

Can the Pact on Migration and Asylum deliver a coherent asylum regime?

15 SEPTEMBER 2026

Julian Zrenner



Photo by Laura Chouette on Unsplash

Introduction

On 12 June 2026, the New Pact on Migration and Asylum passed from legislative promise into operational reality, marking the deadline by which the ten regulations constituting the Pact became directly applicable across the Union. Conceived as the structural response to the paralysis exposed by the 2015 crisis and the collapse of the Dublin logic that preceded it, the Pact was framed by its architects as nothing less than a reset of the Common European Asylum System: a calibrated exchange of mandatory solidarity for reinforced external border control, of harmonised screening for accelerated returns. Yet a Regulation adopted in Brussels binds by virtue of its direct applicability, but it does not thereby produce a common system; it must still be absorbed into twenty-seven, or, including Schengen-associated States, thirty distinct constitutional orders, administrative cultures and political economies of migration. The Pact's first anniversary

of operability offers, therefore, a natural — and rare — vantage point from which to ask whether a single legal text is in fact generating a single legal reality.

This article takes up that question through a comparative legal and empirical assessment of the state of play of the Pact's implementation across a selection of Member States. Rather than attempting the exhaustive, Union-wide census better suited to the Commission's own periodic State of Play reporting, it isolates four national trajectories — Greece, Poland, Spain and Germany — and reads each against the same regulatory baseline: the National Implementation Plans required under Article 84 of the Asylum and Migration Management Regulation, the domestic legislation enacted or withheld to transpose the Pact's border, screening and solidarity mechanisms, and the growing body of judicial and administrative practice generated since June 2026.

The remaining twenty-three Member States fall outside this coverage, as does the wider political controversy over migration policy as a matter of principle. Both exclusions are deliberate. The former follows from a case-selection logic oriented not towards statistical representativeness but towards typological contrast: Greece and Poland are frontline States whose responses diverge respectively into administrative opacity coupled with physical containment and into open statutory divergence; Spain is a frontline, solidarity-beneficiary State whose formally compliant plan has stalled in domestic legislative paralysis; Germany, a solidarity-contributor State with no comparable exposure at the external border, meets its deadlines on paper only to encounter the internal friction of its own federal architecture and of the Schengen framework it helped design. Read together, these four postures sketch a spectrum of implementation gaps rather than a single case study. The latter exclusion is methodological: this article is concerned with compliance, not policy — with whether States are doing what the Pact requires of them, not with whether the Pact ought to require it.

The inquiry carries practical stakes that extend well beyond the text of the Regulations themselves. Every gap this article identifies between a National Implementation Plan and its domestic execution translates, for the individual asylum seeker, into a gap between a right on paper and a remedy in practice — whether that gap takes the form of a screening procedure conducted without published rules, a border denied outright, a deadline the national constitution cannot accommodate, or a Land unable to feed data into a federal register. Legal practitioners advising claimants, national administrations attempting good-faith transposition, and the NGOs and oversight bodies tasked with monitoring compliance all depend on precisely this kind of granular, comparative mapping to know where the Pact's promises currently hold and where they do not.

The scientific interest is more circumstantial, but no less real. Because the Pact became operational only in June 2026, the academic literature

addressing its implementation — as opposed to its drafting or its text — remains nascent, and what exists tends towards single-country reporting or thematic analysis confined to a single mechanism, such as the solidarity pool or the screening procedure. Comparative work that reads several national trajectories against one another, in order to expose a typology of implementation postures rather than a catalogue of national facts, remains largely absent. This article’s contribution lies in that comparative reading.

Its answer, briefly stated, is that formal uniformity is producing substantive divergence: the same ten regulations have generated, within little more than a year, at least four distinct modes of national response — securitised over-compliance, open statutory defiance, legislative paralysis, and federal fragmentation — none of which yet delivers the coherent, rights-compliant asylum architecture the Pact was designed to guarantee.

