-June 2026 period should be understood. While the legislative process and political context may have led to the expectation that all necessary legal, financial and operational elements for Pact implementation would be ready by 12 June 2026, the reality is that there will be a longer transition period. This finding stems from the general overview of limited preparedness among member states. It is further confirmed at a more granular level by the four countries compared in this Report, with none of them having achieved full readiness by June 2026. As such, the first overarching implication is that the Dutch asylum and reception systems, alongside those of other member states, will require continued and effective adjustments, depending on how the implementation experience unfolds on the ground.[189]

The second main policy implication in this context is that national priorities, in many cases predating the adoption of the Pact reforms, will continue to determine implementation dynamics in the upcoming short to mid-term period. For the Netherlands, the transition period will therefore not start from a blank slate. Pre-existing priorities, including the resumption of responsibility transfers, the management of reception capacity, the reduction of secondary movements and improvements to the efficiency of asylum procedures, will continue to shape how the Pact reforms are implemented and assessed, after 12 June.

That member states will be driven by their pre-Pact national strategies could have positive, stabilising effects, as it would prevent a dramatic shift in policy orientation, even if elections approaching in many European countries raise uncertainty to a higher degree. Yet, as a side effect of such national priorities continuing to dominate policy implementation in the short term, political tensions could re-emerge at the EU level. These could paradoxically be greater immediately when expectations about the tangible improvements in migration management from the reforms will be highest, but operational experience more limited.

Concretely, the Report suggests that dissatisfaction with secondary movements and transfers of responsibility on the one hand, or the first solidarity cycle on the other, could lead to renewed tensions between member states, depending on how the initial months of implementation play out. This may not necessarily lead to a return to pre-Pact dynamics, lack of trust undermining cooperation between member states at large, or convergence between similar member state blocks centred around common interests and geography as prior to the Pact. However, tensions would remain consequential at a time when closing implementation gaps will be contingent on continued efforts and mutual trust.

Looking at short-term dynamics concerning the Netherlands specifically, further implications would follow from secondary movements. Preventing or countering them does not depend on a single instrument but a combination of measures and their implementation. Because of this, the prospect of a sustained decrease in secondary movements cannot be taken for granted. The comparative evidence in this Report makes this clear. Incomplete or strained implementation in Italy, Spain and other countries on the external borders could affect registration, screening and border procedures as

well as reception systems and responsibility transfers. As such, uneven implementation could provide additional incentives or contribute to onward movements. Reception pressure in Belgium also shows that challenges and possible effects of secondary movements are not limited to the external borders.

If secondary movements persist, there would be clear consequences for Dutch asylum and reception systems. The Report identifies additional on-territory screening, more complex procedures and responsibility determination, especially if combined with Eurodac gaps, longer stays in reception, and greater case management and litigation prospects, among others. Considering these wide-ranging implications for the Netherlands, Dutch authorities cannot afford to be caught underprepared by the heavier administrative workload and more complex case management that continued secondary movements would generate. These include resources for identification, screening and processing, reception conditions as well as the imposition of restrictions of movement pending transfer, but also court cases and judicial oversight, as well as investments on other related priorities, such as return.

Given the importance of closing gaps while also facing different pressures and priorities, there will be more policy dilemmas and trade-offs for governments and other implementation stakeholders, considering the necessary financial investments and potential negative implications that wrong decisions could carry. Dutch authorities will also face difficult planning choices under uncertainty. These concern, in particular, whether to invest further in transfer capacity, reception capacity, asylum backlog reduction, staffing and infrastructure for screening and border procedures, digital systems and contingency planning, also considering that future irregular arrivals can only be estimated.

Related to these dynamics, in the near term, member states, including the Netherlands, will seek EU financial support, another implication. Financial forward-planning, also looking at other sources, will thus be of the essence to ensure future implementation efforts are covered. However, with the current EU budget lasting only until the end of 2027, resources at EU level are limited. The Dutch interest in EU support will therefore have to contend with other countries' needs. While this suggests resorting to the national budget, in a context of limited finances, choices will be constrained there, too.

For the 2028-34 period, ensuring sufficient financial support will depend on the negotiations of the next EU budget. At this stage, however, uncertainty remains regarding the volume of funding for migration, and for Pact implementation specifically, as well as the structure in which these funds would be embedded.[190] At the same time, ensuring an adequate budget after 2027 will also have to contend with different policy priorities. Also relevant is that targeted support would depend on an understanding of where funding is most needed, while the on-the-ground experience with Pact implementation may only provide partial insights during the negotiations.

The analysis also indicates that persistent secondary movements, especially if combined with uneven responsibility transfers, could also affect Dutch choices in future solidarity cycles. As a further implication, their continuation would also impact the solidarity mechanism and future cycles. Dutch authorities, alongside others, would likely take an even more cautious approach, and have stronger incentives to prioritise contribution types that reduce its own administrative or reception exposure, especially responsibility offsets. Whether offsets or priority contributions can happen, however, would depend on bilateral arrangements as well as higher-level negotiations of future Solidarity Pool.