The Greek vanguard

Beneath the azure skies of the Aegean, Greece has spent the last decade serving as the primary maritime shield of the European Union, absorbing waves of irregular arrivals that have consistently strained its domestic reception systems (European Commission, 2025a). Yet, as the new pact comes into effect, this massive financial injection has supported a system characterized by structural non-disclosure, shrinking legal safeguards, and the physical containment of vulnerable populations (EPIS, n.d.).

The national implementation plan covered by administrative secrecy

The Common Implementation Plan drafted by the European Commission required all member states to submit detailed National Implementation Plans (NIPs) by December 2024, outlining the regulatory, financial, and operational modifications required to align with the Pact (Rabat Process, 2026). While twenty-eight of thirty EU and Schengen-associated countries submitted these documents by early 2026, Greece, as Belgium, Croatia, Cyprus, Denmark, Finland, Iceland, Italy, Latvia, Norway, Portugal, Romania refused to make its NIP publicly available (European Union Agency for Asylum, 2026). This lack of transparency has hindered the ability of civil society, independent oversight bodies, and academic researchers to evaluate the country’s actual readiness to implement the pact’s legal protections (EPIS, n.d.).

This administrative opacity has sparked significant legal resistance (Migreurop, 2025). In early 2025, approximately fifty European civil society organizations petitioned the European Commission, denouncing the systemic withholding of implementation documents as a violation of public access regulations (Migreurop, 2025). In Greece, the lack of transparency directly correlates with critical delays in establishing the legal and administrative safeguards mandated by the Pact (“The migration pact is here,” n.d.). Although the new rules require independent fundamental

rights monitoring mechanisms to ensure border screenings comply with international law, Greece was identified in mid-2026 as one of six member states—alongside Cyprus, Belgium, Hungary, Italy, Malta, Sweden—that had failed to designate or fund such an oversight body (“The migration pact is here,” n.d.). The restriction of access to free legal advice, particularly in the context of new migration management arrangements, constitutes a significant erosion of fundamental procedural guarantees (“The migration pact is here,” n.d.). By substituting individual support with degraded models, states like Greece directly compromise the right to an effective remedy and the fairness of asylum procedures. This limitation alters the very structure of international protection by causing an erosion of the right to an effective remedy as guaranteed by Article 13 of the ECHR, since without qualified legal counsel, asylum seekers are unable to understand the administrative and legal complexities of their case. This opacity prevents the formulation of relevant remedies, transforming access to justice into a theoretical formality rather than a concrete protection, while opening the way to arbitrary procedures. The use of group counselling models for dozens of people simultaneously is inconsistent with the requirement of individual review of applications, negating the specificity of protection needs and increasing the risk of refoulement or misassessment. This system also reinforces the imbalance of power vis-à-vis the administration, transforming the procedure into a logic of purely administrative flow management to the detriment of substantial guarantees and violating the principle of equality of arms. By depriving individuals of the opportunity to articulate their claim for protection, states do not merely limit access to asylum; they weaken the very foundation of human rights, which requires that any measure restricting freedom be subject to a full and informed judicial review.

This systemic failure to protect procedural rights is unfolding under intense judicial scrutiny (Greek Council for Refugees, 2026). On June 23rd of 2026, the European Court of Human Rights issued three landmark judgments condemning Greece for violating the right to family life (Article 8 of the ECnHR) and failing to provide effective remedies (Article 13 of the ECnHR) for recognized refugees seeking family reunification (Greek Council for Refugees, 2026). Concurrently, the domestic legal environment has grown increasingly hostile to civil society; Legal immigration policies and integration of Directive (Law 5275/2026) introduced administrative controls, criminal penalties targeting NGOs and humanitarian workers (Legal Centre Lesvos, 2026).

The Architecture of the Greek Containment

The Greek legal framework physically embodied its island geographic infrastructure (Refugee Support Aegean, n.d.). The open-air “hotspot” camps of the past – exemplified by the destruction of the Moria facility on Lesvos in 2020 – have been systematically replaced by Closed Controlled

Access Centres (CCACs)(European Commission, 2025a). Those centres are mostly governed by domestic law, their procedures aren't anymore soaked with former EU asylum law (Council Decisions 2015/1523 and 2015/1601; Dublin regulation No 604/2013...) due to this new legal framework.

These facilities operate under strict security protocols (Refugee Support Aegean, n.d.). Under the Greek Asylum Code, all newly arrived individuals face an automatic restriction of movement within these centers for up to twenty-five days during initial registration and screening (Refugee.Info Greece, 2026). In practice, this restriction operates as an indiscriminate detention policy, unfortunately applied without individualized assessments (Refugee.Info Greece, 2026). Ten years after the first mass migration wave, the Greek legal system is still aiming for procedural efficiency rather than individual assessment.

This strict legal framework leads, finally, to consequences on Greece's national criminal law. De facto, under the national transposing legislation (Law 5226/2025), rejected applicants face arrest and prosecution for "illegal stay" rather than standard administrative return processes(Legal Centre Lesvos, 2026).

The Polish legal framework

While Greece has channeled EU funding into a compliant model of securitized integration, Poland has adopted a policy of distinct national divergence regarding Pact mandates (EPIS, n.d.). Under Prime Minister Donald Tusk, Warsaw has positioned itself as the eastern geopolitical anchor of European defense, actively rejecting the supranational mandates of the New Pact. By linking migration management to territorial defense and hybrid warfare, Poland has constructed an alternative statutory path that prioritizes national sovereignty over the solidarity formulas designed in Brussels (EPIS, n.d.).

Statutory non-compliance under asylum and migration management regulation articles 7 and 84

Poland refuses to execute the Asylum and Migration Management Regulation (AMMR; Reg. 2024/1351) and, alongside Hungary, refused to submit a National Implementation Plan by December 2024. Instead, Warsaw relies on Article 7 to adopt a National Strategy, justifying its rejection of mandatory relocations and €20,000 penalties through the doctrine of exceptional domestic burden following the 2022 Ukrainian influx. To solidify this, Parliament passed the "Phasing Out Act" (effective March 2026), repealing the 2022 Ukrainian Special Act and moving temporary protection into the general Act on Granting Protection. This imposed strict administrative hurdles on Ukrainian refugees, including mandatory identity checks, registration deadlines, capped assistance, and exclusion from asylum infrastructure.

Friction with the EU centers on the Belarus border. Rather than using EU-level crisis derogations under Regulation (EU) 2024/1359, Poland enacted unilateral measures. On March 26, 2025, Poland amended its protection act to legalize the “instrumentalisation of asylum” (Article 33a), empowering the executive to suspend international protection applications in border zones facing hybrid pressure. The Council of Ministers enacted a 60-day suspension on March 27, 2025, which was repeatedly renewed through 2026. Border Guards’ routine refusals to register asylum claims directly contradict TFEU Article 78(1) and the EU Asylum Procedures Regulation.

This framework triggered severe international and domestic backlash. Poland defied European Court of Human Rights Rule 39 interim measures ordering it not to return stranded migrants to Belarus. Domestically, groups like the Helsinki Foundation for Human Rights filed landmark lawsuits. On May 28, 2026, the first pushback case was argued in Polish administrative courts, challenging Article 33a as a direct violation of Article 56(2) of the Polish Constitution and Article 33 of the 1951 Geneva Convention.

The former Belarus border exception

Poland’s hardline stance is physically manifested along its 400-kilometer border with Belarus, which has been the site of a state-sponsored hybrid crisis since mid-2021 (United Nations High Commissioner for Refugees, 2026b). Citing the deliberate weaponization of migration by Minsk and Moscow, Prime Minister Tusk announced a temporary, territorial suspension of the right to apply for asylum in October 2024 as part of the country’s 2025–2030 migration strategy (Amnesty International, 2024).