Persistent secondary movements may sustain some of the conditions under which unilateral actions, including internal border controls, remain politically attractive. This would, however, depend not only on implementation gaps, but also on national assessments of public policy or internal security, the scale of secondary movements, pressure on reception systems and the availability of less restrictive alternatives, other than broader political considerations and coordination at the EU level. The systemic implication is therefore not a direct causal link between any single country's implementation gap and Dutch border control decisions, but the possibility that persistent uneven implementation weakens confidence in the functioning of the reformed CEAS, also affecting Schengen's resilience as a result.

A sudden increase in arrivals or another type of external shock could intensify these dynamics, raising uncertainty and stakes, but the effects would depend on the scale of the shock, the level of preparedness at that point and the extent to which EU coordination mechanisms are used effectively.

7 Conclusion

The New Pact on Migration and Asylum seeks to address longstanding structural weaknesses affecting the functioning of the CEAS, including persistent secondary movements, uneven implementation and tensions between responsibility and solidarity. While preserving much of the fundamental logic of the previous framework, it introduces a more integrated and interdependent system based on enhanced information systems, reinforced registration and screening requirements, faster procedures, revised responsibility rules and a mandatory but flexible solidarity mechanism.

The analysis conducted in this Report points to significant efforts by member states to prepare for the Pact over the two years preceding its application. National governments and other actors across the EU, including the Netherlands, Belgium, Italy and Spain, have intensified preparations as June 2026 approaches, including legislative adaptations, investments in facilities and IT systems, the development of operational workflows and inter-institutional coordination, and contingency planning. At the same time, the findings do not point to a smooth or uniform transition to the new framework. Rather, they indicate that 12 June 2026 marks the beginning of a longer implementation phase, during which national systems will continue to adapt at different speeds and from different starting points.

Given the timing and evidence cut-off of the research, the questions guiding this Report cannot be comprehensively answered based on clear observed implementation outcomes or definitive practices. The findings instead provide a preliminary assessment of potential implications for the Netherlands and the reformed CEAS of uneven implementation, taking into account remaining uncertainties. Against this limitation, the central research question of which critical factors will determine spillover effects in the Netherlands can be answered as follows: considering the interdependence between national systems and Pact elements, implementation dynamics in other member states will be especially consequential for the Netherlands, where gaps affect concrete functions and processes on which the Dutch asylum and reception systems rely, especially evidence collected via Eurodac, screening and border procedures before onward movements, responsibility transfers, reception conditions in the responsible member state and the functioning of the solidarity mechanism. The answers to the sub-questions are set out below in four steps.

Answer to sub-question 1: Uneven preparedness rather than a simple ready/stalling divide

The answer to the first sub-question is that the comparison does not reveal a simple divide between member states where implementation is proceeding smoothly and those where it is stalling. Instead, preparedness varies significantly by policy area and national starting point. Based on the analysis, it can be confidently stated that none of the four countries examined will have achieved full operational readiness across all relevant components of the Pact by June 2026, although comparative strengths and weaknesses can be identified.

Italy faces significant short-term operational uncertainties, for example regarding screening and border procedures, the setting up of various types of physical infrastructure as well as IT adjustments. At the same time, Italy can build on substantial operational experience at the external border and has undertaken preparatory testing of new procedures. Spain invested in several steps related to the external border process implementation, building on existing operational experience and adaptations undertaken during the preparatory period. Nevertheless, uncertainties remain concerning adequate capacity and the spatial organisation of screening and border procedures, particularly considering variation across its territories.

Belgium presents a different configuration. It has made concrete investments in responsibility transfer capacity, including through case management improvements and dedicated reception for applicants

subject to transfer procedures. These coexist, however, with remaining pressure on its reception system. The Netherlands will enter the application phase with comparatively advanced preparations in areas such as screening and a strong digital case management system, but with no major reported increase in responsibility transfer capacity and a reception system already operating under significant pressure.

The comparison therefore suggests that preparedness should not be understood primarily in terms of whether individual member states are 'ready' or 'not ready'. Virtually all national systems will display areas of relative preparedness with persistent operational, infrastructural or organisational constraints. This differentiated picture is particularly important given the interdependence of the Pact: implementation outcomes will depend on whether specific functions are sufficiently operational across member states to allow successive parts of the system to work as intended.

Answer to sub-question 2: Implementation depends on capacity, cooperation and resilience

The findings suggest that formal legal enactments and adaptations alone are not sufficient to explain differences in preparedness, nor to anticipate future challenges. Implementation capacity is strongly shaped by national pre-existing conditions and the extent to which new Pact requirements can build on new administrative and operational structures.

Member states able to build on well-established or at least pre-existing procedures, infrastructure or digital case management systems will face different implementation challenges from those required to establish entirely new workflows or substantially reorganise their systems. Staffing and administrative capacity are particularly important across Eurodac, screening, border procedures, responsibility determination and reception. Interim arrangements can themselves create additional resource requirements. This is visible, for example, where temporary Eurodac solutions increase reliance on manual processing, with potential consequences for workload and data consistency.