On March 26th of 2025, the Polish government amended its law on protection, formally introducing the legal concept of “instrumentalisation” (Asylum Information Database, 2026). This amendment allowed the government to temporarily suspend the acceptance of asylum applications at the Belarusian border (European Council on Refugees and Exiles, 2026). The suspension, activated on March 27th, for an initial sixty-day period, remained in force throughout the year, effectively denying access to territorial asylum procedures for thousands of individuals entering from Belarus (European Council on Refugees and Exiles, 2026).

These policy decisions have created challenges regarding compliance with international standards. In November 2025, the European Border and Coast Guard Agency (Frontex) took the unprecedented step of halting a joint operation to return Pakistani nationals from Poland. This decision followed a formal intervention by an independent NGO, which proved that the individuals had been denied their fundamental right to apply for asylum in Poland, in direct violation of the principle of non-refoulement (United Nations High Commissioner for Refugees, 2026b).

The new pact still allows this type of exception, by extending their regime. As an example, legal border procedures (mandatory under the new pact), were extended by up to 6 additional weeks (18 weeks in total). In tandem with the amendments to the Schengen border code, States can temporarily close or limit operating hours at specific border crossing points. But, the pact does not permit member States to completely suspend the right to apply for international protection or deny individuals access to protection procedures entirely. Finally, Poland has to argue that the State functions are truly at risk. The European commission, granting the exception, will monitor the necessity and the proportionality of the measures.

Spain's missing rulebook

Solidarity beneficiary without domestic legal framework

Spain is among the Member States most exposed to irregular migration. However, Spain lacks a compliant domestic legal framework. It is the only Member State with a land border in Africa and faces continued irregular border crossings along both Atlantic and mediterranean routes. In 2024, Spain recorded 56,976 irregular entries, while also receiving about 17% of all asylum applications across the Union that year. (Ministerio del Interior, 2024, pp. 7–8) Yet, the Pact's operational phase started without Spain having passed primary legislation its own National Implementation Plan set out. (Europa Press, 2026)

The country is a solidarity beneficiary rather than net contributor under the solidarity mechanism. (European Commission, 2025b, p. 3) Under Article 11 of the Asylum and Migration Management Regulation, a member state may be designated as being under migratory pressure, when irregular migratory arrivals place disproportionate pressure on its asylum and migration system. (Regulation (EU) 2024/1351, art. 11(3)) Given Spain's exposure to large migratory arrivals following search and rescue operations, the Commission designated it as a member state under migratory pressure in its late 2025 European Annual Asylum and Migration Report. (European Commission, 2025b, p. 20) Consequently, Spain is entitled to benefit from the solidarity mechanism set to redistribute responsibility among the Union.

Facing this domestic legislative deadlock, Spain bypassed its parliament entirely. On June 11, 2026, the Subsecretaría del Ministerio del Interior issued an instruction directing civil servants to apply the EU Pact directly and ignore any conflicting national provisions. By invoking the primacy doctrine of the Court of Justice of the European Union, the executive branch effectively circumvented domestic legislation to enforce compliance.

Constitutional hurdles

Spain can't implement the Pact's screening procedure within the time its constitution allows. In Article 8 a seven-day time frame for identity, health, security, and vulnerability check on all third-country nationals apprehended at the external border is introduced (Regulation (EU) 2024/1356, art. 8). Conversely, Article 17(2) of the Spanish constitution caps police arrest without judicial authorization at 72 hours (Constitución Española, art. 17(2)).

This conflict is acknowledged by their National Implementation Strategy, which states that an extension of police arrest from 3 to 7 days is therefore not achievable (Ministerio del Interior, 2024, pp. 6, 14). However, they aim to maximize efficiency by completing all screening operations within 72 hours (Ministerio del Interior, 2024, p. 14). While police custody at Temporary Care Centres for Foreigners (CATEs) lasts up to 72 hours, a judicial transfer to a Detention Centre for Foreigners (CIE) is possible for up to 60 days. The judicial phase covers the following border procedure under the APR (2024), the screening must be completed before that transition. Although this is in compliance with the 7-day maximum screening duration set by the pact and does therefore not constitute non-compliance outright, academic analysis states that CATEs lack formal legal regulation and that access to legal assistance has been a concern (Sacramento et al., 2025, pp. 7–9).

Unresolved Infringement

Spain's second legal gap existed before the Pact and continues to be unresolved. Directive 2008/115/EC, known as the Return Directive, sets the common standards that Member States must follow when returning illegally staying third-country nationals (Directive 2008/115/EC, art. 1). This Directive serves as the legal basis for the Pact's return border procedure (Regulation (EU) 2024/1348, art. 37). The Commission opened an infringement case in 2014 for Spain's failure to establish a return procedure consequent on a negative asylum decision, escalating it with an additional letter of formal notice in 2022 (European Commission, 2022). Spain's National Implementation Plan acknowledges this (Ministerio del Interior, 2024, p. 23), with no Commission closure identified as of July 2026.

El Hierro and the Primacy doctrine

As of July 2026, Spain's implementation of the Pact is documented. Courts are applying the Pact's return and border asylum procedures. In June 2026, shortly after the Pact entered into force, a court in the Canary Islands authorised the detention of 82 Senegalese migrants on El Hierro, marking the first large-scale return procedure under the Pact (InfoMigrants, 2026b). The Commission's July 2026 assessment deemed Spain's operational cooperation as "adequate" (Council of the European Union, 2026, p. 7).

Germany's federal constraints

Solidarity contributor

Germany is not a frontline state at the periphery of the Union. Still, Germany received the highest amount of first-time asylum applications in the Union in 2024: 229,751 and 39,646 in the first half of 2026 (Bundesamt für Migration und Flüchtlinge, 2025, 2026a). The country is also a primary target for secondary migration (InfoMigrants, 2024). Designated as solidarity contributor, Germany is obligated to ensure relocations or financial contributions to pressure states rather than receive them (Regulation (EU) 2024/1351, arts. 11–12).

Under the Pact, a Member State not under migratory pressure is designated a solidarity contributor, obligated to pledge relocations or significant financial contributions to the Annual Solidarity Pool (Regulation (EU) 2024/1351, arts. 11–12). This designation is assessed across irregular border crossings, applications, and unauthorised secondary movements. The Commission's assessment for 2025 decided Germany's institutional capacity capable of absorbing these figures without reaching a disproportionate strain threshold, as applications predominantly arise out of secondary movements between Member States rather than external border arrivals (Regulation (EU) 2024/1351, art. 2(24); Commission Implementing Decision (EU) 2025/2323).

Germany submitted its National Implementation Plan to the European Commission in December 2024 (Bundesministerium des Innern und für Heimat, 2024). In contrast to Spain, Germany started its legislative process for implementation early. The Federal Cabinet adopted the draft bill on 6. November 2024 (Bundesministerium des Innern und für Heimat, 2024, p. 3). The new government adopted two new bills on 3. September 2025 (Bundesministerium des Innern und für Heimat, 2025). The Bundestag passed both bills in February 2026, with the Bundesrat's approval swiftly following in March 2026. Most provisions went into force alongside the Pact itself on 12. June 2026 (Bundesministerium des Innern und für Heimat, 2026; InfoMigrants, 2026a).

Federal hurdles

The most significant challenge to Germany's implementation of the Pact comes from its constitutional division of competencies. Article 20 (1) of Germany's Basic Law established a federal state structure. Under Article 83 of the Basic Law, the States (Länder) execute federal laws (Grundgesetz, arts. 20, 83). So, while the Federal Government can legislate the Pact's required statutes, they cannot control for each state's direct implementation. This is acknowledged by the Implementation Plan directly (Bundesministerium des Innern und für Heimat, 2024, p. 3). The Federal government conducts the asylum procedure, while the Länder are responsible for accommodation and social care of asylum applicants (Bundesministerium

des Innern und für Heimat, 2024, p. 3). Each Land operates independent data systems alongside the federal, central register. However, they recognize the need to build a national system for data integration that is capable of control and monitoring admissions conditions (Bundesministerium des Innern und für Heimat, 2024, p. 3).