Where national systems already face pre-existing constraints, it will be harder to ensure adequate implementation. This will lead to challenges in the case of countries such as Italy and Spain, considering the gaps they already face in different parts of the system. But Belgium and several other member states will also enter the implementation phase facing pre-existing challenges, for example, with reception systems already operating at high occupancy rates. This will make it harder to overcome structural gaps while also increasing capacity and meeting new requirements.

On top of operational and administrative readiness, political commitment and cooperation between member states will also be of the essence. These matter not only as formal support for the Pact, but in day-to-day choices on systematic registration, information-sharing and ensuring infrastructure and resources. This is particularly apparent in responsiveness to notifications and execution of responsibility transfers, however. Operational capacity will be relevant for executing responsibility transfers, in both responsible countries and states exposed to secondary movements. Responsibility capacity is a dual process: investing in and operationalising transfers in the requesting member states will only deliver outcomes if the same level of capacity is deployed in the receiving member state. This means that national transfer capacity does not guarantee higher transfers without cooperation from other member states. What is also needed is political commitment to adhere to obligations, and address remaining gaps. Similar considerations apply to solidarity, whose functioning will depend on the availability of different forms of contributions, but also on mutual trust and cooperation.

Finally, implementation takes place in a more uncertain migratory and geopolitical context. Despite remaining gaps, comparatively lower arrivals during the preparatory period have provided member states with more favourable conditions to prepare for implementation and adapt their systems. Yet, current or future levels of implementation in a context of low arrivals do not demonstrate how national authorities or systems would perform under greater pressure. Ensuring preparedness and resilience will therefore remain an important variable and success indicator after June 2026.

Answer to sub-question 3: Uneven implementation manifests via concrete CEAS dependencies

The Report shows that implementation gaps in one member state can have consequences on other member states and the reformed CEAS. These effects should not be understood as linear or automatic: implementation dynamics depend on the interaction of legal, operational, administrative and political factors. Nevertheless, the analysis identifies several concrete dependencies through which persistent implementation gaps could affect the functioning and consistency of the wider CEAS.

Eurodac provides one of the clearest examples. The Netherlands and Belgium are less exposed than Italy and Spain to large-scale registration responsibilities at the external borders, but their ability to establish responsibility over asylum applications and execute transfers depends on the availability and quality of data recorded in other countries, as well as on timely and continued updates by authorities of other member states. Delayed or incomplete registration can therefore affect the responsibility system even where Dutch or Belgian administrative capacity is itself adequate.

Similar dependencies arise in relation to screening and border procedures. Where insufficient capacity or operational difficulties prevent these procedures from functioning as intended, applicants may, under certain conditions, move onwards. This can shift administrative responsibilities to other member states, including through screening on the territory or asylum applications.

Responsibility and reception are likewise connected. The practical effectiveness of responsibility rules also depends on adequate reception capacity in responsible member states. Inadequate conditions can create judicial obstacles to the execution of responsibility transfers. Low transfer rates can, in turn, reduce reception capacity and increase the length of stay in member states where applicants must remain, also shaping perceptions of whether responsibility is being effectively enforced.

These dynamics are also visible with the solidarity mechanism. Its practical functioning will be shaped by both benefitting member states' perceptions of whether solidarity contributions are being delivered as well as contributing states' assessment of whether countries eligible for support are maintaining well-prepared systems and fulfilling their own obligations. Limited transfer execution and persistent secondary movements could limit certain contributions, particularly relocations, while increasing the appeal of more pragmatic instruments such as responsibility offsets.

While dependencies cannot be eliminated altogether, the findings do not support the conclusion that persistent gaps in implementation after mid-June 2026 will make the Pact inherently unworkable. Rather, the Pact provides a framework facilitating the convergence of interests and practices. Ultimately, the Pact's success itself will depend on whether implementation gaps are progressively reduced, and its interdependent components are able to function together across member states.

Answer to sub-question 4: Risks and lessons for the Netherlands

The principal systemic risk identified by the Report is not the failure of one instrument in isolation. It lies in the individual as well as cumulative effects of uneven implementation across such interdependent elements. This does not mean that such outcomes are inevitable, as the Pact also introduces a stronger governance and, monitoring mechanisms intended precisely to identify implementation gaps, promote cooperation and trust, and support greater convergence over time.

Yet, based on this assessment, it can be stated that the formal start to the implementation phase on 12 June will not lead to an immediate resolution of the structural challenges that the reforms are intended to address. This may lead to EU-wide political tensions and specific operational risks.

Despite the remaining uncertainty, the Report points to some important overarching lessons. The first concerns the longer transition period during which Dutch authorities will have the possibility to address the most pressing and consequential gaps while also not overlooking structural needs. The second concerns Dutch preparedness. The Report indicates that this is not an isolated matter, but should be

understood within the functioning of the wider CEAS. National investments in screening, responsibility procedures, reception or digital systems will have to address internal shortcomings while also having to mitigate the possible impact of uneven enforcement elsewhere, in this context.