Challenging Schengen, and the Pact?

Germany's reinstatement of border controls alongside its European neighbors challenges the Schengen framework. Article 25 of the Schengen Regulation states that Member States may introduce internal border controls temporarily in cases of serious threats to public policy or internal security. The regulation sees border controls at internal borders only to be introduced as a last resort, questioning Germany's legal basis (Regulation (EU) 2016/399, arts. 25–28). In June 2026, the Commission issued a formal opinion regarding the necessity and proportionality of Germany's border checks, challenging Germany's claims. The Commission emphasized the role of the new Pact in tackling Germany's security concerns as to irregular migratory movements (European Commission, 2026a). Administrative courts have also found the controls to be unlawful under EU law (Züllig & Salomon, 2026).

The border checks are not directly in violation of the Pact, but they are not intended. As the regulation points out, the Union should “ensure the absence of internal border controls for persons and frame a common policy on asylum, immigration and management of the external borders of Member States [...]” (Regulation (EU) 2024/1351, recital 1). The Pact intends to prevent secondary movements within a Unionwide framework (Regulation (EU) 2024/1351, arts. 10–12, 24). Germany's border checks don't rely on collective enforcement, but rather on National border management.

The Commission's May 2026 State of Play report states that Germany has adopted most of the relevant national legislation (European Commission, 2026b, p. 5). At the same time, the Commission urged Germany, among other Member States, to step up its implementation, increasing border procedure capacity (European Commission, 2026b, p. 7, n. 34). Questions remain concerning operations. Germany's Federal Office for Migration and Refugees verified in June 2026 that border procedure infrastructure remains incomplete. As of June 2026, the Office confirmed multiple locations established for border procedures, while others are still pending (Bundesamt für Migration und Flüchtlinge, 2026b).

Conclusion

The four trajectories traced above return a single answer to the question posed at the outset: the New Pact on Migration and Asylum has produced formal uniformity without substantive convergence. A single set of regulations, directly applicable across thirty States since 12 June 2026, has generated within little more than a year at least four distinct modes of

domestic reception, none of which yet amounts to the coherent, rights-compliant asylum architecture the Pact was designed to deliver.

Greece illustrates compliant containment: a securitised architecture of closed centres and administrative secrecy pursued at the expense of individual assessment and effective remedy. Poland pushes that same frontline exposure into open statutory defiance, unilaterally suspending the right to asylum along its border with Belarus in disregard of interim measures from the European Court of Human Rights. Spain shows a third failure mode, paralysis rather than defiance: a compliant plan stalled by the absence of a parliamentary majority, forcing the executive to bypass its own legislature. Germany, finally, demonstrates that distance from the external border offers no immunity, as its own federal division of competences and its reintroduction of internal border controls sit uneasily against the Pact's demand for centralised implementation.

Taken together, these postures suggest that the gap between Union law and national practice is structural, not incidental, to the Pact's first year of operation. Direct applicability has bound Member States to a common text; it has not yet bound them to a common practice. Whether the Commission's ongoing monitoring can close that gap, or whether these four trajectories will instead harden into permanent features of a differentiated European asylum landscape, is a question the implementation period ahead will answer.

References

- Amnesty International. (2024, October). Poland: Plans to suspend the right to seek asylum "flagrantly unlawful." <https://www.amnesty.org/en/latest/news/2024/10/poland-plans-to-suspend-the-right-to-seek-asylum-flagrantly-unlawful/>
- Asylum Information Database. (2026, July 30). Overview of the main changes since the previous report update: Poland. European Council on Refugees and Exiles. <https://asylumineurope.org/reports/country/poland/overview-main-changes-previous-report-update/>
- Bundesamt für Migration und Flüchtlinge. (2025, January 9). Asylzahlen Gesamtjahr und Dezember 2024 [Asylum figures for 2024 and December 2024]. <https://www.bamf.de/SharedDocs/Meldungen/DE/2025/250109-asylzahlen-dezember-und-gesamtjahr-2024.html>
- Bundesamt für Migration und Flüchtlinge. (2026a, July 3). Asylzahlen Juni 2026 [Asylum figures, June 2026]. <https://www.bamf.de/SharedDocs/Meldungen/DE/2026/260703-asylzahlen-juni-2026.html>
- Bundesamt für Migration und Flüchtlinge. (2026b, June 12). Was wird sich mit der Reform des Gemeinsamen Europäischen Asylsystems (GEAS) ändern? [What will change with the reform of the Common European Asylum System?] (Pressemitteilung Nr. 06/2026). <https://www.bamf.de/SharedDocs/Pressemitteilungen/DE/2026/260612-geas-reform.html>