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[1] Occupancy rates vary significantly across the different components of Italy's fragmented reception system, making it difficult to provide a wholly accurate overall occupancy rate.
[2] The Pact comprises the following instruments: Eurodac Regulation, Screening Regulation, Asylum Procedures Regulation, Return Border Procedure Regulation, Qualification Regulation, Asylum and Migration Management Regulation, and the Crisis and Force Majeure Regulation. Further instruments include the (recast) Reception Conditions Directive and the Union Resettlement Framework. The updated mandate of the EU Asylum Agency, proposed alongside the Pact, was already agreed upon in 2021.
[3] Commission Implementing Decision (EU) 2025/2323 pursuant to Article 11 of Regulation (EU) 2024/1351.
[4] European Commission (2025), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2025) 319 final; European Commission (2025), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2025) 795 final; and European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final.
[5] Eurodac is the EU's information system for storing and sharing biometric information of asylum applicants, persons apprehended in relation with an irregular border crossing and persons staying irregularly on the territory.
[6] For asylum numbers, see: Eurostat (2026), "Asylum applications – annual statistics", last updated 16 March 2026, and for irregular border crossings, see: Frontex (2026), "Frontex: Irregular border crossings down 26% in 2025, Europe must stay prepared", News Release, 15 January 2026.
[7] 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.
[8] Radjenovic, Anja (2023), The Hotspot Approach in Greece and Italy, Policy Briefing, Brussels: European Parliamentary Research Service.
[9] Several but not all EU member states had some forms of initial screening in place under national law, prior to the Pact reforms. Italy and Greece also gained experience through the 'hotspot approach'. This process – carried out on several Aegean islands as well as Lampedusa, among others – entailed initial reception, identification, and registration of asylum seekers and other migrants arriving by sea. While useful, this experience also pointed to several critical risks that could re-emerge with the Pact reforms, for instance, in relation to overcrowding and living conditions, and access to the asylum procedure, especially in the event of a sudden rise in irregular arrivals. Compared to screening under the new rules, it should also be noted that the hotspot approach entailed less extensive checks. Sources: Radjenovic, Anja (2023), The Hotspot Approach in Greece and Italy, Policy Briefing, Brussels: European Parliamentary Research Service.
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[11] Jacob, Virginie (2025), Managing migration through data: The expansion and integration of Eurodac, Brussels: European Policy Centre.
[12] Idem, pp. 4-5.
[13] It is worth noting that if no decision is made on an asylum application within the 12-week time limit (or 16 weeks in the case of relocations), the asylum applicant is automatically transferred into the regular asylum procedure.
[14] The current applicable legislation is Directive 2008/115/EC, which will be replaced by the Return Regulation establishing a common system for the return of third-country nationals staying illegally in the Union, once adopted.
[15] Note: the recognition rate is based on 2024 statistics. EU Asylum Agency, "Recognition Rates", *Latest Asylum Trends: Annual Analysis* (accessed 30 May 2026).
[16] It should be noted that some applicants, especially Venezuelans, and to a lesser extent Afghans, are often granted national rather than international forms of protection, which are not regulated at EU level and are therefore counted as negative asylum decisions.
[17] Asylum inadmissibility refers to situations wherein national authorities reject an application for international protection without examining the merits of the underlying claim. This generally contributes to speedier processing of claims.
[18] Council of the European Union (2025), "Asylum Policy: Council and European Parliament Agree on EU List of Safe Countries of Origin", Press Release, 18 December 2025.
[19] ECRE (2025), "AIDA Country Report on the Netherlands — Update on 2024", Brussels: European Council on Refugees and Exiles.

[20] See, for 2024 and 2025 numbers of pending caseloads, Eurostat, "Asylum applications - annual statistics", (last updated 16 March 2026).
[21] Ibid.
[22] Ibid.
[23] EU Asylum Agency (2025), "3.3. Border Procedures", in *Asylum Report 2025*, Luxembourg: Publications Office of the European Union, June 2025.
[24] European Commission (2024), Commission Implementing Decision (EU) 2024/2150 of 5 August 2024 Laying Down Rules for the Application of Regulation (EU) 2024/1348 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, Brussels, OJ L 2024/2150, 9 August 2024.
[25] Molnár, Tamás, "Monitoring Fundamental Rights Compliance in the Context of Screening and the Asylum Border Procedure: Putting Bricks Back into the EU House of Rule of Law?", *EU Immigration and Asylum Law and Policy*, 19 September 2024.
[26] Experts and non-governmental organisations have highlighted the risk of rights violations in the context of border surveillance, which is not covered by the mechanism. This could, accordingly, lessen the chance of identifying unlawful practices, such as pushbacks. Goldner Lang, Iris, "National Independent Monitoring Mechanisms for Fundamental Rights Compliance at the EU's External Borders", *European Papers*, Volume 9, Number 3, pp. 1216–1227.
[27] These involve the physical removal of an asylum applicant to the responsible member state and were known as 'Dublin transfers' under the pre-Pact rules. See Footnote 4 on terminology.
[28] EU Asylum Agency, "National Asylum Developments — Italy", *National Asylum Developments Database* (accessed 29 May 2026); ECRE, "Dublin", Asylum Information Database: Italy, (accessed 29 May 2026).
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[32] CGRS (2026), "Asylum Statistics: Overview 2025", Brussels: Commissioner General for Refugees and Stateless Persons, 27 January 2026.
[33] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 14.
[34] Maiani, Francesco, "Responsibility-Determination under the New Asylum and Migration Management Regulation: Plus Ça Change…", *EU Immigration and Asylum Law and Policy*, 18 June 2024.
[35] Ibid.
[36] Note: The Netherlands were among the top five member states to issue 'take back' requests in 2024. See: Eurostat (2025), "Key Data on the Dublin System in 2024", Luxembourg, 4 July 2025.
[37] The definition of absconding was expanded to situations where an applicant is absent from a reception centre or fails to present themselves to the competent authority.
[38] An overview of 'outgoing' transfer requests by the Netherlands can be found here: Eurostat, "Key data on the Dublin system in 2024", News Article, 4 July 2025.
[39] Note: the reference period here is June 2024-July 2025, not the calendar year 2024 or 2025.
[40] Frontex (2026), "Frontex: Irregular Border Crossings Down 26% in 2025, Europe Must Stay Prepared", Warsaw: Frontex, 15 January 2026.
[41] InfoMigrants, "Migrant Arrivals Rose Last Month in Spain, 30 Percent Drop on 2024", *InfoMigrants*, 4 December 2025.
[42] These figures are laid down in the Asylum and Migration Management Regulation.
[43] EU Asylum Agency (2026), Practical Guide on the Solidarity Mechanism: Operational Implementation of Relocation, Part I, Luxembourg: Publications Office of the European Union, p. 15.
[44] Government of The Netherlands and Government of Belgium, Joint Letter on the European Pact on Migration and Asylum, 3 November 2025.
[45] VluchtelingenWerk Nederland, "Cijfers over Vluchtelingen in Nederland" (last accessed 30 May 2026).
[46] Ibid.
[47] Fedasil (2026), "Reception Figures in 2025", Press Release, Brussels: Federal Agency for the Reception of Asylum Seekers, 30 January 2026.
[48] This policy also applied to families whose minor children filed for asylum after unsuccessful applications by their parents. It is worth noting that in March 2026, the Belgian Constitutional Court ordered the suspension of the law limiting access to reception. The minister in charge, Minister of Asylum, Migration and Social Integration Aneleen Van Bossuyt, however, announced that she would continue applying the policy, sparking debates on the rule of law in the country. The application of the new provisions is subject to ongoing adjudication, while still being applied by authorities, suggesting a continued dynamic of government policy, fluctuating arrival numbers, and intervention by courts. See more here: ECRE (2026), "Belgium: Constitutional Court Suspends Restrictive Asylum Procedures; Minister Refuses to Comply — More than 43,000 Unaccompanied Minors Reported in 10 Years — Increase in Small Boat Departures from Coast", Brussels: European Council on Refugees and Exiles, 12 March 2026.
[49] Agence France-Presse, "Arrivals by Sea to Canary Islands Reached New Record in 2024", *The Guardian*, 2 January 2025.
[50] Kassam, Ashifa, "Record 1,000 Migrants Reach Spain's North African Enclave Ceuta in a Day", *The Guardian*, 17 May 2021.
[51] Government of Spain (2025), "The Government of Spain Has Added 32,000 Places in 10 Years for Asylum Seekers, an Example of International Solidarity", Madrid: La Moncloa, 20 June 2025.
[52] Ibid.
[53] CEAR, "Glosario: Protección Internacional", *Refugiados: Más que Cifras* (accessed 29 May 2026).