- Bundesministerium des Innern und für Heimat. (2024, December 20). Nationaler Implementierungsplan (NIP) für Deutschland zur Umsetzung des Gemeinsamen Europäischen Asylsystems [National implementation plan for Germany for the implementation of the Common European Asylum System].
- Bundesministerium des Innern und für Heimat. (2025, September 3). Federal Cabinet adopts bills to transpose the Common European Asylum System into German law [Press release]. <https://www.bmi.bund.de/SharedDocs/pressemitteilungen/EN/2025/09/geas-umsetzung.html>
- Bundesministerium des Innern und für Heimat. (2026, March 27). The Bundesrat approves legislation to implement the EU Pact on Migration and Asylum [Press release]. https://www.bmi.bund.de/SharedDocs/pressemitteilungen/EN/2026/03/geas_bundesrat_en.html
- Council of the European Union. (2026, July 16). Assessment on the application of the new asylum responsibility rules (ST-12021-2026-INIT). <https://data.consilium.europa.eu/doc/document/ST-12021-2026-INIT/en/pdf>
- EPIS. (n.d.). Comparative legal and operational assessment document on EU Pact implementation in Greece and Poland [Unpublished manuscript]. https://drive.google.com/open?id=1chE4eycnkTpBLpLcOKMA8oBvRiZBUk_3
- Europa Press. (2026, June 1). España aplicará el nuevo Pacto Europeo de Migración y Asilo sin una ley nacional que adapte los recursos judiciales [Spain will apply the new European Pact on Migration and Asylum without a national law adapting judicial remedies]. <https://www.europapress.es/epsocial/migracion/noticia-espana-aplicara-nuevo-pacto-europeo-migracion-asilo-ley-nacional-adapte-recursos-judiciales-20260601190110.html>
- European Commission. (2022, September 29). September infringements package: Key decisions [Press release]. https://ec.europa.eu/commission/presscorner/detail/en/inf_22_5402
- European Commission. (2025a, April 4). Communication from the Commission to the Council and the European Parliament (COM(2025) 170 final). EUR-Lex. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0170>
- European Commission. (2025b). The European annual asylum and migration report (COM(2025) 795 final).
- European Commission. (2026a, June 2). Opinion on the necessity and proportionality of the temporary reintroduction of internal border controls by Germany (C(2026) 3557 final). https://home-affairs.ec.europa.eu/document/download/821dcdcf-2cea-4d21-a70a-ff66f1e3f240_en
- European Commission. (2026b, May 8). State of play on the implementation of the Pact on Migration and Asylum (COM(2026) 196 final).