[54] See, e.g., ACAPS, "Spain", *ACAPS Country Overview* (accessed 29 May 2026); ECRE, "Conditions in Reception Facilities", *Asylum Information Database: Spain* (accessed 29 May 2026).
[55] Slingenberg, Lieneke, "The New EU Reception Conditions Directive: More Welfare Conditionality for Asylum Seekers", *EU Immigration and Asylum Law and Policy*, 30 September 2024.
[56] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final.
[57] Brandl, Ulrike, "Mix and Match: Detention, 'De-Facto Detention' or Just Restrictions of Freedom of Movement in the New Pact", *EU Immigration and Asylum Law and Policy*, 14 October 2024.
[58] EU Asylum Agency (2024), Guidelines on Alternatives to Detention, Luxembourg: Publications Office of the European Union.
[59] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final.
[60] See Endnote 2 for a full list of the legislative files.
[61] European Commission (2025), Communication on the European Annual Asylum and Migration Report (2025), Brussels, COM(2025) 795 final, pp. 13-14.
[62] Radjenovic, Anja (2024), Secondary Movements of Asylum-Seekers in the EU Asylum System, Brussels: European Parliamentary Research Service, EPRS_BRI(2024)762326.
[63] See recital 8 of Regulation (EU) 2024/1347 on Standards for the Qualification of Third-Country Nationals or Stateless Persons as Beneficiaries of International Protection, Brussels, OJ L 2024/1347, 22 May 2024: "The further approximation of rules on the recognition and content of refugee status and subsidiary protection status should moreover help to limit the secondary movement of applicants for international protection and beneficiaries of international protection between Member States."
[64] Thym, Daniel, "Secondary Movements: Lack of Progress as the Flipside of Meagre Solidarity", *EU Immigration and Asylum Law and Policy*, 3 October 2024.
[65] Ibid.
[66] Neidhardt, Alberto-Horst (2023), "Beyond Relocations and Secondary Movements: Enhancing Intra-EU Mobility of Beneficiaries of International Protection", Brussels: European Policy Centre.
[67] Regulation (EU) 2024/1717 Amending Regulation (EU) 2016/399 on a Union Code on the Rules Governing the Movement of Persons Across Borders, Brussels, OJ L 2024/1717, 20 June 2024.
[68] Note: internal border controls are permitted for an initial period of 6 months and up to a total of 2 years. Prolongations after the initial 6 months must be accompanied by due justifications and a risk assessment by the member state in question. Beyond this period, and in the event of a persisting serious threat, member states may extend for another 6 months, and up to 12 months in total, based on timely notification and justification vis-à-vis the European Commission, Council and Parliament. See: Regulation (EU) 2024/1717 on a Union Code on the rules governing the movement of persons across borders, Article 25a; and for further reading: Thym, Daniel (2024), Reinvigorating Schengen amid Legal Changes and Secondary Movements, Brussels: European Policy Centre.
[69] European Commission, "Temporary Reintroduction of Border Control", (accessed 13 July 2026).
[70] European Commission (2025), Communication on the European Annual Asylum and Migration Report (2025), Brussels, COM(2025) 795 final.
[71] European Commission (2026), European Asylum and Migration Management Strategy COM(2026) 45 final, 29 January 2026.
[72] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 23.
[73] European Commission, "First Annual Migration Management Cycle", *Pact on Migration and Asylum* (accessed 28 May 2026).
[74] Interview with EU institutional representatives, February 2026.
[75] This section draws on the three Communications on the State of Play of Implementation of the Pact on Migration and Asylum by the European Commission as well as insights obtained through interviews with EU and national representatives.
[76] Chamber of Representatives of Belgium, Exposé d'orientation politique – Asile et migration, Doc 56 0767/ (2024/2025), 13 March 2025.
[77] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 5.
[78] Interview with national representatives, April 2026.
[79] Interview with EU institutional representative, March 2026.
[80] EMN Belgium (2026), "Belgian Council of Ministers Approves Draft Legislation for the Implementation of the European Pact on Migration and Asylum", Press Release, 6 March 2026; Government of Belgium (2026), "Implementatie van het Europees Pact inzake Migratie en Asiel: Tweede Lezing", Brussels: News Belgium.
[81] Interview with EU institutional representative (IT), April 2026.
[82] One interviewee suggested that judicial issues could arise with respect to detention measures or other restrictions of movement, for instance. Interview with EU institutional representative, April 2026.
[83] In such a case, the Parliament would have 60 days to convert the decree into law, a process that can be expected to happen without hurdles. Interview with EU institutional representative, April 2026.
[84] Regulation (EU) 2021/2303 on the European Union Agency for Asylum, Brussels, OJ L 468, 30 December 2021.
[85] EU Asylum Agency (2022), EUAA Asylum and Reception Operational Response Catalogue, Luxembourg: Publications Office of the European Union, November 2022.
[86] EU Asylum Agency, "Country Operations", *Operations* (accessed 29 May 2026).
[87] EU Asylum Agency (2025), EUAA Monitoring Mechanism Explained, Luxembourg: Publications Office of the European Union, January 2025.

[88] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 5.
[89] Regulation (EU) 2021/2303 on the European Union Agency for Asylum.
[90] See the Schengen Monitoring Mechanism for comparison: European Commission, "Schengen Evaluation and Monitoring", *Schengen Governance* (accessed 31 May 2026).
[91] European Commission, "Ground Support for Member States Implementing the EU Pact on Migration and Asylum", *Technical Support Instrument: Migration Management* (accessed 28 May 2026)
[92] Interview with EU institutional representative, April 2026.
[93] Interview with national representatives, April 2026.
[94] More information to be found here: IOM Belgium and Luxembourg, "TSI project", accessed 8 July 2026.
[95] Interview with national representatives, February 2026.
[96] EU Asylum Agency (2023), Operating Plan to Spain 2023-2026.
[97] Note: Spain appointed its independent monitoring mechanism after the third implementation report by the Commission, but before the 12 June deadline.
[98] Note: It was suggested, for example, that certain elements of the screening, such as the security and health checks, could first be carried out on Lampedusa, while the vulnerability assessment and completion of the screening form could be done on the mainland. Interview with EU institutional representative, April 2026.
[99] Interview with national representatives, February 2026.
[100] Interview with national representative, February 2026.
[101] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 6.
[102] Interview with national representative, April 2026.
[103] Interview with national representatives, April 2026.
[104] Interview with national representatives, February 2026.
[105] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 8.
[106] Interview with national representative, February 2026.
[107] See, for an overview, including on Italy, here: EU Asylum Agency (2024), "3.3.1. Border Procedures", in *Asylum Report 2024*, Luxembourg: Publications Office of the European Union, June 2024.
[108] Interview with national representative, February 2026.
[109] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 12.
[110] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final.
[111] Interview with EU institutional representative, April 2026.
[112] Trauner, Florian et al. (2025), "Towards a Fairer EU Asylum Policy: Lessons from the Dublin System for the EU's Solidarity Mechanism", Brussels: European Policy Centre.
[113] Interview with national representatives, February 2026.
[114] Interview with national representatives, April 2026.
[115] Council Implementing Decision (EU) 2025/2642 on the establishment of the Annual Solidarity Pool for 2026.
[116] Interview with EU institutional representative, April 2026.
[117] Government of Spain (2025), "Spain Leads the Drafting of the Implementation Plan of the European Migration and Asylum Pact", Madrid: La Moncloa, 17 March 2025.
[118] Council Implementing Decision (EU) 2025/2642 on the establishment of the Annual Solidarity Pool for 2026; Interview with national representatives, February 2026.
[119] Interview with national representatives, February 2026; and interview with EU institutional representative, March 2026.
[120] VRT NWS (2025), "Belgium Opts to Pay Rather than Take in Additional Asylum Seekers", *VRT NWS*, 9 December 2025; EMN Belgium (2026), "Belgium Commits Financial Contribution to EU Annual Solidarity Pool for 2026", Brussels: European Migration Network Belgium.
[121] Note: The Toolbox encompasses operational support through EU agencies, EU funding, and the Civil Protection Mechanism. Interview with national representative, February 2026.
[122] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final, p. 10.
[123] Central Agency for the Reception of Asylum Seekers (COA) (2026), "Capaciteit en bezetting", (last accessed 15 September 2026).
[124] Fedasil (2026), "Reception Figures in 2025", Press Release, Brussels: Federal Agency for the Reception of Asylum Seekers, 30 January 2026.
[125] RTBF, "Négociations gouvernementales et immigration: un objectif de réduction budgétaire de 1,6 milliard", 30 January 2025.
[126] Fedasil, "Reception of asylum-seekers", (accessed 14 July 2026).
[127] Fedasil (2025), "Réduction de la capacité MENA", Press Release, 12 June 2025.
[128] The Italian reception system comprises different types of facilities, with differences in access, conditions and occupancy across them.
[129] ECRE, "Short Overview of the Italian Reception System", *Asylum Information Database: Italy* (accessed 28 May 2026).
[130] Interview with international organisation, March 2026.
[131] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 10.

[132] It is worth noting that applicants are gradually phased out of reception, with those in the final 'autonomy' phase not admitted to regular accommodation but instead expected to organise their housing privately. ECRE (2025), AIDA Country Report on Spain — Update on 2024, Brussels: European Council on Refugees and Exiles, April 2025.
[133] ECRE, Conditions in reception facilities - Spain, (last accessed 15 September 2026).
[134] ECRE (2025), AIDA Country Report on Spain — Update on 2024, Brussels: European Council on Refugees and Exiles, April 2025, p. 18. Note: The Reception Conditions Directive stipulates that contingency planning ought to be reviewed at least every three years. Seeing as member states were required to submit their contingency plans in 2025, the earliest this would happen, unless necessary due to changed circumstances, would be in 2028.
[135] Interview with national representative, April 2026.
[136] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final.
[137] Interview with EU institutional representative, April 2026.
[138] Note: In February 2026, an additional €115 million were allocated for the implementation of new laws in the field of migration and asylum, including the Pact. Tweede Kamer der Staten-Generaal (2026), "Begroting Asiel en Migratie Afgerond", The Hague: House of Representatives, 5 February 2026; Interview with national representative, February 2026.
[139] Interview with national representatives, April 2026.
[140] An overview of eligible actions under AMIF can be found in Annex VI of the AMIF Regulation, for example: Regulation (EU) 2021/1147 Establishing the Asylum, Migration and Integration Fund, Brussels, OJ L 251, 15 July 2021.
[141] Interview with national representative, February 2026.
[142] Note: certain elements of implementation, such as the hiring of additional, permanent staff as opposed to the secondment of national experts, for example, cannot be funded through EU money.
[143] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 3.
[144] European Commission (2024), Common Implementation Plan for the Pact on Migration and Asylum, Brussels, COM(2024) 251 final.
[145] In 2018, the Commission launched legal proceedings against Hungary for measures that restricted access to asylum and resulted in detention in transit zones and inadequate procedural guarantees in the return procedure. The Court of Justice of the EU (CJEU) held that Hungary failed to fulfil its obligations on a number of counts. This was reaffirmed four years later, in 2024, when the CJEU ordered Hungary to pay a fine of €200 million, with additional penalties for any delays in implementing the asylum and return procedure. However, this did not lead to a change in policy and practice, and was instead weaponised by Orbán's government against the EU. See: Court of Justice of the European Union (2020), Press Release No. 161/20: Judgment in Case C-808/18 — Commission v Hungary — Hungary Has Failed to Fulfil Its Obligations under EU Law in the Area of Procedures for Granting International Protection, Luxembourg, 17 December 2020; Court of Justice of the European Union (2024), Press Release No. 99/24: Judgment in Case C-123/22 — Commission v Hungary (Reception of Applicants for International Protection II) — Hungary Is Ordered to Pay a Lump Sum of 200 Million Euros and a Penalty Payment of 1 Million Euros per Day of Delay, Luxembourg, 13 June 2024.
[146] In the context of the above-mentioned CJEU judgment, the penalties were considered particularly high, with the Court far exceeding what the Commission had initially foreseen. See Barrett, Gavin, "Rule of Law Chickens Coming Home to Roost", *Verfassungsblog*, 21 June 2024.
[147] Interview with international organisation, March 2026.
[148] Jacob, Virginie (2025), Managing migration through data: The expansion and integration of Eurodac, Brussels: European Policy Centre.
[149] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final.
[150] Interoperability of EU-databases is still under development. Europol (2026), "Interoperability with EU large-scale IT systems", 11 February 2026.
[151] Ibid., p. 10.
[152] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 8, footnote 34.
[153] Interview with international organisation, March 2026.
[154] Interview with national representative, February 2026.
[155] EMN (2022), Detention and alternatives to detention in international protection and return procedures, European Migration Network, p. 6.
[156] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, pp. 19-20, footnotes 95 and 97.
[157] Neidhardt, Alberto-Horst (2026), "Mind the Gaps: Implementing the Pact's Screening and Border Procedures", *The Progressive Post*, Brussels: Foundation for European Progressive Studies (FEPS).
[158] 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, Article 18, para 5.
[159] The Netherlands notified the temporary reintroduction of border control until 30 September 2026 at the land borders with Belgium and Germany on the ground of serious threat to public policy caused by high levels of asylum application, irregular migration and secondary movements overburdening the migration system. European Commission, "Temporary Reintroduction of Border Control", (last accessed 13 July 2026).
[160] 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, Article 8, para 4.
[161] The European Court of Human Rights (ECtHR) ruled that transferring asylum seekers to Greece violated Article 3 (prohibition of degrading treatment) due to systemic deficiencies in Greece's asylum procedure and detention conditions. ECtHR (2011), M.S.S. v. Belgium and Greece, application 30696/09.