- https://home-affairs.ec.europa.eu/document/download/8a0aa873-859c-48b4-9f14-29674238393a_en
- European Council on Refugees and Exiles. (2026). AIDA country report on Poland: Update on 2025. <https://ecre.org/aida-country-report-on-poland-update-on-2025/>
- European Union Agency for Asylum. (2026, March). National implementation plans and national strategies under the EU Pact on Migration and Asylum. https://www.euaa.europa.eu/sites/default/files/publications/2026-03/2026_national_implementation_plans_strategies_asylum_EN.pdf
- Fernández Rozas, J. C. (2026, June 15). España adapta la tramitación del asilo al nuevo Pacto Europeo de Migración y Asilo [Spain adapts asylum processing to the new European Pact on Migration and Asylum] [Blog post]. <https://fernandezrozas.com/2026/06/15/espana-adapta-la-tramitacion-del-asilo-al-nuevo-pacto-europeo-de-migracion-y-asilo-13-junio-2026/>
- Greek Council for Refugees. (2026). Νέα από το πεδίο — Ιουνίος 2026 [News from the field — June 2026]. <https://gcr.gr/en/news/item/nea-apo-to-pedio-ioynios-2026/>
- InfoMigrants. (2024, December 27). Germany: Over 15,000 asylum seekers returned after EU transfers. <https://www.infomigrants.net/en/post/61943/germany-over-15000-asylum-seekers-returned-after-eu-transfers>
- InfoMigrants. (2026a, February 27). German Parliament agrees to implement Common European Asylum Policy, tightening rules still further. <https://www.infomigrants.net/en/post/70095/german-parliament-agrees-to-implement-common-european-asylum-policy-tightening-rules-still-further>
- InfoMigrants. (2026b, July). Spain: First large-scale return case under EU asylum pact sparks concerns in the Canary Islands. <https://www.infomigrants.net/en/post/72221/spain-first-largescale-return-case-under-eu-asylum-pact-sparks-concerns-in-the-canary-islands>
- Institut de Dret Públic. (2026, June 14). 12 de junio de 2026: La fallida implementación del Pacto Europeo de Migración y Asilo en España [12 June 2026: The failed implementation of the European Pact on Migration and Asylum in Spain]. Observatorio de Derecho Público. <https://idpbarcelona.net/12-de-junio-de-2026-la-fallida-implementacion-del-pacto-europeo-de-migracion-y-asilo-en-espana/>
- Legal Centre Lesvos. (2026, May 14). Lesvos situation report January–April 2026. <https://legalcentrelesvos.org/2026/05/14/lesvos-situation-report-january-april-2026/>
- The migration pact is here. But the EU isn't ready. (n.d.). The Parliament Magazine. <https://www.theparliamentmagazine.eu/news/article/the-migration-pact-is-here-but-the-eu-isnt-ready>

- Migreurop. (2025, January 31). Access to the national plans for implementing the European Pact on Migration and Asylum. <https://migreurop.org/article3343.html>
- Ministerio del Interior. (2024, December). National implementation plan for the EU Pact on Migration and Asylum. Government of Spain.
- Rabat Process. (2026, May 13). Special session: The European Union's Pact on Migration and Asylum [Meeting report]. <https://www.rabat-process.org/en/document-repository/64-meeting-reports-conclusions/590-special-session/preview?ml=1>
- Refugee.Info Greece. (2026, March 31). Apply for asylum: The steps. <https://greece.refugee.info/en-us/articles/4984594750615>
- Refugee Support Aegean. (n.d.). What is happening today in the refugee structures on the Aegean islands. <https://rsaegean.org/en/ccac-aegean-islands-greece/>
- Riemer, L. (2024, October 18). Taking back control? Verfassungsblog. <https://verfassungsblog.de/taking-back-control/>
- Sacramento, B., [Author 2], & [Author 3]. (2025, September). Challenges in the implementation of the New Pact on Migration and Asylum in national contexts: The case of Spain. RIseEU/Nova Law.
- Solidarity with OTHERS. (2026, June). Monthly newsletter | June 2026. <https://solidaritywithothers.com/monthly-newsletter-june-2026/>
- United Nations High Commissioner for Refugees. (2026a, February). Poland: Bi-annual fact sheet. <https://www.unhcr.org/europe/sites/europe/files/2026-03/bi-annual-fact-sheet-2026-02-poland.pdf>
- United Nations High Commissioner for Refugees. (2026b, January 22). Poland protection sector meeting: Meeting minutes. <https://data.unhcr.org/en/documents/download/121087>
- Züllig, L., & Salomon, S. (2026, June 22). At Germany's service: The European Commission's opinion on the proportionality of German border controls. Verfassungsblog. <https://verfassungsblog.de/commission-border-controls/>