[162] In Belgium, for instance, transfers from the Netherlands have resumed due to the low numbers of arrivals leading to more available reception capacity not because of a structural transformation of the reception system.
[163] Interview with EU institutional representatives, January 2026; interview with national representatives, February 2026.
[164] Radjenovic, Anja (2024), Secondary Movements of Asylum-Seekers in the EU Asylum System, Policy Briefing, Brussels: European Parliamentary Research Service, p.8.
[165] See Art. 23, para 1 and 2, Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection (recast).
[166] Interview with national representatives, February 2026.
[167] Interview with national representatives, January 2026; Interview with EU institutional representatives, February 2026.
[168] The European Court of Auditors found that the emergency relocation schemes for Greece and Italy did not meet their targets and that results remained below initial expectations, despite increased capacity and extensive EU support. European Court of Auditors (2019), Special report 24/2019: Asylum relocation and return of migrants: Time to step action to address disparities between objectives and results, p.35.
[169] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p. 17.
[170] Interview with national representative, February 2026.
[171] Interviews with national representatives, February 2026.
[172] Interview with national representative, February 2026.
[173] Interview with EU institutional representative, January 2026.
[174] Interview with national representatives, February 2026.
[175] Fundamental Rights Agency (2026), Migration and Fundamental Rights Bulletin 1/2026, Section 7.1., 21 April 2026.
[176] Regular asylum applicants vs "responsibility" cases.
[177] In March 2026, in Belgium, the Constitutional Court ordered the suspension of a law limiting reception rights for asylum applicants who already received international protection in another member state. Minister of Asylum and Migration stated she had no intention to suspend the law as the policy is having an effect. ECRE (2026), "Belgium: Constitutional Court Suspends Restrictive Asylum Procedures; Minister Refuses to Comply — More than 43,000 Unaccompanied Minors Reported in 10 Years — Increase in Small Boat Departures from Coast", Brussels: European Council on Refugees and Exiles, 12 March 2026.
[178] Interview with EU institutional representative, March 2026.
[179] EU Asylum Agency (2025), Digital Transformation of Asylum and Reception Systems, Situational Update No. 23.
[180] Interview with national representative, April 2026.
[181] EU Asylum Agency (2026), Operational Standards and Indicators on Reception including Vulnerability-related Aspects, p. 20.
[182] Italy introduced remote judicial hearings. See: EU Asylum Agency (2025), *op.cit.*
[183] EU Asylum Agency (2025), *op.cit.*
[184] European Commission (2026), Communication on the State of Play of Implementation of the Pact on Migration and Asylum, COM(2026) 196 final, p.15, footnote 74.
[185] Belga News Agency (2022), "New Dublin centre in Belgium aims to speed up return of asylum seekers in transit", *Belga News Agency*, 26 August 2022.
[186] EU Asylum Agency (2025), Guidance on Contingency Planning and Preparedness in the Asylum Procedure.
[187] ICMPD (2026), "Romania and ICMPD host first live simulation to test EU Migration Pact readiness", Press Release, 30 April 2026.
[188] EU Asylum Agency (2025), "Frontex, EUAA, Europol and Italy pilot new screening process in Lampedusa", News Release, 27 October 2025.